

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

LOCAL PLAN COMMITTEE – TUESDAY, 27 SEPTEMBER
2022



Title of Report	LOCAL PLAN REVIEW: RESPONSE TO CONSULTATION - EMPLOYMENT POLICIES	
Presented by	Ian Nelson Planning Policy and Land Charges Team Manager	
Background Papers	Responses to consultation Development Strategy Options & Policy Options consultation document (January - March 2022) Start-up Workspace Demand Study (2020) National Planning Policy Framework Planning Practice Guidance	Public Report: Yes
Financial Implications	The cost of the substantive Local Plan Review is met through existing budgets.	
	Signed off by the Deputy Section 151 Officer: Yes	
Legal Implications	Legal implications have been 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	To consider comments received in response to the consultation undertaken in January-March 2022 and other relevant planning considerations and to agree a preferred approach for the Local Plan review on the following matters: <ul style="list-style-type: none"> • Continuity of employment land supply • Replacement, or otherwise, for Local Plan Policy Ec2(2) • Premises for start-up businesses • Local employment policy 	

Recommendations	<p>THAT THE LOCAL PLAN COMMITTEE:</p> <p>I. AGREES THE POLICY SET OUT IN APPENDIX B FOR FUTURE PUBLIC CONSULTATION AS A REPLACEMENT FOR ADOPTED LOCAL PLAN POLICY Ec2(2)</p> <p>II. AGREES THE POLICY APPROACH FOR START-UP PREMISES SET OUT AT PARAGRAPH 4.16 OF THIS REPORT FOR FUTURE PUBLIC CONSULTATION</p> <p>III. AGREES THE POLICY APPROACH FOR LOCAL EMPLOYMENT PLANS SET OUT AT PARAGRAPH 5.11 OF THIS REPORT FOR FUTURE PUBLIC CONSULTATION</p>
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1.0 BACKGROUND

- 1.1 The [Development Strategy and Policy Options document](#) consulted upon in January – March 2022 included sections and consultation questions on a series of employment-related matters. At the [12 July 2022 meeting](#) of this Committee members resolved matters on the employment evidence base and an interim approach to strategic warehousing.
- 1.2 The overall spatial strategy for employment land is addressed in a separate report on this agenda. This report deals with the remaining employment matters, namely:
- Continuity of employment land supply
 - Replacement, or otherwise, for adopted Local Plan Policy Ec2(2)
 - Provision of premises for start-up businesses
 - Local employment policy

2.0 CONTINUITY OF EMPLOYMENT LAND SUPPLY

Background

- 2.1 The consultation document identified that there is some risk that the supply of suitable, available employment land will tail off considerably (and could even reach zero) in the later years of the plan review period. The National Planning Policy Framework (NPPF) requires Local Plan policies “to meet anticipated needs over the plan period” and to be “flexible enough to accommodate needs not anticipated in the plan” (Paragraph 82b & d).
- 2.2 The following consultation question was asked (Q10): Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?
- 2.3 The options the question refers to are:
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| Option 1 | Identify reserve site/s |
| Option 2 | Increase the requirement figures by an additional factor |

Option 3 Await the next review of the Local Plan.

Option 4 Rely on Policy Ec2(2) or its equivalent.

Summary of responses

- 2.4 There was a total of 78 responses to this question although most respondents did not specify which option they preferred and the figure also includes 'don't knows'.
- 2.5 **Option 1** (reserve sites) was preferred by 4 respondents (Leicestershire County Council (LCC), individuals x2, infrastructure provider x1). The reasons given are:
- It strikes a good balance
 - It provides certainty and control, including for infrastructure planning
- 2.6 **Option 2** (increased requirement figure) was favoured by 5 respondents (developer/agent x5). Reasons given are:
- It will ensure flexibility and geographical choice for the plan period to meet a range of occupier demands
 - Enables the council to respond to changing market demand/reduce the limitations on employment development at a time of economic recovery
 - It would provide a safety valve for unmet need from Leicester City
 - Collectively the council's employment evidence base under-estimates the amount of employment land needed
 - Should provide certainty that the basic requirement is met
 - Will ensure flexibility and choice and an on-going supply of suitable and available employment land throughout the plan period.
 - It will give the Council control over site selection and provides the opportunity to plan employment and housing growth comprehensively over the plan period.
 - Sites are likely to be immediately deliverable (unlike Option 1)
 - It would foster competition between sites
- 2.7 **Option 3** (await a future Local Plan review) was favoured by 16 respondents (4x environmental group; 1x residents' group; 2x parish council; 1x district/borough council; 7x individual; 1x councillor). Reasons given for favouring Option 3 are:
- It is consistent with the evidence
 - It allows for monitoring of needs and supply and review at 5 yearly intervals
 - It enables changes in demand as a result of the pandemic, Brexit etc to be monitored e.g., increased homeworking impacting on the need for office space
- 2.8 **Option 4** (Rely on Ec2(2)) was favoured by 2 respondents (1x individual; 1x developer/agent)
- it provides flexibility to deal with changing market demand
 - the NPPF encourages more flexible and criteria-based policies to allow planning applications for employment development where need is proven and proposals are sustainable
- 2.9 In addition, a **combination of Options 2 & 4** was favoured by 4 respondents (4x developer/agent) and a **combination of Options 1 & 2** was favoured by 3 respondents (2x developer/agent; 1x district/borough council).
- 2.10 A summary of the comments received and officer responses are set out in Appendix A.

