

RESPONSES TO PROPOSED POLICIES

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| CHAPTER 4 | POLICY NUMBER – S1 | POLICY NAME – FUTURE DEVELOPMENT NEEDS |
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A. HOUSING

| MAIN ISSUES RAISED [Housing] | COUNCIL RESPONSE | ACTION | RESPONDENTS ID | RESPONDENTS NAME |
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| Policy supported | Noted | No change | 20 161 202 206 238 226 | Oadby and Wigston Borough Council Mather Jamie o/b/o the Whatton Estate Charnwood Borough Council Pegasus Group o/b/o Taylor Wimpey Hinckley and Bosworth Borough Council Oxalis Planning and Pegasus Group East Midlands o/b/o Harworth Estates and Caesarea |
| Para 4.10 There has been little to no consultation prior to significant decisions being made. | The Local Plan has previously been subject to consultation in February 2018, November 2018 to January 2019 and January to March 2022. | No change | 90 | Julia Matthew |

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| <p>Para 4.17 The number of new houses proposed is inappropriate and hugely damaging for this area. Castle Donington has already suffered the effects of massive housing development. There are neither the jobs nor the infrastructure to support even more hastily built and ill thought-out housing. A development of this size will be more than a blot on the landscape; it will be a white elephant, stuck in a location where no-one wants it, replacing much needed farmland and green space.</p> | <p>A significant number of jobs already exist in and around the Castle Donington/East Midlands Airport area which has resulted in significant in commuting from other areas. New housing provides an opportunity to achieve a better balance between homes and jobs. New development will need to be supported by infrastructure. An Infrastructure Delivery Plan is being prepared to address this.</p> | | | |
| <p>Question the need to have accepted the large provision for additional housing due to Leicester's "unmet need", particularly as this District is not adjacent to Leicester and has very poor public transport provision, so any additional housing provided for Leicester is highly likely to lead to significant and unnecessary commuting by private car. Would expect housing requirement to be 424 dwellings each year.</p> <p>Councils are no longer required to abide by housing targets set according to predicted population growth and can allocate less land to development to avoid changing the character of a</p> | <p>As noted in the report to Council of 6 September 2022 in respect of the Statement of Common Ground (SoCG), the vast majority of the increase in housing provision (58%) is due to economic factors and achieves a better balance between homes and jobs.</p> <p>The National Planning Policy Framework (December 2023) notes that the standard method is an advisory starting point for establishing housing requirements. Exceptional circumstances may justify an alternative approach. As set out</p> | No change | 92 | Ashby de la Zouch Town Council |

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| local area. | in the SoCG there is a need for some unmet need to be accommodated in the district, together with a significant uplift for economic factors. | | | |
| The number of houses is unrealistic, will there be amenities from the outset? There is no capacity at existing health providers now. Don't understand the logic (and the plans don't help) of having so much development in the north of county? So many ways to distribute development to increase benefits and minimise negative impact (win-win). | The housing requirement has been established as part of the Statement of Common Ground with the other Leicester and Leicestershire authorities. New development will need to be supported by infrastructure. An Infrastructure Delivery Plan is being prepared to address this. | No change | 103 | Judith Billington |
| Challenge the integrity of the 686 housing requirement number. It is based on the high end of an already high assumed number and is further swollen with an additional 10% contingency. | The housing requirement has been established as part of the Statement of Common Ground with the other Leicester and Leicestershire authorities. It takes account of unmet need from Leicester City, which has partly arisen due to the imposition of an uplift by the government. The redistribution of unmet need has taken account of both the relationship with Leicester City, but also economic factors and achieve a better balance between homes and jobs in the district. This will help to reduce in commuting and also CO2 emissions from journeys to work. | No change | 115 | Protect Diseworth |

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| | A flexibility allowance is required to allow for the possibility of sites being developed at a slower rate than anticipated or not coming forward at all. | | | |
| <p>Agree with the council's approach that the appropriate starting point for calculating North West Leicestershire's housing requirement is through the government's standard method and that there are no exceptional circumstances to justify an alternative approach. Furthermore, agree that Leicester City's unmet housing need must be taken into account in establishing a housing requirement for the district. However, Leicester City's unmet need is only being reflected for the period up to 2036, whilst North West Leicestershire's new local plan period runs to 2040. Such is the magnitude of Leicester's shortfall, as acknowledged in the SoCG, there is no reason to believe the City will be in a position to meet its housing need beyond 2036. North West Leicestershire's housing requirement of 686 dwellings each year should therefore be increased to take that additional four year period into account.</p> | <p>The figure of 686 dwellings has already been taken into account in the period up to 2040 as shown in Table 2 of the Proposed housing and employment allocations document.</p> | <p>No change</p> | <p>116</p> | <p>Strategic Land Group o/b/o Keith and Sandra Goodwin</p> |

