

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

LOCAL PLAN COMMITTEE – MONDAY, 16 DECEMBER 2024



<p>Title of Report</p>	<p>LOCAL PLAN- PROPOSED EMPLOYMENT ALLOCATIONS: CONSIDERATION OF RESPONSES TO CONSULTATION</p>	
<p>Presented by</p>	<p>Sarah Lee Principal Planning Policy Officer</p>	
<p>Background Papers</p>	<p>National Planning Policy Framework (December 2023)</p> <p>Draft Local Plan Consultation (February-March 2024) for consultation documents and representations received.</p> <p>Report to Local Plan Committee – 13 November 2024</p> <p>Draft Local Plan site assessments</p> <p>Need for Employment Land Update Note (July 2024)</p> <p>Employment Topic Paper 2024</p>	<p>Public Report: Yes</p>
<p>Financial Implications</p>	<p>Nothing specific arising from the report recommendations. The cost of the preparation of the Local Plan is met from existing budgets.</p> <p>Signed off by the Section 151 Officer: Yes</p>	
<p>Legal Implications</p>	<p>Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Council to take into account the representations it receives as it prepares the Local Plan.</p> <p>Signed off by the Monitoring Officer: Yes</p>	
<p>Staffing and Corporate Implications</p>	<p>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.</p> <p>Signed off by the Head of Paid Service: Yes</p>	

Purpose of Report	<p>The report summarises and responds to the issues raised in the Regulation 18 consultation responses with respect to sites for employment. The report also sets out a proposed approach for dealing with the Freeport site in the Local Plan and puts forward strategic warehousing sites and locations to include in forthcoming transport modelling.</p>
Recommendations	<p>THAT LOCAL PLAN COMMITTEE AGREES:</p> <p>(i) SUBJECT TO THE OUTCOME OF FURTHER WORK INCLUDING TRANSPORT MODELLING, VIABILITY ASSESSMENT AND INFRASTRUCTURE REQUIREMENTS, THAT THE GENERAL NEEDS EMPLOYMENT SITES AND LOCATIONS IN TABLE 4 BE PROPOSED TO BE ALLOCATED IN THE REGULATION 19 VERSION OF THE LOCAL PLAN.</p> <p>(ii) SUBJECT TO THE OUTCOME OF FURTHER WORK INCLUDING TRANSPORT MODELLING, VIABILITY ASSESSMENT AND INFRASTRUCTURE REQUIREMENTS AND PUBLIC CONSULTATION, THAT THE GENERAL NEEDS EMPLOYMENT SITES IN TABLE 5 BE PROPOSED TO BE ALLOCATED IN THE REGULATION 19 VERSION OF THE LOCAL PLAN</p> <p>(iii) THAT THE PROPOSED POLICY WORDING CHANGES INCLUDED IN APPENDIX A BE INCORPORATED IN THE REGULATION 19 VERSION LOCAL PLAN.</p> <p>(iv) THE BROAD APPROACH TO THE FREEPORT DESCRIBED IN PARAGRAPH 4.8.</p> <p>(v) THE STRATEGIC WAREHOUSING SITES AND LOCATIONS IN TABLE 7 FOR THE PURPOSES OF TRANSPORT MODELLING.</p>

1.0 INTRODUCTION

1.1 This report complements Item 1 on the agenda and deals with the matter of employment land for the new Local Plan. Its overarching purpose is to enable the Committee to make some key decisions so that the Local Plan can progress. The report deals with the following matters:

- Reports and responds to the representations about the proposed general needs employment sites received during the Regulation 18 Local Plan consultation (January to March 2024);
- Recommends the general needs employment sites to be included as allocations as part of the Regulation 19 plan, **subject to** the outcome from other evidence base work, including transport modelling, infrastructure

planning and viability assessment. Additionally, for two sites, agreement for public consultation is requested.

- Requests that specific policy wording changes are agreed.
- Reports and responds to the representations about the Potential Locations for Strategic Distribution received during the Regulation 18 consultation; and
- Recommends strategic warehousing locations to feed into the forthcoming transport modelling which is being undertaken as part of the evidence base for the plan.

2.0 BACKGROUND

2.1 The Proposed Housing and Employment Allocations consultation document (January 2024) included draft site allocations for general needs employment and two potential locations for strategic distribution. The volume of responses to each of the consultation sites/locations is shown in the table below.

