



North West Leicestershire Local Plan Review

Development Strategy and Policy Options

January 2022

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1. Introduction to the consultation

What has happened so far?

- 1.1. The [North West Leicestershire Local Plan](#) was adopted in November 2017. It is a comprehensive plan which sets the spatial strategy for the district, allocates land for development and provides policies to guide planning application decisions. It covers the period up to 2031.
- 1.2. Policy S1 of the adopted Local Plan required the council to undertake an early review of the plan. A first stage [Issues consultation](#) ran from February to April 2018 and a summary of the feedback we received was reported to [Local Plan Committee on 22 June 2018](#). The [Emerging Options consultation](#) followed between November 2018 and January 2019 and a [summary of responses](#) received was published. The council then decided to progress the plan review in two parts:
 - a 'Partial Review' concerned with amendments to Policy S1 only; and
 - the 'Substantive Review' which is a wider ranging review of the adopted Local Plan taking into account changes that have occurred since adoption and the implications of extending the plan period to 2039
- 1.3. The examining Inspector found the Partial Review sound, subject to modifications, in February 2021. The North West Leicestershire Local Plan (as amended by the Partial Review) was adopted in March 2021.
- 1.4. Throughout this time, the 'substantive' Local Plan Review (now referred to simply as 'the Local Plan Review') has been progressing. Amongst other work, we had a 'Call for Sites' inviting people to submit potential housing and employment sites for us to consider for inclusion in the Local Plan Review. This latest Call for Sites closed on 21 October 2020.

Changes since the Local Plan was adopted

- 1.5. Notable changes which have occurred since the Local Plan (2017) was adopted include those described below.
 - a. the [National Planning Policy Framework](#) (NPPF) was revised in 2018 and 2021;
 - b. In September 2020 significant changes were made to the [Use Classes Order \(UCO\)](#), the result being to allow for greater flexibility for some uses to change without the need to obtain planning permission, whereas other changes have introduced restrictions against the loss of community uses;
 - c. Leicester City Council has declared an unmet need for both housing and employment land. The Leicester and Leicestershire authorities are working together to resolve how this unmet need can best be addressed;
 - d. the Government published its [Planning for the Future White Paper](#) in Autumn 2020 although the detail of any reforms and when they might be introduced is currently uncertain; and
 - e. more specifically, the Government changed its standard method for calculating housing requirements in December 2020 which resulted in a significant increase in Leicester City's unmet need. More recently the Government has indicated it may

further revise or replace its standard methodology for calculating local housing need requirements.

- 1.6. In respect of proposed Government changes, the council has chosen not to wait these to be confirmed before moving forward with its Local Plan Review. To do otherwise would result in unacceptable delay to the plan's preparation. The council will re-evaluate the position as and when further Government announcements are made.

Evidence and supporting documents

- 1.7. A foundation of the Local Plan Review will be its up-to-date **evidence base**. The studies prepared so far are listed in Appendix 1 and are available on the council's website nwleics.gov.uk/local_plan_review_evidence_base.
- 1.8. Effective plan-making is central to the achievement of sustainable development and a key way that the sustainability credentials of an emerging plan are tested is through a **Sustainability Appraisal (SA)**. The SA [Scoping Report](#) contains baseline information about the environmental, social and economic characteristics of the district and sets out the 17 SA objectives in a Framework which will be used to assess the plan's emerging policies and proposals, as well as reasonable alternative approaches. To date we have completed a [Sustainability Appraisal of Spatial Options](#) which tests various housing strategy options in terms of both overall numbers of homes and geographical distribution. This topic is covered in Section 4. The SA process will also incorporate Equalities Impact Assessment and a Health Impact Assessment of the proposed Local Plan.
- 1.9. The Local Plan will also need to have regard to other strategies and documents produced by the Council and other partners, such as the [Leicester & Leicestershire 2050 Strategic Growth Plan](#), the [Health & Wellbeing Strategy](#) and the [Zero Carbon Roadmap](#) and [Action Plan](#).
- 1.10. Evidence studies to be completed and published in the future include whole-plan viability assessment, infrastructure assessment, strategic transport modelling and Habitat Regulations Assessment.

Duty to Co-operate

- 1.11. Throughout the preparation of the Local Plan Review, the council has a duty to co-operate with partner organisations on strategic matters that have cross boundary implications.
- 1.12. The Leicester and Leicestershire authorities have a strong track record of joint working. The Leicester and Leicestershire [Strategic Growth Plan](#) is an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans.
- 1.13. The authorities also collaborate to commission joint evidence on strategic matters. A strategic warehousing study was completed last year and an update to the Housing and Economic Needs Assessment (2017) is in preparation.
- 1.14. Statements of Common Ground between the authorities are agreed and updated to confirm shared positions on strategic matters. The matter of Leicester City's unmet needs is a key

issue for all the Local Plans currently being prepared in the county and one which the authorities are actively seeking to resolve.

- 1.15. The council also has a duty to engage with other expert agencies such as National Highways, Environment Agency and Natural England amongst others on strategic matters and also with the authorities in neighbouring counties - Derbyshire, Nottinghamshire, Warwickshire and Staffordshire - where there are relevant cross-boundary issues.

Local Plan Review timetable

- 1.16. This current document is a Regulation 18 stage public consultation, part of the plan preparation process. The current stage is highlighted in the overall draft timetable below.¹

Stage	Dates
Emerging options (Regulation 18)	November 2018 to January 2019
Development Strategy Options and Policy Options	January/February 2022
Consult on potential site allocations	Spring 2022
Consult on draft policies	Autumn 2022
Agree publication version (Regulation 19)	June 2023
Consult on Publication Local Plan (Regulation 19)	June/July 2023
Submission	October 2023
Examination	January 2024
Adoption	mid 2024

Format of this consultation document

- 1.17. This consultation document is structured into 8 sections covering broad topics, some of which are divided into a number of individual policy areas. Each of the policy sections sets out background to the policy area, including relevant national policy and guidance and local evidence, and goes on to consider reasonable alternative approaches. In some instances we have sufficient information to propose a preferred policy option and, on occasions, to put forward specific policy wording. There is a consultation question or questions at key parts of each section. The final question is a general question for you to make points which you have not been able to cover in your answers elsewhere. A single list of all the consultation questions is included in Appendix 2.
- 1.18. Section 10 sets out the 'next steps' for the Local Plan Review.

¹ This is subject to change. The Local Development Scheme containing an updated timetable is to be considered by the council's Local Plan Committee on 26 January 2021.

Responding to the consultation

- 1.19. Please answer the consultation questions. You do not need to answer each one; just the ones which are relevant to you. You can submit your response:
- online using our consultation portal consultation.nwleics.gov.uk/planning/local-plan-consultationjan2022
 - by email to planning.policy@nwleicestershire.gov.uk
 - by post to Planning Policy & Land Charges Team, North West Leicestershire District Council, Council Offices, Coalville, Whitwick Road, Coalville, Leicestershire, LE67 3FJ
- 1.20. Remember, we must receive your response by **the end of Monday 28 February 2022**.
- 1.21. If you have any difficulties accessing or responding to this consultation, please contact the Team directly by email at planning.policy@nwleicestershire.gov.uk or by phone on 01530 454676.

2. **Local Plan Review objectives**

Introduction

- 2.1. The Local Plan Review will contain a set of plan objectives. These overarching objectives describe, in overall terms, what the Local Plan Review aims to achieve and provides a guiding framework for the plan's policies and proposals. Each Local Plan policy should help achieve one or more of the objectives.

Background

- 2.2. The adopted Local Plan objectives are the starting point. We have re-visited them to take account of updated information and changes in circumstance since the adopted Local Plan was prepared. Relevant factors have included;
- the Sustainability Appraisal objectives from the [Sustainability Appraisal Scoping Report \(2020\)](#).
 - National Planning Policy Framework (NPPF) which has been revised since the Local Plan was adopted
 - the council's own [Delivery Plan](#) which provides an important local perspective. Whilst this covers a shorter timeframe than the Local Plan Review, it is a statement of the council's key priorities which strategic documents, such as the Local Plan, can help to deliver.
 - other key council strategies such as the [Health & Wellbeing Strategy](#) and the [Zero Carbon Roadmap](#) and [Action Plan](#)
 - the objectives in the [Leicester & Leicestershire 2050 Strategic Growth Plan](#)

Preferred approach

- 2.3. The proposed objectives are listed below. The number of objectives (11) is slightly less than in the adopted Local Plan (15) because some themes have been consolidated.

- 1 - Enable the health and wellbeing of the district's population.
- 2 – Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.
- 3 - Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.
- 4 - Reduce the need to travel and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.
- 5 - Support the district's economy, including its rural economy, by providing for a range of employment opportunities which respond to the needs of businesses and local workers.
- 6 - Enhance the vitality and viability of the district's town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville.
- 7 - Ensure new development mitigates for and adapts to climate change, including reducing vulnerability to flooding, and contributes to reduced net greenhouse gas emissions to support the district becoming carbon neutral by 2050.
- 8 - Conserve and enhance the district's built, cultural, industrial and rural heritage and heritage assets.
- 9 - Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes.
- 10 - Ensure the efficient use of natural resources and brownfield land, control pollution and facilitate the sustainable use and management of minerals and waste.
- 11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way.

Consultation question

Q1 - Do you agree with these Local Plan Review Objectives? If not, why not?

3. Settlement hierarchy

Introduction: What is the settlement hierarchy?

- 3.1. The adopted Local Plan establishes (Policy S2) a settlement hierarchy which distinguishes between the roles and functions of different settlements with the respective position in the hierarchy determined by the availability of services and facilities that communities need (i.e. settlements with a similar range and level of services and facilities are at the same level in the hierarchy). In effect, the settlement hierarchy measures the sustainability of settlements relative to each other. The settlement hierarchy is used to guide the location of future development.
- 3.2. The current settlement hierarchy consists of the following categories of settlements:
 1. Principal Town
 2. Key Service Centres
 3. Local Service Centres
 4. Sustainable Villages
 5. Small Villages
 6. Hamlets
- 3.3. As part of the Local Plan Review it is necessary to consider whether the current settlement hierarchy should be retained or amended in anyway.

Background

- 3.4. The starting point for the review was to establish an up-to-date list of services and facilities available by settlement.
- 3.5. Having established a definitive list, we then developed a methodology to be able to assess the relative sustainability of settlements. Rather than simply being about what services and facilities are available within a settlement, it also considered accessibility to services and facilities elsewhere by public transport as such provision can contribute towards the sustainability of a settlement.
- 3.6. The following factors were assessed:
 - Access to convenience stores for food shopping;
 - Access to education facilities, both primary and secondary;
 - Access to employment locations;
 - Public transport access to higher order services outside of the settlement; and
 - Range of accessible community services and facilities (libraries, GPs, pharmacies, post offices, community venues, pubs, places of worship, and recreation facilities)
- 3.7. The methodology involved a system of scoring points depending upon how a settlement performed against the set criteria for each service and facility assessed. There then followed a series of steps to define those settlements which are considered to be sustainable to some degree and hence appropriate as potential locations for general market housing.

- 3.8. More details regarding the methodology, including the overall scoring, are set out in the [Settlement Study 2021](#) and the [Settlement Study Appendix B](#).

Outcome from the review

- 3.9. In terms of the current settlement categories, it is proposed to rename Small Villages as Local Housing Needs Villages and Hamlets as Other Villages/Settlements.
- 3.10. In terms of Local Housing Needs Villages, housing development in these would be restricted to those that meet the needs of somebody with a demonstrable local connection to the settlement concerned. We consulted upon this proposal as part of the [Emerging Options consultation](#) between November 2018 and January 2019 and the matter was considered by the Council's [Local Plan Committee on 26 June 2019](#) as part of the overall response to the consultation. The following local connection criteria are proposed:

- a) Existing resident in the parish within which the application is located for a continuous period of at least 10 years prior to an application being submitted; or
- b) The person requires frequent attention and/or care due to age, ill health, disability and/or infirmity as demonstrated by written evidence from a medical doctor or relevant statutory support agency and therefore has an essential need to live close to a close family member who currently reside in the parish within which the application is located and have done so for a continuous period of at least 10 years and; or
- c) The person has an essential need to provide support , as demonstrated by written evidence from a medical doctor or relevant statutory support agency, for a close family member who currently reside in the parish within which the application is located and have done so for a continuous period of at least 10 years; or
- d) The existing accommodation of the proposed occupant must be located within the parish and be no longer suitable for their needs due to its size or is difficult to get around due to ill health or disability as demonstrated by written evidence from a medical doctor or relevant statutory support agency; or
- e) No longer resident in the parish within which the application is located but has previously resided in the parish for a period of at least 10 years within the last twenty years.

3.11. The proposed settlement hierarchy is:

Settlement Classification
<p>Principal Town</p> <p>Coalville Urban Area which comprises of Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area.</p>
<p>Key Service Centres</p> <p>Ashby de la Zouch</p> <p>Castle Donington</p>
<p>Local Service Centres</p> <p>Ibstock</p> <p>Kegworth</p> <p>Measham</p>
<p>Sustainable Villages</p> <p>Albert Village, Appleby Magna, Belton, Blackfordby, Breedon on the Hill, Coleorton (the Lower Moor Road area only), Diseworth, Donisthorpe, Ellistown, Heather, Long Whatton, Moira (including Norris Hill), Oakthorpe, Packington, Ravenstone, Swannington, Woodville (part), Worthington.</p>
<p>Local Housing Needs Villages</p> <p>Batram, Boundary, Coleorton (the part not considered to be a Sustainable Village), Griffydam, Hemington, Lockington, Lount, Newbold, Newton Burgoland, Normanton le Heath, Osgathorpe, Peggs Green, Sinope, Snarestone, Swepstone, Wilson.</p>
<p>Other Villages/Settlements</p> <p>Settlements not named in the above categories</p>

- 3.12. The hierarchy is virtually the same as that in the adopted Local Plan save for the following:
- The addition of that part of Woodville that is located within North West Leicestershire to the list of Sustainable Villages;
 - 1 village (Boundary) moving into the Local Housing Need Village designation); and
 - 2 villages (Spring Cottage and Tonge) moving to the Other Village/ Settlement designation from Small Villages.

Consultation questions

<p>Q2 – Do you agree with the proposed settlement hierarchy? If not, why not?</p> <p>Q3 - Do you agree with the approach to Local Housing Needs Villages? If not, why not?</p>
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4. **Development strategy options for housing**

- 4.1. The National Planning Policy Framework (NPPF, 2021 paragraph 20) requires that strategic policies in plans should “set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development ...”.
- 4.2. Therefore, a key part of the local plan preparation process is to set out a development strategy that identifies both:
- the overall amount of new development that needs to be provided for, principally housing and employment; and
 - where this development should go.