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| Housing requirement should be increased to assist in meeting the need for affordable housing | See paragraphs 4.5 to 4.9 of main report | | 130,136, 172,174 144,195,200,219, 221, 280 147 150 187,656 214,232 | Fisher German o/b/o Richborough Estates, William David Homes, Cora and Mr Botham Marrons o/b/o Clarendon Land and Developments, William Davis, MyPad, David Wilson Homes, Williams Homes, Richborough Estates Gladman Developments Savills o/b/o David Wilson Homes (East Midlands) Define Planning & Design Ltd o/b/o Bloor Homes, Rosconn Stantec UK Ltd o/b/o Bloor Homes Midlands and Taylor Wimpey |

| MAIN ISSUES RAISED [Housing] | COUNCIL RESPONSE | ACTION | RESPONDENTS ID | RESPONDENTS NAME |
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| | | | 237 245 341 | Strategic Land, Caddick Land Home Builders Federation Evolve Planning o/b/o Bloor Homes Leicestershire County Council |
| The plan period should be extended to allow for at least 15-years from the date of adoption consistent with the NPPF | See paragraph 4.10 to 4.14 of main report | | 130,136,172,174 144,195,200,219, 221, 280 150 182 | Fisher German o/b/o Richborough Estates, William Davis Homes, Cora and Mr Botham Marrons o/b/o Clarendon Land and Developments, William Davis, MyPad, David Wilson Homes, Williams Homes, Richborough Estates Savills o/b/o David Wilson Homes (East Midlands) Boyer Planning o/b/o Redrow |

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|---------------------------------|------------------|--------|-------------------|--|
| | | | 183 | Homes East Midlands Turley o/b/o Clowes Developments (UK)Ltd, Redrow Homes Ltd and Wilson Pegasus Group |
| | | | 184,193 | o/b/o Hallam Land Management Define Planning & Design Ltd |
| | | | 187,656 | o/b/o Bloor Homes, Rosconn Pegasus Group |
| | | | 211,216,235 | o/b/o Davidsons and Westernrange Stantec UK Ltd |
| | | | 214 | o/b/o Bloor Homes Midlands and Taylor Wimpey Strategic Land, Carter Jonas |
| | | | 215 | o/b/o Secretary of State for Transport c/o High Speed Two (HS2) Ltd |

| MAIN ISSUES RAISED [Housing] | COUNCIL RESPONSE | ACTION | RESPONDENTS ID | RESPONDENTS NAME |
|---|--|-----------|---|---|
| | | | 225, 229 237 243 245,256 | Planning Prospects Ltd o/b/o St Modwens Logistics and P,W,C & R Redfern Home Builders Federation Avison Young o/b/o Jelson Homes Evolve Planning o/b/o Bloor Homes, Cameron Homes |
| Suggests amendment to Policy S1 to contain a commitment to co-operate with adjoining authorities in considering cross-boundary proposals for growth and to review the Local Plan to take into account proposals that become part of the strategy for the adjoining area, in particular with respect to a new settlement in Hinckley & Bosworth which is currently being discussed with the Borough Council. | Hinckley and Bosworth Borough Council has yet to agree to include a new settlement as part of their emerging plan. It would be premature to include wording in policy S1 at this time. | No change | 133 | Chave Planning Ltd o/b/o Nurton Developments Limited |
| There may be a need to take further unmet need as Hinckley & Bosworth has not agreed to take all the unmet | It will be for Hinckley & Bosworth to satisfy their Local Plan Inspector that their reasons for | No change | 150 | Savills o/b/o David Wilson |

