

## APPENDIX B– POLICY EC4 (EMPLOYMENT USES ON UNIDENTIFIED SITES)

### RESPONSES TO PROPOSED POLICIES

<b>CHAPTER: 7</b>	<b>POLICY NUMBER: Ec4</b>	<b>POLICY NAME: Employment Uses on Unidentified Sites</b>
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<b>MAIN ISSUES RAISED</b>	<b>COUNCIL RESPONSE</b>	<b>ACTION</b>	<b>RESPONDENTS ID</b>	<b>RESPONDENTS NAME</b>
<b>General comments</b>				
As the plan is allocating sites, draft Policy Ec4 and the uncertainty associated with it is unnecessary especially as the Local Plan is subjected to a legally required five-year review.	NPPF paragraph 86 requires local plan policies to both meet anticipated needs for the whole plan period and also to have a degree of flexibility. Policy Ec4 provides this flexibility in a way which also provides clarity about the criteria which must be met for permission to be granted on an unidentified site.	No change	189	Long Whatton & Diseworth Parish Council
Importance of road related transport, haulage use and associated small scale storage should form part of 'general employment uses' at paras 7.8-7.13 or that they do not form part of the floorspace/land requirement figures in the plan. Already evidence of pressure such uses but no land is identified in the plan. Amended wording suggested as follows "(b) The applicant has demonstrated that the immediate requirement cannot reasonably be satisfied on any other available	<p>The Council's employment land evidence does not measure the need for open storage uses (a haulage yard for example). The demand for such uses is highly specific and difficult to anticipate sufficiently well to justify e.g. site allocation in the Local Plan.</p> <p>A search of planning applications shows 6 proposals for haulage yards were submitted over the past 10 years (2015-25) of which 4 were permitted, one was withdrawn and</p>	No change.	348	David Stanley Transport

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land/buildings within the relevant search area and ....”	<p>one is awaiting determination. There were 5 proposals for open storage over the same period, all permitted. This is an indication that the policies in the adopted Local Plan are sufficient to manage the demand for these uses.</p> <p>The policy wording proposed in this representation would qualify the policy requirement to a degree (‘cannot reasonably be satisfied’). It is considered this is unnecessary and adds more subjectivity to the policy. It is inherent in the current wording that the requirement couldn’t be met on an <b>unavailable</b> site.</p>			
<b>Part (3) of Policy Ec4</b>				
Amend part (3) with the addition of ‘only’ as follows “Exceptionally.... proposals for employment development on unidentified land outside of the Limits to Development will <b>only</b> be supported where ....”	The current wording “will be supported where...” is consistent with other policies in the plan (e.g. Policy S4 – Countryside).	No change	92	Ashby Town Council
Add to (3): That such development does not adversely impact the locality by virtue of over-development	The extent to which a proposal is (or isn’t) overdevelopment will be revealed by its impacts on other factors such as landscape quality, highways and residential amenity	No change	115	Protect Diseworth

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	for example. Such factors are included as considerations in the draft policy and in other policies in the plan.			
<ul style="list-style-type: none"> <li>The requirement for a named end user should be removed. 3(a)(i) is sufficient on its own.</li> <li>It is impractical and it is unlikely that a developer would be willing to include a named end user in s106.</li> <li>These permissions (and the policy that enables them) must be flexible enough to give occupiers the comfort to invest in NWL.</li> <li>The requirement could stop proposals coming forward and would constrain the market.</li> <li>Occupiers' requirements are typically known &lt;24 months before occupation whereas the process of due diligence, pre-application, submission, determination and build out typically takes 48+ months.</li> <li>It is unduly restrictive.</li> <li>Removing the requirement would provide more flexibility to adapt to market demands e.g. switch from logistics to industry if required.</li> <li>Need to consider against NPPF 2023 para 86(d).</li> </ul>	<p>Employment land requirements to 2042 will be met through extant planning permissions and site allocations in the new plan. The requirement figures are also further boosted by a flexibility margin as insurance against sites not coming forward as expected (see Table 4 in the Proposed Policies consultation document). The role of Policy Ec4 needs to be understood in this context. It is an exception-style policy to deal with situations where a requirement for additional employment land could not have been anticipated during the plan's preparation. The policy criteria must therefore be sufficiently robust to ensure that the release of additional land is fully justified through the information submitted as part of a planning application.</p> <p>Explaining the requirements of a named end user can help demonstrate why the release of an</p>	Clarify in the supporting text that the inclusion of named end user/s in a legal agreement will apply to the first occupation only.	158 204	The Whatton Estate and B&C Jarrom; P Fovague

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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<ul style="list-style-type: none"> <li>Speculative development of strategic sites, where there is demonstrable need, is imperative to ensuring adequate supply of buildings</li> <li>Remove 'immediate' from (3)(a)(i)</li> <li>Change 'and' at the end of (3)(c)(i) to 'or'.</li> </ul>	<p>unidentified site is needed. Criterion (3)(a)(ii) is expressed as an either/or requirement and compliance can still be demonstrated by meeting the second part of the criterion if there is no end user in place.</p>			
<p>Criteria 3a-c are not flexible. The policy is too restrictive. In view of district's advantages, the plan should not place restrictions on growth of local economy.</p>	<p>The function of the end user requirement is to demonstrate an explicit need for the development and an intent that the premises will indeed be occupied. The policy says this will be secured through legal agreement but in addition the supporting text will confirm that this applies to the first occupation only.</p> <p>It is considered necessary that the requirement in (3)(a)(i) is qualified with the term 'immediate' to confirm that it is arising now and is not a future need that would be better dealt with through a Local Plan Review for example. The equivalent policy in the adopted plan uses the term 'immediate' and sites have been granted permission on this basis.</p>		<p>185</p> <p>186</p>	<p>Clowes</p> <p>Wilson Bowden</p>

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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<ul style="list-style-type: none"> <li>The reference to North West Leicestershire at the end of 3(a)(i) is ambiguous. Must the requirement originate in the District, the required location is in the District, or simply that the proposal is in the District? The District does not operate as a self-contained market.</li> <li>If some narrow specificity of location is intended by Part 3(a)(i) of the Draft Policy it is not clear why Part 3(b) should be more expansive.</li> <li>Part 3(c)(ii) should be replaced with “and / or”.</li> </ul>	<p>It is agreed that the wording of 3(a)(i) could be ambiguous. Revised wording is suggested to clarify that the <b>location</b> of the development in North West Leicestershire is the key matter.</p>	<p>Amend Part 3 (a)(i) to read “an immediate requirement for the <b>amount and type of</b> employment land <del>of the type</del> <b>proposed to be located</b> in North West Leicestershire;”</p>	<p>225 229</p>	<p>St Modwen P, W C &amp; R Redfern</p>
<p>Part 3 criterion (a)(ii) is overly restrictive.</p> <ul style="list-style-type: none"> <li>There are sensitivities behind prospective occupiers wanting to relocate. Occupiers may have a need for anonymity to protect their commercial position, and/ or there may be sensitivities around relinquishing their existing space / location and the potential implications for existing and future work forces.</li> <li>The requirement also does not account for timescales for relocation, which are often not aligned with the timescales associated with securing planning permission.</li> </ul>	<p>Explaining the requirements of a named end user can help demonstrate why the release of an unidentified site is needed. Criterion (3)(a)(ii) is expressed as an either/or requirement and compliance can still be demonstrated by meeting the second part of the criterion if there is no end user in place.</p> <p>Part 3(b) of the policy requires applicants to demonstrate that their proposal cannot be accommodated elsewhere within a ‘relevant search area’. For a strategic warehousing scheme, the</p>	<p>No change.</p>	<p>234</p>	<p>I M Properties</p>

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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Part 3 (b). In the context of the potentially fluctuating nature of the areas of opportunity, need greater justification for the inclusion of Areas of Opportunity within the policy wording.	policy says that this would be the relevant Area/s of Opportunity (AoO). The AoO are defined in the Leicester and Leicestershire Strategic Distribution Study (2021) but this study is currently being updated. Officers will consider if the finalised study (when available) has any implications for this aspect of Policy Ec4.			
<p>Named end user criterion is overly restrictive, contrary to NPPF and unworkable commercially.</p> <ul style="list-style-type: none"> <li>• Due to commercial sensitives, it is not commonplace to have an end-user identified</li> <li>• generally, occupiers do not commit until planning permission is granted</li> <li>• The policy does not allow for the proposed occupier falling away during the course of the planning application.</li> <li>• This proposed wording adds burden and delay to obtaining planning permission.</li> <li>• This policy requirement is, in effect, encouraging the use of personal planning permissions which can be very restrictive when marketing the site if the first occupier vacates.</li> </ul>	<p>Criterion (3)(a)(ii) is expressed as an either/or requirement and compliance can still be demonstrated by meeting the second part of the criterion if there is no end user in place. This second part mirrors the wording of NPPF paragraph 86e and requires applicants to make the case why additional employment land is required over and above that which is already available. This is considered a reasonable and proportionate approach.</p> <p>The equivalent policy in the adopted Local Plan has been successfully applied to multi-unit schemes. The purpose of Part 3(a)(i) is to establish that there is a</p>	Amend Part 3 (a)(i) to read “an immediate requirement for the <b>amount and type of</b> employment land <del>of the type</del> <b>proposed to be located</b> in North West Leicestershire;”	290	SEGRO

