

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

LOCAL PLAN COMMITTEE – WEDNESDAY, 30 JULY 2025



Title of Report	LOCAL PLAN – ADDITIONAL PROPOSED EMPLOYMENT ALLOCATIONS: CONSIDERATION OF RESPONSES TO CONSULTATION	
Presented by	Sarah Lee Principal Planning Policy Officer	
Background Papers	National Planning Policy Framework (December 2024) Draft Local Plan Site Assessments Need for Employment Land Update Note (July 2024) Local Plan Committee Report 16 December 2024 Additional Proposed Housing and Employment Allocations (March 2025) Heritage Assessment of Land between Ellistown Terrace Road and Wood Road Ellistown (EMP98) [to follow]	Public Report: Yes
Financial Implications	Nothing specific arising from the report recommendations. The cost of the preparation of the Local Plan is met from existing budgets.	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	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.	
	Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	No staffing implications associated with the specific content of this report. Links with the Council's Priorities are set out at the end of the report	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	The report summarises and responds to the issues raised in	

	the consultation responses to the two employment sites in the Additional Proposed Allocations Regulation 18 consultation (March 2025). The report also provides updates on the employment land supply position, the recent Call for Employment Sites and strategic warehousing matters.
Recommendations	<p>THAT LOCAL PLAN COMMITTEE:</p> <p>(1) AGREES NOT TO INCLUDE LAND EAST OF MIDLAND ROAD ELLISTOWN (EMP24 ORIGINAL AREA AND EMP24 REDUCED AREA) AS AN ALLOCATION IN THE REGULATION 19 VERSION OF THE LOCAL PLAN.</p> <p>(2) SUBJECT TO THE OUTCOME OF FURTHER WORK INCLUDING TRANSPORT MODELLING, VIABILITY ASSESSMENT AND INFRASTRUCTURE REQUIREMENTS, AGREES THAT LAND BETWEEN ELLISTOWN TERRACE ROAD AND WOOD ROAD, ELLISTOWN (EMP98) IN APPENDIX D BE PROPOSED TO BE ALLOCATED IN THE REGULATION 19 VERSION OF THE LOCAL PLAN.</p> <p>(3) AGREES THE POLICIES MAP EXTRACT FOR MONEY HILL IN APPENDIX E FOR INCLUSION IN THE REGULATION 19 VERSION OF THE LOCAL PLAN.</p>

1.0 BACKGROUND

1.1 The report's structure and subject matter are outlined below.

- Section 2 updates the general employment land supply position to 1 April 2025.
- Section 3 considers the representations to the two additional/amended employment sites included in the [2025 Additional Sites consultation](#) (Regulation 18). Recommendations (1) and (2) relate to this section.
- Section 4 provides initial information about the potential employment and lorry parking sites submitted during the latest Call for Sites.
- Section 5 deals with the Member request for the new Local Plan Policies Map to show the location of the employment land at Money Hill, Ashby. Recommendation (3) relates to this section.
- Section 6 is a brief update on Strategic B8 matters.

1.2 The content of the appendices is as follows:

- Appendix A – EMP24 Land east of Midland Road, Ellistown (reduced area): representations and responses
- Appendix B – EMP98 Land between Ellistown Terrace Road and Wood Road, Ellistown: representations and responses
- Appendix C – Other matters: representations and responses
- Appendix D – EMP98 revised policy wording
- Appendix E – Map of Money Hill employment allocation

1.3 By way of a recap, here is a summary of previous Committee decisions which are relevant to matters in this report.

- Local Plan Committee on [17 January 2024](#) agreed the draft housing and employment allocations for consultation purposes. The Regulation 18 stage consultation ran between 5 February and 17 March 2024.
- A report to the [22 May 2024](#) Local Plan Committee provided an overview of the number and type of responses received to the consultation.
- Local Plan Committee on [13 November 2024](#) resolved to start the plan period at 2024 and extend it by two years to 2042 with a consequent increase in the overall requirement for general needs employment land.
- A report to the [16 December 2024](#) Local Plan Committee considered the representations to the proposed employment site allocations in the 2024 Regulation 18 consultation. The Committee agreed a) general needs employment sites to go forward to the Regulation 19 version of the plan; b) strategic warehousing sites for transport modelling purposes; and c) an approach for dealing with the Freeport site in the Local Plan.