Table 1 – Number of responses

EMP24 – East of Midland Road, Ellistown	13
EMP89 – West of Hilltop, Castle Donington	5
EMP73(part) – North of Derby Road, Kegworth	15
EMP73(part) – North of A453, Kegworth	16
EMP60 – Burton Road, Oakthorpe	5
IW1 – Isley Woodhouse new settlement	*205
EMP90(part) – South of East Midlands Airport	183
EMP82 – North of J11 A/M42	59

* all representations, including non-employment related

2.2 Appended to the report are schedules which a) summarise the issues raised and who raised them and; b) provide an officer response. Where policy changes are merited, revised policy wording is shown in the schedule **in bold** and the Committee is asked to agree these suggested changes (general needs employment sites only).

- Appendix A deals with representations and responses to the general need employment sites.
- Appendix B covers representations and responses to the two potential locations for strategic distribution at Land south of the airport (EMP90) and Land north of J11 A/M42 (EMP82).

2.3 In the time since the Regulation 18 consultation document was being prepared, four additional employment sites have come forward for consideration. These new sites have been assessed in the same way as sites submitted earlier in the process. All the site assessments are published on the [New Local Plan – Site Assessment](#) webpage.

- **EMP94 – Heath Lodge, Tamworth Road, Appleby Magna** (2.29Ha). Uses could include strategic warehousing if this site was brought forward together with adjoining SHELAA sites. (Map in Appendix C)
- **EMP95 – Land off London Road, Kegworth** (2.2Ha). This site is being promoted for general needs employment. (Map in Appendix C)
- **EMP97 – Land south of Kegworth bypass** (64Ha). This site is being promoted for strategic warehousing. (Map in Appendix C)

- **EMP98 - Land north of Wood Lane and west of Ellistown Terrace Road, Ellistown/Batram** (16.4Ha). This site has been put forward for a mix of general needs employment and strategic warehousing. (Map in Appendix D)
- 2.4 An updated Sustainability Appraisal - Sites Assessment Findings Report incorporating the new sites is also available on the [website](#). In producing their report, the SA consultants have taken account of comments made in response to the consultation together with queries raised by officers. The findings of the SA have been taken into account in the preparation of this report and its recommendations.
- 2.5 The decisions the Committee took at its 13 November 2024 meeting are important context for the matters in this report. At that meeting the Committee agreed that a) provision be made for a minimum of 45.8ha of land for industrial/nonstrategic warehousing; and b) a working figure of 200-250 ha of land for strategic warehousing be used for the purposes of transport modelling.

3.0 GENERAL NEEDS EMPLOYMENT

- 3.1 The draft Local Plan consultation document identifies six sites for general needs employment. The issues raised in the representations for five of these sites and officers' responses are included in Appendix A. The sixth site is the new settlement at Isley Woodhouse (Policy IW1) which will include some employment land. As IW1 is a housing-led proposal, the representations to that site are dealt with in the accompanying report at Item 1 on this agenda.

The draft employment site policies included some requirements which could be adequately dealt with by one of the topic-based policies. It is now recommended that the following requirements be deleted from the general needs employment site policies as unnecessary duplication is contrary to paragraph 16 of the National Planning Policy Framework (NPPF). These changes, summarised below, are included in Appendix A.

- Criteria relating to Biodiversity Net Gain. This matter is adequately dealt with by draft Policy En1.
 - References to the River Mease catchment in favour of draft Policy En2.
 - The provision of surface water drainage schemes which is addressed in draft Policy AP8.
- 3.2 For three of the proposed employment sites, either the issues raised in the representations do not alter the view that the sites are suitable, or the matters can be addressed through policy amendments.

- **EMP60 – Land at Burton Road, Oakthorpe** (near Measham). Policy amendments are proposed to require a Minerals Assessment and to add a target for levels of surface water run-off. Whilst highways matters are not fully resolved, they are not currently expected to prevent the development of this site.
- **EMP73 (part) – Land north of Derby Road, Kegworth**. Policy amendments to recognise a) that the site is part of the gateway to the village; b) that the Derwent Valley Aqueduct runs under the site; and c) the need to consider the amenity of the future residents on the opposite site to the south of Derby Road which has planning permission.
- **EMP89 – Land west of Hilltop, Castle Donington**. The express requirement for 6,000sqm of offices is replaced with an increased capacity figure for industry/smaller scale warehousing. Criteria are added to confirm that a)

office uses will be supported provided a sequential test is satisfied; and b) the scheme's design respects Hill Top Farmhouse and its wider setting.