How much housing should be provided for?

- 4.3. In 2018 the Government introduced a new way for calculating the minimum number of new homes that each local authority should provide for. This is referred to as the ‘standard method’. Further details about the standard method and how it is calculated is in [National Planning Practice Guidance](#) (PPG).
- 4.4. The NPPF is clear that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” (paragraph 61).
- 4.5. Further guidance is provided by the PPG. This states “The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure”.
- 4.6. In addition, the PPG identifies a number of circumstances when it might be appropriate to plan for a higher housing need figure because of:
- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); or
 - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; or
 - where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method
- 4.7. From consideration of what the NPPF and PPG say, there are a number of factors which will influence whether a local housing need figure should be higher than the outcome from the standard method:
- demographic trends
 - build rates (market signals)

- unmet need
- deliverable growth strategies

4.8. These are considered in turn below.

4.9. **Demographic trends.** The latest demographic trends for the district are provided by the [2018-based Office for National Statistics household projections](#) which contain 5 different projections as set out below:

Table 1: 2018-based household projections

Projection	Annual household growth 2020-39
10-year variant	370
Alternative internal	570
Principal (or Main) Projection	707
Low International migration	661
High international migration	752

4.10. **Build rates (market signals).** The reference to market signals in the NPPF could be taken to refer to build rates as an indicator of market demand. Since the start of the adopted Local Plan (2011) build rates have averaged 619 dwellings per annum (2011-21), although a higher figure (770 dwellings) has been achieved since 2016/17.

4.11. **Unmet need.** There is an unmet need from Leicester City of about 18,000 dwellings. These will have to be accommodated somewhere in Leicestershire. The Leicester and Leicestershire authorities are working together to agree how this will be distributed.

4.12. Whilst there is not an agreement at this time, it is reasonable to assume that some of this is likely to be redirected towards North West Leicestershire.

4.13. **Deliverable growth strategy.** There is a [Strategic Growth Plan](#) (SGP) in place for Leicester and Leicestershire. This identifies a figure for North West Leicestershire for the period 2031-50 of 512 dwellings each year (i.e. more than the standard method).

4.14. All of the above suggests that any housing requirement included as part of the Local Plan will have to be higher than the standard method.

What options have been identified?

- 4.15. The following options have been developed.
- 368 dwellings (this is the result from the standard method) – referred to as **Low scenario**
 - 448 dwellings (this is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA)) – referred to as **Medium scenario**
 - 512 dwellings (this is the figure from the Leicester and Leicestershire Strategic Growth Plan) – referred to as **High 1 scenario**

- 730 dwellings (this is based on the 2018 household projections with an allowance for vacancy rates in dwellings) – referred to as **High 2 scenario**

4.16. We need to plan for the period 2020-39. However, we are not starting with a blank sheet of paper; a significant amount of new housing development is already committed, whether it has the benefit of planning permission or is an allocation in the adopted Local Plan. Taking account of the amount of development that was projected to be built in the 2020 housing trajectory, together with the total number of dwellings which it is projected will be built after the end of the current local plan period (2031), it is estimated that 8,784 would be built by 2039.

4.17. The implications for the various scenarios are shown in Table 2 below.

Table 2: Housing requirements by scenario

Scenario	Annual Amount	Total Requirement 2020-39	Total projected provision	Over provision/ Shortfall
Standard Method (Low)	359	6,103	8,784	+2,681
HEDNA (Medium)	448	8,512	8,784	+272
Strategic Growth Plan (High 1)	512	9,728	8,784	-944
2018-based projections (High 2)	730	13,870	8,784	-5,086

4.18. Each of the four growth scenarios were assessed against those factors highlighted in paragraph 4.7 with the results shown below.

Table 3 – Scenario assessment

Demographic trends	Build rates (market signals)	Unmet need	Deliverable growth strategy
Low scenario (368 dwellings per annum)			
This scenario is below each of the 5 main projections.	These are 68% more than this scenario. As such this must be regarded as being <i>“significantly greater than the outcome from the standard method”</i> as advised in the PPG	This scenario does not allow for the possibility of any unmet need from Leicester City being accommodated in North West Leicestershire. This scenario would conflict with national policy. This would raise significant issues for the Local Plan in respect of the Duty to Cooperate.	The growth envisaged in the SGP is significantly more than allowed for under this scenario and assumed a lower level of unmet need from Leicester City.

Medium scenario (448 dwellings per annum)			
This scenario is above the 10-year variant projection, but otherwise significantly below the other 4 projections, including being 58% below the Principal Projection.	These are 38% more than allowed for under this scenario which is based on a lower figure than the adopted Local Plan (481 dwellings) and is based on the 2017 Housing and Economic Development Needs Assessment.	Under this scenario there would be a reasonable buffer of 80 dwellings per annum compared to the standard method.	The growth envisaged in the SGP is more than allowed for under this scenario.
High 1 scenario (512 dwellings per annum)			
This scenario is above the 10-year variant projection, but otherwise significantly below the other 4 projections, including being 38% below the Principal Projection.	These are 21% more than allowed for under this scenario, even though it is based on a higher figure than the adopted Local Plan (481 dwellings).	Under this scenario there would be a reasonable buffer of 144 dwellings per annum compared to the standard method.	The growth allowed for in this scenario is the same as that in the SGP.
High 2 scenario (730 dwellings per annum)			
This scenario is above all the projections, other than the High International Migration projection. It is 3% more than the Principal Projection.	These are 18% less than allowed for under this scenario, although more recent rates are above this.	Under this scenario there would be a significant buffer of 362 dwellings per annum compared to the standard method.	The growth allowed for under this scenario is significantly more than envisaged in the SGP.

What is our preferred option?

- 4.19. Having regard to the various factors it is concluded that:
- **Low scenario** - this would not be an appropriate basis on which to continue planning for future provision as it performs poorly against all of the factors.
 - **Medium scenario** – Having regard to the above factors, it is considered that the medium scenario would not be an appropriate basis on which to continue planning for future provision. Whilst the level of growth would provide a buffer for accommodating any unmet need from Leicester City, over the plan period this would represent about 1,500 dwellings. However, the unmet need is about 18,000 dwellings and so the buffer may not be sufficient. Planning for this level of growth would represent a risk and potentially require additional work at a later date.

- **High 1 scenario** – this scenario is more balanced in terms of these factors than either the Low or Medium scenarios. The level of growth would provide a good buffer for accommodating unmet need from Leicester City, although it is not clear at this time whether it would be sufficient and so it would still represent a risk. This level of growth is consistent with the SGP. However, the level of growth is well below both demographic trends and build rates. On balance, it is considered that it represents a potentially suitable scenario.
 - **High 2 scenario** - Having regard to all of the factors, this scenario performs the best. It provides a very significant degree of flexibility to help address issues of unmet need. The PPG also notes that the standard method “does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour”. In terms of economic circumstances, the district is already a net importer of labour as measured using the Office for National Statistics job density rate which results in in-commuting to the district. This trend is almost certain to continue into the future. It is also worth noting that the [Housing and Economic Needs Assessment 2017](#) HEDNA which informed the adopted Local Plan housing requirement figure, included an upwards adjustment for economic need.
- 4.20. Overall it was concluded that at this time the High 1 and High 2 scenarios appear to cover the most likely future requirement until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed.
- 4.21. Therefore, when looking at where housing growth should be directed to, the amount of growth to be considered is:
- **High 1 scenario** – 512 dwellings each year, for which there is a residual requirement of about 1,000 dwellings
 - **High 2 scenario** – 730 dwellings each year, for which there is a residual requirement of about 5,100 dwellings

Consultation question

Q4 - Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

Where should new housing be located?

- 4.22. In preparing the Local Plan we have to consider all reasonable alternatives. To do this we created a series of options for how growth might be distributed across the district.
- 4.23. The starting point for developing these potential distribution options was the settlement hierarchy established in the adopted Local Plan (Policy S2). As explained in Section 3, this distinguishes between the roles and functions of different settlements, with the respective position in the hierarchy determined by the availability of services and facilities that communities need (i.e. settlements with a similar range and level of services and facilities are at the same level in the hierarchy).

- 4.24. The council’s [Strategic Housing and Economic Land Availability Assessment 2019](#) (SHELAA) included the identification of two sites located south of East Midlands Airport and adjoining each other and which separately had been proposed as potential new settlements of 2,400 and 2,340 dwellings respectively (site references IW1 and IW2). Subsequently, the two site promoters agreed to work together to promote a single new settlement (site IW1 in the [2021 SHELAA](#)).
- 4.25. Therefore, it is considered appropriate to include a New Settlement as a potential option in combination with other options but also on its own. In total 9 options were developed as set out below.

Table 4 – spatial distribution options

Option 1	As per adopted Local Plan
Option 2	Principal Town and Key Service Centres
Option 3	Principal Town and Key Service Centres and Local Service Centres
Option 4	Principal Town and New settlement
Option 5	Principal Town, New settlement and Key Service Centres
Option 6	Principal Town, New settlement and Key Service Centres and Local Service Centres
Option 7	Principal Town, New settlement and Key Service Centres and Local Service Centres and Sustainable Villages
Option 8	New settlement
Option 9	Principal Town, New settlement and Key Service Centres and Local Service Centres, Sustainable Villages and Small Villages

- 4.26. These options were then combined with the growth scenarios identified at paragraph 4.15 to create a series of more detailed options including theoretical amounts of growth being assigned to the different settlement categories.
- As Option 1 would not require any new allocations (see Table 2) this option was only tested against the low and medium scenarios.
 - Options 2-7 and Option 9 were assessed against the High 1 and High 2 scenarios, whilst Option 8 (New Settlement) was only assessed against the High 2 scenario as the amount of development that needs to be provided for under the High 1 scenario (about 1,000 dwellings) would be too small to deliver the necessary infrastructure and supporting facilities and so was not considered to be a reasonable alternative.
- 4.27. In total this resulted in 16 options as set out in Table 5. The spatial options have been subject to [Sustainability Appraisal](#). The dwelling numbers included in the table are indicative at this stage for the purposes of testing the options. The final strategy will not necessarily reflect these figures exactly.

Table 5 – detailed distribution options

Option	Description
Low and Medium scenario (368-448 dwellings/annum)	
Option1	Baseline Option (Continuation of adopted Local Plan)
High 1 scenario (residual requirement = 1,000 dwellings)	
Option2a	Principal Town (Coalville – 600 dwellings) and Key Service Centres (KSC) (Castle Donington and Ashby de la Zouch – 400dwellings)
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
Option4a	Principal Town (400 dwellings) and New Settlement (600 dwellings)
Option5a	Principal Town (450 dwellings), New Settlement (450 dwellings)and KSC (100 dwellings)
Option6a	Principal Town (350 dwellings), New Settlement (350 dwellings),KSC (200 dwellings) and LSC (100 dwellings)
Option7a	Principal Town (350 dwellings), New Settlement (350 dwellings),KSC (150 dwellings), LSC (100 dwellings) and Sustainable Villages (50 dwellings)
Option9a	Principal Town (200 dwellings), New Settlement (350 dwellings), KSC 90 dwellings), LSC (50 dwellings), Sustainable Villages (270dwellings) and Small Villages (40 dwellings)
New Settlement (residual requirement = 5,100 dwellings)	
Option8	New Settlement
High 2 scenario (residual requirement = 5,100 dwellings)	
Option2b	Principal Town (3,060 dwellings) and Key Service Centres (2,040dwellings))
Option3b	Principal Town (2,550 dwellings), Key Service Centres (1,530dwellings) and LSC (1,020 dwellings)
Option4b	Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)
Option5b	Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)
Option6b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

- 4.28. The following section sets out the council’s assessment of these options, with the exception of Option 1 which was discounted because it had been concluded that the low and medium growth scenarios were not appropriate.

Assessment of options

High 1 scenario (1,000 dwellings)

- 4.29. Options 4a to 9a all include the New Settlement as an element of the potential strategy. The overall potential scale of growth at the New Settlement is estimated to be about 4,700 dwellings. However, the scale of growth under options 4a to 9a is only 350 to 600 dwellings

(Table 5). On its own such a scale of growth is too small to be likely to be viable or to be able to deliver the necessary infrastructure. Therefore, they would need to be seen in the context of the New Settlement as a longer-term proposal, going well beyond the end of the plan period (2039).

- 4.30. A strategy which sought to defer the vast majority of development of a new settlement beyond the plan period carries an element of risk, not least in terms of the long-term commitment that this would require from the developer/landowner.
- 4.31. Therefore, it was, on balance, considered that that options 4a to 9a should not be taken forward under this growth option.
- 4.32. In terms of the remaining options (Options 2a and 3a), the results from the Sustainability Appraisal are summarised below.

Summary from Sustainability Appraisal

Option 2a

- 2 negative effects - SA1 (Health) and SA8 (Sustainable travel)
- 3 positive effects - SA4 (Housing), SA6 (Town Centres) and SA10 (Carbon emissions)

Options 3a

- 1 significant effect – SA8 (Sustainable travel)
- 2 negative effects - SA2 (Inequalities) and SA11 (Climate change)
- 3 positive effects - SA4 (Housing), SA6 (Town Centres) and SA10 (Carbon emissions)

These two options score virtually the same in terms of the SA assessment, save for option 3a scores a significant negative affect against SA8 (Sustainable travel) which reflects the fact that under this option growth would be dispersed down to Local Service Centres (Ibstock, Kegworth and Measham). The SA assessment notes that:

“This [is] due to public transport services being infrequent and there being fairly low levels of connectivity in the Local Service Centres, as well as lack of designated walkways and cycle paths linking settlements which may discourage sustainable travel.”

Whilst the level of public transport provision is not as significant in Local Service Centres, it is the case that all are served by services to higher order centres, not just those in the district but beyond (e.g. Derby, Leicester, Burton upon Trent and Loughborough). Development in these centres would also potentially provide an opportunity to enhance walking and cycling provision, something noted in the detailed assessment.

Similarly, there would be some benefits to the shops and other services of the Local Service Centres which would not arise from Option 2a, although this would be countered to some degree by fewer benefits for the town centres of Coalville, Ashby de la Zouch and Castle Donington if residents were to shop in the Local

Service Centres.

Both options score positively against SA4 (Housing).

Other considerations

- 4.33. Option 2a would result in development being concentrated in a more limited number of settlements and hence sites than Option 3a. This would not provide such a flexibility or choice in the housing market and represents a potential risk in terms of deliverability and would also provide fewer benefits from a housing perspective.
- 4.34. Both Options 2a and 3a would not provide much support for the NPPF advice to “*identify opportunities for villages to grow and thrive*” (paragraph 79), although Option 3a would provide slightly more opportunities than 2a.