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| <p>need from Leicester City apportioned to it as part of the Statement of Common Ground.</p> <p>There is also a shortfall in provision in the Coalville Urban Area as noted in previous reports.</p> | <p>not accepting the full unmet need from Leicester City apportioned to it in the Statement of Common Ground are appropriate. Only if that is proven would there be a need for the remaining unmet need to be apportioned elsewhere.</p> <p>The shortfall in provision in the Coalville Urban Area will need to be addressed as was made clear in the report to Local Plan Committee in January 2024.</p> | | | Homes (East Midlands) |
| <p>Question the amount of overspill from Leicester City to the district, even though there is no common boundary between the two. It does not address the needs of Leicester. It will also result in an increase in carbon emissions due to vehicular movements.</p> | <p>The redistribution of unmet need from Leicester City as set out in the Statement of Common Ground agreed by the Leicestershire authorities has regard to the proximity of each authority to the City, but also to the need to strike a balance between jobs and homes. It is this that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.</p> | No change | <p>175</p> <p>180</p> <p>304</p> <p>336</p> <p>352</p> <p>376</p> | <p>Oakthorpe, Donisthorpe & Acresford Parish Council</p> <p>Ashby Wolds Town Council</p> <p>Kathryn Hutchinson</p> <p>Kevin Walker</p> <p>Jeffrey Guy</p> <p>Jim Snee</p> |
| <p>The Local Plan makes more provision for more housing than is appropriate. If the Council has agreed to take unmet need from the City then that is accounted for in the standard method.</p> | <p>The Council agreed to sign the Statement of Common Ground redistributing unmet need from Leicester in September 2022. This is not accounted for in the</p> | No change | 181 | <p>Adams Hendry Consulting Ltd</p> <p>o/b/o MSV Group</p> |

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| <p>Furthermore, the Planning Practice guidance is clear that the 35% uplift for the City should be met within the cities themselves rather than surrounding areas. Any increase in North West Leicestershire should be limited to that based on the functional relationship with Leicester (an additional 52 dwellings each year).</p> | <p>standard method which as set out in the Planning Practice Guidance (PPG) is a minimum annual need figure. The PPG goes on to make clear that a higher housing need figure may be appropriate in various circumstances including taking unmet need from another authority. The redistribution of unmet need has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes. It is this that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.</p> | | | |
| <p>The proposed requirement of 686 dwellings falls short of option 7b (730 dwellings) previously consulted upon and would result in a shortfall of 880 dwellings. The proposed requirement of 686 dwellings was not tested as part of this but should be in order explain why it has been selected over the higher figure.</p> | <p>See paragraph 4.19 to 4.20 of main report</p> | | <p>182 195, 200, 219, 221</p> | <p>Boyer Planning o/b/o Redrow Homes East Midlands Marrons o/b/o William Davis, MyPad, David Wilson Homes, Williams Homes</p> |
| <p>The plan should be rebased to 2024</p> | <p>See paragraph 4.17 of main report</p> | | <p>184,193</p> | <p>Pegasus Group o/b/o Hallam</p> |

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|--|--|--|------------------------|---|
| | | | 211,216 219,221 | Land Management Pegasus Group o/b/o Davidsons and Westernrange Marrons o/b/o William Davis, MyPad, David Wilson Homes, Williams Homes |
| <p>The strategic policies should set out the housing requirement for designated neighbourhood plan areas. In accordance with the Planning Practice Guidance, local plans should not duplicate policies in Neighbourhood Plans.</p> | <p>As set out at paragraph 4.76 of the Site Allocations document, there are currently two new Neighbourhood Plans being prepared, one for Breedon on the Hill parish and one for Long Whatton and Diseworth parish. Both plans have, in accordance with the NPPF, been provided with an indicative housing figure in the absence of anything in the adopted Local Plan.</p> <p>The plan also notes that both the Swannington and Blackfordby Neighbourhood Plans have allocated housing sites.</p> <p>There is no requirement for a Neighbourhood Plan to identify sites for housing; this is a decision for a Neighbourhood</p> | <p>Further consideration will be given providing more clarification about the role of Neighbourhood Plans in meeting housing requirements as part of the Regulation 19 plan.</p> | 189 196 | <p>Long Whatton & Diseworth Parish Council Breedon on the Hill Parish Council</p> |