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<ul style="list-style-type: none"> <li>Requirement is not compliant with Paragraph 86 of the NPPF - it would create potential barriers to investment and would not enable a rapid response to changes in economic circumstances in the event a potential occupier falls away.</li> <li>Wording effectively relates only to single unit development proposals designed to the requirements of an end-user and therefore could limit its market flexibility in the future. It precludes strategic warehousing and multi-unit sites, including SME units as part of a wider development, from coming forward as it is highly unlikely that all units on a multi-unit scheme would be pre-let.</li> <li>Revised wording suggested.</li> </ul>	<p>requirement for the amount and type of employment <b>land</b> i.e the application site as a whole. For multi-unit schemes, part (ii) could still be met by a combination of named end user/s and evidence that meets the terms of NPPF paragraph 86e.</p>			
<p>Add 'subject to mitigation' to part 3(c)(ii) of the policy.</p> <p>Is good access to the SRN needed for non-strategic development?</p>	<p>Agreed.</p>	<p>Amend 3(c) to read:</p> <p>(ii) <b>For proposals which will generate significant HGV movements,</b> has good access to the strategic highway network (M1, M42/A42 and A50); and</p> <p>(iii) <b>Through mitigation as necessary, has</b> an acceptable impact on the capacity of that network,</p>	<p>341</p>	<p>LCC</p>

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		including any junctions; and...		



## APPENDIX B – POLICY EC5 (EXISTING EMPLOYMENT AREAS)

### RESPONSES TO PROPOSED POLICIES

<b>CHAPTER: 7</b>	<b>POLICY NUMBER: Ec5</b>	<b>POLICY NAME: Existing Employment Areas</b>
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<b>MAIN ISSUES RAISED</b>	<b>COUNCIL RESPONSE</b>	<b>ACTION</b>	<b>RESPONDENTS ID</b>	<b>RESPONDENTS NAME</b>
<b>Support</b>				
Supports the inclusion of Mercia Park in this table as one of the “best performing” employment sites in the district.	Support welcomed	No change	234	IM Properties
Support the inclusion of East Midlands Gateway as an Existing Employment Area.	Support welcomed  The boundary of this Existing Employment Area shown in the Regulation 18 consultation document included the substantial areas of structural landscaping which surrounding the buildings at EMG. The boundary is to be refined to exclude these landscape areas.	Amend the boundary of the East Midlands Gateway Existing Employment Area shown on the Policies Map to exclude large areas of landscaping.	290	SEGRO
The approach to the protection of established employment is appropriate in that it recognises the need for sites/assets that are no longer capable of reasonable economic use can be devoted to suitable alternative uses.	Support welcomed.  Although not linked to this representation, an amendment to the policy is merited to make it consistent with other policies which require evidence of a lack of demand for premises in their current/latest use. Policies H7 (Self-build and custom homes) and	Amend Part 2(b) to read: “There is no reasonable demand to use the premises/site for the uses in Table 5 <b>as evidenced by robust marketing of the premises/site at current market value for a continuous period of at least 6 months. If the</b>	341	LCC (Property)

## APPENDIX B – POLICY EC5 (EXISTING EMPLOYMENT AREAS)

MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	Ec12 (Tourism and visitor accommodation) for example include more detail in the policy (rather than the supporting text) than Policy Ec5. Amendments are recommended to address this.	<p><b>Council requires independent verification of the evidence submitted, this will be at the expense of the applicant; or....”</b></p> <p>Amend Part 3(a) to read: “There is no reasonable demand to use the premises for employment uses <b>as evidenced by robust marketing of the premises/site at current market value for a continuous period of at least 6 months. If the Council requires independent verification of the evidence submitted, this will be at the expense of the applicant; or....”</b></p> <p>Linked amendments to the supporting text may also be required.</p>		
<b>Kegworth Computer Centre</b>				
The Kegworth Computer Centre site (Ec5(t)) should be used for supermarket/ leisure/ community use. It would	Based on our <a href="#">retail evidence</a> there is no pressing need for the Local Plan to allocate land for a new	Amend Part (1) of the policy to read:	119 128 364	G Sewell Cllr Sewell Paul Sewell

## APPENDIX B – POLICY EC5 (EXISTING EMPLOYMENT AREAS)

MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
contribute to the well-being of new residents, help to integrate the community, and enhance Kegworth. The current centre is too far to walk with young children and for the elderly.	supermarket in the district or indeed in Kegworth specifically (see paragraph 8.8 of the <a href="#">Reg 18 Policies document</a> ).	(1) <b>Subject to compatibility with nearby uses, the</b> Existing Employment Areas, <del>to be defined</del> <b>shown</b> on the Policies Map, are suitable for the uses set out in Table 5.	395 379	Sophie Sewell Fern Sewell
The Kegworth Computer Centre is effectively a brownfield site. It is sandwiched between existing housing and committed housing areas (policy H5). Unless the employment created here were complementary to residential use to enhance and strengthen local facilities (e.g. supermarket or leisure), it would create a physical, visual or environmental barrier and would reduce the chances of the new 141 home development being integrated into Kegworth.	In respect of amenity uses, the planning permission on land to the west for 150 dwellings will provide for formal and informal open recreation space, provided HS2 safeguarding is rescinded (14/00541/OUTM). For the Local Plan to identify this (or any) site for indoor leisure, there would need to be sufficient confidence that such a facility would be deliverable (e.g. an interested developer, public funding available). At present this is not the case and indeed there is a current planning application on the site for a unit for Use Class E (g) (ii)/(iii)/B2/B8 (25/00236/FULM). Overall, identifying the site for such uses would be both unjustified and undeliverable.	Amend Part (3) of the policy to read: “(3) Outside Primary Employment Areas, conversion or redevelopment of premises which are, or were most recently, in employment use (Use Classes E(g), B2 and B8) for non-employment development will be supported where the proposed use is compatible with nearby uses and it is demonstrated that...”	134	Kegworth PC
Kegworth Computer Centre site: consider providing amenity space for the village. The increasing population/ housing stock and the lack of space elsewhere in the village makes retail and social facilities a much-needed priority. The village centre is compact and unable to expand, has already lost a post office facility and such village amenities on the computer centre would serve the village well over the coming years.	Unlike the equivalent adopted Local Plan policy (Policy Ec3), draft Policy Ec5(1) does not include additional considerations such as impact on residential amenity. In some respects this is appropriate		263	J. Sisson

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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	<p>as a purpose of this policy is to positively direct employment development and occupiers to these established industrial areas. However, some of the EEAs are close to residential areas such as the Kegworth Computer Centre. There is a balance to strike between enabling the intensified use of such sites and the ensuring that any resulting impacts are acceptable, especially if there is housing nearby. An addition to Part (1) of the policy to include compatibility with nearby uses as a caveat is suggested. A similar change to Part (3) of the policy is merited as well.</p>			
<b>Other sites</b>				
<p>The employment land at Money Hill does not appear as an existing site or a new site. There does not appear to be a policy to include it in the Plan other than a mention in the housing allocation policy. It appears that the employment land could be provided anywhere across the wider housing site. Its location and any constraints need to be specifically defined in an employment land policy.</p>	<p>This change relating to Money Hill was agreed by Local Plan Committee on <a href="#">11 March 2025</a> (see page 3 of <a href="#">Appendix B</a>).</p>	No (further) change.	92	Ashby Town Council

**APPENDIX B – POLICY EC5 (EXISTING EMPLOYMENT AREAS)**

<b>MAIN ISSUES RAISED</b>	<b>COUNCIL RESPONSE</b>	<b>ACTION</b>	<b>RESPONDENTS ID</b>	<b>RESPONDENTS NAME</b>
Include Bardon Hill Office and Bardon Hill Quarry Processing Area in table 5. The Bardon Complex employs over 400 people and provides a suitable location for long term employment. The Offices have the benefit of permanent planning permission and the Bardon Hill Quarry Processing area is identified in the concept restoration plan for future industrial development.	The buildings are associated with quarrying activity in the wider site. If and when the area becomes an industrial area as part of the site's restoration, that would be the time to consider its designation as an EEA.	No change.	107	Aggregate Industries Ltd