- 3.3 The other three sites included in the Regulation 18 consultation plan are discussed below.
- 3.4 **Isley Woodhouse (IW1)**. Although there were many representations to the proposed new settlement, there were no substantive comments specifically on the employment land aspects.
- 3.5 The expectation is that the new settlement will include approximately 23,000sqm of industry/warehousing floorspace when complete. The draft plan anticipated that some 4,600sqm of this would be built by 2040. In the meantime, officers have taken a more cautious view of when construction of the residential parts of the new settlement will start. The site's promoters are nonetheless optimistic that all the employment floorspace will be built out by 2042, the new end date for the plan. This is ambitious but feasible. With the employment land fronting onto the A453, they anticipate that it will be brought forward in the early phases of the development.
- 3.6 For the time being, it is considered that a more cautious approach is required. The assumption is that some 10,000sqm will be completed by the end of the plan period. This will be kept under review.
- 3.7 **Land north of Remembrance Way, Kegworth (EMP73 (part))** was put forward as a general needs employment site in the draft Local Plan consultation. In view of the site's location, and anticipating an increasing need for strategic warehousing, it is now considered that this site could be suitable for strategic-scale B8. This is discussed in more detail in the next section of this report. That aside, policy amendments are proposed to exclude the northern portion of the site from development due to flood risk and to recognise that the Derwent Valley Aqueduct runs beneath the site. It is requested that these changes be agreed (as part of recommendation (iii)) pending a future decision about the uses for this site.
- 3.8 **Land East of Midland Road, Ellistown (EMP24)** was identified for some 29,160sqm of industry/warehousing in the draft Local Plan. In the absence of better alternatives, the site was included despite highways concerns, the impact of developing in the gap between Hugglescote and Ellistown and the potential effects on residential amenity. Subsequently, the County Highway Authority has expressed more forcibly its concerns in respect of a) additional HGV movements on Midland Road; b) limited scope to upgrade the double mini roundabout in Ellistown; and c) poor pedestrian routes along Midland Road.
- 3.9 The highway concerns could be overcome if the site were accessed from Moore Road in the South Leicestershire Industrial estate. This will require access over third-party land and there is some difference in levels although this has not been shown to be unresolvable. In addition, reducing the development area to the eastern part of the site only would better maintain separation between Ellistown and Hugglescote and curtail impacts on residential amenity. This would reduce the site area to approximately 6Ha (c16,200sqm industry/warehousing). A map of this revised area is included in Appendix D. If it proves that development in this form cannot be achieved, the draft allocation may not be included in the Regulation 19 version of the Plan.
- 3.10 **General Employment Land Requirements.** The remaining ('residual') requirement for general employment land (2024-42) which was reported to the 13 November 2024 meeting is reproduced in Table 2 below. This is the amount of employment land that the new Local Plan should identify to support the predicted growth of the district's

economy based on the evidential studies. This requirement is substantially higher than when the draft Local Plan consultation was prepared, partly because of the extended plan period. Coupled with the changes outlined above, additional sites will be needed as a result.

Table 2 – General needs employment land requirement (2024-42)

	Offices (sqm)	Industry/non-strategic warehousing (sqm)
Residual requirement (2024-42)	-2,990sqm (= -0.5Ha)	c183,328sqm (=c45.8Ha)

- 3.11 The figures in Table 2 include the employment land planned in the adopted Local Plan allocation at Money Hill, Ashby. However, the capacity and uses attributed to Money Hill need revisiting and this is assessed later in this section. Table 3 shows how the requirements change if Money Hill is temporarily excluded from the employment land supply.