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| | Plan group. For example, one Neighbourhood Plan (Ashby de la Zouch) is being reviewed, but no request was made to provide a housing requirement figure. | | | |
| The policy should clearly express that the housing requirement is not a ceiling. | See paragraph 4.4 of main report | | 195, 200, 219, 221 188 207 214 245,256 | Marrons o/b/o William Davis, MyPad, David Wilson Homes, Williams Homes C Green Planning Satplan o/b/o Metacre Ltd Stantec UK Ltd o/b/o Bloor Homes Midlands and Taylor Wimpey Strategic Land Evolve Planning o/b/o Bloor Homes, Cameron Homes |
| The plan should look ahead at least 30-years | See paragraph 4.15 to 4.16 of main report | | 215 243 | Carter Jonas o/b/o Secretary of State for Transport c/o High Speed Two (HS2) Ltd |

| MAIN ISSUES RAISED [Housing] | COUNCIL RESPONSE | ACTION | RESPONDENTS ID | RESPONDENTS NAME |
|--|--|---------------|-----------------------|--|
| | | | 656 | Avison Young o/b/o Jelson Homes Define o/b/o Rosconn |
| CPRE is concerned the current calculations are based on questionable out of date data. The interim census results suggest, yet again, that ONS 2014 [used for the standard method figure of 372 dwellings] may no longer be an appropriate base for calculating need. The Leicester unmet need figure has yet to be tested through the examination process | Consistent with national policy, the SoCG takes as its starting point the outcome of the standard method, which is based on the 2014-based household projections. The Leicester City plan Examination is scheduled for later this year, but it would not be appropriate to wait for this to be completed before continuing with this plan. | No change | 220 | CPRE Leicestershire |
| Based on comments about the plan objectives falling short, so the strategy as part of the plan follows suit also. Again, scale and number of houses cannot be justified, and I await results of the distribution requirement, but again suggest it will be unrealistic based on scale. IE To much cramped into an inappropriate space; position too close together for both housing and warehousing; in an area which is already heading for over development with an infrastructure which is already struggling to support what is already developed. | The overall scale of housing development that the plan has to provide for has been established through the Statement of Common Ground with the other Leicestershire authorities consistent with national policy. The proposed development strategy in the plan seeks to balance homes and jobs in proximity to each other. The need for new infrastructure is recognised and will be addressed as part of the Infrastructure Delivery Plan. | No change | 255 | Jonathan Aust |

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| <p>The figure of 686 houses per year does not seem to be based on solid facts, but more to do with arbitrary figures. ""Leicester City Council declared that it had an unmet, but unquantified, need in 2017"" It seems that the requirement for extra housing is for Leicester City, and now the premise is to locate this housing away from the city.</p> <p>The " Leicestershire International Gateway" is already overloaded with recent development, i.e. SEGRO , warehousing around EMA, new builds in Castle Donington (with plans for more housing plus warehousing).The proposed development of the Freeport towards Diseworth and similarly Isley Walton would further overload the area and severely impact Diseworth (a conservation area) and surrounding villages.</p> | <p>The figure of 686 dwellings is that included in the Statement of Common Ground and is based on the recommendations in the Leicester and Leicestershire Housing and Economic Needs Assessment Housing Distribution Paper. As noted in the Statement of Common Ground relating to Housing and Employment Land Needs (2022), Leicester City has provided evidence which quantifies the level of unmet need. This was the subject of an independent review of the City's evidence which concluded that that the evidence from the city was robust.</p> | No change | 285 | Garry Needham |
| <p>Has Leicester got brownfield sites that could be used rather than countryside in NW Leicestershire. 13,270 for the period of plan, 686 homes per year, almost double the original allocation.</p> | <p>As part of its Local Plan Leicester City sought to maximise the amount of development it can accommodate, including on brownfield sites. The City Council has provided evidence which quantifies the level of unmet need. This was the subject of an independent review of the City's evidence which concluded that</p> | No change | 289 | Swannington Parish Council |

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| | that the evidence from the city was robust. | | | |
| Policy S1 should be strengthened to ensure that nowhere in NWLDC should there be an area that suffers excessive loss of countryside, amenity, environment or quality of life and well-being by virtue of over-development. | In coming to a decision on any proposed development it is necessary to have regard to all material considerations, which includes matters such as those highlighted. However, such decisions will rest on the details of what is proposed and what might be acceptable in one location, might not be acceptable in another. As such the plan cannot anticipate every eventuality. | No change | 376 | Jim Snee |
| The housing requirements for NWLDC have been considerably increased (nearly 90%) by the enforced co-operation policy with Leicester City Council. I note that recently Coventry City Council successfully challenged the housing figures being imposed upon them by government. Have the underpinning assumptions been challenged to be sure that housing requirement calculations are correct? If housing is needed in Leicester City, then how does meeting that housing need in areas of different character and about 15-20 miles away necessarily help, especially if we use our agricultural land to provide this housing, and inconsideration of Net | The housing requirement takes as its starting point the official housing projections published by the Office for National Statistics as required by national policy. The redistribution of unmet need from Leicester City has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome. | No change | 396 | Siobhan Dillon |