Overall conclusion

- 4.35. Whilst there is not much to choose between Options 2a and 3a, it is considered that the concerns about deliverability and the greater opportunity afforded by Option 3a for growth in villages are such that it is considered that under the High 1 scenario that only **Option 3a** should be taken forward.

High 2 scenario (5,100 dwellings)

- 4.36. A key test for the Local Plan is that whatever is proposed must be deliverable.
- 4.37. The identification of land for a further 5,100 dwellings would inevitably require the allocation of some significant sites in terms of size, potentially including a New Settlement as allowed for in Options 4b, 5b, 6b, 7b, 9b and 8.
- 4.38. Large scale development such as a new settlement has the potential to deliver significant benefits in terms of new homes but also new infrastructure. However, such large schemes take a significant amount of time to bring to fruition.
- 4.39. Research published by Lichfields (2020) (an established and respected planning consultancy firm) found that large schemes can take 5 or more years to start, with sites of 2,000 or more dwellings taking on average 8.4 years from validation of the first planning application to the first dwelling being completed. This information is used in the assessments below.

Option 2b – Principal Town (3,060 dwellings) and Key Service Centres (2,040 dwellings)

Summary from Sustainability Appraisal

- 1 significant negative effect – SA2 (Inequalities)
- 2 negative effects – SA1 (Health) and SA8 (Sustainable travel)
- 3 positive effects - SA4 (Housing), SA6 (Town centres) and SA10 (Carbon emissions).

This option has the least number of significant negative effects of all the High 2 options.

Other considerations

- 4.40. Whilst Option 2b performs well against the SA, as development is limited to two settlement categories and 3 settlements (Coalville, Ashby de la Zouch and Castle Donington) this provides little flexibility or choice for the market which is important for ensuring sustainable delivery rates. If delivery rates are not sustained, then this represents a risk to the 5-year housing land supply which is required to ensure that the plan does not become out-of-date.
- 4.41. Historically, the housing market in the Coalville area has been weaker than other parts of the district. The build rate for Coalville (328 dwellings each year) would be significantly more than that achieved for the period 2011-21 (180 dwellings each year) and more than that achieved more recently (2016-21 – 267 dwellings each year). Therefore, there are significant doubts about the ability of the market to deliver such a scale of growth having regard to recent build rates.
- 4.42. The scale of growth is such that it is almost inevitable that some large-scale sites would be required. For example, looking at the Council’s recently published [Strategic Housing and Economic Land Availability Assessment 2021](#) (SHELAA) to accommodate growth in the Key Service Centres would be likely to require identifying an area of 1,400 dwellings west of Castle Donington or 800 dwellings at Packington Nook Ashby de la Zouch. As already noted, it takes time for large scale sites such as these to begin to deliver. Again, any slippage in delivery would impact upon the 5- year housing land supply, and so represents a risk to ensuring that the plan does not become out-of-date.
- 4.43. Therefore, for the above reasons it was considered that Option 2b should not be taken forward.

Option 3b - Principal Town (2,550 dwellings), Key Service Centres (1,530 dwellings) and LSC (1,020 dwellings)

Summary from Sustainability Appraisal

3 significant negative effect – SA1 (Health), SA2 (Inequalities) and SA8 (Sustainable travel)
1 negative effect – SA11 (Climate change)
3 positive effects - SA4 (Housing), SA6 (Town centres) and SA10 (Carbon emissions).

Overall, this option performs better than 4b but not as well a 2b.

Other considerations

- 4.44. Under Option 3b, growth would be more spread out than Option 2b with growth at 3 settlement categories and 6 settlements (Coalville, Ashby de la Zouch, Castle Donington, Ibstock, Kegworth and Measham) and so concerns about over concentration in a limited number of areas is less relevant.

- 4.45. As with Option 2b there are concerns regarding the required build rate in Coalville (301 dwellings each year) compared to what has been achieved 2011-21 (180 dwellings) and 2016-21 (267 dwellings). So once again there are significant doubts about the ability of the market to deliver such a scale of growth in Coalville having regard to recent build rates.
- 4.46. Therefore, for this reason it is considered that Option 3b should not be taken forward.

Option 4b - Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)

Summary from Sustainability Appraisal

4 significant negative effect – SA2 (Inequalities), SA12 (Bio/geodiversity), SA13 (Landscape/Townscape) and SA14 (Land Use)
2 negative effect – SA6 (Town Centres) and SA11 (Climate change)
2 positive effects - SA4 (Housing) and SA10 (Carbon emissions).

Overall, this option performs similar to other options, particularly in terms of the significant negative effects

Other considerations

- 4.47. This option raises questions regarding the deliverability of the new settlement element of this option (3,060 dwellings up to 2039). It is estimated that development would not commence until 2028 (at the earliest) with a build rate as estimated by the site promoter of 250 dwellings, (which would be higher than that suggested in the Lichfields report referred to at paragraph 4.38). This would result in 2,750 dwellings being built 2028-39. This is less than the number required under this option.
- 4.48. Whilst it would be possible to adjust the figures in this option (i.e. reduce the anticipated number from the new settlement and increase those anticipated from the Principal Town), it is focussed in just two settlement categories (Principal Town and New Settlement) which provides little flexibility or choice. It could also require delivery rates, which if not sustained, represent a risk to the 5-year housing land supply which is required to ensure that the plan does not become out-of-date.
- 4.49. Therefore, it is considered that Option 4b should not be taken forward.

Option 5b - Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)

Summary from Sustainability Appraisal

4 significant negative effect – SA2 (Inequalities), SA12 (Bio/geodiversity), SA13 (Landscape/Townscape) and SA14 (Land Use)

2 negative effect – SA6 (Town Centres) and SA11 (Climate change) 2 positive effects - SA4 (Housing) and SA10 (Carbon emissions).

Overall, this option performs similar to other options, particularly in terms of the significant negative effects

Other considerations

- 4.50. Growth would be more spread out than Options 2b and 4b, but not as well spread out as Option 3b as it would be concentrated in 4 settlements (Coalville, new settlement, Ashby de la Zouch and Castle Donington) compared to 6.
- 4.51. As with other options there are concerns regarding the required build rate in Coalville (301 dwellings each year) compared to what has been achieved 2011-21 (180 dwellings) and 2016 -21 (267 dwellings). So once again there are significant doubts about the ability of the market to deliver such a scale of growth in Coalville.
- 4.52. Deliverability of the New Settlement is potentially of less concern than Option 4b, but there is not much flexibility for slippage.
- 4.53. In view of the number of significant negative effects and the concern regarding deliverability, it is considered that Option 5b should not be taken forward.

Option 6b - Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)

Option 7b - Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

Option 9b - Principal Town (1,020 dwellings), New Settlement (1,785 dwellings), KSC (459 dwellings), LSC (255 dwellings), Sustainable Villages (1,377 dwellings) and Small Villages (204 dwellings)

Summary from Sustainability Appraisal

These options are considered together in view of the fact that their scores are very similar.

Option 6b

3 significant negative effects - SA11(Climate Change), SA12 (Bio/geodiversity) and SA13 (Landscape/Townscape)

2 negative effects – SA1 (Health and SA8 (Sustainable travel)

1 positive effect – SA4 (Housing)

Option 7b

5 significant negative effects – SA2 (Inequalities), SA11(Climate Change), SA12(Bio/geodiversity) and SA13 (Landscape/Townscape) and SA14 (Land

use)
2 negative effects - SA1 (Health) and SA8 (Sustainable travel)
2 significant positive effects – SA4 (Housing) and SA6 (Town Centres)

Option 9b

5 significant negative effect - SA2 (Inequalities), SA11(Climate Change), SA12(Bio/geodiversity) and SA13 (Landscape/Townscape) and SA14 (Land use)

2 negative effects – SA6 (Town Centres) and SA8 (Sustainable travel)

1 significant positive effect – SA4 Housing

With the exception of Options 1, 2a and 3a, Option 6b has the least number of significant negative scores (3) all of which are common to the majority of options.

In terms of Option 7b, only option 8 has more significant positive scores (3).

The SA Report comments that in respect of Objective SA4, which is concerned with Housing, that with Option 7b *“SA4 (good quality homes to meet local needs) has been identified as a potential significant positive as under this option development is spread across the entire District rather than in a limited number of locations, ensuring that there is an increase in the number and mix of housing whilst also providing an element of affordable housing to meet the needs of the population, particularly at this higher quantum of growth”*. Similar wording is used in respect of Option 9b.

In effect, both Options 7b and 9b would benefit local communities as they would provide opportunities for people to remain in their local community whilst moving on to or up the housing ladder.

Other considerations

- 4.54. Option 6b results in the least dispersed pattern of development and would only be concentrated in Local Service Centres and above (including a new settlement). This would leave a significant number of settlements without any development, potentially to the detriment of those services and facilities in these settlements which rely upon regular customers. Such an approach would not sit comfortably with the NPPF (paragraph 79) which seeks to ensure that *“Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”*. Conversely, the pressure upon services and facilities in the higher order centres would be much greater.
- 4.55. In contrast, Option 7b would include development in sustainable villages whilst Option 9b would also include development in small villages. Option 7b would, with the exception a new settlement, represent a continuation of the strategy in the adopted Local Plan; a strategy which has a demonstrable strong delivery record.
- 4.56. Option 9b would represent a significant departure from the current strategy as it would focus more development on the lower order settlements where there are fewer services and facilities. It would have the potential to provide a significant number of smaller sites which could benefit small and medium sized developers, something which the NPPF requires Local

Plans to support. However, Option 7b would potentially also provide such opportunities, albeit perhaps not to the same extent, as it would include development in Sustainable Villages. Option 6b would be likely to provide a more limited number of opportunities in this respect.

- 4.57. Having a greater number of sites in a greater number of locations as in Options 7b and 9b would also represent less of a risk in terms of deliverability.
- 4.58. On balance, it is considered that whilst Option 6b scores well from an SA perspective, the fact that it would result in development being concentrated in a more limited number of settlements and hence sites, it represents something of a risk in terms of deliverability. In addition, it would also provide less benefits from a housing perspective means that it should not be taken forward.
- 4.59. This leaves Options 7b and 9b. In SA terms they score virtually the same, although 7b would potentially provide greater benefit to existing town and local centres (SA4).
- 4.60. The NPPF is clear that *“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*.
- 4.61. Whilst Option 9b would satisfy the requirements of paragraph 79 of the NPPF regarding promoting development in villages, it would result in a less sustainable pattern of development than Option 7b as it would put more development in those settlements with fewer services and facilities. In particular, the smallest settlements have very limited services and facilities compared to other more sustainable settlements, including more limited access to public transport, meaning that people would need to use cars on a regular basis. This would conflict with the aims of national policy to address climate change related issues.
- 4.62. Therefore, it is recommended that neither Option 6b or 9b be taken forward and that **Option 7b** be the preferred option under the High 2 growth scenario.

Option 8 – New Settlement (5,100 dwellings)

- 4.63. Under this option all new housing development (other than existing commitments) would be focussed on a single new settlement. This option performs well under the SA assessment with more positive scores than any other option (6) of which 3 are judged to be ‘significant positive effects’.
- 4.64. This strategy would be unlikely to satisfy the NPPF requirement regarding deliverability. This is because it offers no flexibility in the event that, for whatever reason, development did not proceed as envisaged and so would be a very high-risk approach. It would also conflict with the NPPF which states that *“it is important that a sufficient amount and variety of land can come forward where it is needed”* [emphasis added] (NPPF paragraph 60).

- 4.65. The NPPF requires (paragraph 73d) that assumptions about delivery rates need to be realistic when planning new settlements (or significant extensions to settlements). Having regard to the time taken for new large-scale development to come to fruition, deliverability of 5,100 dwellings by 2039 at the new settlement would be unrealistic. A build rate of 250 dwellings per annum, would only result in 2,750 dwellings being built by 2039.
- 4.66. Therefore, Option 8 was not a reasonable option to take forward.

Overall conclusion regarding distribution options

- 4.67. Having regard to a combination of the outcome from the SA and also other factors, it is considered that under the High 1 scenario Option 3a should be the preferred option at this stage whilst under the High 2 scenario Option 7b should be the preferred option at this stage. These are summarised below.

Table 6 - options to be taken forward

Option	Description
High 1 scenario (1,000 dwellings)	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
High 2 scenario (5,100 dwellings)	
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

Consultation question

Q5 - Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

5. **Housing**

Self-build and custom housebuilding

Introduction

- 5.1. Self-build and custom housebuilding is a key element of the government’s agenda to increase the supply of housing, both market and affordable. Its purpose is also to give more people the opportunity to build their own homes. The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) (‘the Act’) provides a legal definition of a self-build and custom housebuilding meaning the building or completion by individuals, an association of individuals or persons working with or for individuals, of houses to be occupied as homes by those individuals.
- 5.2. The adopted Local Plan does not include a policy for self-build and custom housebuilding.

Background

- 5.3. Legislation introduced in recent years places duties on councils relating to increasing the availability of land for self-build and custom housebuilding. The Act requires councils to keep and have regard to a self-build and custom housebuilding register which is a record of the individuals and associations of individuals seeking serviced plots of land in the area to self-build or custom build their own home.
- 5.4. The Act places a further duty upon councils to grant permission for enough suitable plots of land to meet the demand in their area. The level of demand is established by the number of entries added to the council’s register during a base period which runs from 31 October to 30 October each year. The local authority then has 3 years from the end of each base period in which to permit an equivalent number of plots.
- 5.5. The North West Leicestershire register was established in April 2016 and as of 30 October 2021 there are 72 individuals on the list. Using the prescribed base periods, for our district the number of entries, and therefore demand, equates to: -
- Permit 6 plots by October 2019.
 - Permit a further 10 plots by October 2020.
 - Permit a further 8 plots by October 2021.
 - Permit a further 14 plots by October 2022.
 - Permit a further 20 plots by October 2023.
 - Permit a further 14 plots by October 2024.
- 5.6. Since October 2021 we have to date received six additional entries which bring the cumulative total of individuals on the list to 78, overall demonstrating demand for self-build and custom housebuilding plots in the district.
- 5.7. The Planning Practice Guidance (PPG) on [Self-build and custom housebuilding](#) provides further guidance. It states that councils need to take into account the self-build and custom housebuilding register when preparing planning policies. The register is also likely to be a

material consideration when determining proposals for self- build and custom housebuilding plots.

