

RESPONSES TO PROPOSED ALLOCATIONS

EMPLOYMENT	SITE NUMBER: EMP24	SITE NAME: Land to the east of Midland Road, Ellistown (reduced area)		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
General				
EMP24 is within the Ellistown and Battleflat Neighbourhood Plan area. Due regard should be taken to the respective policies within these plans when considering allocations.	Noted. The Neighbourhood Plan has an end date of 2031 whereas the new Local Plan will cover the period to 2042. Additional sites are needed to accommodate future growth for this longer period. This means identifying land where currently development is restricted in the Neighbourhood Plan (and the adopted Local Plan), as in this case. The detailed policies of the Neighbourhood Plan will have appropriate weight at planning application stage.	No change	150	LCC
An allocation policy requiring access via third party land is unreasonable and entirely unnecessary in this case. It adds unnecessary barriers to the delivery of an economically sustainable and achievable site which is currently subject to an outline planning application. Furthermore, this requirement does not enable flexibility	Access via Moore Road is technically preferable but, at this point, it is agreed that it is not demonstrably deliverable.	Unless or until one of the following are demonstrated, it is proposed not to allocate land in this location for employment. a) the highways matters for EMP24 (original	290	Richborough Estates

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as required by paragraph 86(e) of the NPPF (2024).		<p>area) can be addressed</p> <p>b) access over 3rd party land is achievable for EMP24 (reduced area)</p>		
The 2025 consultation document identifies a shortfall of 12 ha of employment land. This is significant and at odds with the reduced capacity at EMP24. The reinstatement of the original allocation boundary (of 10.8 ha) would clearly assist in meeting a substantial portion of this unmet need in a location previously recognised and identified as suitable for such a use.	A purpose of the Local Plan is to identify sufficient suitable and deliverable sites to meet future needs. In the case of EMP24 (original area), it has not been demonstrated that highways concerns can be overcome which means that the site is not demonstrably suitable. The shortfall in employment land supply does not, of itself, override this issue.	No change.	290	Richborough Estates
Highways				
<p>The site is not in an appropriate location for HGVs to access through the village centre. Access would only be considered from Moore Road, if achievable in terms of land ownership and the red line boundary.</p> <p>If access is via Moore Lane all HGVs would then route from the east via A511/Beveridge Lane rather than through the village centre. It may still be necessary to mitigate any non-HGV</p>	<p>The Local Highways Authority favour access via Moore Road as outlined in the draft policy, subject to achievability. The response identifies that even with this access there may still need to be some improvement to the double mini-roundabout junction although it is acknowledged that the additional traffic movements through this junction will be</p>	<p>Unless or until one of the following are demonstrated, it is proposed not to allocate land in this location for employment.</p> <p>a) the highways matters for EMP24 (original area) can be addressed</p>	150	LCC (Local Highways Authority)

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<p>impacts at the double mini roundabout junction, although the impact would be reduced if all access was taken from Moore Road with routeing to/from the A511/Beveridge Lane. [RAG Rating: Red]</p>	<p>fewer than if the site access was onto Midland Road. A scheme for this junction has not yet been produced.</p> <p>Whist access via Moore Road is technically preferable, at this point, it is uncertain whether it would be achievable in practice.</p> <p>Access via Midland Road, as proposed originally, would put additional HGV traffic through Ellistown and this has not be demonstrated to be acceptable in highways terms.</p> <p>Overall, there is a degree of uncertainty about the highways aspects of an employment allocation in this location.</p>	<p>b) access over 3rd party land is achievable for EMP24 (reduced area)</p>		
<p>Additional HGV movements on Midland Road and across the local road network have been addressed within the Transport Assessment (TA), supporting planning application 24/01653/OUTM. Measures proposed in the TA include a lorry control plan. Also the future uses are proposed to be small scale so the development will generate a relatively low number of HGVs and is likely to use smaller goods vehicles.</p>	<p>LCC Highways concerns relating to EMP24 (original area) may be addressed through the information submitted with the current application but, at the time of writing, these matters are not resolved.</p>	<p>Unless or until one of the following are demonstrated, it is proposed not to allocate land in this location for employment.</p> <p>a) the highways matters for EMP24 (original area) can be addressed</p>	290	Richborough Estates

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<p>LCC Highways response to the current planning application does not object in respect of the double mini roundabout.</p> <p>The Active Travel Plan submitted with the application demonstrates that walking, cycling, and bus travel are realistic options for employees commuting to and from site.</p> <p>The technical evidence submitted with the current application, together with the proposed developer contributions, should be sufficient to alleviate LCC Highway's concerns.</p> <p>Access via Midland Road has not been ruled out by Leicestershire County Council Highways through its response to the 2024 consultation document or indeed the outline planning application. There is no technical evidence to support the amended conclusions, reduced site capacity and area, and therefore the amended allocation drafting.</p>		b) access over 3 rd party land is achievable for EMP24 (reduced area)		
Local services and infrastructure				
Site is approximately 1400m west of the railway and given the size of allocation will require careful consideration in relation to traffic generation, routing and impact on	As no specific evidence has been provided regarding this matter it is not considered appropriate to add a specific requirement to the allocation	No change	87	Network Rail