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|--|--|---------------|-----------------------|---------------------------------------|
| Zero targets. Population growth is currently being driven by immigration, which may not always be the case if we are unable to provide reliable food and energy and materials for development. | | | | |
| Consider that 686 houses each year is unrealistic. | The housing requirement is based on the outcome from the standard method and an adjustment to help address unmet need from Leicester City, both of which are consistent with government policy. This redistribution has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome. | No change | 401 | Mr Wykes |
| The NPPF requires there to be growth, positive decision making and a significant increase in the supply of housing. The target of 686 houses pa is likely to be an insufficient supply to remedy the housing crisis. | The housing requirement is based on the outcome from the standard method consistent with government policy and an adjustment to help address unmet need from Leicester City. This redistribution has had regard to the functional relationship of each authority to the City, but | No change | 422 | Country Land and Business Association |

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| | also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome. | | | |
| The methodology employed by the Authority to arrive at the annual number of dwellings is flawed as regards the locations identified. Viz. the loading of those extra dwellings (to accommodate the 'overflow' from Leicester) predominantly in the far north west of the district at the furthest remove from the city. In addition this area starved of sensible public transport solutions and hemmed in by further business development with attendant issues of pollutions of all kinds and an already vastly over-subscribed infrastructure is already experiencing profound degradation. There are better options that would alleviate the pressures around J23. | The redistribution from Leicester City has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome. The area around East Midlands Airport is well served by public transport with regular links to Derby, Nottingham, Leicester and Loughborough. The need for additional infrastructure will be addressed as part of an Infrastructure Delivery Plan which is being prepared. | No change | 475 | David Manley |
| Paragraph 4.33 describes North West Leicestershire as a mainly rural district, which you want to maintain | The authority monitoring report shows that there has been a decrease in the number of larger | No change | 487 | Mary Lorimer |

| MAIN ISSUES RAISED [Housing] | COUNCIL RESPONSE | ACTION | RESPONDENTS ID | RESPONDENTS NAME |
|--|---|------------------|-----------------------|-------------------------|
| <p>and enhance the environment. Current developments round Coalville/Ellistown have destroyed this rural environment and replaced it by warehousing which provides few job opportunities, increased traffic, particularly HGVs and excessive light pollution. The housing has been predominantly commuter housing for people working in Birmingham and Leicester and has not been of a type to be of use to local people, but has caused problems with excess traffic, loss of public amenity (e.g. public footpaths and old railway line off Grange Road, Hugglescote), destruction of wildlife habitats on Grange Road. The policies sound OK but have very negative effects on the health and well being of the people of the area.</p> | <p>properties built since the current plan was adopted. The draft plan seeks to ensure that that new housing development includes a range of house types and sizes. Whilst there has been significant development around the Coalville area, this is reflection of its status as the largest settlement in the district.</p> | | | |
| <p>I disagree that there is a need for that amount of new houses to be built per year, 686 is an unrealistic amount. I feel this is a means to meet corporate greed. There are plenty of brown space areas that could be renovated and repurposed.</p> | <p>The housing requirement is based on the outcome from the standard method consistent with government policy and an adjustment to help address unmet need from Leicester City. This redistribution has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that</p> | <p>No change</p> | <p>503</p> | <p>Helen Warren</p> |

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|---|--|------------------|-------------------|------------------------|
| | <p>has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.</p> <p>There is very limited brownfield land in the district that does not already have consent for redevelopment. Current developments include new housing on the site of the former Snibston Discovery Park and at Wolsey Road, both in Coalville.</p> | | | |
| <p>I totally object to using the countryside surrounding our village for warehouses and housing. This will destroy our village,</p> | <p>Noted</p> | <p>No change</p> | <p>581</p> | <p>Kathleen Pigott</p> |
| <p>It is clear the North West Leicestershire is an attractive place for people to live and work and growth of new homes and industrial land has been significant in recent years. It needs to be recognised that the % growth in the District has been way ahead of other parts of Leicestershire. The increase in requirements allocated due to the Statement of Common Ground with Leicester City, is something that is expected within the legal requirements of neighbouring authorities and yet there is no land boundary with Leicester City. The issue has been cause with Leicester</p> | <p>Whilst the district does not share a boundary with Leicester City, there is requirement to ensure that the needs of the Leicester and Leicestershire Housing Market Area (HMA) are met within the HMA as a whole. The redistribution of unmet need from Leicester City has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North</p> | <p>No change</p> | <p>651</p> | <p>Amanda Hack</p> |