- 1.4 Note: 'General needs' employment land is land for offices, industry and smaller scale warehousing (units up to 9,000sqm). Warehouse units of 9,000+ sqm are categorised as 'strategic warehousing'.

2.0 GENERAL NEEDS EMPLOYMENT LAND SUPPLY UPDATE

- 2.1 Officers monitor the progress of sites with planning permission for employment uses. Table 1 below shows the latest position taking account of the permissions granted, implemented and expired for 'general needs' employment between 1 April 2024 and 31 March 2025.
- 2.2 The [Need for Employment Land Update Note July 2024](#) by Rapleys, which is part of the plan's evidence base, establishes the future requirement for general employment land (Line A). The losses allowance (Line B) is added to compensate for the amount of employment floorspace likely to be put to alternative uses over the lifetime of the new plan (e.g. empty offices being converted to homes) and the flexibility allowance (Line C) is a contingency against planning permissions not coming forward when expected and/or delivering less floorspace than anticipated.
- 2.3 On the supply side are the planning permissions which have been built over the past year (Line E), extant planning permissions including those under construction (Line F) and the allocated employment land at Money Hill, Ashby (Line G).

Table 1 – General needs employment land supply position 1 April 2025

		Offices sqm	Industrial/smaller Warehousing sqm
A	Rapleys requirement (2024-42) ¹	40,000	166,860
B	Losses allowance (2027-42)	8,015	51,010
C	Flexibility margin	0	80,675
D	Total requirement (A+B+C)	48,015	298,545
E	Completions in 2024/25	-3,751	17,658
F	Planning permissions at 1 April 2025	5,157	50,845
G	Allocation (Money Hill)	6,000	37,800
H	Supply (E+F+G)	7,406	106,303
I	Residual requirement (D-H)	40,609	192,242

¹ Extended by two years to match the Local Plan end date of 2042

- 2.4 The total requirement (Line D) minus the supply (Line H) results in the outstanding ('residual') requirement figures for offices and industrial/non-strategic warehousing (Line I). These figures correspond to the amount of additional employment land needed for the 2025-42 period.
- 2.5 There has already been considerable progress identifying land and sites to help address this residual requirement. At its meeting on 16 December 2024, the Committee agreed² the employment site allocations shown in Table 2 below for inclusion in the Regulation 19 version of the Plan.

Table 2 – Sites agreed for inclusion in the Reg. 19 Plan

Site Ref.	Site address	Industry/smaller warehousing (sqm)
EMP98	West of Hilltop, Castle Donington	17,253
EMP73 (part)	North of Derby Road, Kegworth	30,000
EMP60	Burton Road, Oakthorpe	12,100
IW1	Isley Woodhouse new settlement	10,000
Total		69,353

- 2.6 In addition:
- Subject to the forthcoming Development Consent Order process, the Freeport proposal is expected to include an element of general needs employment land.
 - Vacant land within established industrial estates also contributes towards employment land supply. Local Plan Policy Ec3 and draft Policy Ec5 (Existing Employment Areas) give 'in principle' support for new employment development in these locations. Officers estimate that there is some 5.44 ha of vacant land which can contribute to the overall supply position.
- 2.7 The combined capacity from all these sources is shown in Table 3.

Table 3 – Combined capacity of the Reg. 19 sites, Freeport and vacant land in Existing Employment Areas

	Offices (sqm)	Industrial/smaller warehousing (sqm)
Allocations agreed for Reg 19. plan	0	69,350
Freeport (general needs only)	0	up to 55,800
Capacity in Existing Employment Areas	1,290	15,120
Total	1,290	Up to 140,270

- 2.8 Together, these sites and locations are still not sufficient to achieve the requirements in full (Table 1, Line I). Additional land for some 39,300sqm of offices (equivalent to approximately 6.6ha) and 52,000sqm of industrial (approximately 18ha) is needed.