## APPENDIX B – POLICY EC6 (START UP WORKSPACE)

### RESPONSES TO PROPOSED POLICIES

CHAPTER: 7	POLICY NUMBER: Ec6	POLICY NAME: Start-up Workspace		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Support				
Support	Support welcomed.  Although not linked to these representations, the policy would be improved by making reference to relevant use classes.	Amend the policy to read “(2) [Subject to the findings of the plan-wide viability assessment], require an element of start-up space on sites allocated in this Local Plan for general employment (Use.Classes. E(g)?B8.and.B9but. excluding wholly strategic B8 allocations) and larger-scale residential-led/ mixed use development; and...”	92 207	Ashby Town Council; Metacres Ltd
The overall principle of a policy providing start-up workspace is generally supported, subject to viability.			185 186	Clowes Developments Ltd; Wilson Bowden Developments Ltd
The opportunity for small organisations to move to new premises will be useful for business growth.			651	Amanda Hack
Site-related comments				
Land West of Hilltop Farm (Site EMP89) may be more appropriately located to provide such units within the site over the proposed office space provision as currently set out within the allocation policy for this site.	This site’s suitability for a proportion of start-up units is noted and welcomed. Local Plan Committee has subsequently agreed to exclude offices from the allocation policy for employment site EMP89 ( <a href="#">Local Plan Committee 16 December 2024</a> ).	No change	185	Clowes Developments Ltd

## APPENDIX B – POLICY EC6 (START UP WORKSPACE)

MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
The provision of such smaller units could potentially be provided as part of the employment development proposals at Ellistown Terrace Road, Ellistown (Site EMP98).	This site's suitability for a proportion of start-up units is noted and welcomed.	No change	186	Wilson Bowden Developments Ltd
<b>Other comments</b>				
Requiring an element of start-up space in all employment development is not necessarily feasible or implementable. We suggest the wording is amended to incentivise employment land to include start-up space, but not necessarily require an element of it, in the interests of meeting overall employment land needs.	<p>The justification for this policy is the apparent mismatch between the demand for start-up premises and market supply. In such circumstances it can be appropriate for the planning system to intervene.</p> <p>It is unclear how an incentive approach suggested in this representation would work. One approach could be to permit units in locations where development is generally restricted but draft Policy Ec4 largely does this, provided there is sufficient justification. Policy Ec6 as drafted would also trigger an element of start-up space on sites considered under Policy Ec4.</p> <p>Part (2) of the policy excludes sites allocated for wholly strategic B8 use from the requirement to provide start-up units. This is for practical reasons as the locations which are broadly suitable for large</p>	Amend Part (3) of the policy as follows: “(3) [Subject to the findings of the plan-wide viability assessment], expect that major employment. development (Use. Classes.E(g)?B8.and.B4 but.excluding.wholly. strategic.B4proposals). on unallocated sites outside Existing Employment Areas will include an element of start-up space unless this is demonstrably unfeasible in an individual case, including for reasons of site-specific viability.	204	Paul Fovague

## APPENDIX B – POLICY EC6 (START UP WORKSPACE)

MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	<p>scale warehousing will be much less suited for business start-ups. For consistency, this exception should be added to Part (3) of the policy as well.</p> <p>Overall, it is considered that the Local Plan has a role to boost the supply of start-up units where feasible. Subject to the findings of the forthcoming Viability Assessment, Policy Ec6 would be a means to achieve this.</p>			
<p>The policy would benefit from greater detail on the broad location of such uses as in lower tier settlements but also permitted on exception sites in suitable locations on the periphery of sustainable settlements.</p>	<p>Part (2) of the policy requires an element of start-up premises on sites allocated in the plan. In this situation, the location of the site is already known.</p> <p>Part (3) applies to unallocated sites and requires start-up units as part of such schemes (in certain circumstances). In this scenario, the suitability of the location will be tested as part of a planning application through the application of draft Local Plan policies including Policies S2, S4 and Ec4. Adding further detail on location to Policy Ec6, as requested in this representation, is not considered necessary.</p>	No change	207	Metacres Ltd



**APPENDIX B – POLICY EC6 (START UP WORKSPACE)**

<b>MAIN ISSUES RAISED</b>	<b>COUNCIL RESPONSE</b>	<b>ACTION</b>	<b>RESPONDENTS ID</b>	<b>RESPONDENTS NAME</b>
It should be recognised that the delivery of start-up space within larger and strategic employment areas would be unattractive to developers and investors given the higher risk associated with fledgeling enterprises compared to occupiers of established good covenant.	Noted. There is a balance to achieve in aiming to boost the supply of start-up units but not in a way which frustrates the delivery of new employment premises overall. In recognition of the situation this representation describes; a) wholly strategic warehousing sites are excluded from the requirements of Policy Ec6; and b) Part (3) of the policy excludes start-up unit provision where this would be “demonstrably unfeasible in an individual case, including for reasons of site-specific viability”.	No change	341	Leicestershire County Council (Property)

## APPENDIX B – POLICY EC7 (LOCAL EMPLOYMENT OPPORTUNITIES)

### RESPONSES TO PROPOSED POLICIES

<b>CHAPTER: 7</b>	<b>POLICY NUMBER: Ec7</b>	<b>POLICY NAME: Local Employment Opportunities</b>
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Support the draft policy to provide and secure local employment opportunities for local people	Support welcome	No change	204 290	Paul Fovargue SEGRO
50+ jobs generated is a suitable threshold for the requirement so as not to unduly burden or discourage small business.	<p>Support welcomed however the draft policy refers to ‘jobs generated’ but it is not clear how this would relate to a firm which is relocating for example. It is also unclear how the policy would apply to a multi-unit scheme. Revised wording is suggested.</p> <p>In addition, there may be circumstances where it is appropriate to include the Employment and Skills Plan requirement within a legal agreement, especially if one is already being prepared to deal with other matters. The policy and supporting text can be revised to allow for this eventuality. The choice of mechanism may depend on matters such as monitoring arrangements and proportionality.</p>	<p>Amend Policy Ec7 as follows: “(1) An Employment and Skills Plan is required where the whole development or unit(s) within the development will be occupied by a firm or firms with 16+ employees (FTE) for developments which will generate 50+ jobs (FTE) when operational. The Employment and Skills Plan...”</p> <p>Amend Part (2) to read “The requirement for an Employment and Skills Plan will be secured by planning condition <b>or through a legal agreement</b>”.</p>	158 280	Trustees of the Whatton Estate and B&C Jarrom; Richborough Estates

## APPENDIX B – POLICY EC7 (LOCAL EMPLOYMENT OPPORTUNITIES)

MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
		Also insert the following at the end of paragraph 7.49: “There may be circumstances where the requirement for an Employment and Skills Plan is best secured by legal agreement, especially if one is already being prepared to deal with other matters. The choice of mechanism will depend on matters such as monitoring arrangements and proportionality.”		
Whilst local employment initiatives are supported, it is not always possible to achieve them depending on the nature of the use of the employment sites and the skills available locally. This policy approach should therefore provide the flexibility to recognise this where necessary.	The draft policy establishes that an Employment and Skills Plan (ESP) should be prepared and it is considered that this should be the starting expectation. More exceptionally, there may be circumstances where an ESP is unnecessary or inappropriate, e.g if the occupier already has an established training scheme in place, and this would need to be explained and evidenced as part of the planning application process. This scenario should be explained in the supporting text.	Insert a new paragraph after paragraph 7.48 »Exceptionally?there.may.be.situations.where.an.Employment.and.Skills.Plan.is.unnecessary.or.inappropriate.e.g.if.the.occupier.already.has.an.established.training.scheme.in.place?and.this.would.need.to.be.explained.and.justified.as.part.of.the.planning.application.process;	185 186	Clowes Wilson Bowden

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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	In addition, the text could clarify that the policy applies to any employment generating proposal and would include, for example, a leisure facility or a care home.	Amend paragraph 7.49 to read “Setting the trigger point at <del>proposals where at least 50 new jobs will be created.</del> firms with at least 16 employees.(FTE) focuses the requirement on medium and larger businesses. We consider that this is a proportionate and pragmatic approach. The requirement applies to business occupiers in general and would include for example leisure uses? care homes etc.		
A helpful focus could be to help align local education and training opportunities with the needs of an evolving job market. Support direct policies or initiatives aimed at workforce development, including collaboration with local businesses, educational institutions and training providers to tailor education and training programmes that meet the specific needs of the local economy. This policy could be incorporated within the overall strategic employment policy.	Noted. The types of initiatives mentioned seem sensible and may be part of a workstream led by the Council’s Economic Development team for example. The policy wording does not preclude these kinds of initiatives but also enables the content of Employment and Skills Plans to reflect the workforce and employer requirements evident at the time.	No change	341	LCC

## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

### RESPONSES TO PROPOSED POLICIES

CHAPTER: 6		POLICY NUMBER: Ec8	POLICY NAME: EAST MIDLANDS AIRPORT		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME	
Not directly relevant to Ashby other than noise	Noted	No change	92	Ashby de la Zouch Town Council	
Any expansions at East Midlands airport are likely to increase vehicle trips on the surrounding road network, including the Strategic Road Network managed by National Highways. It should therefore be included in policy that new development that gives rise to a material increase in airport capacity or capability will be required to... ‘be supported by a Transport Assessment or Transport Statement which identifies the anticipated traffic and transport impacts’.	The need for of a Transport Assessment or Transport Statement where new development is likely to generate significant amounts of movement is already required in Policy IF5 (Transport Infrastructure and New Development).  It is not necessary for the Local Plan to repeat policy requirements, as all of the policies must be read together.	No change	112	National Highways	
The continuing ambition and expansion of the Airport outlined at para 7.50 and the emergence of the Freeport make the admission in 7.53, that the last Sustainable Development Plan was dated as long ago as 2015, concerning. The next Airport Sustainable Development Plan will certainly have implications for this Local Plan and the wording of 7.53 should be tightened to ensure proper scrutiny and adequate	The Sustainable Development Plan for the Airport has been the subject of recent consultation, including a report to this Committee on 21 May 2025. Paragraph 7.53 of the draft plan will need to be updated to reflect this.	No change	134	Kegworth parish Council	

## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

<p>consideration by the Airport of the objectives, policies and allocations in the Draft Local Plan.</p> <p>The relationship of Policy Ec8 to the Freeport's jurisdiction and to policy IF1 (Development and Infrastructure) and IF5 (Transport Infrastructure and New Development) both need to be clarified.</p> <p>Clause (3)(d) expands upon the unrestricted support for Airport growth in Clause (1):</p> <p>Noise: Kegworth Parish Council applauds the Airport Noise Action Plan process but feels that the cumulative effect of noise from the Airport/aircraft, Donington Park Circuit, the M1, and the EMAGIC railhead is not properly</p>	<p>The Freeport is an economic designation. The designation does not take into account planning considerations. Any aspects of the Freeport, including those within the boundary of the airport, which require planning permission will need to satisfy any planning requirements, including those set out in the Local Plan.</p> <p>Policy IF 1 and policy IF5 apply to any development which requires planning permission.</p> <p>Whilst the policy does not support unrestricted growth, it is considered that the policy could be strengthened through changes to part (1) of the policy. This should include assessing any proposal against an up-to-date Masterplan for the Airport so as to ensure that EMA keeps this up-to-date.</p> <p>The issue of noise as part of any development is addressed under Policy AP2. It is not necessary for the Local Plan to repeat policy requirements, as all of the policies must be read together.</p>	<p>No change</p> <p>No change</p> <p>Amend (1) to state; “The growth of East Midlands Airport <u>for both passengers and cargo</u> will be supported to enable it to fulfil its role as a regional</p>		
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## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

acknowledged here or elsewhere in the Local Plan.		airport, subject to <u>satisfying the policies of this Local Plan and any other material considerations, including an up-to-date Airport Masterplan</u> ”		
Clause (3)(b) fails to define 'local' in relation to Air Quality and is vague in relation to scientific monitoring. Proven links between Air Quality and Health, the reinstatement of Housing sites in Kegworth adjacent to the M1, and the latest focus on Fine Particulate Matter all suggest that the removal of all monitors in the Kegworth area was premature. At least one up to date device should be reinstated.	<p>The reference to air quality could relate to that generated from aircraft movements or from road users. The definition of local would be different depending upon the source and would also depend upon the quantum of development and movements.</p> <p>The Air Quality Management Area (AQMA) at Kegworth was undeclared in 2021 following six years of compliance. However, the Council still monitors air quality in Kegworth through four monitoring locations, three within the former AQMA and one within the airports flightpath away from significant road traffic.</p>	No change		
Clause (3)(d) seems to imply that the reduction of airport-generated road traffic is an effect of improved public transport but fails to say clearly that improved road infrastructure is a	<p>It is acknowledged that there may be a need for improved road infrastructure in the vicinity of EMA. Some of this may be as a result of growth at the airport but is also likely to be due to non-EMA</p>	No change		

## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

prerequisite of growth given the pressures on M1 J24 and the A453.	generated traffic associated with other developments in the locality. Policy IF1 (Development and Infrastructure) and IF5 (Transport Infrastructure and New development), refer to the need for new development to support improvements to the transport network. It is not necessary for the Local Plan to repeat policy requirements, as all of the policies must be read together.			
<p>We welcome the statement on page 93 that, “East Midlands Airport is a vital component of the economy of North West Leicestershire and beyond,” and the value it brings as a hub for air freight purposes.</p> <p>EMA is UPS’s main air and brokerage operations in the UK, recently investing £138m in an expanded facility and employing approximately 600 people. Beyond the local area, the cargo operations at EMA help to connect UK businesses to customers around the globe, which will ultimately help the economy to grow, jobs to be created and new sectors to thrive.</p>	Noted	No change	218	UPS
Natural England advise that both Green Infrastructure and Biodiversity Net Gain (BNG) should be considered at the	Noted.	No change	223	Natural England



## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

earliest stages of the planning process for this development. Wider connections including cross boundary links should be considered with other developments in this northern part of the District.				
<p>Welcome the overall approach to development at the airport which is largely a continuation of the adopted Local Plan. However, the policy should be amended to properly reflect EMA's role as an important UK passenger airport and its role as a nationally important cargo airport. Both these roles are supported by national aviation policy. As drafted, the policy excludes the reference to the Airport's important air cargo operation.</p> <p>The Noise Action Plan has been updated and tightens and strengthens noise controls.</p>	<p>It is considered that part (1) of the policy should include reference to both passenger and cargo traffic. However, any support is not unqualified. Further changes are, therefore, proposed in response to concerns expressed by Kegworth Parish Council</p> <p>As the 2024 Noise Action Plan has now been signed off by the Secretary of State, paragraph 7.56 will require updating.</p>	<p>Amend (1) to state;            "The growth of East Midlands Airport <u>for both passengers and cargo</u> will be supported to enable it to fulfil its role as a regional airport, <u>subject to satisfying the policies of this Local Plan and any other material considerations, including an up-to-date Airport Masterplan</u>"</p> <p>Amend paragraph 7.56 to state:            Aircraft and airport operations at East Midlands Airport result in high levels of noise disturbance, particularly at night when background noise is generally lower. To help manage the impact of noise, a Noise Action Plan <del>(2019-23)</del> (2024-28) sets out a range of initiatives to</p>	230	East Midlands Airport

## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

<p>The Airport has committed to achieving Net Zero carbon for its own operations by 2038 at the latest, as part of the development of the Airport's environment plan.</p> <p>EMA will continue to provide financial support for the development of public transport and sustainable access including the launch of a Sustainable Transport Fund in 2024.</p>	<p>Noted and welcomed.</p> <p>Noted and welcomed.</p>	<p>be undertaken by the Airport. <del>A new Noise Plan (2024-28) is in preparation which seeks to tighten the noise controls and also</del> <u>which</u> widens the restrictions on the type of aircraft that operate at night. <u>The Council will encourage the Airport to undertake further reviews of the Noise Action Plan throughout the plan period</u>"</p>		
<p>It is important that the full potential of each of the designated tax relief areas, including those within East Midlands Airport, are realised. The Freeport support the allocation of Freeport sites within NWLDC for Use Classes B2 and B8 to enable their use by investors in the target sectors and facilitate the</p>	<p>Support is noted. The proposed policy seeks to strike a balance between supporting growth at the Airport and the benefits this brings regionally, whilst also protecting local communities and the wider environment.</p>	<p>No change</p>	<p>231</p>	<p>East Midlands Freeport</p>

## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

<p>Freeport. We also note that the sites within East Midlands Airport boundary are restricted by the use classes listed in draft policy Ec8.</p> <p>Partner organisations are expected to be best-in-class when it comes to sensitive masterplanning and community engagement.</p> <p>We are committed to working with the landowners and the Council as the Local Planning Authority to facilitate the allocation and subsequent granting of permissions on the site.</p>				
<p>We note the inclusion of references to improvements in connectivity between East Midlands Airport and adjacent rail services (paragraph 7.58) and welcome discussions with North West Leicestershire and the airport in respect of this aspiration. We note that improvements in public transport access to the airport are included in EC8 (3)(d), however, we feel that this policy should be expanded to include a reference to the airport and/or developers providing financial support to achieve this, and we would ask that wording to reflect this is included in the</p>	<p>All new developments are subject to the provision of Policy IF1 (Development and Infrastructure) and IF5 (Transport Infrastructure and New development), which refer to the need for new development to support improvements to the transport network. It is not necessary for the Local Plan to repeat policy requirements, as all of the policies must be read together.</p>	<p>No change</p>	<p>244</p>	<p>Network Rail</p>

## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

policy so that it is captured in the local plan.				
<p>It is suggested that the policy would benefit from explicit reference to the provision of onsite ‘clean’ fuel infrastructure such as EV charging to encourage the uptake of such vehicles, given that a significant proportion of people are likely to continue to arrive at the airport by car.</p> <p>In addition, it is surprising that there is no reference to the Freeport proposals in the draft Policy, noting that they are directly and indirectly associated with the airport site and its operations.</p>	<p>It is considered that 2(g) should be amended to also refer to EV charging facilities.</p> <p>Freeport proposals are subject to a separate policy regime, outside the remit of the Local Plan.</p>	<p>Amend 2(g) to state:  “Improvements to public transport and airport customer car parking, <u>including the provision of EV charging facilities</u>”</p>	341	Leicestershire County Council
<p>It is encouraging that the new plan explicitly recognises climate change (and not just noise and air quality) relating to the airport (paragraph 7.55), and that it now includes the requirement for new development that increases capacity / capability to “Maximise opportunities to achieve net zero carbon in respect of proposed buildings and non-aircraft operations” (Draft Policy Ec8 3c – East Midlands Airport). It is also welcomed that the plan maintains the requirement to improve public transport access (Draft Policy Ec8 3d – East Midlands Airport).</p>	<p>Noted. It is considered that 3 (c) could be strengthened further</p>	<p>That 3 (c) be amended to state:  Maximise opportunities to achieve net zero carbon in respect of proposed buildings and non – aircraft operations, <u>including the incorporation of climate change resilience measures; and the provision of green infrastructure measures, subject to not conflicting with the safe operation of the airport or aircraft</u></p>	353	Derbyshire County Council
<p>Paragraph 7.54 You only have to look at what has happened at other Freeport</p>	<p>Freeport status is designated by the Government and is an</p>	<p>No change</p>	427	Chris Duggan

## APPENDIX B – POLICY EC8 (EAST MIDLANDS AIRPORT)

<p>sites to know this has completed destroyed the surrounding areas. Homes have been destroyed. It is ruining the mental health of people.</p> <p>Paragraph 7.56 The noise is already loud. 37 years I've lived in Diseworth and every year it gets worse. We constantly complain to the airport and they do not fix the problem. If they were to build further it will only make the problem worse and unsustainable for people and animals. This must stop.</p>	<p>economic designation designed to encourage economic growth through relaxed tax and custom rules. However, any future development is subject to normal planning considerations to ensure that the impact upon local communities and the wider environment are protected. Policy Ec8, together with other policies in the plan, seeks to do this whilst balancing against the economic benefits.</p> <p>The proposed policy recognises that the impact of noise arising from activity at the Airport upon local communities is an important consideration when assessing proposals for development.</p>			
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## APPENDIX B – POLICY EC9 (EAST MIDLANDS AIRPORT: SAFEGUARDING)

### RESPONSES TO PROPOSED POLICIES

CHAPTER:	POLICY NUMBER: Ec9	POLICY NAME: EAST MIDLANDS AIRPORT: SAFEGUARDING		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
The ICB are supportive of this to eliminate risks and minimise accidents requiring emergency response.	Noted	No change	45	Leicester, Leicestershire and Rutland Integrated Care Board
Not directly relevant to Ashby other than noise	Noted	No change	92	Ashby de la Zouch Town Council
Kegworth Parish Council supports this policy, not least because memories remain of the Kegworth Air Disaster. We wish to see land South of the Development Boundary remain as valuable agricultural land. We believe that the Melbourne Parklands designation fits the intention of this policy. In particular we support clause (2)(g) and suggest that large scale solar arrays can be best concentrated on the EMAGIC or other Freeport sites.	Noted  The policy seeks to ensure that the placement of large-scale solar arrays does not result in issues of glare which could distract pilots.	No change	134	Kegworth Parish Council
Clowes generally supports the policy; however, it is considered that the policy needs further clarification in respect of criterion (2)(b). The criterion outlines that “All buildings, structures, erections and works that exceed the height specified on the safeguarding	The safeguarding map can be viewed from this <a href="#">link</a> . The height of buildings which require consultation with East Midlands Airport range from 10 metres to 90 metres depending upon the location of the proposed building.	No change	185	Pegasus Planning o/b/o Clowes Developments Limited

## APPENDIX B – POLICY EC9 (EAST MIDLANDS AIRPORT: SAFEGUARDING)

map;" No such height is specified on the safeguarding area on the policy map or separately on a safeguarding map. It is considered that this needs to be included within the local plan to ensure that the policy is transparent and effective.	The Regulation 19 version of the local plan will include a link to safeguarding map for ease of reference. In addition, the paper copy will include a printed version of the map.			
<p>The overall approach in this policy is welcomed and supported. It retains the approach that was set out in the previous Local Plan. A clarification should be added to (1) 'Development which would adversely affect the operational integrity or safety of East Midlands Airport or aircraft operating at the airport and in the vicinity will not be permitted'.</p> <p>The policy should also refer to the potential for glint and glare from solar-PV arrays that can be a distraction and a hazard to pilots and air traffic control operations.</p>	<p>It is considered that it would be appropriate to amend part (1) of the policy as suggested.</p> <p>The issue of glint and glare is addressed at part (g) of the policy.</p>	Amend part (1) of policy to state: "Development which would adversely affect the operational integrity or safety of East Midlands Airport <u>or aircraft operating at the airport and in the vicinity</u> will not be permitted'	230	East Midlands Airport
No particular comments from a strategic transport perspective. (As an observation, point (e)(i) could result in conflicts with wider aspirations/requirements for development in this area (in particular the proposed strategic sites at Isley Woodhouse and Castle Donington) - e.g. in terms of seeking to create "beautiful" developments in accordance with the NPPF and/or measures to achieve biodiversity net-gain.	<p>The requirements of this policy reflect that in Circular 1/2003. This specifically notes that whether or not a development is likely to attract birds will depend on a number of factors.</p> <p>It is recognised that there will often be conflicts between different policies.</p>	No change	341	Leicestershire County Council

## APPENDIX B – POLICY EC10 (EAST MIDLANDS AIRPORT: PUBLIC SAFETY ZONES)

### RESPONSES TO PROPOSED POLICIES

CHAPTER: 6		POLICY NUMBER: Ec10	POLICY NAME: EAST MIDLANDS AIRPORT: PUBLIC SAFETY ZONES		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME	
The ICB are supportive of this to control the number of people on the ground at risk in the unlikely event of an aircraft accident on take-off or landing.	Noted	No change	45	Leicester, Leicestershire and Rutland Integrated Care Board	
Not directly relevant to Ashby other than noise	Noted	No change	92	Ashby de la Zouch Town Council	
It makes no sense to reduce the size of the safety zone, presumably proposed so new developments will not have that as a consideration. The Airport continues to increase in activity, which will speed up with the proposed freeport.	The responsibility for identifying the safeguarded area lies with the Manchester Airport Group which owns East Midlands Airport.	No change	119	Geoff Sewell	
I oppose the reduction in size to this zone. I remember clearly the horrific air disaster in 1989, and the reduction of this zone will not give confidence to villagers who live in close proximity to the arrival/departure zone. Safeguarding of building directly beneath the current splay of the zone would be crucial to maintain and keep confidence high. Air traffic movements are increasing all the time at the Airport and it will become far busier when the Freeport us up and running, as will the M1, which also	The responsibility for identifying the safeguarded area lies with the Manchester Airport Group which owns East Midlands Airport.	No change	128	Carol Sewell	