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| City being land locked and developments being restricted to brownfield or loss of green space. The amount of land that has been allocated for homes in recent years across the whole of the District there appears to be a reliance on larger homes. Its useful to see that consideration is given to smaller and affordable homes and/or economic developments. Finally within this section...although it will be reflected in other sections that there has been little consideration to the land allocated within the Freeport Site where this employment land (which has been redlined by Government) considers requirement for land allocated through the district. | West Leicestershire. The plan seeks to ensure that that new housing development includes a range of house types and sizes. | | | |

B. GENERAL EMPLOYMENT

| MAIN ISSUES RAISED [General Employment] | COUNCIL RESPONSE | ACTION | RESPONDENTS ID | RESPONDENTS NAME |
|---|--|---------------|-----------------------|-------------------------|
| The employment land allocation is much higher than necessary, due considerable additional provision to allow for what are described as <i>“future losses of employment land to other uses and a flexibility margin as insurance for uncertainty and changing business needs”</i> . This is contrary to the recommendations of | Notwithstanding the consultants’ advice, the Council considers that these adjustments are justified. a) historic evidence suggests that some employment land will be redeveloped for other uses over the lifetime of the new plan; and b) to demonstrate some flexibility as required by the NPPF (paragraph | No change. | 92 | Ashby Town Council |

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| the Council's own consultants, Stantec (see paragraphs 6.8-6.9 of the Stantec Study). | 86d). The approach is also considered to be consistent with the NPPF with respect to 'positively and proactively encouraging sustainable growth' (paragraph 86a). | | | |
| <p>1 - Stantec should assess need to 2040 (or whatever the end of the plan period is)</p> <p>2 - Plot ratio of 40% is not realistic. 35% has been used in the strategic B8 study and should be used here</p> <p>3 – 5-year buffer should be added to the ELS as B2/B8 requirement is expressed as a minimum.</p> <p>4 - S1(2) should state that B2/B8 is a minimum requirement (by extension, the office figure be expressed as a maximum.)</p> <p>5 - Employment requirement should be expressed as a single figure and not separated by use class. This is to ensure that the Plan meets anticipated needs over the plan period and provides flexibility to respond to changing economic circumstances.</p> | <p>1 – The Employment Land Update Report (2024) covers the plan period to 2040 and provides an up-to-date assessment of the need for new employment land. The requirement figures in Policy S1 need to be updated accordingly.</p> <p>2 – No change. The Council's consultants confirm that 40% is a reasonable rule of thumb to use for estimating land requirements. The Council has applied a more specific, locally derived ratio to its actual site allocations. This is explained in the Employment Topic Paper.</p> <p>3 - No change. A flexibility margin for industry/smaller warehousing equivalent to five years of completions has been added to the employment land requirements (see Table 4 in the Policies consultation document).</p> <p>4 – Both requirements are expressed as 'at least' figures in</p> | <p>4 – Amend Policy S1(2) to read "The requirement for general needs employment land for the period 2024 to 2040 purposes is at least 35,000sqm for office uses.... and at least 146,000sqm for industrial and small warehousing..."</p> | 185 | Clowes Developments Ltd |

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| | the update report. Policy S1 to be amended accordingly. 5 - No change. The site requirements for offices may be different to industry/warehousing. Appropriate flexibility is achieved in other ways such as the addition of a flexibility allowance to the requirement figures and the reference to minimum requirements. | | | |
| Same issues as raised in Representation 185, plus: 1 - The need calculations are based on employment forecasts produced by Experian and Oxford Economics in 2020, which are now outdated. In addition, the employment needs estimates also don't take account of the recent East Midlands Devolution Deal. Although Leicestershire is not a part of the deal, the area will likely receive economic benefits as a result of the deal, which will lead to need for employment land. | 1 – The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements for the period 2024-2040. | See amendment above proposed response to Rep. 185. | 186 | Wilson Bowden Developments Ltd |
| 1 - draft policy S1 does not express the 195,500 sqm figure as a minimum 2 - Stantec report is not up to date or reflective of market demand. a) largely pre-dates Covid pandemic which accelerated B2/B8 demand; b) | 1 - Agreed. 2/3/4 - The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements for | See amendment above proposed response to Rep. 185. | 204 | Paul Fovargue |