Consideration

- 2.11 The additional employment land allocations made in the Local Plan Review will boost overall supply but achieving an appropriate continuity of supply could be an issue for the later stages of the plan period.
- 2.12 The crux of the issue is how the Local Plan Review should deal with uncertainty and unpredictability, for example if site allocations and planning permissions are developed out quickly and before the end of the plan period and/or business needs change in a way not predicted by the evidence.
- 2.13 The consultation revealed varying perspectives on this issue.
- 2.14 Identifying reserve sites (Option 1) would give the Council control over site selection. However, the overall range and type of employment sites needed by businesses is more varied than for housing for example. If a reserve site did not match a business's requirements, permission on an unallocated site could still be justified. There is no requirement in national policy for the equivalent of the 5-year supply for employment land. Also, the rate of delivery of such sites tends not to be steady and consistent (the amount of floorspace being built can vary considerably year on year) so trying to use an annual requirement figure as a policy trigger is unlikely to be either appropriate or effective, making it particularly difficult to set clear and relevant policy triggers for the release of a reserve site.
- 2.15 Adding a percentage uplift to the requirement figures (Option 2) is supported by developers/landowners. However the requirement figures already include an additional flexibility allowance equivalent to 5 years' worth of completions and a further uplift does not necessarily address the point about the continuity of supply.
- 2.16 There is an argument to simply rely on the market to regulate supply (Option 3). The Local Plan Review will allocate sufficient sites in the light of the evidence and they will come forward in response to demand. There is no specific NPPF requirement for continuity of supply although officers consider that it represents a sensible planning approach. The position would be monitored though 5-yearly Local Plan Reviews and relying on this approach is the most popular option with respondents. If sites are developed out more quickly than anticipated, additional land can be allocated on the next LPR based on updated evidence. If they are developed out more slowly, the continuing suitability of the allocated sites can be checked as part of the review process and either be retained or substituted in the plan as appropriate.
- 2.17 Bearing in mind that the NPPF requires Local Plan policies to be "flexible enough to accommodate needs not anticipated in the plan" (Paragraph 82d), the Local Plan Review needs to address this expectation in some form.
- 2.18 Neither Option 1 or 2 seems sufficiently targeted at ensuring a continuity of supply. Regular plan reviews (Option 3) is a critical way of ensuring that land supply in terms of types of sites and quantity of land continues to be matched to economic growth but is not sufficiently responsive to deal with a more immediate, unexpected shortage of land and/or a specific and unpredicted business demand.
- 2.19 This then leaves Option 4. Notwithstanding the issues experienced in applying Policy Ec2(2) to date, it is nevertheless considered that the most effective solution would be to include an Ec2(2) type policy, amended as appropriate, which provides the flexibility required by the NPPF to deal with changing market demand in conjunction with clarity and a degree of certainty for all users of the plan.