- 5.8. This guidance also suggests how local authorities can best support self-build and custom housebuilding and increase the number of planning permission. For example, planning policies that require the provision of self-build and custom housebuilding plots. In addition, when considering local housing need for the district, this should include an assessment of people wishing to self-build or custom build their own homes.
- 5.9. However, there is nothing set out in legislation or guidance that says proposals for self-build and custom housebuilding plots should be treated any differently to applications for housing in general, for example, they will be expected to comply with general housing policies in the Local Plan.
- 5.10. Notwithstanding, there is a clear demand for self- build and custom housebuilding plots in the district. In light of this and national policy and guidance, this issue has been addressed in previous reports to the Local Plan Committee. This was initially considered at Local Plan Committee on [12 September 2018](#), primarily to investigate how a self-build and custom housebuilding policy could be included in the Local Plan Review.
- 5.11. We then consulted upon options as part of the [Emerging Options consultation](#) between November 2018 and January 2019, including the provision of a policy in respect of self-build and custom housebuilding plots. A meeting of the Local Plan Committee on [26 June 2019](#) considered all the responses to that consultation. It was agreed at this committee not to require the provision of self-build and custom housebuilding plots as part of general market developments, due to the practical issues with the application of such an approach and due to the lack of consistent support from Inspectors at examinations of Local Plans. Therefore, the Local Plan Committee agreed to give further consideration to the most appropriate form for such a policy and additionally agreed that not including a policy was not considered appropriate.
- 5.12. The matter was further considered in detail at Local Plan Committee on [27 May 2020](#) and the committee agreed the options and approach detailed below for consultation.

Policy Options

General Policy on self- build and custom housebuilding

- 5.13. The following are potential options for how the issue of self-build and custom housebuilding could be addressed in the Local Plan Review.
- Option 1: Inclusion of a general policy on self-build and custom housebuilding.
 - Option 2: Inclusion of a general policy on self-build and custom housebuilding with a 'list of criteria' to identify the matters self-build and custom housebuilding development proposals should satisfy, for example, design, amenity and highway safety.
- 5.14. A summary assessment of the advantages and disadvantages of the two other options is set out in the following table.

ADVANTAGES	DISADVANTAGES
Option 1 – inclusion of a general policy on self-build and custom housebuilding	
<ul style="list-style-type: none"> • A general policy would explicitly state the council’s support for self-build and custom housebuilding and confirm its commitment to the maintenance of a self-build register. • Demonstrates the council’s commitment to this issue. 	<ul style="list-style-type: none"> • Not considered to add any value to the guidance contained in National Policy and Guidance and lacks a mechanism to deliver self-build and custom housebuilding plots.
Option 2 – inclusion of a general policy on self-build and custom housebuilding with a ‘list of criteria’	
<ul style="list-style-type: none"> • Demonstrates and explicitly states the council’s support for self-build and custom housebuilding. • Provides further detail on how such applications would be assessed in terms of design, amenity, highway safety etc 	<ul style="list-style-type: none"> • Question whether this would add value to National Policy and Guidance. • These issues are not unique to this form of development and are applicable to all new dwellings and housing development in the district. • It is advised that similar overarching policies would also be included within any future adopted Local Plan and would apply to all forms of development. Therefore, could result in an unnecessary duplication of policy.

Specific self-build and custom housebuilding housing allocations

5.15. In addition, to a general policy, the Local Plan Committee also gave consideration to the identification and allocation of land within the Local Plan, to be used solely as self-build and custom housebuilding plots. The number of allocations could be calculated having regard to the number of individuals or organisations on the council’s self-build register. Two options were considered to implement this approach, both detailed below along with the advantages and disadvantages of each.

- Option 3 - the identification and allocation of land within the Local Plan, to be used solely as self-build and custom housebuilding plots.
- Option 4 – council to bring forward and/or make land available solely to self-build and custom housebuilding plots.

ADVANTAGES	DISADVANTAGES
Option 3 – Identification and allocation of land specifically for self-build and custom housebuilding plots.	
<ul style="list-style-type: none"> • Approach would provide a specific mechanism for providing self-build and custom housebuilding plots. • Council could choose to go down this route as a landowner irrespective of any specific policy provision in the Local Plan. 	<ul style="list-style-type: none"> • Questions are raised over the justification for allocating sites specifically for self-build and custom housebuilding as opposed to general housing, particularly given there are no ‘special circumstances’ in planning policy terms for self-build and custom housebuilding. • Allocation would need to be in locations which are acceptable in planning terms.

	<ul style="list-style-type: none"> • Approach may not increase housing supply and could replace one form of housing (general) with another form of housing (self-build and custom housebuilding). Consequently, it could be at the expense of other forms of housing that meets a need. This issue could however be addressed if it is identified that the provision of any of these sites would not count towards the district's overall housing provision, reducing concern over their deliverability.
<p>Option 4 – Council to bring forward and/or make land available solely to self-build and custom housebuilding plots.</p>	
<ul style="list-style-type: none"> • Approach would provide a specific mechanism for providing self-build and custom housebuilding plots. 	<ul style="list-style-type: none"> • In addition, to the above issues, the council does not own significant areas of land and so it is questionable as to how many plots could be delivered. • Regards the acquisition of land, queries are raised as to whether the Council is in a position to be able to take on financial liabilities and risks to enable acquisition of land. • Relatively limited demand for serviced plots, when compared to other housing needs and demands in the district. Are the challenges and risks proportionate to the benefits?

Preferred Option

- 5.16. Having considered the potential impacts and benefits of the potential policy options, a hybrid approach is the preferred way forward.
- 5.17. The suggested policy has a number of elements:
- It supports proposals for self-build and custom housebuilding plots in locations suitable for housing, including allocations, committed sites and windfall sites. The latter category essentially covers those sites which are not specifically identified for development but, for example, are within the Limits to Development. It would work alongside our proposed approach to the identification of Local Needs Villages as part of the proposed settlement hierarchy (see Section 3)
 - Seeks the provision of serviced plots for self-build and custom housebuilding plots on larger housing sites/allocations, providing there is evidence of demand. By limiting this approach to sites of a specific size and where there is evidence this is considered to address some of the concerns identified by Inspectors at other Examinations.
 - Identifies the site threshold for when self-build and custom housebuilding serviced plots are to be sought.
 - Allows flexibility to facilitate the development of service plots that remain unsold for a period of time.

- 5.18. The suggested policy is set out below.

Policy XX - Self-build and custom housebuilding

Proposals which meet the definition of self-build and custom housebuilding will be supported in any location considered to be suitable for housing, in accordance with the policies of this Local Plan, including allocated sites, committed sites and windfall sites. Where there is clear evidence of demand in the district, as evidenced through the self-build and custom housebuilding register or other evidence submitted as part of any planning application, and where servicing and site arrangements can be made suitable and attractive for such homes, the Council will seek the provision of land for self-build and custom housebuilding plots on housing sites capable of providing 50 or more dwellings, as part of an appropriate mix of dwellings.

Where self-build and custom housebuilding plots are included as part of a larger scheme which also includes plots or dwellings available on the open market, and where the self-build and custom housebuilding plots have been made available and marketed appropriately for a period of at least 12 months but have not been sold, then the plots may either remain available for purchase on the open market or be built out by the developer for sale on the open market.

Consultation question

Q6 - Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?

Space Standards

Introduction

- 5.19. The [Nationally Described Space Standards](#) (NDSS) are intended to provide a reasonable minimum level of internal living space, reflective of the proposed level of occupancy for that dwelling. It sets out requirements for the gross internal floor area of new dwellings and dimensions for key parts of the home such as bedrooms, the amount of built-in storage and ceiling heights. These standards are not part of building regulations and are solely within the planning system as a form of technical planning standard.
- 5.20. A number of benefits are associated with ensuring there are a minimum set of standards including improved family cohesion, reduced overcrowding, space for solitary activities such as studying or home working and suitable daylight and ventilation. These benefits have particularly become more relevant with increased agile working – which is likely to remain for many office-based workers – as a result of the COVID-19 pandemic.
- 5.21. Policy D1 of the adopted Local Plan includes the provision of appropriate storage and facilities for waste, recycling and bicycles, but there is no reference to space standards or other storage requirements.

- 5.22. The Council's [Good Design Supplementary Planning Document](#) (SPD), published in 2017, provides supplementary guidance to Local Plan policies for applicants relating to the Council's design aspirations for new developments. Amongst other matters it:
- seeks to ensure spaces are fit for purpose having regard to their intended use and maximum number of occupants.
 - encourages applicants to demonstrate that sufficient space is provided to include items that would reasonably be expected to be found within a particular room, along with the appropriate space to function in each room.
- 5.23. The SPD does not go as far as specifying the space standards required, however it is presently being reviewed. Further guidance and new policy on space standards should complement one another.

Background

- 5.24. To justify the inclusion of internal space standards the [PPG](#) states this involves providing evidence of need based on the type and size of development currently being built and assessing the impact on viability. Where a policy has been adopted, there should also be a reasonable transitional period to enable developers to factor the cost of space standards into future land acquisitions.
- 5.25. The PPG also advises that two main impacts could arise from adopting a space standard – the viability of an individual development and, as a consequence, the deliverability of potential site allocations for housing and implications on the housing land supply – and on affordability.
- 5.26. The PPG states councils should take account of the following to inform whether they should adopt the space standards:
- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed;
 - **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities also need to consider impacts on affordability where a space standard is to be adopted;
 - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.
- 5.27. We have completed an initial assessment of floorspace from a small sample of dwellings using the Gross Internal Area (GIA) derived from floorplans and information submitted as part of planning applications since 2015. The majority of developments exceed the NDSS, although those that fell below the standards were developments in the smaller settlements of Moira and Ravenstone. To determine whether this is reflective of issues regarding viability, a range of site typologies reflective of the settlements and of comparable development sizes would need to be tested through the Local Plan Viability Assessment which will be completed prior to the Regulation 19 version of the plan.

Policy Options

- 5.28. We have considered the following policy options for incorporating space standards:
- 5.29. **Option 1** – Do not include a policy on NDSS and future developments would continue to meet the mandatory space standards required through Building Regulations.
- 5.30. **Option 2** – Consider applying space standards to developments of a certain size or tenure, where achieving the standards is less likely to impact on the viability of the development. The Council will test the NDSS through its Local Plan Viability Assessment, which will include testing a number of alternative development sizes and site typologies in different settlements in the settlement hierarchy.

Preferred Option

- 5.31. At this stage we consider it appropriate to include a policy that applies to all new dwellings and which clarifies that this includes conversions and subdivision of existing buildings. This option reflects the council's position that the NDSS should be the minimum standards and would see higher internal space standards than if the Local Plan Review stays silent on this matter. The impact of these standards on viability will need to be assessed through the Local Plan Viability Assessment.

Policy XX: Space Standards

Gross internal floor areas for all new residential developments, including conversions, will be required to meet the Nationally Described Space Standards, as a minimum, as set out in the Technical Housing Standards Nationally Described Space Standard, or successor.

Consultation question

Q7 - Do you agree with the proposed policy on Space Standards? If not, why not?

Accessible and Adaptable Housing

Introduction

- 5.32. The NPPF makes clear that local planning authorities should seek to address the needs of different groups with specific housing requirements in their communities, including older people and those with disabilities.
- 5.33. Accessibility requirements for dwellings are set out in the Building Regulations (Part M, 2015). However, the [PPG](#) includes provisions for councils to consider requiring enhanced levels of accessibility, adaptability and wheelchair standards in new homes to help address the needs of specific groups. The categories – as set out in Building Regulations Part M10 are:

M4(2) Accessible and adaptable dwellings must be designed to enable most people to access and use the dwelling and incorporate features which:

- make it potentially suitable for a wide range of occupants, including older people and those with reduced mobility; and
- allow adaptation of the dwelling to meet the changing needs of occupants over time.

M4(3): Wheelchair user dwellings includes two different levels:

- a) Wheelchair adaptable dwellings which must be designed to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs.
- b) Wheelchair accessible dwellings which must be designed and built with the necessary features/adaptations included to enable it meets the needs of occupants who use wheelchairs.

5.34. The provision of wheelchair accessible and adaptable housing built from the outset to meet current and future demand enables people to live more independently and not have to move home and results in savings on a range of health and social costs in the long term.

5.35. Policy H6 of the adopted Local Plan (House Types and Mix) seeks to ensure that market housing meets the needs of the district's current and future residents, delivering a range of types and sizes. Notably, for development of 50 or more dwellings, the policy states the following will be provided: *"A proportion of dwellings which are suitable for occupation or easily adaptable for people with disabilities in accordance with Part M4(2) of the Building Regulations"*. No policy addresses the provision of wheelchair adaptable or accessible homes.

Background

5.36. The PPG states that an ageing population will see the numbers of disabled people continuing to increase and it is important to plan early and meet the needs throughout their lifetime. It advises that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling i.e. social housing. All other requirements apply to both market and social housing. The PPG draws a distinction between wheelchair accessible and wheelchair adaptable homes.

5.37. A [Local Housing Needs Assessment](#) (LHNA) report undertaken to support the Local Plan Review considered the needs of older people and those with disabilities and looks at the potential requirements for housing built to the accessibility and wheelchair technical standards in accordance with the PPG. The study identifies that over the period 2018-2036, the district is projected to see a notable increase in the older person population with the total number of people aged 65 and over increasing by 47% over this period. This compares with overall population growth of 13% and a modest increase in the under 65 population of 4%. The proportionate increase in the number of older people in the district is higher than that projected for Leicestershire and East Midlands Review considered the needs of older people and those with disabilities and looks at the potential requirements for housing built to the accessibility and wheelchair technical standards in accordance with the PPG. The study identifies that over the period 2018-2036, the district is projected to see a notable increase in the older person population with the total number of people aged 65 and over increasing by

47% over this period. This compares with overall population growth of 13% and a modest increase in the under 65 population of 4%. The proportionate increase in the number of older people in the district is higher than that projected for Leicestershire and East Midlands.

- 5.38. Taking account of future population growth there is projected to be an increase of 61% of the population aged 65 and over with mobility problems. Other notable findings from the report include a future need for all types of specialist housing for older people; a need for additional care bedspaces; and a need for around 400 dwellings to be for wheelchair users – meeting technical standard M4(3). The study concludes that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing.
- 5.39. It recommends that the Council considers requiring all dwellings, in all tenures, to meet the M4(2) standards – this is compared to the adopted policy requirement only applying to applications for 50 or more dwellings. It also recommends at least 5% of homes meeting M4(3) for social housing.
- 5.40. The study also recommends that the Council should consider if a different approach is more appropriate for market housing and affordable homes, recognising that registered providers may already build to higher standards.