² Subject to the outcome of transport modelling work, the ongoing Infrastructure Delivery Plan and Local Plan Viability Assessment.

3.0 PROPOSED ADDITIONAL HOUSING AND EMPLOYMENT ALLOCATIONS FOR CONSULTATION (MARCH 2025)

- 3.1 The 2025 [Additional Proposed Housing and Employment Allocations](#) consultation, which ran between 21 March to 2 May 2025, included two proposed general needs employment sites. Table 4 shows the level and type of consultation feedback each received.

Table 4 – Consultation responses

Site	No. responses	Types of respondents
EMP24 – Land east of Midland Road, Ellistown (reduced area)	5	Developer/agent/landowner (1) Statutory/non-statutory agencies (3) Local authority (1)
EMP98 - Land between Ellistown Terrace Road and Wood Road, Ellistown	12	Developer/agent/landowner (4) Statutory/non-statutory agencies (4) Local authority (3) Resident (1)

- 3.2 The schedules in Appendices A, B and C summarise the issues raised by respondents to the consultation and provide officer comments in response.
- Appendix A deals with representations to EMP24 (reduced area)
 - Appendix B deals with representations to EMP98
 - Appendix C deals with other matters raised in the representations
- 3.3 The representations (with personal details redacted) will be published on the Council's website in due course.

EMP24 Land east of Midland Road (reduced area)

- 3.4 A 10.8ha site in this location was included in the 2024 [Proposed Housing and Employment Allocations](#) consultation (Regulation 18). Consideration of the representations received and further evaluation of highways and amenity impacts, as well as potential effects on the separation between Hugglescote and Ellistown, led to a decision to limit development to the eastern part of the site only (6ha) with access via Moore Road in the South Leicester Industrial Estate. It is this revised proposal which was included in the 2025 Additional Sites consultation.
- 3.5 There is a current planning application (24/01653/OUTM) on the larger site.
- 3.6 For ease, key information about the two site alternatives is set out below.

Reference	Area	Consultation stage	Access	Application
EMP24 (original area)	10.8ha	2024 Reg. 18	Midland Road	24/01653/OUTM
EMP24 (red. area)	6ha	2025 Reg. 18	Moore Road	n/a

- 3.7 **Representations.** Leicestershire County Council (LCC) Highways' response to EMP24 (reduced area) is broadly positive about access via Moore Road although it identifies that there may need to be improvements to the double mini-roundabout in the centre of Ellistown to accommodate additional non-HGV traffic. Access via Moore Road would require the crossing of third-party land. The site promoters argue that this is unreasonable, unnecessary and a barrier to delivery, although they do not explicitly say it is unachievable.

- 3.8 For EMP24 (original area), the highways objections to an access via Midland Road **may** be resolved as part of the current planning application but, at the time of writing, this has not happened. Overall, officers do not have sufficient surety to recommend the allocation of EMP24 (original area) in the new Local Plan. If highways matters are resolved in the future, officers would additionally recommend significant strengthening of the design and landscaping aspects of any Local Plan allocation policy to require extensive landscaping to the Midland Road frontage and for buildings to be set back to better retain the perceived and actual separation between Hugglescote and Ellistown on the east side of Midland Road and to help address issues of residential amenity.
- 3.9 Access via Moore Road is technically preferable but, at this point, it is uncertain whether it would be achievable in practice.
- 3.10 Based on current information, officers are not in a position to recommend EMP24 (original area) or EMP24 (reduced area) for inclusion in the Regulation 19 Plan. If information that addresses the highways concerns for either or both sites becomes available before the Regulation 19 Plan is finalised, a potential allocation can be reconsidered.