2.20 The consultation included a specific question on Policy Ec2(2) which is considered in the next section.

3.0 POLICY EC2(2) – NEW EMPLOYMENT SITES

3.1 The following question was asked (Q13) - Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered? The options the question refers to are:

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|----------|---|
| Option 1 | Delete Policy Ec2(2) |
| Option 2 | Retain Ec2(2) in its current form (business as usual) |
| Option 3 | Amend Policy Ec2(2) to make it more specific/restrictive (a) - include a requirement that the premises should be for a named end user |
| Option 4 | Amend Policy Ec2(2) to make it more specific/restrictive (b) – amend the alternative sites test to include sites with planning permission |
| Option 5 | Amend Policy Ec2(2) to make it more specific/restrictive (c) – amend the alternative sites test to potentially include sites outside the district |
| Option 6 | Amend Policy Ec2(2) to make it more specific/restrictive (d) - demonstrate that the need/demand is exceptional |
| Option 7 | Amend Policy Ec2(2) to make it more specific/restrictive (e) – omit the reference to ‘demand’ and refer to ‘need’ only |
| Option 8 | Amend Policy Ec2(2) to make it more specific/restrictive – combination of Options 3-7. |

Summary of responses

3.2 There were 75 responses to this question (including ‘don’t knows’). Only some of the respondents identified a preferred option.

3.3 **Option 1** (delete Ec2(2)) was preferred by 9 respondents (individuals x4; residents’ group x1; environmental group x1; council x1; parish council x2). The reasons given are:

- Current policy is not effective at controlling development in open countryside
- Provides more flexibility from a landowner perspective

3.4 **Option 2** (retain Ec2(2)) was preferred by 14 respondents (council x1; developer x13). The reasons given are:

- Retain Policy Ec2 but make policy more flexible/permissive in line with the spirit of the NPPF
- The policy ensures that any windfall sites are properly assessed against the need for additional employment land and generally against the relevant Local Plan policies
- If the allocations have been properly formulated but are then exhausted or found to be inadequate as circumstances change, the Plan should welcome further development subject to controls of the type embodied in Policy Ec2(2).

- There is a need for a specific, flexible, criteria-based policy that addresses the pressure and need for strategic employment sites, covering more than just warehousing/logistics needs.
- 3.5 **Option 3** (Ec2(2) plus named end user) – no responses
- 3.6 **Option 4** (Ec2(2) plus sites with planning permission) was preferred by 2 respondents (councils x2). The reasons given are:
- The approach would provide some consistency with the existing policy situation, but would need to ensure applicants understood they would also be required to assess proposals benefitting from planning permission
- 3.7 **Option 5** (Ec2(2) plus sites outside the district) was preferred by 2 respondents (residents x2). The reasons given are:
- It achieves a balanced approach. The logistics sector does not work to administrative boundaries.
- 3.8 **Option 6** (Ec2(2) plus exceptional need/demand) was preferred by 1 respondent (developer x1). The reasons given are:
- Exceptional need or demand (e.g. needs not anticipated by the plan, changing economic circumstances) should relate to the quantity and quality of relevant supply e.g. is there a lack or shortage of suitable and available land to accommodate the identified needs or demands
 - The assessment for supply for strategic warehousing would be different. This is because operators may be more footloose and the catchment area may be greater. In such cases, the availability of consented or allocated land outside the district could be a factor.
 - Further, the dimension of time is important. Not all consented or allocated land can be delivered within the timeframe of operator's requirements. Any assessment of supply should consider the suitability and availability of sites to meet the exceptional need proposed.
- 3.9 **Option 7** (Ec2(2) plus need only) was preferred by 2 respondents (parish council x1; resident x1) with no reasons given.
- 3.10 **Option 8** (Ec2(2) plus options 3-7) was preferred by 6 respondents (environmental group x3; resident x3). The reasons given are:
- Need to consider alternative sites especially when the proposed use has national/regional purpose
 - Support Option 8 but requiring the demonstration of 'need' only rather than 'need or demand' (Option 7) does not appear to add any value
- 3.11 A summary of the comments received and officer responses are set out in Appendix A.

Consideration

- 3.12 As with Q10, the need or otherwise to have a Ec2(2)-type policy in the Local Plan Review is linked to how the plan deals with changing and unpredictable business needs. Local Plans are required to address 'anticipated needs' namely those which can be predicted based on an economic forecast (as used in the Stantec Study) and, as outlined earlier, to be "flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation),

and to enable a rapid response to changes in economic circumstances.” (NPPF Paragraph 82d, emphasis added).