Policy Options

- 5.41. We have considered the following policy options:
- 5.42. **Option 1** – to roll forward the adopted Local Plan policy of seeking a proportion of dwellings to meet standard M4(2) for developments of over 50 dwellings. This would result in developments of less than 50 dwellings potentially not meeting a need for accessible and adaptable housing over the plan period.
- 5.43. **Option 2** - require all dwellings to meet the M4(2) standard for accessible and adaptable dwellings.

Preferred Option

- 5.44. Informed by the evidence on the need for adaptable and accessible homes, we will require all dwellings to meet the M4(2) standard for accessible and adaptable dwellings. This requirement goes further than the adopted Local Plan which requires this standard for developments of 50 or more dwellings. This is to ensure the future housing stock in the district is able to accommodate the increase in demand for accessible and adaptable housing, if needed, particularly in rural settlements where development proposals would not meet the adopted threshold.
- 5.45. We propose to take forward the recommendation in the LHNA to require at least 5% of affordable homes to meet the standard for M4(3) wheelchair adaptable and accessible dwellings. Furthermore, we will work with Registered Providers to identify what proportion of this requirement should be for wheelchair adaptable or wheelchair accessible dwellings.

Policy XX: Accessible and Adaptable Housing

All new build residential developments will be required to meet at least M4(2) (accessible and adaptable) standards of the Building Regulations (or subsequent update).

5% of all new dwellings of the affordable housing requirement of all new proposals will be required to meet Part M4(3) (wheelchair user dwellings) standard – with the number of these dwellings to meet Part M4(3)(b) (wheelchair accessible) to be determined in consultation with the District Council and the respective registered provider.

Exceptions to these requirements will only be considered where it can be robustly demonstrated that it will not be possible to provide safe, step-free access.

Consultation questions

Q8 - Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?

Q9- Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?

6. Development strategy options for employment

- 6.1. One of the key elements of the Local Plan Review will be to make sure there is a sufficient supply of new employment land in suitable locations to match the likely requirements of local businesses and inward investment. As for housing, there are choices to be made about the amount, types and location of future employment land. The selected approach must be an appropriate one having regard to both the evidence and realistic alternatives.
- 6.2. We use the term 'general employment land' to encompass the following uses:
- offices (use class E(g)(i))
 - research & development (use class E(g)(ii))
 - light industrial (use class E(g)(iii))
 - industrial (use class B2)
 - non-strategic warehousing (units up to 9,000sqm) (use class B8).
- 6.3. The needs of the strategic warehousing sector (units of more than 9,000sqm) are covered later in this section.

Need for general employment land

- 6.4. There has been considerable market demand for industrial and smaller warehousing premises in NWL over recent years and the supply of sites for these uses has been quite strong, already surpassing the estimated requirements in the [Housing and Economic Development Needs Assessment 2017](#) (HEDNA). That said, the supply of industrial space is in competition with the strong demand from the strategic warehouse sector which generates higher land values with which non-strategic industrial development cannot compete.
- 6.5. The market for new offices has been somewhat constrained. Whilst the number of office-based jobs in the district has increased, this has not been matched by the demand for actual new office space.
- 6.6. An up-to-date assessment of the need for additional general employment land is provided by the [North West Leicestershire: The Need for Employment Land \(December 2020\)](#) study ('the Stantec study'). This study is part of the evidence base for the Local Plan Review and covers the period 2017-39.
- 6.7. Table 7 shows how much additional office and industrial/smaller warehousing space will be needed between 2017-39 according to the Stantec study and also shows the land supply position at 31 March 2021. The assessment includes the following:
- a **losses allowance** to take account of future losses of employment land to other uses;
 - a **flexibility margin** equivalent to 5 year's annual average completions as insurance for uncertainty and changing business needs; and
 - the **plot ratios** used in the Stantec study. Plot ratios are used to estimate how much land will be needed to provide a certain amount of employment floorspace. The Stantec study uses plot ratios of 60% for offices and 40% for industry/smaller

warehousing. As an example, for 100sqm of offices the amount of land needed will be $100/0.6 = 167\text{sqm}$ of land

Table 7: Employment Land Need/Supply balance at 31 March 2021

		Offices		Industrial/smaller warehousing	
		Sqm	Ha	Sqm	Ha
A	<i>Stantec Requirement (2017 – 39)</i>	57,000	9.0	187,000	47.00
B	<i>Losses allowance (2023 – 39)</i>	2,400	0.4	72,800	18.2
C	<i>Flexibility Margin</i>	11,285	1.88	25,484	6.37
D	Total Requirement [A+B+C]	70,685	11.28	285,284	71.57
E	<i>Net completions (2017 – 2021)</i>	12,784	6.33	2,990	-0.49
F	<i>Net permissions at 31/03/2021</i>	23,986	8.74	73,910	28.22
G	<i>Allocation (Money Hill)</i>	31,980	5.33	42,640	10.66
H	Total Supply [E+F+G]	68,750	20.4	119,540	38.39
	Residual requirement(+)/surplus(-) (2021-39) [H-D]	1,935	-9.12	165,744	33.18

- 6.8. Based on current information, the Local Plan Review would need to allocate new sites sufficient for **up to 2,000sqm of office space** and **at least 166,000sqm/33Ha of industrial/smaller warehousing**. At first look it appears that there is an over-supply of land for offices (9.12ha) but, from what we know from extant planning permissions etc, this will not be enough to accommodate the new office floorspace requirement in full. At a plot ratio of 60%, some 3,300sqm of land (0.3Ha) will be needed for up to 2,000sqm of office space.
- 6.9. There are two further matters which could impact on the amount and type of additional employment land that the Local Plan will need to identify:
- the Leicester and Leicestershire authorities have commissioned a replacement for the 2017 HEDNA. Amongst other things, this will contain an alternative assessment of employment land requirements for each authority area, including NWL. The study is due to be completed in Spring 2022 and we will consider the implications of its findings in due course.
 - Leicester City Council has declared an unmet need for some 23Ha of employment land. As with housing, how and where this unmet need should be addressed is the subject of discussion and negotiation between the Leicester and Leicestershire authorities with the intention that an agreed position will be set out in a revised Statement of Common Ground. Any implications for NWL's employment land requirements will be addressed through our plan-making process.

Continuity of supply

- 6.10. At 1 April 2021 there is some 53Ha of land allocated or with planning permission for general employment uses in the district. We have looked at the timescales for when these sites are likely to be developed and this reveals that there is some risk that the supply of suitable,

available employment land will tail off considerably (and could even reach zero) in the later years of the plan review period.

- 6.11. The additional land allocations which will be included in the plan will help the position but achieving an appropriate continuity of supply could still be an issue. There is no NPPF requirement to demonstrate a rolling supply of employment land but there is a risk that business growth could be frustrated by a lack of suitable sites post 2031. The NPPF confirms that “planning policies should... set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period” (paragraph 82b) (emphasis added).

Policy Options

- 6.12. In response, the following are potential ways of ensuring a continuity of supply in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
<p>Option 1 – identify reserve site/s. This would involve identifying specific additional site/s in the Local Plan Review, on top of those needed to meet the numerical requirements which would be released for development only in the specific circumstances of insufficient supply. The plan would include a policy setting out the triggers which would need to be met to justify the release of the site/s.</p>	
<ul style="list-style-type: none"> • it helps give certainty to users of the plan • it is a pro-active approach • it gives the council control over site selection 	<ul style="list-style-type: none"> • it may be difficult to make any policy triggers sufficiently definitive • the reserve site/s may not match every occupier’s site requirements (in terms of size, location etc)
<p>Option 2 – increase the requirement figures by an additional factor. This would involve increasing the numerical requirement for additional employment land by a certain amount or percentage and allocating a correspondingly more land in the plan.</p>	
<ul style="list-style-type: none"> • it increases the total quantity of employment land • it gives extra flexibility and choice to the market 	<ul style="list-style-type: none"> • it does not provide control over the timing of, and circumstances when, the additional land would become available. • it relies on the market reaching a natural balance to spread out delivery over the plan period.
<p>Option 3 – await the next review of the Local Plan. This is a ‘do nothing for now’ approach. As the issue potentially arises at the end of the plan period, and plans are subject to 5-yearly reviews, we would monitor our needs and supply position and reconsider whether additional land needs to be identified next time the plan is reviewed. This is the approach suggested in the Stantec study (starting at paragraph 6.5).</p>	
<ul style="list-style-type: none"> • it removes a risk of allocating more land than necessary in the short to medium term 	<ul style="list-style-type: none"> • it defers dealing with a known potential issue
<p>Option 4 – rely on Policy Ec2(2) or its equivalent. Policy Ec2(2) in the adopted Local Plan applies to proposals for employment development on unidentified sites in the countryside.</p>	

ADVANTAGES	DISADVANTAGES
If land supply becomes insufficient in the later part of the plan period, we would use Policy Ec2(2) or its equivalent to consider applications on such sites.	
<ul style="list-style-type: none"> it removes a risk of allocating more land than necessary in the short to medium term 	<ul style="list-style-type: none"> it does not involve a comprehensive assessment of which would be the 'best' sites it does not provide control over the timing of, and circumstances when, sites would come forward

Consultation question

Q10 - Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?

Strategy options for general employment land

- 6.13. In addition to the amount of additional land needed, we also need to consider how this should be distributed within the district.
- 6.14. As a starting point, the Table 8 shows the geographic distribution of the employment developments completed between 2017-21 as well as extant planning permissions and allocated land at April 2021. This is, in effect, the distribution delivered by the adopted Local Plan.

Table 8: Local Plan distribution of employment land

Area	Offices	Industry	Smaller B8	<i>Industry + Smaller B8</i>	Strategic B8
Measham/Appleby Magna area	4%	4%	-	2%	26%
Ashby area	57%	19%	42%	23%	5.2%
Castle Donington area (incl. Diseworth, Lockington)	23%	14%	20%	16%	58.7%
Coalville area (including Bardon)	12%	63%	34%	52%	-
Sawley	-	-	-	-	8.7%
Elsewhere (Heather, Kegworth, Moira, Sinope, Breedon)	4%	-	4%	7%	1.4%

- 6.15. This shows that the majority of recent/forthcoming employment development is in a relatively limited number of locations in NWL. For offices, completions and future supply is focused in Ashby, in particular at Ivanhoe Business Park (now complete) and at Money Hill, with a significant amount of office floorspace also permitted at Park Lane and EM Point at Castle Donington.
- 6.16. The main location for industrial uses has been the wider Coalville area including the recently completed Tungsten Park, Bardon and sites under construction at Victoria Road, Ellistown and east of Regs Way. The concentration of smaller scale warehousing at Ashby is accounted for by Money Hill, Land north of Lountside, Flagstaff Island and units at Ivanhoe Business Park. When the industrial and smaller warehousing figures are combined, Coalville has the greatest proportion of floorspace followed by Ashby and Castle Donington.
- 6.17. This pattern aligns with the settlement hierarchy in the adopted Local Plan with the majority of general employment provision at the most sustainable settlements of Coalville, Ashby de la Zouch and Castle Donington.
- 6.18. The Castle Donington area has been the focus for strategic scale distribution and Mercia Park accounts for the substantial amount of strategic distribution floorspace in the Measham/Appleby Magna area with significant developments also at Ashby (former Lounge site) and Sawley (Aldi).

Policy Options

- 6.19. We have devised 4 potential options for how the Local Plan Review could distribute future employment land. At this stage we have not identified a preferred option, pending the outcomes from the sustainability appraisal and the consideration of feedback from this current consultation.
- 6.20. **General Employment Land Strategy Option 1.** This would be a continuation of the adopted Local Plan distribution. General employment land allocations would be principally at Coalville, Ashby and Castle Donington (i.e. the settlements at the top of the settlement hierarchy). Features of this approach include:
- it could result in a choice of sites
 - the overall number of locations would be limited and mirror those where there is current supply
 - other settlements would not see any increase in supply
 - potentially the sites would be well related to labour supply
- 6.21. **General Employment Land Strategy Option 2.** This would involve allocating employment land at Coalville, Ashby and Castle Donington (like Option 1) and also at Measham/Appleby Magna as a 'new', expanding employment location. Features of this approach include:
- it could result in a choice of sites
 - the overall number of locations would be fairly limited and mirror those where there is current supply
 - other settlements would not see any increase in supply

- potentially the sites would be quite well related to labour supply and there may be particular benefits for Measham where there are known pockets of deprivation
- the strategy could include establishing J11A42 as a ‘new’, expanding employment location, capitalising on the profile of Mercia Park with the potential to share infrastructure
- however there is also likely to be strong competition from the strategic distribution sector in this location

6.22. **General Employment Land Strategy Option 3.** This approach would involve a more widespread distribution of employment land, including to locations which are currently less well provided for such as the Local Service Centres – Ibstock, Kegworth, Measham – and, potentially, Sustainable Villages. Key features of this approach include:

- it could result in a choice of both sites and locations
- Local Service Centre locations are unlikely to be as attractive to the market compared with Coalville, Ashby and the Castle Donington area
- the Stantec study recommends that we plan for “development opportunities at substantial sites, with critical mass and visibility, rather than relying on piecemeal development on scattered plots” (paragraph 6.13). This option may be more likely to result in the latter.

6.23. **General Employment Land Strategy Option 4.** This would involve allocating land in a single/new location for a high quality, mixed-use business park. The features of this option include:

- it could achieve the Stantec recommendation for development of a critical mass and visibility comprising modern, flexible high-specification space in an attractive environment (paragraphs 5.104, 6.13)
- it would result in a more limited choice of locations compared with other options
- potential locations could be in competition with the strategic distribution market
- this approach could be incorporated as part of a mix of uses in a new settlement, although this is likely to push delivery to the end of the Local Plan Review period and/or beyond
- there is already an opportunity for this approach at Money Hill (16Ha), if there is sufficient demand

Consultation question

Q11 - Which general employment land strategy option do you prefer? Is there a different option which should be considered?

Strategic warehousing: need and supply

6.24. Over recent years there has been considerable demand for new-build strategic warehousing (logistics) in NWL, that is units of 9,000sqm and above. This reflects the district’s exceptionally good strategic transport links, notably the M42/A42 transport corridor, the A50/Midland Main

Line and M1/A511. Since April 2011, permissions have been granted for some 423Ha of strategic warehousing including East Midlands Gateway (139Ha), plots at East Midlands Distribution Centre (22Ha), Mercia Park (97Ha), and Aldi at Sawley (39Ha). The level of provision in NWL alone has exceeded what was predicted for the whole of Leicester and Leicestershire up to 2031 in the [Strategic Distribution Study \(2017\)](#) which signals the particular market strength of this sector in the district.