EMP98 Land between Ellistown Terrace Road and Wood Road, Ellistown

- 3.11 This 16.4Ha site comprising two large agricultural fields is located to the south of Ellistown and to the east of Battram. Ellistown Terrace Road borders it to the east and Wood Road (B585) to the south.
- 3.12 **Representations.** Pickering Farmhouse (Grade II) is located some 350m to the west of this site. Concerns have been raised that the draft policy does not deal adequately with the potential for harm to the setting of this listed farmhouse, including in views from nearby footpaths. In response, officers commissioned a preliminary heritage assessment to appraise the potential heritage impact of development. This finds that Pickering Farmhouse is of considerable heritage significance. Development on EMP98 may be seen in some distant, glimpsed views of the Farmhouse and this would constitute harm to the setting of the listed building. Importantly however, vegetation and topography means that the building is largely screened from EMP98 itself. Its architectural and historical value is generally appreciated from more close-range views and not in views from EMP98. The assessment concludes that it is **unlikely** that development on EMP98 would amount to 'substantial harm' to the heritage significance of the building (NPPF paragraph 214). With this advice, officers consider that heritage impacts are not a barrier to the allocation of this site provided there are appropriate safeguards in the allocation policy.
- 3.13 There is a proposed employment allocation in the draft Hinckley and Bosworth Local Plan (2024) on the opposite side of Wood Road, facing EMP98 [EMP1 - Land at Wiggs Farm, Wood Lane/Station Road, Bagworth]. In its consultation response, Hinckley and Bosworth Borough Council welcomes the intention of part (3) of the draft allocation policy to have a co-ordinated and comprehensive approach to address the highways impacts of the two sites. Officers will collaborate with Borough Council and Local Highways Authority colleagues on this matter. In the meantime, revised wording for part (3) of the policy is recommended although this may need to be further updated to reflect the outcomes of these discussions and/or the outcomes of transport modelling more widely. In addition, there is a current planning application on the Hinckley site (H&BBC reference 25/00523/FUL) and these policy discussions could be superseded if this application is decided in the meantime.

- 3.14 Further amendments to the policy for EMP98 are recommended in response to other points made in the representations.
- Add a criterion to require that any potential pollution and land stability risks from the adjacent open storage site be investigated and addressed as part of a future planning application. [representation from the Environment Agency]
 - Require a mineral assessment for brick and clay. [LCC Planning]
 - Strengthen the amenity considerations in the policy [local resident]
 - Amend the list of potential uses to include Class E(g)(iii) (light industry). [site promoters]
- 3.15 The consultation document identified that this site could provide a mix of general needs units and strategic scale warehousing. Attributing 20,000sqm of general needs space to this site would leave space for an element of strategic-scale warehousing if that is considered appropriate when the strategic warehousing requirements are known. If not, the general needs employment capacity of the site could be increased. This means that the exact capacity and disposition of uses for this site are not finalised.
- 3.16 A revised version of the policy wording for EMP98 is included in Appendix D.

Representations on other matters

- 3.17 Whilst the consultation document was solely concerned with proposed site allocations, some of the feedback related to other matters. These additional matters are summarised and responded to in Appendix C. No changes to the Plan are recommended in response.

4.0 CALL FOR SITES

- 4.1 Table 5 shows how employment land supply changes when the agreed site allocations, capacity at the Freeport and in Existing Employment Areas and EMP98 are factored in.

Table 5 – Revised residual requirement

		Offices (sqm)	Industrial/smaller warehousing (sqm)
A	Residual requirement	40,609	192,242
B	Allocations + Freeport + EEA capacity (Table 3)	1,290	140,270
C	EMP98 Ellistown Terrace Road and Wood Road	0	20,000
D	Additional supply (B+C)	1,290	160,270
E	Revised residual requirement (D-A)³	39,319 (c 13.1ha)	at least 31,972 (c 11ha)

- 4.2 In the knowledge of an employment land shortfall, the 2025 Additional Sites consultation document included a Call for Sites for general needs employment and also for potential lorry parking locations.
- 4.3 The sites that came forward are listed in Table 6 below. The first three are new sites which have not been assessed previously. Site EMP101 (Land north of Wood Road, Ellistown/Battram) is immediately to the west of site EMP98 discussed above. The remaining six are sites or parts of sites which have been submitted previously. In some cases, updated information has been supplied.