## APPENDIX B – POLICY EC10 (EAST MIDLANDS AIRPORT: PUBLIC SAFETY ZONES)

needs protection from possible accidents involving aircraft				
The reduction in the area and size of the PSZs described at 7.64 is unwelcome in a community where memories remain of the Kegworth Air Disaster. The proximity of the M1 was a high-risk factor in 1989 and remains so. As well as requesting a review of the 1 in 100000 risk contour East of the M1, we request that no unnecessary increases of activity are permitted. We regard that the use of words and phrases like 'low density' 'very few' and 'reasonable expectation of low intensity use' are subjective and unhelpful when it comes to deciding planning applications.	The policy and the dimensions of Public Safety Zones at major airports in the UK is set out by the Department for Transport (DfT) in its document – Control of development in airport public safety zones. The responsibility for identifying the Public Safety Zone lies with the Manchester Airport Group which owns East Midlands Airport. The wording and phrasing reflects that in Government guidance.	No change	134	Kegworth Parish Council
This policy is supported, as it retains an established approach from the existing Local Plan, but it updates it to include more recent guidance from the Department for Transport in respect of Public Safety Zones and the change in the Public Safety Zone area. Given the extent of the new Public Safety Zones there is an opportunity to reduce the amount of wording in the policy as many of the uses that can be acceptable in Public Safety Zones could not take place due to the location of the airfield and the proximity of the runway.	Whilst the PSZ are smaller than previously, it remains appropriate to be clear as to what uses will not be allowed within them.	No change	230	East Midlands Airport
No comments	Noted	No change	341	Leicestershire County Council

## APPENDIX B – POLICY EC10 (EAST MIDLANDS AIRPORT: PUBLIC SAFETY ZONES)

Is it safe and wise to build a large scale development so near to a very busy airport? The safety zones are very small and are unlikely to protect the people living within/under the flight path, should an accident occur.	The policy and the dimensions of Public Safety Zones at major airports in the UK is set out by the Department for Transport (DfT) in its document – Control of development in airport public safety zones. The responsibility for identifying the Public Safety Zone lies with the Manchester Airport Group which owns East Midlands Airport.	No change	350	Teresa Walker
I am not in favour of the reduction of this safety zone. I support the maintaining of the current safety zone, when air traffic in and out of the Airport is increasing, particularly with the Freeport coming to the area.	The policy and the dimensions of Public Safety Zones at major airports in the UK is set out by the Department for Transport (DfT) in its document – Control of development in airport public safety zones. The responsibility for identifying the Public Safety Zone lies with the Manchester Airport Group which owns East Midlands Airport.	No change	379	Fern Sewell
I am not in favour of the reduction of this safety zone. I was in Kegworth at the time of the Air Disaster in 1989 and would support the maintaining of the current safety zone, when air traffic in and out of the Airport is increasing.	The policy and the dimensions of Public Safety Zones at major airports in the UK is set out by the Department for Transport (DfT) in its document – Control of development in airport public safety zones. The responsibility for identifying the Public Safety Zone lies with the Manchester Airport Group which owns East Midlands Airport.	No change	382	Kirstyn Sewell

## **APPENDIX B – POLICY EC10 (EAST MIDLANDS AIRPORT: PUBLIC SAFETY ZONES)**

## RESPONSES TO PROPOSED POLICIES

CHAPTER: 7		POLICY NUMBER: Ec11	POLICY NAME: Donington Park Circuit		
MAIN ISSUES RAISED		COUNCIL RESPONSE	ACTION	RESPONDENT ID	RESPONDENT NAME
<b>(1) The development of Donington Park Circuit as a national and international racing circuit will be supported.</b>					
MSV acknowledges the support provided to development of Donington Park Circuit in draft Policy Ec11 however this is limited to that part of the site within the boundaries of the circuit as defined on the Policies Map.	Noted	Support is noted, see part (2) below on the subject of the Policies Map.	181	Adams Hendry Consulting (MSV Group)	
<b>(2) Within the boundaries of Donington Park Circuit, as defined on the Policies Map, development will be limited to: (a) Facilities and infrastructure meeting the operational needs of the racetrack including motorsport and spectator facilities; (b) Facilities and infrastructure for driver training and driving experiences; (c) Motorsport and automotive uses which have a clear relationship with the existing uses at the circuit and is of a scale appropriate to that relationship. This shall include developments associated with the design, racing, testing and maintenance of motorsport vehicles; (d) Landscape works; and (e) Internal highways and infrastructure.</b>					
[The boundary of the Policies Map is drawn too tightly to enable any development in accordance with part (2)(c) of the policy “ <i>with currently developable space being substantially required for the operation of events held at the circuit</i> ” More substantial developable space is required to for the operation of events. MSV requests that the Policies Map boundary is amended as shown on Figure 1 attached.]	NPPF para 85 states that “ <i>planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</i> ”  However, only limited information has been provided on why the boundary should be extended and there is no information on why those	No change – <b>more detailed justification required.</b>	181	Adams Hendry Consulting (MSV Group)	

## APPENDIX B – POLICY EC11 (DONINGTON RACE CIRCUIT)

	particular area are deemed necessary for expansion. If adequate justification were to be provided, an assessment of the proposals would need to be undertaken by officers, the changes would need to undergo public consultation and it would need to be assessed in the Sustainability Appraisal.			
<b>(3) All development at Donington Park Circuit, particularly that which gives rise to a material increase in the use of the racetrack or the number of visitors, will be required to: (a) Incorporate measures to mitigate its noise impact on local residents and the wider area; (b) Provide improvements in public transport accessibility, where viable, and/or other appropriate transport measures that will reduce the impact of event and operational traffic on the local and strategic network; (c) Retain existing mature trees and woodland and provide a landscaping scheme that mitigates its effects on the local landscape; and (d) Conserve or enhance the site's racing and parkland heritage and heritage assets.</b>				
<p>[It is not clear why part (3) relates to <b>all</b> development. The policy allows for some types of development that for example would not result in noise impact or a need for public transport measures. It is unreasonable for a policy to go beyond what would legally be required as a planning obligation. The introduction to the policy should be rewritten as follows:</p> <p><i><del>"All Development at Donington Park Circuit particularly that</del> which gives rise to a material increase in the use of the racetrack or number of visitors will be required to:..."</i>]</p>	<p>The point about 'all' development is accepted. However, we do not agree with the proposed deletion of 'particularly that' – this allows for the possibility that development may not have a material increase in traffic but may still be required to mitigate its impact (for example noise).</p>	<p><b>Amend the introductory sentence of part (3):</b></p> <p><b><u>"<del>All</del> <del>D</del> Where necessary, development at Donington Park Circuit, particularly that which gives rise to..."</u></b></p>	181	Adams Hendry Consulting (MSV Group)

<b>(3)(a) Incorporate measures to mitigate its noise impact on local residents and the wider area</b>				
<p>[The proposed wording of part (a) is unclear and suggests an existing noise impact or assuming a theoretical noise impact from development. MSV does not object to the principal of the requirement for those developments which give rise to a material increase in the use of the racetrack or number of visitors, but suggest the policy would be better expressed as follows:</p> <p><i>(a) Incorporate measures to <b><u>ensure any additional</u></b> <del>reduce its noise impact</del> <b><u>arising from the proposed development</u></b> on local residents and the wider area <b><u>is minimised</u></b>;</i></p>	<p>The addition of ‘where necessary’ to the introductory sentence adds some flexibility and ‘its’ could be replaced with ‘any’ to make clear not all development would have a noise impact.</p> <p>Noise needs to be considered when development may create additional noise or would be sensitive to the prevailing acoustic environment (PPG). The NPPF states that planning policies should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution (para 187e) as well as mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development –and avoid noise giving rise to significant adverse impacts on health and the quality of life (para 198). The policy could be updated to better reflect the NPPF.</p>	<p><b>Rewrite part (3)(a) as follows:</b></p> <p><b><u>Incorporate measures to mitigate its and reduce to a minimum any noise impact which would adversely and unacceptably affect on local residents and the wider area.”</u></b></p> <p><b>At Regulation 19 stage, make clear in the supporting text which provides further clarification on the Council’s expectations with regards to noise assessment and impact.</b></p>	181	Adams Hendry Consulting (MSV Group)

## APPENDIX B – POLICY EC11 (DONINGTON RACE CIRCUIT)

<b>(b) Provide improvements in public transport accessibility, where viable, and/or other appropriate transport measures that will reduce the impact of event and operational traffic on the local and strategic network</b>				
<p>[Part 3b should be rewritten as follows:</p> <p><i>(b) Provide improvements in public transport accessibility <b><u>to the circuit</u></b> where viable, and/or other appropriate transport measures that will reduce the impact of event and operational traffic on the local and strategic network]</i></p>	<p>We agree that including reference to the circuit makes the policy clearer and .</p>	<p><b>Rewrite part (3)(b) as follows:</b></p> <p><i>(b) Provide improvements in public transport accessibility <b><u>to and from the circuit</u></b> where viable, and/or other appropriate <b><u>sustainable</u></b> transport measures that will reduce the impact of event and operational traffic on the local and strategic network;</i></p> <p><b>At Reg 19 stage, add more detail on what is meant by ‘appropriate sustainable transport’ measures to the supporting text.</b></p>	<p>181</p>	<p>Adams Hendry Consulting (MSV Group)</p>
<p>[The policy would benefit from explicit reference to the provision of onsite ‘clean’ fuel infrastructure such as EV charging to encourage the uptake of such vehicles, given that a significant proportion of people are likely to continue to arrive at the circuit by car:</p> <p>“3 (b) Provide improvements in public transport accessibility, where viable, and/or other appropriate transport measures <b><u>including improvements to zero-carbon infrastructure such as EV charge points</u></b> that will reduce the impact of event and operational traffic on the local and strategic network; <b><u>and on the climate</u></b>”]</p>	<p>More detail on other transport measures could be added to the supporting text and officers think it should be made clearer that the transport measures should be sustainable.</p>		<p>341</p>	<p>Leicestershire County Council</p>