- 3.13 The consultation revealed diverse views on how best to deal with this matter.
- 3.14 Option 1 (no Ec2(2)-type policy) was supported by some but collectively the options which retained Ec2(2) in some form (Options 2-8) were more popular. The consultation document identified that without Ec2(2), it is less clear for all users of the plan which considerations will apply to a proposal for additional employment floorspace on an unallocated site and it is uncertain whether or not the approach would be sufficiently flexible to accord with the NPPF which could be a risk to the soundness of the plan at Examination. The consultation feedback has not altered that view. Also, development pressure is such that further planning applications can be expected and setting out the policy considerations that will apply arguably gives the Council more control rather than less.
- 3.15 The planning system in England and Wales is plan-led (NPPF paragraph 15). It is important to recognise that an Ec2(2)-type policy would not operate in isolation as it would be a component of the Local Plan Review’s overall approach to employment development as described below:
- a. Allocate sites to meet anticipated general employment needs plus a margin (the flexibility allowance) in a diversity of locations. The NPPF talks about making ‘sufficient provision’ for employment land (paragraph 20), suggesting a reasonable limit, not an open-ended choice.
 - b. Allocate site/s for strategic B8 to accord with Leicester & Leicestershire authorities’ joint approach (when agreed)
 - c. Designate Existing Employment Areas (Policy EC3 in adopted Local Plan) to help retain the overall stock of better quality premises for which there is a demand (within the limits of changes which do not require planning permission by virtue of Permitted Development Rights and the Use Classes Order)
 - d. 5-yearly review of the Local Plan to check the progress of the employment land strategy, update the overall land supply and to respond to updated economic evidence
 - e. Policy Ec2 for circumstances which cannot be predicted in advance e.g., a demand which is specific in nature (and the Local Plan Review route is not responsive enough) such as for a specific firm, an immediate demand in a particular segment of the market, changing economic circumstances and/or an immediate need for a site which is an exception from the need evidence.
- 3.16 In view of how Policy Ec2(2) has operated in the past, it is worth considering refinements to the adopted policy to better reflect the exceptional circumstances which could merit granting permission on an unallocated site.
- 3.17 Five distinct options were outlined in the consultation document.

Ec2(2) refinement	Recommendation
Option 3 - include a requirement that the premises should be for a named end user	Agreed. This enables the actual business requirements to be more easily explained and assessed through the planning application process. The proposed policy wording suggests that this could be secure

	through a legal agreement. There will be instances where it is not possible to name an end user at planning application stage for example for reasons of business confidentiality.
Option 4 - amend the alternative sites test to include sites with planning permission	Agreed. The proposed policy in Appendix B also includes brownfield sites and sites within Primary Employment Areas.
Option 5 - amend the alternative sites test to potentially include sites outside the district	Agreed in part. This would be appropriate for Strategic B8 proposals where the market operates over a geographical area that is wider than a single district or borough and could relate to the Areas of Opportunity identified in the Strategic B8 Study.
Option 6 - demonstrate that the need/demand is exceptional	Agreed. Wording from the NPPF has been added to the proposed policy with respect to 'unanticipated needs'. The policy also describes the overall approach as an 'exceptional' one.
Option 7 - omit the reference to 'demand' and refer to 'need' only	Agreed in part. The proposed policy now uses the term 'immediate requirement' instead of 'immediate need or demand' to better convey the need for a clear justification and to avoid any confusion between what is meant by 'need' and 'demand'.

3.18 Suggested revised wording for Policy Ec2(2) is included in Appendix B. It is recommended that this is included in a future consultation draft of the Local Plan Review.

4.0 START-UP WORKSPACE

Background

4.1 The [Start-up Workspace Demand Report](#) found evidence of occupiers struggling to find small scale industrial units in the District suitable for start-up firms. There appears to be a gap in the district's portfolio of business premises which the Local Plan Review could help to address. As a follow-up the workspace study, the council's Business Focus team has recently engaged consultants to advise on how the council can intervene more directly in this market and to provide an assessment of investment potential. The study is expected to be completed later in 2022.