Table 3 – General needs employment land requirement (2024-42), excluding Money Hill

Residual requirement (2024-42) [without 16Ha at Money Hill]	c 28,990 sqm (=c4.83Ha)	c 225,968 sqm (=c56.6Ha)
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- 3.12 Recognising that additional sites need to be found, the following section considers how this might be done.
- 3.13 **New sites.** As explained at paragraph 2.3, in the time since the Regulation 18 consultation document was being prepared, the following additional employment sites have been submitted for consideration:

- **EMP94 - Heath Lodge, Tamworth Road, Appleby Magna. (2.29Ha).** This site comprises a large field, the property Heath Lodge and boarding kennels to the east of J11 A42. The site has been put forward by the Secretary of State for Transport as it is part of the safeguarded route for HS2, now cancelled, although the safeguarding remains in place
- **EMP95 - Land off London Road, Kegworth (2.2Ha)** The site comprises a roughly triangular parcel of agricultural land bounded by the A6 Kegworth bypass to the south, London Road to the east and New Brickyard Lane to the west and north-west.
- **EMP98 - Land north of Wood Lane and west of Ellistown Terrace Road, Ellistown/Battram (16.4Ha).** This site has been put forward for a mix of general needs employment and strategic warehousing.

- 3.14 These sites have been assessed using the same approach as for previous sites. Officers have also taken into account the representations received about sites which were previously assessed and dismissed (see 'other sites' schedules in Appendix A).

- 3.15 Faced with an increased requirement, it is considered that **Land north of Wood Road and west of Ellistown Terrace Road, Ellistown/Batram (EMP98)** is a suitable site for allocation (map in Appendix D). Matters for the allocation policy include, but are not limited to, the following:
- Potential impacts on Pickering Farmhouse to the west (Grade II Listed).
 - Comprehensive landscaping requirements
 - Access onto Wood Road (B585)
 - Land facing the site on the south of Wood Road has been put forward as a potential employment site in a recent consultation on Hinckley and Bosworth's Local Plan. If the site in Hinckley and Bosworth borough goes forward, a co-ordinated approach to the highways implications of the two sites will be required.
- 3.16 The site is being promoted for both general needs and strategic warehousing and it is considered that the site may be suitable for a mix of these uses. The 20,000sqm of industry/smaller scale warehousing ascribed to this site in Table 5 below would leave further space within the site for strategic warehousing if that were considered appropriate when strategic warehousing requirements are known. If not, the general needs employment capacity of the site could increase.
- 3.17 **Money Hill, Ashby (A5).** To date, the working assumption has been that the 16Ha of employment land at Money Hill will be split equally between offices, industrial and small warehousing (5.3Ha for each) but a more robust and reasoned approach is now needed. The revised assumption is that 2Ha of the land will be for offices (approximately 6,000sqm) and 14Ha for a mix of industrial and smaller scale warehousing (approximately 37,800sqm). The site promoters argue that the site should accommodate 8-13Ha of employment land but their submission does not explain how circumstances have changed such that 16Ha is no longer appropriate. Further, a reduction in the Money Hill figure would result in additional site/s having to be identified elsewhere and, in every likelihood, this would be on greenfield land.
- 3.18 **Capacity at the Freeport.** The suggested approach to the Freeport land south of the airport (EMP90) is addressed in the next section. The site promoter is currently proposing that up to 20% of the floorspace on that site could be for industrial uses rather than strategic warehousing. The floorspace provided would contribute towards the plan's industrial requirement.
- 3.19 **Capacity within existing industrial estates.** Policy Ec3 of the adopted Local Plan identifies 'Primary Employment Areas'. These are established industrial areas which are generally well occupied and are home to the district's better quality premises. Policy Ec3 provides 'in principle' support for new office, industry and warehousing development within these designated areas and draft Local Plan Policy Ec5 carries forward this approach. There are areas of vacant land within the Primary Employment Areas which could come forward for development. These have been assessed and add capacity for some 2,400sqm of office space and 13,230sqm of industrial/warehousing to the supply position.

3.20 The overall outcome of this review is shown in Tables 4 and 5 below. Table 6 brings the position together.

- **Table 4:** Modest changes are proposed for these sites but these are not so substantial that further consultation is required **before** Regulation 19 stage (recommendation (i)).
- **Table 5:** These have either been more significantly amended (EMP24) or are new (EMP98). For those reasons it is recommended that they are subject to further consultation (recommendation (ii)).

3.21 As for the housing sites dealt with elsewhere on this agenda, the actual allocation of these sites will only be confirmed when a Regulation 19 version of the plan is agreed at a future meeting of Council. Any final recommendations (with respect to the Regulation 19 plan) will be subject to the outcome of transport modelling work, the work on an Infrastructure Delivery Plan and the viability assessment, together with other technical pieces of evidence. Whilst this Committee is not making final decisions, it is vital that there is a clear 'direction of travel' in order that these additional pieces of evidence work can be commissioned and developed.