## APPENDIX B – POLICY EC11 (DONINGTON RACE CIRCUIT)

<b>(c) Retain existing mature trees and woodland and provide a landscaping scheme that mitigates its effects on the local landscape</b>				
The requirement to retain existing mature trees and woodland should be caveated with the words 'where appropriate'. The merits of the proposed development should be considered against any harm to existing trees, woodland and landscaping and a judgement reached. The blanket requirement on tree removal limits opportunities for potential landscape enhancement through the replacement of diseased trees or low quality specimens.	The addition of 'where necessary' adds flexibility. The supporting text could make clearer that the a balanced view would be taken with regards to diseased or unsafe trees.	<b>Add to the supporting text at Regulation 19 stage.</b>		
<b>(d) Conserve or enhance the site's racing and parkland heritage and heritage assets</b>				
[it is not clear why this blanket requirement has been included for developments that will have very little impact on these assets. It is noted that there is not an equivalent requirement in draft Policy CD10 (land north and south of Park Lane, Castle Donington) despite the heritage report identifying that the proposed development would result in moderate harm to Donington Hall and associated parkland and structures]	<p>'Where necessary' has been added to add flexibility.</p> <p>The reference to parkland and racing heritage was included at the request of the Council's Conservation Officer.</p> <p>The Policy for CD10 seeks to enhance heritage assets in the vicinity and is based on a heritage assessment, whereas future proposals at the Circuit are unknown.</p>	<b>Add to the supporting text at Regulation 19 stage.</b>		



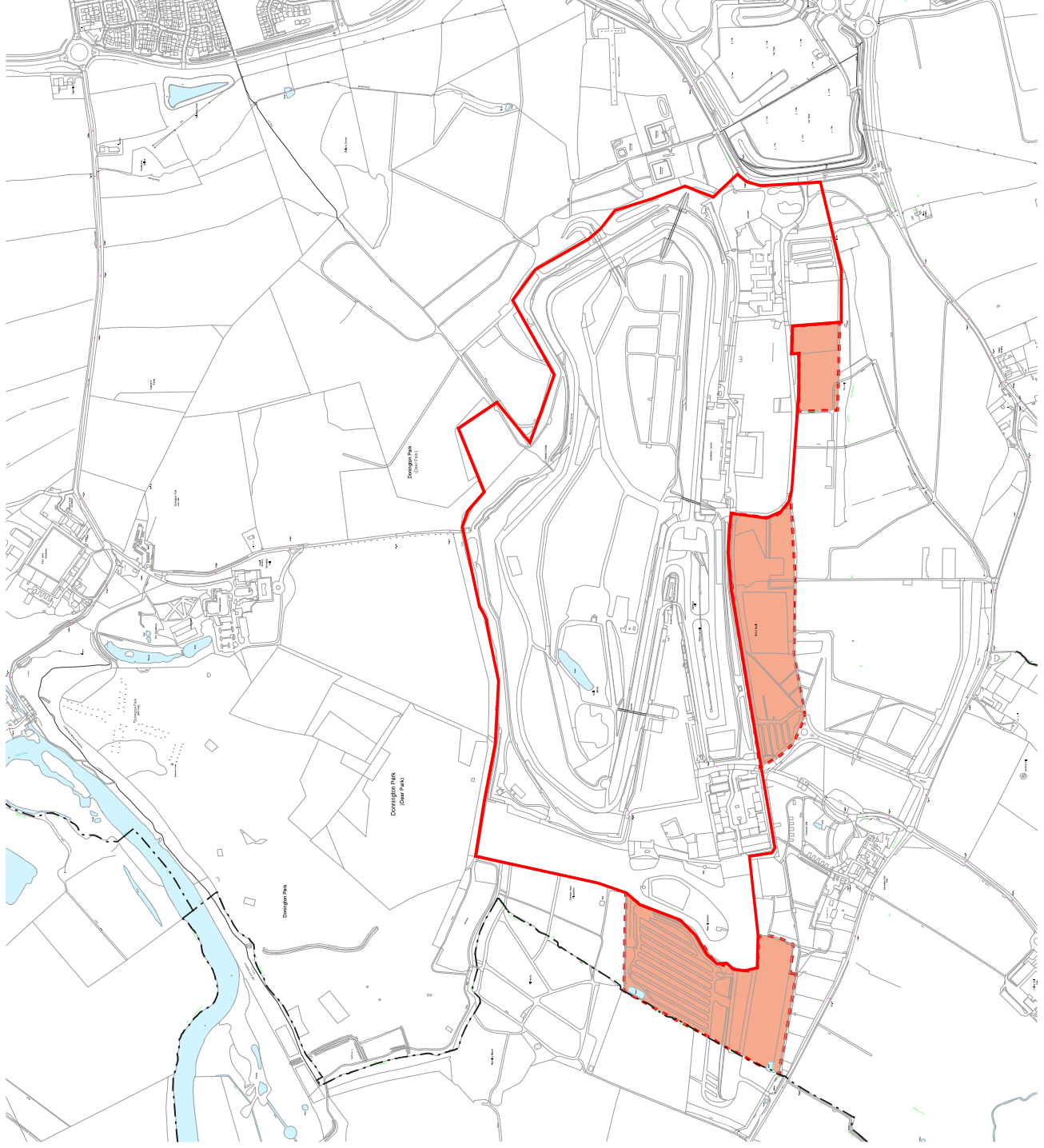
## APPENDIX B – POLICY EC11 (DONINGTON RACE CIRCUIT)

<b>General comments</b>				
Not directly relevant to Ashby	None	No action required	92	Ashby de la Zouch Town Council
[Comments made in relation to East Midlands Airport are also applicable to this policy. The comment made in relation to EMA was that any expansions to the airport was me likely to increase trips on the surrounding road network, include the Strategic Road Network managed by National Highways. The policy should state that any new development that gives rise to a material increase in airport capacity or capability will be required to... <i>'be supported by a Transport Assessment or Transport Statement which identifies the anticipated traffic and transport impacts'</i> .	<p>The need for a Transport Assessment or Transport Statement where new development is likely to generate significant amounts of movement is a requirement of Policy IF5 (Transport Infrastructure and New Development).</p> <p>It is not necessary for the Local Plan to repeat policy requirements (NPPF paragraph 16f), as all of the policies must be read together.</p>	No change	112	National Highways
Any additional development proposals on this site should consider if it is likely to have an adverse effect on the Donington Park SSSI. Mitigation strategies provided to reduce adverse impacts on SSSIs should offer positive opportunities for nature and should be set out in sufficient detail to ensure their long-term protection and enhancement.	In order to prevent repetition in policies (NPPF para 16f) This comment will be considered when officers review Policy En1 – Nature Conservation/Biodiversity Net Gain.	No change to Policy Ec11	223	Natural England



KEY

- - - District boundary
- Donington Park - Policy Ec7
- Proposed extension - Policy Ec11



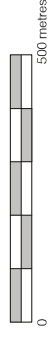
Source:  
North West Leicestershire Local Plan  
Adopted November 2017

Figure 1 :  
**DONINGTON PARK**

Drawn by: NM

Date: 120324\_B

Scale 1: 10 000 @ A3



## APPENDIX B – POLICY EC12 (TOURISM AND VISITOR ACCOMMODATION)

### RESPONSES TO PROPOSED POLICIES

CHAPTER: 7	POLICY NUMBER: Ec12	POLICY NAME: TOURISM AND VISITOR ACCOMMODATION (STRATEGIC POLICY)		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENT ID	RESPONDENT NAME
The reference to the historic environment and associated local distinctiveness in Policy criteria 1c is supported. Tourism can take many forms, and heritage plays an important role.	Noted.	No change.	357	Historic England
NPPF para 88c) advises that policy should seek to enable sustainable tourism and leisure developments in the countryside. As North West Leicestershire remains a largely rural area the approach in this policy is therefore broadly aligned with the NPPF and, additionally, gives protection to existing tourism assets. Although further thought may need to be given to the period of non-viability in finalising the proposal.	Noted. As set out in the supporting text the loss of existing tourist attractions and facilities will be strongly resisted. The 24-month evidence of demand for the attraction provides enough time (and changes of season) to fully demonstrate demand and that its retention has been fully explored.	Propose that the policy wording of part (3)(b) is amended to make the policy requirements clearer. Amendments proposed to part (3)(b): Evidence there is no commercial demand for the attraction, and it has been <b>robustly</b> actively marketed at current market value for at <b>continuous period of at least 6 consecutive months. If the Council requires independent verification of the evidence submitted, this will be at the expense of the applicant.</b> Any related amendments to the supporting text will also be made at Regulation 19 stage	341	Leicestershire County Council