4.2 The following consultation question was asked (Q14): Which policy option for start-up workspace do you prefer? Is there a different option which should be considered? The options the question refers to are:

Option 1 Allocate specific sites for start-up premises

Option 2 Specify a requirement for a proportion of start-up premises as part of the overall mix of employment floorspace on allocated employment sites only

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| Option 3 | Generic policy which would apply to all employment sites, whether allocated or not, to require a proportion of units to be for start-ups and/or a financial contribution towards provision elsewhere |
| Option 4 | Policy to support the provision of start-up space on suitable sites |
| Option 5 | Policy that would allow start-up premises as an exception on sites where development would normally be restricted |
| Option 6 | No change |

Summary of responses

- 4.3 There was a total of 58 responses to this question although most respondents did not specify which option they preferred and the figure also includes 'don't know/no comment' responses.
- 4.4 **Option 1** (allocate specific sites) was preferred by 9 respondents (residents' group x1; individual x4; environmental group x1; developer x1; parish/town council x2). The reasons given are:
- Allows sites which are best suited to start-ups in terms of accessibility and convenience to be allocated
 - Allows start-ups to be co-located with other businesses which can be beneficial for shared infrastructure/services and innovation
 - Option 1 is preferable to individual businesses setting up on individual sites with poor conditions, poor access and potentially creating nuisance to neighbouring properties and land.
 - This is the most direct solution to address the identified gap in provision
- 4.5 **Option 2** (requirement applies to allocated sites) was favoured by 4 respondents (individual x3; environmental group x1). The reason given is:
- It would ensure some start-up space is met from already allocated industrial use land but leave flexibility for other sites if applicable.
- 4.6 **Option 3** (requirement applies to all sites) was favoured by 5 respondents (individual x1, council x1; developer x2; environmental group x1). Reasons given for favouring Option 3 are;
- A policy could reasonably set a target for start-up workspace, require applicants properly to justify the extent to which they have considered it, and confirm that development which contributes to the target will be considered favourably.
 - Option 3 would be the most flexible approach. A flexible approach is most likely to ensure developer engagement.
- 4.7 **Option 4** (supporting policy) was favoured by 1 respondent (parish council x1). No specific reason was given.
- 4.8 **Option 5** (exceptions approach) alone was not favoured by any respondents but a combination of **Options 1 & 5** was favoured by 1 respondent (developer x1) and **Options 4 & 5** in combination was favoured by 2 respondents (environmental group x1; Leicestershire County Council) for the following reason;
- If Option 4 is unlikely to result in significant additional start-up floorspace, Option 5 is supported

- 4.9 **Option 6** (no change) was favoured by 2 respondents (individual x1; parish council x1). No specific reason was given.
- 4.10 A summary of the comments received and officer responses are set out in Appendix A.

Consideration

- 4.11 The consultation document set out potential advantages and disadvantages of the various options. Allocating specific sites for start-up premises (Option1) is the most popular of the suggested approaches. It would enable the council to have control over the selection of sites but has limitations in terms of likely site distribution, how the selection of individual sites to allocate could be justified and the need for a willing landowner. There are likely to be viability concerns for a site/s which are entirely for the smallest units unless there was also public sector intervention. Option 2 has more flexibility in this regard but large scale and single operator sites may not be suited to providing a mix of very small scale uses.
- 4.12 Option 3 would mean that a much wider range of sites would become liable to deliver an element of start-up space but the start-up study does not quantify the need meaning that setting a percentage requirement will be difficult to justify and there is some prospect that potential provision would exceed practical demand. To a lesser extent this would apply to Option 2 as well. Planning permission has recently been granted for 37 industrial starter units (approximately 135sqm each) at Heather Brickworks (22/00153/REMM) which would be for rent and could be provided in blocks of 2, 3, 5 or 6 units. This shows it is feasible for the market to provide start-up space and we will monitor the rate of take-up for these units.
- 4.13 One respondent also commented that asking for a financial contribution towards provision elsewhere, as outlined in Option 3, is unlikely to be deliverable unless the council has its own programme of site delivery. Options 1-3 inclusive also raise issues of viability; any requirement is likely to need to be subject to a viability caveat so that appropriate development is not frustrated.
- 4.14 Option 4, of itself may be of limited effectiveness but it could form part of a more specific policy dealing with this issue.
- 4.15 Taking an exceptions-style approach (Option 5) which would allow start-up development in the countryside as an exception to normal policies of restraint is likely to result in a less sustainable pattern of development whilst making no provision for start-up space (Option 6) would fail to respond to evidence of a need.
- 4.16 Taking these considerations in the round, a hybrid policy approach is recommended for inclusion in a future consultation draft of the Local Plan Review comprising the following components;
- a. Support development which provides start-up premises subject to other relevant policies in the plan
 - b. Subject to the findings of the plan-wide viability assessment, include a requirement for an element of start-up space on general employment land allocations in the Local Plan Review (excluding wholly strategic B8 allocations) and as part of any larger-scale residential-led/mixed use site allocations.
 - c. Subject to the findings of the plan-wide viability assessment, expect that major development on unallocated sites outside Ec3 areas (i.e., additional general employment floorspace of >1,000sqm or site area of >1Ha) will make provision

for an element of start up space unless this is demonstrably unfeasible in any individual case, including for reasons of site-specific viability. For clarity, the plan's supporting text could set out the types of information that an applicant would need to supply to justify nil provision.