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| <p>since 2020, demand growth has been fuelled by growth in e-commerce and structural changes to operating practices in both the industrial and logistics sectors (e.g. 'Just-in-Case' instead of 'Just-in-Time' practices and re-shoring since Brexit). Whilst the market has steadied, with developers and investors taking a more cautious approach because of the hike in interest rates, demand levels from occupiers remain healthy.</p> <p>3 - Take up of industry/warehousing in NWL has been nearly half of that for the county as a whole. Both Stantec and the Strategic B8 study fall grossly short of historic demand.</p> <p>4 - This shows that there is strong evidence of long term economic demand for industrial and logistics space in NWL and the district holds a predominant position compared to the County at a whole. In light of this, we would encourage the local authority to update the evidence informing Policy S1(2) and (3) and express any employment floorspace targets under Policy S1 as a minimum at the least</p> | <p>the period 2024-2040.</p> | | | |
| <p>1 - It is critical that these need figures [for general employment needs] are fully evidenced and justified via up to date evidence to take into account the</p> | <p>1 – The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements.</p> | <p>See amendment above proposed response to Rep. 185.</p> | <p>214</p> | <p>Bloor Homes Midlands and Taylor Wimpey Strategic Land</p> |

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| changes in the market and working patterns post Covid. | | | | |
| <p>1 - office requirement should be 59,570sqm not 59,590sqm as stated.</p> <p>2 - Given the ever-changing nature of employment requirements, it is considered that there should be no maximum requirement for office uses in the Plan. This would help to ensure the Plan meets the test of soundness with regard to being positively prepared and consistent with national policy.</p> <p>3 - B8 study fails to consider strategic B2 needs</p> | <p>1 - No change in response to this specific comment although the Employment Land Update Report (2024) provides a refreshed assessment of general employment land requirements to 2040.</p> <p>2 -The office requirement is expressed as 'at least' figure in the Update report. Policy S1 to be amended accordingly.</p> <p>3 – The update report confirms that the industrial requirement includes all industrial need, including for larger scale units.</p> | See amendment above proposed response to Rep. 185. | 215 | Secretary of State for Transport (HS2) |
| <p>1 - an average plot ratio of 40% is unachievable if used as a conversion factor to arrive at a gross requirement. The representations suggested that if it was to be applied, then it must be made clear it yields a net land requirement, what that requirement represents (i.e. specifying what is excluded), and allocations made accordingly. It was noted that this would require an assessment of the likely net developable area of allocations to ensure this net requirement can be</p> | <p>1 - The Council's consultants confirm that 40% is a reasonable rule of thumb to use for estimating land requirements. The Council has applied a more specific, locally derived ratio to its actual site allocations which should give more certainty that the specified amount of floorspace can be achieved. This is explained in the Employment Topic Paper.</p> <p>2 -The employment land element of the Money Hill allocation will be considered in a future Committee</p> | No specific change in response to this representation although changes are proposed to the employment land requirements arising from the Update report. | 225 | St Modwen Logistics |

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| <p>met, or there would be a significant risk of insufficient provision being made. Land allocations should be on the basis of a realistic ratio. 40% is used in Table 4 in the consultation document and at paragraph 4 in the Topic Paper.</p> <p>2 - Recognise that the employment element of Money Hill will not come forward and perhaps allocating it for another use, or ensuring sufficient additional land is allocated such that if it does continue to stall this part of the requirement is not left unmet.</p> <p>3 - Stantec does not make any adjustment for pent up demand (see pages 3-4 of submission)</p> <p>4 - no account of the need for Strategic B2 - smaller than B8 but significant and important to the economy.</p> <p>5 - there are serious concerns with the extent to which the evidence base properly and fully identifies the requirement for employment land. A common theme between the approach to the non-strategic and strategic sectors is the question of suppressed demand.</p> | <p>report dealing with the site-based representations.</p> <p>3 & 5 - The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements. The Council's consultants advise that the method used is 'soundly based'.</p> <p>4 - The Update report confirms that the industrial requirement includes all industrial need, including for larger scale units.</p> | | | |
| [raises the same issues as Representation 225] | [as for 225] | No specific change in response to this representation although | 229 | P, W, C & R Redfern |