## APPENDIX B – POLICY EC12 (TOURISM AND VISITOR ACCOMMODATION)

<p>The value of tourism is important to the NWL economy and opportunities to develop is important. However, it's welcomed that the Local Plan looks to restrict the loss of facilities.</p>	<p>Noted. The loss of existing tourist attractions and facilities will be strongly resisted.</p>	<p>Proposed that the title of the policy is amended to: Draft Policy Ec12 - <del>Tourism</del> <b>Tourist Attractions</b> and Visitor Accommodation to better reflect the subject of the policy.</p>	<p>651</p>	<p>Amanda Hack</p>
<p>The requirement for 24 months of marketing in part (6) of the policy is too long and fails to provide adaptability and flexibility for business to respond to changing economic and social issues. A period of 12 months would be more appropriate.</p>	<p>Noted. As set out in the supporting text, we will resist the loss of visitor accommodation to other uses. As such the requirements for 24 months of marketing is considered a suitable period to establish the accommodation business and by covering two calendar years will cover several quiet and busy holiday periods.</p>	<p>Propose that the policy wording of parts (6)(a) and (6)(b) are amended to make the policy requirements clearer and consistent with part (3)(b) of the policy. Amend part (6)(a): The visitor accommodation in question has been <b>robustly</b> <del>appropriately</del> marketed to potential visitors over a <b>continuous</b> period of at least 24 months. Amend part (6)(b): The booking records over a period of at least 24 months shows there is a lack of demand for the visitor accommodation. <b>If the Council requires independent verification of the evidence submitted, this will be at the expense of the applicant.</b> Any related amendments to the supporting text will also be made.</p>	<p>8</p>	<p>JJM Planning</p>

## APPENDIX B – POLICY EC12 (TOURISM AND VISITOR ACCOMMODATION)

SUGGESTED POLICY ADDITIONS				
<p>The Policy does not currently refer to the National Forest or the Sustainable Tourism Accommodation Design Guide. The NFC requests that there is a criterion referring to tourism attractions and facilities in the wider National Forest and within the Heart of the Forest, and reference to the Sustainable Tourism Accommodation Guide in the visitor accommodation section.</p> <p>Suggested additional criterion in the tourism and attractions section of Policy Ec12:  <u>Within the National Forest, appropriately located and designed sustainable tourism attractions and facilities should have regard to the National Forest Transformative Tourism Plan, and within the Heart of the National Forest tourist attractions and facilities should support the delivery of the Heart of the National Forest Vision as set out in policy En3</u></p>	<p>The draft National Forest Policy (En3) supports tourism and visitor accommodation development in the National Forest which accords with Policy Ec12 and reflects the National Forest Company's Sustainable Tourism Accommodation Design Guide. Developments for tourism or visitor accommodation in the National Forest would need to comply with policies Ec12 and En3 as such there is no need to repeat policy wording in line with advice in Para. 16 (f) of the NPPF which states that "<i>Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area...</i>"</p>	<p>No change.</p>	<p>146</p>	<p>National Forest Company</p>
<p>Suggested additional criterion in the Visitor Accommodation section of Policy Ec12:  <u>New and retrofitted visitor accommodation in the National Forest will be supported where</u></p>	<p>Noted and consider that this wording would be better placed within the supporting text to the National Forest Policy (En3).</p>	<p>Add additional wording to the supporting text of Policy En3 to reference new and retrofitted visitor accommodation.</p>	<p>146</p>	<p>National Forest Company</p>

## APPENDIX B – POLICY EC12 (TOURISM AND VISITOR ACCOMMODATION)

<u>distinctive National Forest character and sense of place is demonstrated by aligning to the design principles in the National Forest Company's Sustainable Tourism Accommodation Guide.</u>				
<b>COMMENTS ON SUPPORTING PARAGRAPHS</b>				
Request omitting reference to the National Forest Tourism Growth Plan 2017-2027 as an updated tourism plan is being prepared. The document has the working title of 'Transformative Tourism Plan 2024-2029' and accordingly we request the following amendment to paragraph 7.80. 7.80 We will work with the National Forest Company and other tourist organisations to maximise the opportunities for tourism and visitor attractions in the district. <del>The National Forest Company have published the National Forest Tourism Growth Plan 2017-2027 which outlines strategies to further strengthen and grow sustainable tourism in the area.</del> <u>The National Forest Company's Transformative Tourism Plan 2024-2029 outlines approaches to support the development of sustainable tourism across the National Forest.</u>	Noted and agree that the supporting text should be amended to reflect up to date information.	Amend the supporting text to reflect the most up to date information from the National Forest Company at the time of drafting the Regulation 19 version of the Local Plan.	146	National Forest Company

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<p>Request omitting ‘.... <i>especially where they are associated with the National Forest</i>’ from the first sentence and including more about the National Forest and visitor accommodation in the next criterion as we hope that the Policy is more supportive of (appropriate) tourism accommodation in the National Forest than elsewhere in the District.</p> <p>7.86 Some types of visitor accommodation (including lodges, glamping, camping, caravans) are more suited to a countryside location, <del>especially where they are associated with the National Forest...</del></p>	<p>Noted, however it is proposed that additional supporting text be added to The National Forest Policy (En3). Developments for tourism or visitor accommodation in the National Forest would need to comply with policies Ec12 and En3 as such there is no need to repeat policy wording in line with advice in Para. 16 (f) of the NPPF which states that “<i>Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area...</i>”</p>	<p>Additional wording is proposed to be added to the supporting text to Policy En3 and a cross reference in the supporting text (of Ec12) to En3 will be added.</p>	146	National Forest Company
<p>Include reference to retrofitted/existing accommodation as the Sustainable Tourism Accommodation Guide is a guide for new and retrofitted tourism accommodation, and include wording from paragraph 10.54 <i>[Can/should this criterion also refer to criterion 10.54 which provides an insight into the Sustainable Tourism Accommodation Guide?]</i></p> <p>7.87 <u><i>Within the National Forest, new and retrofitted visitor accommodation (which can range</i></u></p>			146	National Forest Company

## APPENDIX B – POLICY EC12 (TOURISM AND VISITOR ACCOMMODATION)

<u>from glamping sites and cabins through to guest houses, pubs and hotels) will be supported where it is appropriately related to the National Forest and demonstrates distinctive National Forest character and sense of place by aligning to the design principles in the National Forest Company's Sustainable Tourism Accommodation Guide.</u>				
Suggested additional paragraph in the supporting text referring to the Heart of the Forest: <u>Within the Heart of the National Forest tourist attractions and facilities should support the delivery of the Heart of the National Forest Vision as set out in policy En3</u>			146	National Forest Company
<b>GENERAL COMMENTS</b>				
Support	Noted.	No change	92	Ashby de la Zouch Town Council
Development outside the limits of development will not be supported. More consultation is needed as there are just too many exceptions to the rules. For example, "Holiday Lodges" now permanently occupied as residential properties. "Weekend Party Houses" creating noise nuisance for existing residents. "Glamping" sites close to existing	Noted. The NPPF (para. 88) requires planning policies to enable " <i>sustainable rural tourism and leisure developments which respect the character of the countryside</i> ". The Local Plan draft Countryside Policy (S4) supports " <i>(l) Tourism attractions and facilities and visitor accommodation in accordance with Policy Ec12</i> ".	No change.	175	Oakthorpe, Donisthorpe & Acresford Parush Council



## APPENDIX B – POLICY EC12 (TOURISM AND VISITOR ACCOMMODATION)

residential properties creating noise and other nuisances. ODAPC doesn't want such developments.	Part (6) of Policy Ec12 sets out the criteria that would need to be met when considering the conversion of or redevelopment of visitor accommodation to permanent residential accommodation. Part (7) of the policy ensures that Planning conditions or Section 106 legal agreements will be applied to new visitor accommodation to ensure it is limited to holiday use and is not used as permanent residential accommodation.			
The Limits of Development are currently not strictly adhered to, creating situations where - for example within AWTC's parish – a retirement property could be bought in good faith, only to have change-of-use holiday lets directly adjacent go it, thereby both spoiling the quality of life of the unsuspecting buyer as well as precluding a viable sale.		No change.	180	Ashby Woulds Town Council