5.0 LOCAL EMPLOYMENT POLICY

Background

5.1 A local employment policy linked to new development could encourage businesses to recruit locally and to offer training to raise the attainment level of their staff. The consultation document identified that "local employment initiatives can help ensure that local people benefit from new development and equally show that businesses are invested in the wellbeing of their communities" (paragraph 7.16). Local recruitment can also help curtail commuting distances and thereby contribute to the Council's zero carbon ambitions.

5.2 The following question was asked (Q15) - Which policy option for local employment do you prefer? Is there a different option which should be considered? The options the question refers to are:

Option 1 Policy to encourage local employment initiatives in new, large-scale developments

Option 2 Policy to require local employment initiatives in new, large-scale developments.

Option 3 No change

Summary of responses

5.3 **Option 1** was preferred by 7 respondents (environmental group x1; developer x4; parish council x1; individual x1). The reasons given are:

- More Local employment could help to cut emissions
- It is not always possible to achieve local recruitment depending on the skills available locally and this policy approach provides the flexibility to recognise this.
- Most flexible of the options

5.4 **Option 2** was preferred by 8 respondents (residents' group x1; individual x3; environmental group x1; Leicestershire County Council; developer x1; parish/town council x1). The reasons given are:

- It provides the opportunity to engage with and influence employers at the early planning application stage
- Skills development inter-relates with health and wellbeing
- It brings about the greatest opportunities to minimise the need to travel by private car with potential environmental benefits.
- Properly framed this need not be onerous and would have benefits in terms of building relationships between development and the community and reducing commuting.

5.5 **Option 3** was preferred by 10 respondents (individual x7; environmental group x2; parish council x1). The reasons given are:

- Employment opportunities are reliant on a vibrant economy. Artificial assistance creates an expensive illusion of prosperity.
- Recruitment shouldn't be restricted so firms can get the best person for the job

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

Consideration

- 5.7 Accepting that local recruitment and training is, in principle, desirable, Option 3 (no change) relies on applicants offering a Local Employment and Training Plan as part of their development proposals. Some larger employers do this, but by no means all, and without some form of policy in place the Council's ability to influence employers in this regard is very limited. The same is true, but to a lesser extent, for Option 1 where at least the 'encouragement' would have Development Plan status.
- 5.8 The concern that such a plan could unduly restrict a firm's access to a suitable workforce is noted and is an important consideration when overall unemployment is low. The intention of an Employment Plan is to ensure that the firm takes measures to recruit local workers where possible, or to set a percentage target to fill roles locally, but not to prescribe that employees must be from within a local area at all costs. For some roles, this will just not be possible.
- 5.9 This being the case, a policy to require local employment initiatives (Option 2) does not appear unacceptably onerous. One of the consultation responses identified that a pre-commencement condition could be used to require the submission, approval and implementation of an Employment Plan including measures to encourage local recruitment during construction, and a pre-occupation condition requiring the same for when the development is operational.
- 5.10 A decision needs to be taken on what would trigger a requirement for an Employment Plan. As the focus of an Employment Plan is recruitment and training, the number of new jobs created would seem the most appropriate measure rather than, for example, the amount of new floorspace created. Business statistics produced by the Department for Business, Energy & Industrial Strategy define a small business as one with 0-49 employees, a medium-sized business 50-249 employees and a large business 250+ employees. If we set the trigger point at proposals where at least 50 new jobs will be created, this would focus the requirement on medium and larger businesses which seems appropriate.
- 5.11 It is recommended that a policy requiring a Local Employment Plan for the construction and operational phases of a development which will create 50 or more new jobs is included in a future draft of the Local Plan Review for consultation.

Policies and other considerations, as appropriate	
Council Priorities:	Support for businesses and helping people into local jobs 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 decisions, of themselves, 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 decisions, of themselves, 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/Tenant 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.
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