³ Compare with figures in paragraph 2.8

- 4.4 In addition to those sites listed below, details of a 27.8ha employment site were submitted which is being promoted as part of a proposed new settlement in the vicinity of Twycross. The majority of the land for this new settlement is in Hinckley and Bosworth Borough but it includes some land in North West Leicestershire. The Additional Housing Allocations item on this agenda provides more information about this proposal.

Table 6 – 2025 Call for Sites submissions (excluding proposed new settlement near Twycross)

Ref	Site	Status	Proposed use	Ha
EMP99	Land north of rail line, Hemington	New site	Employment	6.8
EMP100	Land at Fields Farm, Measham	New site	Employment	5.7
EMP101	Land north of Wood Road, Ellistown/Batram	New site	Employment	11
EMP97 (part)	Molehill Farm, Kegworth	Part of a previously submitted site	Employment	32.65
EMP63 (part)	Carnival Way (Option 1), Castle Donington	Part of a previously submitted site	Employment	1.8
EMP63	Carnival Way (Option 2), Castle Donington	Previously submitted site	Employment	8.7
EMP90 (part)	MAG site, south of East Midlands Airport	Part of a previously submitted site	Employment	41.28
EMP66	Ex-Measham Mine site, Measham	Previously submitted site	Employment	3.6
EMP38	Ashby Aquatics, Nottingham Road, Ashby	Previously submitted site	Lorry parking	2.8

- 4.5 Officers will assess the new sites and commission a Sustainability Appraisal. They will also decide whether further assessment is required for any of the resubmissions. Officers will report to a future meeting of this Committee if any are considered suitable for allocation to help address the shortfall in employment land.
- 4.6 As explained in the Additional Housing Allocations item on this agenda, the government's recent announcement to lift the safeguarding of the HS2 route means it is no longer necessary for Packington Nook, Ashby (site A7) to be a reserve site in the Local Plan. This means that the 9ha (approximately 26,000sqm) of general needs employment, which would have helped support the overall sustainability of that housing-led proposal, will not come forward.

5.0 MONEY HILL

- 5.1 At the 11 June 2025 meeting of the Committee, officers were asked to confirm how the employment land allocation at Money Hill, Ashby will be shown on the Policies Map. A map has been prepared (Appendix E) and it is recommended that this be agreed for inclusion in the Regulation 19 version of the Plan.

6.0 STRATEGIC WAREHOUSING

- 6.1 The 2024 Proposed Sites consultation included two Potential Locations for Strategic Distribution; a) part of the Freeport site (EMP90) and b) Land north of J11 A/M24 (EMP82). The Development Consent Order application for the Freeport site is expected to be submitted to the Planning Inspectorate in August 2025. There are also

current planning applications on the part of the Freeport site controlled by Manchester Airports Group (24/00727/OUTM) and the Junction 11 site (25/00274/FULM).

- 6.2 Joint work with the Leicester and Leicestershire authorities to produce up to date evidence on strategic warehousing need and an indicative apportionment to the individual districts and boroughs is still in preparation. To reduce delay, the Committee agreed a working figure of 200-250Ha of land for strategic warehousing and sites/locations to match this figure **for transport modelling purposes only**. The Committee also agreed an outline Local Plan approach for the Freeport site.
- 6.3 As soon as possible after the joint work is complete, there will be a report to this Committee covering the following matters:
- The findings and implications of the joint study.
 - Review of the representations to the 2024 consultation which relate to the strategic warehousing evidence. These have not been reported previously, pending the completion of the joint work.
 - Identification of strategic warehousing sites for inclusion in the Regulation 19 version of the Plan.

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:	None discernible
Equalities/Diversity:	An Equalities Impact Assessment of the Local Plan review will be undertaken as part of the Sustainability Appraisal
Customer Impact:	No issues identified.
Economic and Social Impact:	The decision itself will have no specific 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 decision, of itself, will have no specific impact. 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:	There have been three rounds of 'Regulation 18' stage consultation on the new Local Plan so far. 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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