Table 4 – Sites for general needs employment (Recommendation (i))

Site Reference	Site Address	Offices (sqm)	Industry/smaller warehouse (sqm)
EMP89	West of Hilltop, Castle Donington	0	17,253
EMP73 (part)	North of Derby Road, Kegworth	0	30,000
EMP60	Burton Road, Oakthorpe	0	12,100
IW1	New settlement, Isely Woodhouse	0	10,000
A5	Money Hill	6,000	37,800
EMP90	Land south of EMA (subject to the DCO decision)	0	<55,800

Table 5 – Sites for general needs employment (Recommendation (ii))

Site Reference	Site Address	Offices (sqm)	Industry/smaller warehouse (sqm)
EMP24(part)	East of Midland Road, Ellistown (reduced area)	0	16,200
EMP98	Ellistown Terrace Road & Wood Rd (part of site for general needs B2/B8)	0	20,000

Table 6 – All Sites and locations for general needs employment

Site Reference	Site Address	Offices (sqm)	Industry/smaller warehouse (sqm)
EMP24(part)	East of Midland Road, Ellistown (reduced area)	0	16,200
EMP89	West of Hilltop, Castle Donington	0	17,253
EMP73 (part)	North of Derby Road, Kegworth	0	30,000
EMP60	Burton Road, Oakthorpe	0	12,100
IW1	New settlement, Isely Woodhouse	0	10,000
A5	Money Hill	6,000	37,800
EMP90	Land south of EMA(subject to DCO decision)	0	<55,800
EMP98	Ellistown Terrace Road & Wood Rd (part of site for general needs B2/B8)	0	20,000
Land within Primary Employment Areas		2,400	13,230
		8,400	<212,383
Position at 2042		-20,590sqm	-<13,585sqm

- 3.22 Table 6 shows a considerable shortfall in the provision for new office space. Employment forecasts in the [Need for Employment Land Update Note \(July 2024\)](#) show that the number of people in office-based jobs will increase which, on the face of it, translates into a need for new office premises. Crucially, however, a market demand for new stock is not evident. Linked to this, speculative office development is currently not viable. Increased home and hybrid working since the pandemic will have had a bearing but the lack of demand in the district was evident before this. There were successful developments in the 2000s-2010s (for example the Ivanhoe Business Park in Ashby) but relatively little since then. As an illustration, the planning permission for three new office buildings at the E M Point site near Castle Donington (18/02227/FULM) looks unlikely to be built out and a revised application for office, research, light industry, general industry and warehousing uses is currently under consideration (22/01116/FULM). The applicants for the redevelopment of 3,638sqm of good quality offices for a Lidl foodstore at Ashby (23/01153/FULM) were able to demonstrate a lack of market demand. Further, developers are not promoting realistic office sites through the Local Plan process (see paragraph 37 of the [Employment Topic Paper](#)).
- 3.23 There is some risk in not planning for the full requirement but as outlined, it is considered that there are compelling signs that the forecasts are out of step with actual demand. With a view to flexibility, it may be necessary for the plan to outline an approach if office demand does return during the lifetime of the plan.
- 3.24 In comparison, the demand for industrial and warehousing continues to be strong. Faced with this, substituting the office element at the Hilltop site at Castle Donington (EMP89) in favour of industrial/warehousing space appears appropriate. With the sites as proposed, Table 4 shows an industrial/warehousing shortfall of approximately 13,600sqm (c5Ha). This may change further when the employment land supply position is updated in April 2025. At this stage there are no further sites that it is considered are suitable to bridge the gap. This matter will be kept under review as the plan progresses.

4.0 STRATEGIC WAREHOUSING

4.1 Faced with the current uncertainty about overall strategic warehousing requirements, the Committee is not being asked to agree strategic warehousing sites at this stage. At its November meeting the Committee agreed a working figure of 200-250Ha of land for strategic warehousing for the purposes of transport modelling only.

4.2 The draft Local Plan consultation document identified two Potential Locations for Strategic Distribution:

- EMP90 - Land south of the airport; and
- EMP82 - Land north of J11 A/M42.