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nearby level crossings (for instance in the Bardon Hill area). It is likely that Network Rail would have concerns in respect of this allocation should it come forward and mitigation measures may be required to address any safety impact which would be at the developer's expense.	policy (if one were being made). However, the potential impact of development on the safety and operation of level crossings and any appropriate mitigation measures would be addressed through Transport Assessments at planning application stage.			
Environmental Issues				
Separation. Removal of the portion of the allocation between the allotments to the south and the existing Roberts Travel Group depot to the north is entirely arbitrary, follows no existing or clear boundary within the landform, subdivides a single agricultural field and is entirely unevidenced. It has been clearly evidenced through landscaping technical work submitted with the outline planning application that the site (as a 10.8 ha whole) is well screened by existing vegetation, which adequately restricts any views when looking southwards from Hugglescote and that perceived and visual separation can be maintained. In addition, further mitigation measures in the form of planting and landscaping have been proposed by our client to further strengthen the clear natural demarcation between the settlements.	If highways concerns are resolved and EMP24 (original area) is reconsidered for allocation, there would need to be significant strengthening of the design and landscaping aspects of an 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 in the east side of Midland Road.	No change	290	Richborough Estates

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Heritage. Re archaeology: 2024 geophysical survey identified archaeological features of industrial origin. Site will require pre-determination evaluation, followed by appropriate mitigation secured by condition upon any future planning permission.	The archaeological features of the site are noted. As identified this representation, archaeological evaluation and mitigation is a matter which will be addressed at planning application stage.	No change.	150	LCC (Heritage)
Flooding. There is a significant surface water flood path which appears to run down the western boundary of the site and then across the middle broadly where 'track' is marked. This flood risk will need to be appropriately managed without simply culverting. No industrial units should be placed on the area of high surface water risk.	<p>The Flood Map for Planning shows a propensity for surface water flooding at some locations within the site.</p> <p>In March 2025, The Environment Agency updated the Flood Map for Planning datasets to include both a climate change scenario and three present-day surface water flood risk scenarios. In addition, the 2024 National Planning Policy Framework has been strengthened and plans need to take into account all sources of flood risk in a sequential approach to the location of development (paragraph 172). In light of these updates, officers are currently liaising with the consultants who prepared the Strategic Flood Risk Assessment on the possible need to update the evidence base. At this time there is no</p>	No change.	150	LCC (Lead Local Flood Authority)

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	reason to think that this would result in any of the proposed allocations as not being considered suitable, but specific policy requirements may need to be included in the next version of the Plan.			
Waste. The site is adjacent to South Leicestershire Ind Est, Ellistown (N21) which is a safeguarded waste site (Russell's Auto Salvage). It is also within 200m of safeguarded waste site (N22), Direct Car Spares. Any allocation should be in line with LMWLP Policy W9 and not prejudice the operation of the site. Any future planning permission would need to be in line with the 'agent of change' principle (NPPF paragraph 200).	In summary Policy W9 of the Leicestershire Minerals & Waste Local Plan requires a) there to be no adverse effect on the amenity of the new development; and b) that the new development would not prejudice the operation of the safeguarded waste sites. South Leicestershire Industrial Estate currently includes a range of employment uses which appear to operate without detriment to the waste sites and vice versa. The proximity of development to the N21 site may need to be considered as part of the site's layout but this is matter for the planning application stage.	No change.	150	LCC (Minerals and Waste)
National Forest. The supporting text should refer to the site's location in the National Forest.	Agreed.	Reference the site's location in the National Forest in the supporting text.	165	National Forest
Biodiversity. All the allocations should incorporate opportunities for Green	It is agreed that the incorporation of Green Infrastructure (GI)	No change.	345	Natural England

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<p>Infrastructure and biodiversity enhancement. The emerging Leicestershire & Rutland Local Nature Recovery Strategy should also be a consideration.</p> <p>Any site for allocation in the local plan should clearly set out the Biodiversity Net Gain (BNG) requirements for the development including both on-site and where appropriate off-site provision (we acknowledge that the policy requirements for BNG are set out in Policy En1).</p>	<p>within development is an important objective but it is considered that the issue is adequately addressed in draft Policy ENV1 and does not need to be repeated in individual site allocation policies. Similarly, BNG is dealt with in national policy and guidance, in addition to the requirements in Policy ENV1.</p>			
<p>Biodiversity. This site falls within the SSSI catchment risk zones of Newton Burgoland and Ashby Canal SSSIs. We advise that any proposal in these locations must provide sufficient evidence that any water discharges arising from the development will not cause significant impact to the relevant designated site.</p>	<p>At this point there is no evidence from Natural England or others that employment development in this location will have any adverse effects on designated sites such that the allocation of the site should not proceed. Water discharge arrangements are a detailed matter which will be assessed for their efficacy at planning application stage.</p>	No change	345	Natural England
Amenity Issues				
<p>There is no up to date evidence or justification for reducing the allocation based on the 'potential' effects on residential amenity.</p>	<p>If highways concerns are resolved and EMP24 (original area) is reconsidered for allocation, policy additions would be merited to require buildings to be set back from the Midland Road frontage with additional boundary landscaping to avoid</p>	No change	290	Richborough Estates

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	amenity impacts on the property fronting the site on the west side of Midland Road.			