- 6.25. With respect to the logistics sector specifically, the NPPF states that “planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for.... storage and distribution operations at a variety of scales and in suitably accessible locations” (paragraph 83). A key matter for the Local Plan Review will be to how to make an appropriate level provision for the strategic distribution sector in the face of continuing demand.
- 6.26. An updated assessment of this sector’s needs (2020-41) is provided in the [Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change \(April 2021\)](#) study (‘the study’) which was jointly commissioned by the Leicester and Leicestershire authorities. The study has a base date of 1st April 2020 and once the land supply position is updated to April 2021, there is a current supply of some 387,125 sqm of strategic distribution floorspace at rail served sites and 1,131,014 sqm at non-rail served sites in Leicester and Leicestershire. When this supply position is deducted from the amount of additional floorspace needed to 2041, the result is a shortfall of 718,875 sqm (288Ha ^{Ha}) at rail served sites and 334,986 sqm (96Ha) at non-rail served sites.
- 6.27. The rail-served requirement would be largely fulfilled through the proposed Hinckley National Rail Freight Interchange (NRFI) at Junction 2 of the M69 if it were to be permitted.
- 6.28. An application at Netherfield Lane, Sawley in NWL (20/00316/OUT) was approved in October 2021 and this adds some 33,675 sqm of strategic warehousing to the supply (and 32,051 sqm non-strategic units). Taking this into account results in a **shortfall of 301,293 sqm at non-rail served sites to 2041**. Also, permission has recently been granted on appeal for 89,200 sqm of industry (B2)/warehousing (B8) in Hinckley and Bosworth Borough (on the border with NWL). Depending on the split between uses, this would further reduce the shortfall to **at least 212,093sqm**.

Strategic warehousing: initial policy option

- 6.29. The Leicester and Leicestershire authorities are working together to assess how best the outstanding requirements can be met in a way which maintains an appropriate supply in terms of geography and trajectory, as recommended in the study.
- 6.30. To enable us to make progress whilst this joint working continues, we have decided to proceed on the basis of an initial option. Making no/minimal provision for strategic distribution would be unrealistic in view of the intensity of the development pressure in NWL for this sector. Importantly, any option at this stage is preliminary and does not signal the council’s commitment or agreement to take a particular share of the remaining Leicester and Leicestershire need.

- 6.31. **Initial Policy Option:** 50% of the outstanding road-served requirement to be met in NWL which would equal approximately 150,000sqm, or about 106,000sqm taking account of the recent appeal decision in Hinkley and Bosworth subject to confirmation with the other Leicester and Leicestershire authorities.
- 6.32. To put this in context, the higher of these two figures would be slightly less than the size of the Amazon unit at Beveridge Lane, Ellistown.

Consultation question

Q12 - Do you agree with the initial policy option for strategic warehousing? If not, why not?

7. **Employment**

- 7.1. The adopted Local Plan contains a suite of policies which support and direct employment-generating development. This section considers possible approaches to Local Plan Policy Ec2 – new employment sites and also discusses potential new policies for start-up workspace and local employment initiatives.

Policy Ec2(2) – New employment sites

Introduction

- 7.2. Policy Ec2 in the adopted Local Plan is concerned with new employment sites. Part 1 of the policy allocates up to 16ha of land at Money Hill, Ashby de la Zouch for employment. This is part of a wider allocation for housing, part of which has outline planning permission.
- 7.3. Part 2 deals with the circumstances where a planning application is submitted for additional offices, industry and/or warehousing on an unallocated site. We need to consider whether or not a similar type of policy to Ec2(2) should be retained in the Local Plan Review and, if so, what form it should take.

Background

- 7.4. The context for this is the plan's approach to flexibility to deal with unpredictable circumstances. The NPPF makes clear that the achievement of sustainable development is linked to three overarching objectives: an economic objective, a social objective and an environmental objective. With respect to the first of these, the planning system should "help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure" (paragraph 8, emphasis added)
- 7.5. The NPPF directs that planning policies should "be flexible enough to accommodate needs not anticipated in the plan allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances" (paragraph 82d).
- 7.6. The clear implication is that it would be inappropriate for the Local Plan Review to plan simply for the economic growth which is forecast at a point in time. The plan's policies should be sufficiently flexible to deal with changing circumstances over the plan's lifetime, for example if the economy grows more strongly than current studies anticipate and/or if the nature of business needs turns out to be different to what can be anticipated now.
- 7.7. In the preceding chapter, and in common with approaches elsewhere, we have added a flexibility margin to our need figures to help ensure a degree of flexibility and market choice of sites. We also set out options for how best to achieve a continuity of supply. There has been considerable market interest in employment development in the district over recent years, in particular for strategic scale warehousing, and it is likely that this demand pressure will

continue and could be different or stronger from what is currently predicted. The question now is whether the plan should also have a policy for employment land proposals on unidentified sites?

Policy Options

7.8. We have devised the following potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
<p>Option 1 - delete Policy Ec2(2) Applications for new employment floorspace on sites which are not allocated in the plan would be considered against the strategy/general policies contained in the Local Plan Review.</p>	
<ul style="list-style-type: none"> • overcomes the concern that Policy EC2(2) in its current form encourages unwarranted applications 	<ul style="list-style-type: none"> • it is less clear for all users of the plan which considerations will apply to a proposal for additional employment floorspace on an unallocated site • it is uncertain whether or not the approach would be sufficiently flexibility to accord with the NPPF although the supply continuity options which relate to reserve sites and adding to the requirement figures could help in this regard
<p>Option 2 – retain Ec2(2) in its current form (business as usual) Applications for new employment floorspace on sites which are not allocated in the plan would be considered against Ec2(2) plus any other relevant policies.</p>	
<ul style="list-style-type: none"> • provides clarity for all users of the plan about the criteria which will apply • demonstrates how the plan deals with the NPPF requirement for flexibility 	<ul style="list-style-type: none"> • does not overcome the concern that the existence of the policy encourages unwarranted applications • does not deal with the concern that the current policy is too permissive • the Stantec report suggests there is a risk of piecemeal development (paragraph 6.12) which would not provide the quality and scale of industrial space that high-value occupiers are looking for
<p>Option 3 – amend Policy Ec2(2) to make it more specific/restrictive (a) - include a requirement that the premises should be for a named end user</p>	
<ul style="list-style-type: none"> • enables the actual business requirements to be more easily explained and assessed through the planning application process 	<ul style="list-style-type: none"> • would exclude situations where there is a genuine market demand but no named end user and so may not be sufficiently flexible • firms can have genuine reasons for not wanting to publicise relocation plans before they are confirmed e.g. staff retention issues
<p>Option 4 – amend Policy Ec2(2) to make it more specific/restrictive (b) – amend the alternative sites test to include sites with planning permission Ec2(2) currently requires applicants to assess land allocated in the plan as potential alternative locations for the need/demand which has been identified. This could be expanded to also include sites which have planning permission.</p>	

ADVANTAGES	DISADVANTAGES
<ul style="list-style-type: none"> ensures that other suitable sites are explored with reasons given if they are discounted before an unidentified site could be deemed acceptable 	<ul style="list-style-type: none"> could be onerous for applicants (although a similar exercise is usually part of the Environmental Impact Assessment process)
<p>Option 5 – amend Policy Ec2(2) to make it more specific/restrictive (c) – amend the alternative sites test to potentially include sites outside the district Ec2(2) currently requires applicants to assess land allocated in the plan as potential alternative locations for the need/demand which has been identified. This could be expanded to potentially include sites which are outside the district but within the market area for the development.</p>	
<ul style="list-style-type: none"> may better reflect the ‘real life’ site search a business would undertake for strategic warehousing, this would better reflect the sub-regional nature of the market 	<ul style="list-style-type: none"> could be onerous for applicants (although a similar exercise is usually part of the Environmental Impact Assessment process) it will be difficult to justify the extent of the site search area the district council does not have planning control over sites outside the district
<p>Option 6 – amend Policy Ec2(2) to make it more specific/restrictive (d) - demonstrate that the need/demand is exceptional Ec2(2) currently requires evidence of an immediate need or demand. This could be expanded to require applicants to demonstrate that their need/demand is exceptional and that it was not/could not have been captured by the studies which the Local Plan Review relies upon.</p>	
<ul style="list-style-type: none"> captures a business-specific justification provides a policy framework for ‘needs not anticipated in the plan’ (NPPF paragraph 81d) to be addressed 	<ul style="list-style-type: none"> approach effectively invites applicants to challenge/undermine the council’s employment needs evidence base
<p>Option 7 – amend Policy Ec2(2) to make it more specific/restrictive (e) – omit the reference to ‘demand’ and refer to ‘need’ only</p>	
<ul style="list-style-type: none"> NPPF uses the single term ‘need’ and does not draw a distinction between ‘need’ and ‘demand’ 	<ul style="list-style-type: none"> excluding the term ‘demand’ could in effect exclude proposals that would meet a business-specific requirement and/or address a market gap. This could be considered to be out of step with the NPPF direction for policies to be “flexible enough to accommodate needs not anticipated in the plan” (paragraph 82).
<p>Option 8 – amend Policy Ec2(2) to make it more specific/restrictive – combination of Options 3-7.</p>	
<ul style="list-style-type: none"> overall, a more restrictive approach helps to address the concern that the current policy is insufficient to resist inappropriate development 	<ul style="list-style-type: none"> overall, a more restrictive approach could dissuade genuine investment opportunities which would have benefitted the local economy

Consultation question

Q13 - Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?

Start-up space

Introduction

- 7.9. In addition to the amount and location of new employment land, the Local Plan Review also has a role in helping to identify and cater for specific sector requirements, including where a specific business need is not being met by the market. A case in point is the concern that there is a shortage of premises suitable for start-up businesses. In response, one of the objectives in the Council's [Economic Growth Plan \(2019-21\)](#) is to ensure there is sufficient workspace and support for new enterprises and for business start-ups.

Background

- 7.10. Whilst the NPPF does not talk about start-up space specifically, it does emphasise that planning policies should work to meet anticipated needs over the plan period (paragraph 82b).
- 7.11. To understand the issue in more depth, we commissioned a [Start-up Workspace Demand Report](#) ('the report') which forms part of the evidence base for the Local Plan Review. The report found evidence of occupiers struggling to find small scale industrial units in NWL suitable for start-up firms. A link is made to viability issues; the development of small industrial space is constrained by low rental values and high building and fit-out costs, despite there being evidence of strong latent demand for such premises. Small businesses are also typically looking for shorter leases with more flexible terms and these are less attractive for many landlords. The study found that the existing small industrial units in the district are well occupied with little turnover or new stock.
- 7.12. An effect of this overall situation is that businesses may stay for too long in unsuitable accommodation which will impact on their productivity. An overall shortage of smaller scale space may mean that growing businesses do not vacate their start-up premises, blocking their availability for other new, fledgling businesses to move into, or it could mean they move out of the district completely to find suitable premises.
- 7.13. The Local Plan Review could help to deliver small workshop schemes (<100sqm) in the district, some of which could be available on flexible lease terms and with access to business support services. There is also a case to provide 'grow on' light industrial space of 150-500 sqm.

Policy Options

- 7.14. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 - allocate specific sites for start-up premises	
<ul style="list-style-type: none"> • this would be a clear and direct way for the Local Plan Review to address the shortage of start-up workspace in the district which the market has failed to provide 	<ul style="list-style-type: none"> • market factors (viability) may mean that the allocated site/s still do not come forward for development unless other forms of financial support are in place • it would be potentially difficult to justify which site/s should be selected for start-up premises and therefore excluded from general needs employment development • it is likely to result in provision being concentrated in a limited number of locations
Option 2 – specify a requirement for a proportion of start-up premises as part of the overall mix of employment floorspace on allocated employment sites only	
<ul style="list-style-type: none"> • this would be a clear and direct way for the Local Plan Review to address the shortage of start-up workspace in the district which the market has failed to provide • it should result in mixed employment sites with a range of business types/sizes 	<ul style="list-style-type: none"> • there could be a risk to the viability of the development as a whole • an on-site mix of units may be unfeasible for large scale/single operator sites (e.g. strategic distribution sites) • percentage requirements will require justification
Option 3 – generic policy which would apply to all employment sites, whether allocated or not, to require a proportion of units to be for start-ups and/or a financial contribution towards provision elsewhere	
<ul style="list-style-type: none"> • this would be a clear and direct way for the Local Plan Review to address the shortage of start-up workspace in the district which the market has failed to provide • it should result in mixed employment sites with a range of business types/sizes 	<ul style="list-style-type: none"> • there could be a risk to the viability of the development as a whole • site size thresholds and percentage requirements will require justification • accepting commuted sums would require the council to establish and resource a workspace delivery programme
Option 4 – policy to support the provision of start-up space on suitable sites	
<ul style="list-style-type: none"> • this would provide a clear statement of support for the development of start-up workspace • including criteria for judging a suitable site would make the policy more useful 	<ul style="list-style-type: none"> • on its own, it is unlikely to result in significant additional start up floorspace being provided. There is a risk that the plan would not be planning positively to address the identified need for start-up space.
<p>Option 5 – policy that would allow start-up premises as an exception on sites where development would normally be restricted. This would follow the same principle as a rural exceptions site policy for affordable housing and could be a continuation/adaptation of Policy S3 (Countryside) which allows for the expansion of rural businesses and small-scale employment generating development.</p>	

ADVANTAGES	DISADVANTAGES
<ul style="list-style-type: none"> there is a good prospect that the policy will bring forward additional sites although much will depend on how restrictive (or otherwise) the policy criteria are 	<ul style="list-style-type: none"> the development locations that result from this approach are likely to be less sustainable than for the other options
<p>Option 6 – no change. The Local Plan Review does not include a policy for start-up workspace.</p>	
<ul style="list-style-type: none"> there would be a reliance on the market to meet the need for this type of premises 	<ul style="list-style-type: none"> the plan would not be planning positively to address the evidenced need for start-up space. there would be a reliance on the market to meet the need for this type of premises

Consultation question

Q14 - Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?

Local employment

Introduction

- 7.15. The Local Plan Review could include a policy dealing with local employment. This could include encouraging businesses to recruit locally and to offer training to raise the attainment level of their staff.