4.3 This section deals with the following matters:

- The representations to EMP90 and a recommended overall approach to the designated Freeport land;
- The representations to EMP82; and
- Sites/locations selected for the purposes of transport modelling.

4.4 **EMP90 – Land south of East Midlands Airport.** 183 representations were received about this proposal, the majority from residents who have multiple areas of concern. Supporting representations were submitted by landowners and the sites' promoters. The issues raised are summarised and responded to in Appendix B. A wide range of matters are covered and include the following:

- Concerns about the designation process, the overall necessity for the development in this location, existence of preferable alternative locations, concern that the Freeport's economic benefits have been overstated, or do not outweigh the harm, and conflict with adopted and emerging planning policy.
- Cumulative impacts of this site together with other developments planned in the area, including on infrastructure.
- Disproportionate amount of development in this location.
- Highways: concerns about the existing capacity of the local and strategic road network, road safety e.g. increased rat running and dangers for walkers and cyclists and inadequate sustainable transport.
- Landscape and townscape: overly large scale and obtrusive development, loss of countryside and loss of the separate and specific character of Diseworth.
- Loss of wildlife and habitats and scepticism that a net gain in biodiversity can be achieved
- Adverse impacts on heritage assets including Diseworth Conservation Area
- Concern that Diseworth and Long Whatton's existing flooding problems will be exacerbated
- Impacts on residents: overbearing visual impact, 24hr disturbance (noise, lighting, traffic), adverse for residents' health and wellbeing and loss of attractive walking routes
- Loss of productive agricultural land
- Carbon emissions will increase

- 4.5 Whilst the draft Local Plan consultation was taking place, the Secretary of State determined that the proposals for land south of the airport (and including land within the existing East Midlands Gateway site) should be treated as a development of national significance for which a Development Consent Order (DCO) is required. This means that it will be the Secretary of State who decides whether the proposals go ahead. The decision, its timing and the detailed information needed to make the decision will all be outside the Council's control. The DCO timetable is not confirmed but it is understood that SEGRO intends to submit their application by April 2025. This means the DCO decision could be made before the new Local Plan is submitted for Examination, but this is far from certain.
- 4.6 If the site was allocated in the new Local Plan but the DCO was not granted, the plan would contain a site allocation which cannot be delivered. On the other hand, the Local Plan cannot remain silent on a proposal of this scale and significance, not least because of its inter-relationship with other aspects of the plan (e.g. cumulative transport impacts, strategic warehousing requirements) and the local impacts on Diseworth village, its residents and surroundings.
- 4.7 The current undetermined planning application on the part of EMP90 which Manchester Airports Group controls (24/00727/OUTM) adds to the overall complexity of the situation.
- 4.8 Having considered these issues, it is recommended that the Local Plan takes the following approach to the designated Freeport land i.e. land south of the airport **and** the designated Freeport land within the airport boundary and at East Midlands Gateway:
- Identify key issues and matters of concern which need to be addressed as part of any proposed planning application relating to the proposed development south of the airport (site EMP90). This could form the basis for this Council's Statement of Local Impacts for the DCO inquiry.
 - For the purposes of the plan, it will be assumed that the quantum and type of development on EMP90 will be as currently being proposed i.e. 100Ha/279,000sqm of B2/B8 uses. This is important for the planning of strategic warehousing and general needs employment overall and for considering the cumulative impacts of development in this part of the district (e.g. transport). **This does not mean that the Council supports the proposals in their current form.** This approach does, however, recognise that the decision on the acceptability of the development will be made through the DCO process **and** enables the Local Plan to progress.
 - Set out any planning considerations for development on the parts of the airport and East Midlands Gateway which are also part of the designated Freeport.
- 4.9 **EMP82 – Land NW of J11 A/M42.** This site was put forward as a Potential Location for Strategic Warehousing in the consultation plan. The consideration of the representations for this site is in Appendix B. The changes being proposed include a) reference to specific measures to manage traffic and HGV movements and to improved bus services; b) more specificity regarding design; and c) retention of hedgerows.