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| | | changes are proposed to the employment land requirements arising from the Update report. | | |
| Employment evidence documents (Review of EEAs; Stantec; Start up workspace; Strategic B8 study) generally out of date given impact of Covid 19 on employment patterns. | The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements. | See amendment above proposed response to Rep. 185. | 233 | MAG Property |
| Employment land requirements lack supporting data and justification | The employment land requirements in the draft plan draw on published evidence documents, specifically the Need for Employment Land Report (2020) (with a recent update) and the Strategic Distribution Study (2021). The latter was prepared jointly with the other Leicester & Leicestershire authorities. These expert reports contain the data analysis and reasoning needed to estimate the amounts of employment land required in the future. | No specific change in response to this representation although changes are proposed to the employment land requirements arising from the Update report. | 285 376 401 | Garry Needham Jim Snee Mr Wykes |
| 75% of the calculated office/ warehousing requirement for all of the NWLDC region is destined for Kegworth, Castle Donington and Isley Woodhouse all within 1 mile of East Midlands Airport. This is an incredible overloading on one small area and from an employment point of view is | Proposed sites for general needs employment are located at Ellistown and Oakthorpe (near Measham) in addition to Kegworth, Castle Donington and at the new settlement in the longer term. Together with the allocated employment land at Money Hill, | No specific change in response to these representations. | 285; 405;115 | Garry Needham; Northern Parishes; Protect Diseworth |

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| <p>unfair to the rest of the county. Employment opportunities should be distributed evenly and fairly across the region - to where people live in their existing communities. NWLDC must review this proposed strategy.</p> | <p>Ashby, the proposals provide a reasonable spread and choice of locations across the district. For strategic warehousing, there is a focus on the north of the district. Key drivers for this are a) good road connections. The A50, M/A42, M1 and A6 all converge and connect here; b) rail freight terminal at East Midlands Gateway; c) East Midlands Airport for cargo; d) local labour supply in Derby and Nottingham.</p> | | | |
| <p>Provision of office space seems high although 7.11 details specific factors that could curtail office demand including the number of people working from home.</p> | <p>The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements. This shows modest decrease in the overall office requirement which reflects recent experience.</p> | <p>No specific change in response to this representation.</p> | <p>289</p> | <p>Swannington Parish Council</p> |
| <p>1 - There is strong demand for land and premises for both freehold and leasehold, and across a range of unit sizes and tenures, although the size band for industrial premises leans towards the mid-to-large box. According to the latest Market Insight 2024 by Innes England, the industrial market across Leicester and Leicestershire continues to deliver strong results, with good occupier</p> | <p>1,2,4 – noted 3 – The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements.</p> | <p>See amendment above proposed response to Rep. 185.</p> | <p>341</p> | <p>Leicestershire CC</p> |

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| <p>demand, rising rents, generating the confidence for developer and investor support with new supply. Take-up in the Leicester and Leicestershire industrial market remained above the 10-year average for the fourth successive year in 2023, with total activity of 2.7m sq ft. The 'Big Box' market continued to see good levels of activity, with six deals totalling 1.25m sq ft. Much of this growth is driven by our area's strong connectivity to road, rail and air. Available Grade A space fell slightly to 1m sq ft, although there are several large-scale units coming forwards in the south of Leicestershire. As such, the protection of sites for employment uses across NWL is particularly important in this context, especially industrial.</p> <p>2 - The County Council is interested in the provision for employment land, support for local businesses and the integration of new developments with existing infrastructure to foster economic resilience and growth.</p> <p>3 - Whilst the approach to the estimation of employment land needs is logical the evidence supporting the overall requirements for employment land over the plan period is based on historic data and may have over-</p> | | | | |

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| <p>estimated the requirement for office space given the changes in working practices and subsequent downturn in demand post-COVID. However, if the overall employment land requirement is maintained (excluding strategic distribution) the opportunity will be provided to respond to future changes in market conditions and future increased economic activity.</p> <p>4 - Further, the approach in respect of strategic B8 is seen as appropriate and takes account of the market and demand across the wider economic area.</p> | | | | |