Background

- 7.16. Whilst the district has key economic strengths, it can be argued that action is needed to sustain its position. In the broadest sense, local employment initiatives can help ensure that local people benefit from new development and equally show that businesses are invested in the wellbeing of their communities. Developers often identify job creation as part of the supporting case for development and there is the opportunity to establish a local dimension to this overall jobs boost. Examples of existing initiatives in NWL include the Airport Academy at East Midlands Airport and the SEGRO Logistics Park employment group.
- 7.17. Nationally, the number of job vacancies is at an all-time high (July-September 2021) and care must be taken not to frustrate the local economy. More generally, increased local recruitment could also help to bear down on commuting distances, important in a district which is a net importer of labour and where 92% of journeys to work are by car (the national average is 78%).
- 7.18. The NPPF provides overall support for positive measures which benefit the economy. “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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”. (paragraph 81)

Policy Options

7.19. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
<p>Option 1 – policy to encourage local employment initiatives in new, large-scale developments. Include a policy (or add a criterion to an existing policy) stating that for large scale developments (indicative thresholds would need to be confirmed), the council will encourage measures which support the recruitment of local workers and which promote skills development (for example apprenticeships) a) during construction; and/or b) in the end use where this is employment-generating. The policy could also encourage occupiers to prepare an ‘Employment & Skills Plan’ (or similar) which could be used to confirm and monitor the measures put in place.</p>	
<ul style="list-style-type: none"> • it signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. 	<ul style="list-style-type: none"> • it falls short of being a requirement so may be only modestly effective.
<p>Option 2 – policy to require local employment initiatives in new, large-scale developments. As for option 1, but it would be a specific policy requirement that needs to be met as opposed to option 1 which only encourages provision</p>	
<ul style="list-style-type: none"> • this could help ensure that local people benefit from new development and, equally, show that businesses are invested in the wellbeing of their communities. • it could support a generalised aim to reduce commuting distances • the inclusion of a Local Plan policy will ensure that applicants address the matter in planning applications 	<ul style="list-style-type: none"> • the policy would be more difficult to apply to speculative proposals where there is no identified end user. • it would also be important that compliance with the policy does not create recruitment barriers for businesses. • site size thresholds would need to be justified
<p>Option 3 – no change. Do not make specific provision in the Local Plan Review for local employment and/or skills development. Action on this issue would involve the council and its partners (such as Job Centre Plus, local colleges etc) engaging with new and expanding businesses to encourage and enable them to recruit locally and to improve local skills levels.</p>	
<ul style="list-style-type: none"> • it relies on existing, non-planning mechanisms 	<ul style="list-style-type: none"> • it would miss the opportunity which a planning application gives to engage with and influence employers at the earliest stage.

Consultation question

Q15 - Which policy option for local employment do you prefer? Is there a different option which should be considered?

8. Health & wellbeing

Introduction

- 8.1. The Council's [Delivery Plan](#) includes as one of its aims that 'our Communities are safe, healthy and connected' and one of its key tasks is to 'Deliver the actions in our Health and Wellbeing Strategy.' The Council's [Health & Wellbeing Strategy](#) specifically identifies the role of planning policy in the delivery of the strategy, specifically to embed health and wellbeing in the Local Plan.
- 8.2. The planning process can help promote the health and wellbeing of its residents, workers and visitors to the district, and the Local Plan has a key role in shaping the built and natural environment. This can influence people's ability to follow healthy behaviour, facilitate development that supports and encourages active and healthy lifestyles and can have positive impacts on reducing inequalities.
- 8.3. The adopted North West Leicestershire Local Plan does not include a single policy addressing Health and Wellbeing. However this issue is addressed explicitly and implicitly in various policies throughout the Local Plan and health and wellbeing cuts across several themes, such as climate change, impacts of pollution, the public realm and access to recreation facilities.

Background

- 8.4. The social objective of the planning system is 'to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.' (NPPF paragraph 8b).
- 8.5. The planning system has a clear role to play in the creation of healthy communities and the NPPF (Para 92) expects that policies and planning decisions should aim to achieve healthy, inclusive and safe places, which:
 - Provide opportunities for social interaction
 - Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.
- 8.6. Throughout the NPPF we can see examples of how the planning system can contribute to the health and well-being of our communities, and a range of issues are raised covering matter such as:
 - Provision of accessible green infrastructure;
 - Opportunities for sport and physical activity, including layouts that encourage walking and cycling;
 - Provision of sports facilities and allotments;
 - Access to healthier food;
 - Limit need to travel and opportunities for sustainable travel, to help reduce congestion, improve air quality and public health;
 - Securing well-designed, attractive and healthy places.

- 8.7. The National Planning Practice Guidance (NPPG): Healthy and Safe Communities, reaffirms that local health and wellbeing and health infrastructure are to be considered in plan making and in planning decision-making. It advises that: *“Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).”* (Paragraph: 001 Reference ID:53-001-20190722).
- 8.8. This consultation seeks to consider ways that the Local Plan can contribute towards the creation of healthy places that support and enable healthy lifestyles. It is also however clear that the planning system has a role to play in the provision of health infrastructure, for example, GP surgeries, and this would be addressed by the Infrastructure Delivery Plan which will be prepared. This document will detail the strategic infrastructure required to deliver the planned growth within the Local Plan and to ensure that the right infrastructure is prioritised.
- 8.9. Like all parts of the country, the district faces several significant health and wellbeing challenges within its communities. The council’s Health and Wellbeing Strategy details that the council and a range of organisations, including its health partners, are working with their communities to support and improve health and wellbeing. When looking at the district, important issues include:
- Increasing levels of physical activity – Approximately one quarter of adults are not physically active and a further 11% are not meeting Chief Medical Officer guidelines of 150 minutes of physical exercise per week.
 - Healthy diet and weight – Over 70% of adults are overweight or obese which is significantly above the national average of 62.8%.
 - Child obesity rates (16.7%) are below the national average, but child rates increase significantly between reception and Year 6. By school Year 6 (final year of primary education), just over 30% of children are overweight or obese.
 - Social isolation – ensuring people have opportunities for social interaction and engagement with their community.
 - Access to appropriate healthcare services when required.
 - Mental wellbeing – for all ages
 - Healthy Ageing – supporting people to stay independent and active.
 - Residents to have the best possible start in life

(Source: Active Lives Survey 2021, Sport England [Active Lives | Sport England](#) and Public Health England 2021 [Local Health - Data - PHE](#))

- 8.10. The issue of health and wellbeing was considered as part of the [Emerging Options consultation](#) between November 2018 and January 2019. Responses received highlighted a good level of support for the inclusion of a health and wellbeing policy although there was some suggestion that such a policy could lead to the duplication of policy as this matter as dealt with throughout the Local Plan. There was also some support for the use of Health Impact Assessment Screening Statement.

- 8.11. Health and wellbeing was then considered in more detail at Local Plan Committee on [7 July 2021](#), and having considered various options, the committee agreed the policy approach to be consulted upon and this is detailed below.

Strategic Health and Wellbeing Policy Options

- 8.12. Two options have been considered, and are set out below:
- Option 1 – no specific policy on health and wellbeing
 - Option 2 – inclusion of a health and wellbeing policy
- 8.13. A summary assessment of the advantages/disadvantages of these two options is set out in the following table:

ADVANTAGES	DISADVANTAGES
Option 1 - no general policy on health and wellbeing. Health and wellbeing issues would continue to be addressed solely through a number of policies throughout the Local Plan	
<ul style="list-style-type: none"> • Health and wellbeing issues would continue to be addressed solely through a number of policies throughout the Local Plan. 	<ul style="list-style-type: none"> • could be a missed opportunity to explicitly embed health and wellbeing in the Local Plan and to show conformity with the NPPF and the Council’s Health and Wellbeing Strategy.
Option 2 – include a general health and wellbeing policy	
<ul style="list-style-type: none"> • The NPPF recognises the important role that planning can take in helping to address health and wellbeing issues associated with new development • Health and wellbeing would be explicitly addressed and embedded in policy and provides a greater opportunity to address the current challenges faced with respect to health and wellbeing. • Seeks to ensure that issues relating to health and wellbeing are considered as part of the planning process in order to positively improve outcome for the people who live, work and visit the district • Contributes towards the vision and priorities of the North West Leicestershire Health and Wellbeing Strategy 2018-2028. 	<ul style="list-style-type: none"> • Potential duplication of other policies

Preferred Option

- 8.14. The preferred approach is Option 2, the inclusion of some form of overarching policy, in conformity with national policy and guidance and supporting the Council’s role and responsibility in addressing health and wellbeing issues faced by its communities. This approach would allow the plan to build upon the NPPF’s principle of achieving sustainable development, to support strong, vibrant and healthy communities, and to take into account the health status and needs of the local population.

- 8.15. Suggested policy wording is set out below. Supporting text will also provide an explanation of the requirements in the policy as well as the relevant background and issues faced by the district.

Policy XX - Health and Wellbeing

New development will be required to improve and promote strong, vibrant and healthy communities through ensuring a high quality environment by:

- i. Creating an inclusive built and natural environment,
- ii. Promoting and facilitating active and healthy lifestyles,
- iii. Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality,
- iv. Providing good access for all to health and social care facilities,
- v. Promoting access for all to green spaces, sports facilities, play and recreation opportunities,

The Council will require:

- a. development to positively contribute to creating high quality, active, safe and accessible places;
- b. development proposals to assess their impact upon existing services and facilities, relating to health, social wellbeing, cultural and recreation; and
- c. proposals for development schemes to include a Health Impact Assessment (HIA) in accordance with Policy XX. Where significant adverse health impacts are identified, proposals for development will not be supported unless appropriate mitigation can be provided.

Consultation question

Q16 - Do you agree with the proposed health and wellbeing policy? If not, why not?

Health Impact Assessment Policy Options

- 8.16. A Health Impact Assessment (HIA) is a process which ensures that the effect of development on both health and wellbeing inequalities are considered and responded to during the planning process. It seeks to identify the positive opportunities for health from a proposal as well as highlighting potential negative impacts that need mitigation. The Local Plan itself will be the subject of a HIA (as a component of the SA process) however it is also important that individual developments themselves help to ensure a healthy environment for local communities. Therefore, the purpose of this consultation is to focus on the potential use of HIAs on individual planning applications. The findings of a HIA of an individual planning application can be used to inform the decision-making process. Its role is not to provide a definitive answer on whether planning permission should be granted or not.
- 8.17. There are different types of HIA, including a desktop HIA, a rapid HIA and a comprehensive HIA, and the type of HIA undertaken could depend on the nature of the development proposed. For example, the size of a development or its intended use will determine the type and focus of a HIA. The three identified types of HIAs can be summarised as:

- Desktop - Involves engaging with a small number of stakeholders using their existing knowledge and available evidence to assess health impacts.
- Rapid - A brief assessment of health impacts, including a literature review of both quantitative and qualitative evidence available, and gathering additional knowledge and evidence from local stakeholders. This process may include the establishment of a small steering group and/or stakeholder workshop.
- Comprehensive - Most suited to complex and large proposals. An in-depth and resource intensive process, requiring extensive literature searches and data collection, work with multiple stakeholders and public engagement.

8.18. Potential options for how this matter could be addressed include the following:

- **Option 1** – no change and the Local Plan does not include a policy that seeks the submission of a Health Impact Assessment to support development proposals.
- **Option 2** – require a Health Impact Assessment to accompany all planning applications
- **Option 3** - require a form of Health Impact Assessment for planning proposals that meet a specified threshold, including the use of a Health Impact Screening Statement as a systematic way of deciding whether a full HIA is required.

8.19. A summary assessment of the advantages/disadvantages of these two options is set out in the following table:

ADVANTAGES	DISADVANTAGES
Option 1 – no requirement for a Health Impact Assessment	
<ul style="list-style-type: none"> • No additional cost implications for the applicant or the Council. 	<ul style="list-style-type: none"> • Whilst major applications which are of a scale that require a Strategic Environmental Appraisal would specifically address health issues, this does not apply to the majority of planning applications. • Missed opportunity to identify health and wellbeing issues, associated with a specific development proposal for the majority of applications. • Missed opportunity to address negative impacts as well as identifying positive impacts, for the majority of applications. • Contrary to the Council’s Health and Wellbeing Strategy which supports the use of Health Impact Assessments.
Option 2 – A Health Impact Assessment to accompany all planning applications	
<ul style="list-style-type: none"> • Ensures that the effect of development on both health and wellbeing inequalities are considered and responded to during the planning process for all planning applications. • Provides consistency and certainty for applicants as to what is expected 	<ul style="list-style-type: none"> • Such a requirement may not be proportionate to the size/scale of the development proposed and could result in disproportionate expense to applicants. • Resource implications with potential significant costs for Council as well as a

	high level of input from external health agencies to facilitate this approach.
Option 3 - Require a form of Health Impact Assessment for planning proposals that meet a specified threshold, including the use of a Health Impact Screening Statement as a systematic way of deciding whether a full HIA is required.	
<ul style="list-style-type: none"> • Ensures that the effect of development on both health and wellbeing inequalities are considered and responded to during the planning process for a number of planning applications. • Allows for the development of an understanding of health and wellbeing issues, at an early stage in the development process, so can be used to shape a development and allow for reasonable and appropriate amendments. • Recognises that the size of development will determine the type and focus of the Health Impact Assessment. • Provides consistency and certainty for applicants as to what is expected, as well as flexibility allowing an assessment to be proportionate to the type of development proposed. 	<ul style="list-style-type: none"> • Such a requirement may not be proportionate to the size/scale of the development proposed and could result in disproportionate expense to applicants, albeit potentially to a lesser degree than Option 2. • Resource implications with potential significant costs for Council as well as a high level of input from external health agencies to facilitate this approach, albeit potentially to a lesser degree than Option 2.

Preferred Option

- 8.20. Having considered the advantages and disadvantages of each approach, it is suggested that Options 3 allows for greater flexibility and opportunity for a HIA to be proportionate to the type of development that is proposed.
- 8.21. To progress this option further, consideration needs to be given to the thresholds and criteria applied when seeking the submission of a HIA Screening Statement. In suggesting a site threshold, we have had regard to a key element of government policy which is to provide support for small and medium sized builders. The option seeks to set a threshold that does not apply to small and medium sized builders and therefore minimise the burden on such developers. It is therefore suggested that the threshold be set as major developments and these be defined as:
- those of 1ha or more or 30 or more dwellings and not developed by a small to medium sized builder, defined as those having a turnover of up to £45m
- 8.22. Suggested policy wording is set out below. Supporting text will provide an explanation of the requirements in the policy as well as the relevant background and issues faced by the district.

Policy XX - Health Impact Assessment

A Health Impact Screening Statement will be required for certain development proposals, to demonstrate its impact on health and wellbeing, and how it will contribute towards building strong vibrant and healthy communities and help reduce health inequalities in the district. For developments where the screening assessment indicates more significant health impacts, a more comprehensive, in-depth Health Impact Assessment will be required. This will also be expected to demonstrate how any negative and cumulative impacts will be addressed.