- 4.10 In view of the uncertainty about requirements, the Committee is not being asked to agree strategic warehousing sites for inclusion in the Regulation 19 plan at this time.
- 4.11 **Sites/locations to feed into transport modelling.** The working figure of 200-250Ha agreed for the purposes of transport modelling at the November meeting is not, of itself, sufficient to undertake the modelling work. It is additionally necessary to ascribe amounts of development to specific locations and road junctions so that the effects on the road network can be tested using the model.
- 4.12 Importantly, the Committee is not being asked at this stage to decide on the planning merits of sites. **The decision relates to transport modelling only.** Indeed, the highways implications revealed by the modelling will have a bearing on the final selection of sites for the Local Plan.
- 4.13 Table 7 below shows the locations recommended for inclusion in the transport modelling. The locations selected are sites that are being promoted and in some cases are the subject of current planning applications. This suggests they could be delivered if any of them are proposed for allocation in due course.
- 4.14 Importantly, locations have been selected with the aim of making effective use of the transport modelling process. The approach tests the impact of a certain amount of development at each of the following key junctions:
- Location A - J23a/J24 M1 and J1A50
 - Location B – J13 A42
 - Location C – J11 A42
 - Location D – J22 M1

Table 7 – Strategic warehousing locations and sites for transport modelling

Location A - J23a/J24 M1 and J1A50		
EMP90 - Land south of EMA (part of the Freeport)	80Ha	Whole site is 100Ha. Up to 20% of floorspace for industry and at least 80% for strategic warehousing.
EMP02 - Land adj. Aldi Regional Distribution Centre, Sawley	15Ha	This land is identified in the adopted Local Plan (Policy Ec1c). The site previously had outline permission which has expired. There is a current planning application on the site (24/01200/FULM).
EMP73 (part) - Land north A453, Kegworth	15Ha	This site was included in the draft Local Plan for general needs employment but is in a location where the demand for strategic warehousing is likely to predominate.
Designated Freeport land within East Midlands Gateway	6.4Ha	The DCO submission is expected to include some 6.4Ha of land (designated as part of the Freeport) at East Midlands Gateway for additional warehousing and/or open storage
Location B – J13 A42		
EMP80 – Land at Corkscrew Lane, Ashby	11.5Ha	There is a current planning application on this site (23/00420/OUTM)
EMP87(part) – East of Ashby	20Ha	Part of the land parcel between A42 and A512 only.
Location C – J11 A42		
EMP82 - Land north J11 A/M42	28Ha	Potential Location for Strategic B8 in the draft Local Plan consultation
EMP83, 84(part),94 – Land NE of J11	35Ha	Comprises land between A42 and Tamworth Road towards Measham.
Location D – J22 M1		
EMP98 - Ellistown Terrace Road & Wood Rd, Ellistown (see paragraph 3.15)	7Ha	Site submitted in representations to the draft Local Plan consultation. The site is considered suitable for a mix of strategic and general needs employment. [whole site is 16Ha]
	c218Ha	

- 4.15 The locations and hectarages are shown on the plans in Appendix E. Collectively the locations on this list achieve towards the lower-mid end of the 200-250Ha working range for transport modelling. The recommendation is that this list of sites/locations be agreed for the purposes of transport modelling only.
- 4.16 A new site for strategic warehousing south of Kegworth bypass, Kegworth (EMP97) of some 64Ha was submitted during the Regulation 18 consultation. As transport modelling will already be testing a very significant amount of development in the vicinity of J23a/J24/J1A50, it is not proposed to add EMP97 to the list of locations for testing.

Policies and other considerations, as appropriate	
Council Priorities:	<ul style="list-style-type: none"> - Planning and regeneration - Communities and housing - Clean, green and Zero Carbon
Policy Considerations:	The Local Plan is required to be consistent with the National Planning Policy Framework and other government guidance and requirements
Safeguarding:	Non discernible.
Equalities/Diversity:	An Equalities Impact Assessment of the Local Plan review will be undertaken as part of the Sustainability Appraisal.
Customer Impact:	Reporting the consultation responses received helps demonstrate how the feedback is being taken into account
Economic and Social Impact:	The new Local Plan as a whole will aim to deliver positive economic and social impacts and these will be recorded through the Sustainability Appraisal.
Environment, Climate Change and zero carbon:	The new Local Plan as a whole will aim to deliver positive environmental and climate change impacts and these will be recorded through the Sustainability Appraisal.
Consultation/Community/Tenant Engagement:	The Regulation 18 Local Plan has been subject to consultation and further consultation will be undertaken at Regulation 19 stage.
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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