A Health Impact Screening Statement must be undertaken on the following:

- Residential development proposals of 30 dwellings or more, or residential sites with an area of 1 ha or more.
- Non-residential development for new or net additional floorspace of 1,000 sqm or more or non-residential development on sites of 1 ha or more.
- Restaurants and cafes (Use Class E)
- Drinking establishments (Sui Generis)
- Hot food takeaways (Sui Generis)
- Residential institutions (Use Class C2)
- Non-residential institutions (Use Class F1)
- Leisure facilities (Use Class F2)
- Betting shops and pay-day loan shops (Sui Generis)

- 8.23. Whilst the above threshold/criteria would not cover all application types, the intention is to 'catch' those applications that are more likely to have an impact on health and wellbeing, whilst being flexible and proportionate to the development proposed. The range of development proposals are reasonable and comprehensive and focuses on the development types and uses that are more likely to have an impact on health and wellbeing issues.
- 8.24. The text of the Local Plan could provide information on the preparation of a screening statement and the type of issues that would need to be addressed. It could also provide information on what could trigger the need for a more comprehensive Health Impact Assessment. It is anticipated that the work currently being undertaken with Public Health England, would also provide some form of guidance to assist with the application of the policy.
- 8.25. There is a potential further option for this policy to include an additional criterion that specifies an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one. However, the disadvantage of this is that it would provide a level of uncertainty and questions could be raised about the application of this, for example, what circumstances may arise that may require 'other' proposals to require a screening statement.

Consultation questions

Q17 - Do you agree with the proposed Health Impact Assessment policy? If not, why not?

Q18 - Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?

9. **Renewables and low carbon**

Introduction

- 9.1. The council made a climate change emergency declaration on 25 June 2019 which set out the council’s commitment to support the Government’s net zero target to 2050 and its aim to achieve carbon neutrality for the council’s own emissions by 2030. The Local Plan Review has a key role to play in seeking to minimise the impact of climate change arising from new development.

Background

- 9.2. To support climate change-related policies in the Local Plan, a [Renewable and Low Carbon Energy Study](#) was undertaken by consultants (AECOM) and published in 2021.
- 9.3. The AECOM Study builds on previous analytical work such as the [Renewable Wind Study](#) undertaken in 2016, and the local targets and commitments such as those laid out in the [Zero Carbon Roadmap](#) (2020).
- 9.4. The AECOM Study provides evidence on the likely technical potential for different forms of renewable energy and low carbon energy in the district having regard to best practice, planning policy guidance and the NPPF and which will be sufficient to inform policies and/or targets in the Local Plan Review.

Renewable Energy

Introduction

- 9.5. Energy consumption which is based on carbon from new development must be reduced in order to meet zero carbon targets. This means that demand will need to be sourced from renewable forms of energy.

Background

- 9.6. Policy Cc1 in the adopted Local Plan is concerned with renewable energy and sets out a range of criteria that planning applications must meet for renewable energy installations to be supported. This is principally concerned with proposals for wind turbines. Policy Cc1 does not establish a target for the amount of energy to be provided from renewable energy sources as there was a lack of any evidence regarding potential at that time.
- 9.7. Since the adoption of the Local Plan the NPPF has been updated and in relation to renewable energy it states that the planning system should “...support the transition to a low carbon future in a changing climate...and support renewable and low carbon energy and associated infrastructure” (paragraph 152).
- 9.8. Further, “to help increase the use and supply of renewable and low carbon energy and heat, plans should:
- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers” (paragraph 155).

9.9. Furthermore, with the council’s declaration of a Climate Change Emergency, it is clear that the Local Plan Review will need to do much more than is currently the case.

9.10. The AECOM study identifies that in terms of renewable energy that the main opportunities for NWLDC going forward will be wind energy, solar and heat pumps. It also notes that these are well-established technologies that currently represent the most cost-effective solutions for generating renewable electricity in the UK.

Wind Energy and Solar Energy

9.11. The provision of energy from wind was the subject of a [Written Ministerial Statement \(WMS\) \(HCWS42\)](#) of 18 June 2015. The council has identified potential areas that are suitable for wind energy on the Opportunities Maps for [Small Scale Wind Energy](#) and [Medium/Large Scale Wind Energy](#) (2016) that accompany the adopted Local Plan. The AECOM study considers it is appropriate to continue to use the 2016 Wind Energy Study Maps and, as such, the AECOM Study utilises the maps to inform their analysis of future renewable energy opportunities. The current Local Plan Policy Cc1 addresses the second bullet point requirement of the WMS in that it requires applicants to demonstrate that the local community support proposals for one or more wind turbines.

9.12. In terms of solar energy generation, the AECOM study confirms that Photovoltaic (PV) farms are among the most cost-effective ways of generating renewable electricity and can be installed more flexibly than many other low/zero carbon (LZC) technologies, and that they should be considered a key opportunity that can provide renewable energy for North West Leicestershire at a strategic scale.

9.13. The Zero Carbon Roadmap identifies the following targets:

- **Wind** - Set a formal target for wind capacity in NWL from 3MW today to at least 75MW by 2050 in the Local Plan.
- **Solar** - Set a formal target for solar capacity in NWL from 89MW today to at least 140MW by 2050 in the Local Plan.

9.14. These targets have been confirmed by the AECOM study as being achievable.

Policy Options

9.15. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 - to not include a solar and wind energy generation target	
<ul style="list-style-type: none"> • Simple approach 	<ul style="list-style-type: none"> • Would make it less likely that the zero-carbon target could be achieved
Option 2 – solar and wind energy targets as set out in the adopted Zero Carbon Roadmap	
<ul style="list-style-type: none"> • Provides clarity for all users of the plan about the criteria that will apply • Roadmap targets have been independently corroborated by AECOM who agree they are achievable 	<ul style="list-style-type: none"> • Will need to monitor provision
Option 3 – solar and wind energy targets higher than in the Roadmap	
<ul style="list-style-type: none"> • Provides clarity for all users of the plan about the criteria that will apply • Proactive approach to renewable energy in order to achieve 2050 zero carbon target and to respond to NWLDC declared climate emergency. 	<ul style="list-style-type: none"> • Will need to monitor provision
Option 4 –solar and wind energy targets lower than in the Roadmap	
<ul style="list-style-type: none"> • Lower target more likely to be met 	<ul style="list-style-type: none"> • Would make it less likely that the zero carbon target could be achieved • Will need to monitor provision

Preferred Approach

9.16. Option 2 is the preferred approach as these targets have been identified as achievable in the AECOM Study. The targets will need to be pro-rated to be consistent with the plan period. As the Roadmap was adopted in 2020, the pro-rated targets from 2020 to 2039 would be:

- **Wind target** would equate to 45.41MW from 2020 to 2039.
- **Solar target** would equate to 37.11MW from 2020 to 2039.

9.17. The proposed policy wording for renewable energy is:

<p>Policy XX - Renewable Energy</p> <p>The Council will aim to achieve the following renewable energy generation targets by 2039:</p> <ul style="list-style-type: none"> • 37.11 MW of energy generated by solar energy generation • 45.41 MW of energy generated by wind generation <p>To achieve this:</p> <ol style="list-style-type: none"> 1) The council will support renewable energy developments that are appropriate to their setting and make a positive contribution towards increasing the levels of renewable and low carbon energy generation in the district.

- 2) Planning applications for renewable energy including any new grid connection lines and any ancillary infrastructure and buildings associated with the development will be supported where:
 - a) There is no unacceptable impact on residential amenity in terms of noise, shadow flicker, vibration, topple distance and visual dominance; and
 - b) There is no adverse impact on the landscape character taking account of the special qualities set out within the individual National Character Areas; and
 - c) All impacts on biodiversity have been adequately mitigated or enhanced; and
 - d) Heritage assets and their settings are conserved or enhanced; and
 - e) Proposals take account of the cumulative effect that would result from the proposal in conjunction with permitted and existing renewable energy schemes; and
 - f) Proposals are accompanied by details to demonstrate how the site will be decommissioned to ensure the restoration of the site following cessation; and
 - g) Proposals for large-scale renewable energy should demonstrate that the economic, social and environmental benefits are for those communities closest to the proposed facility.
- 3) In addition to the above considerations, proposals for wind energy developments will be supported where:
 - a) The site lies within the 'Area Identified as potentially suitable for large or small scale turbines' as defined on the policies map; and
 - b) It can be demonstrated there is support from the local community or is set out within an area defined as being suitable for wind energy development within an adopted Neighbourhood Plan; and
 - c) All impacts on air traffic safety and radar and communications have been assessed and consulted upon.
- 4) In terms of proposals for solar energy developments including both mounted and standalone ground mounted installations and extensions or repowering of solar extensions, preference will be for sites which are focussed on previously developed land away from the best and most versatile agricultural land unless exceptionally justified.
- 5) All new developments will be required to incorporate proposals for on-site electricity and heat production from solar, wind and other renewable technologies so as to maximise renewable energy production.

We will consider the preparation of a Supplementary Planning Document to provide further guidance on this issue.

Consultation question

Q19 - Do you agree with the proposed renewable energy policy? If not, why not?

Energy Efficiency

Introduction

- 9.18. The adopted Local Plan does not include a policy relating to energy efficiency. This was primarily because the Planning and Energy Act 2008 had proposed that local authorities would no longer be able to set energy efficiency standards above the national building regulations. Since the adoption of the Local Plan, the government, in their 2019 Spring Statement, committed that (by 2025) it would introduce a Future Homes Standard (FHS) which would require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency.

Background

- 9.19. Under the FHS, new buildings would be required to meet significantly higher targets for energy efficiency and carbon savings. The Government consulted on two possible uplifts to start from 2020:
- Option 1: 20% reduction in carbon emissions compared to the current standard for an average home built to Building Regulations 2013 Part L requirements.
 - Option 2: 31% reduction in carbon emissions compared to the current standard for an average home built to Building Regulations 2013 Part L requirements.
- 9.20. As part of the [FHS Consultation](#) the Government confirmed that a 19-20% CO₂ reduction is viable on a national scale, it is the less ambitious of the two targets proposed within the FHS consultation. Option 2 – the 31% reduction – was the Government’s preferred option, on the basis that, amongst other things, it would deliver more carbon savings.
- 9.21. In January 2021 the Government published its response to the FHS consultation. This reconfirmed the FHS and made it clear that it will not come into force until 2025.
- 9.22. In December 2021 an uplift to the current Building Regulations was regulated for and the uplift standards of new homes producing 31% less CO₂ emissions is to come into force in June 2022.
- 9.23. The AECOM study states that the council should aim to set the highest standards for energy and CO₂ performance that can reasonably and viably be implemented, both for new and existing buildings. This is crucial in order to achieve the decarbonisation target.
- 9.24. The AECOM study suggests that an even higher target could potentially be set, which could include a requirement for any residual emissions to be offset via developer contributions.

Policy Options

9.25. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 – to not include an energy efficiency target.	
	<ul style="list-style-type: none"> • Does not respond to Council’s climate change emergency declaration • The plan would not be planning positively to support the government’s energy efficiency requirements
Option 2 - Require an energy efficiency target of 31% (to be required on adoption of the Local Plan or when updated building regulations come into force, whichever is the earliest).	
<ul style="list-style-type: none"> • Proactive and requires energy efficiency measures to be addressed immediately. • Positively responds to council’s climate change emergency declaration 	<ul style="list-style-type: none"> • Requires earlier action than government requirement
Option 3 – Energy efficiency target higher than 31%	
<ul style="list-style-type: none"> • Proactive approach • Positively responds to council’s climate change emergency declaration 	<ul style="list-style-type: none"> • Higher than government requirements
Option 4 – Energy efficiency target lower than 31%	
	<ul style="list-style-type: none"> • Lower than government target – may soon be superseded by a higher target. • Does not proactively respond to council’s climate change emergency declaration

Preferred Approach

9.26. It is considered that Option 3 would be the most pragmatic option and consistent with the AECOM study which states that “NWLDC should...look to set the highest level of building performance standards for new buildings that can reasonably be implemented and should do so as soon as possible”(Paragraph 5.1.1).

9.27. We have drafted a single, comprehensive policy that covers energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change. It is included in this document at paragraph 9.55

Consultation question

Q20 - Do you agree with the preferred policy approach for energy efficiency? If not, why not?

Reducing Carbon

Introduction

- 9.28. To help ensure that the targets for energy efficiency are met, it will be necessary for new developments to address issues in respect of what is referred to as ‘Embodied Carbon’. This is the carbon associated with both building materials and the construction and maintenance of a building throughout its whole lifecycle.
- 9.29. The current Local Plan includes (in Policy D1) a requirement that “(5) New development should have regard to sustainable design and construction methods”, however there are no specific requirements beyond this.

Background

- 9.30. The AECOM Study states that to reach Net Zero it will be necessary to implement policies that address a broader range of emissions that occur over the building’s lifecycle, at all stages of the supply chain.
- 9.31. The AECOM Study identifies that one way of addressing this would be for the council to require applicants to undertake a lifecycle carbon assessment (LCA) or otherwise demonstrate that they have taken steps to minimise lifecycle emissions. LCAs involve a holistic assessment of both operational and non-operational/embodied emissions. LCA is a multi-step procedure through the life stages of a building.
- 9.32. The AECOM Study notes that carrying out a whole LCA will incur significant design team fees which may be prohibitive in the context of minor developments, so this type of policy might be restricted to major developments. However, the council could consider requesting that applicants for minor applications complete a simpler checklist to demonstrate that they have given due consideration to this topic.
- 9.33. It is suggested that major residential developments be defined as:
- those of 1ha or more or 30 or more dwellings and not developed by a small to medium sized builder, defined as those having a turnover of up to £45m;

and major non-residential developments be defined as:

- those sites of at least 0.25ha or 500 sq metres of floorspace

Policy Options

- 9.34. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 – to not include a policy requirement to require applicants to undertake a Lifecycle Carbon Assessment	
<ul style="list-style-type: none"> • There would be no additional burden on developments 	<ul style="list-style-type: none"> • xxDoes not address the need to reduce carbon emissions

Option 2 – include policy requirement for all developments to undertake a Lifecycle Carbon Assessment	
<ul style="list-style-type: none"> • It signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. 	<ul style="list-style-type: none"> • Cost to applicants, in particular to smaller developers. • Need for training of Development Management officers • Additional burden for officers to check assessments
Option 3 - include policy requirement for major developments to undertake a Lifecycle Carbon Assessment and minor developments to use a simple checklist to demonstrate that Lifecycle Carbon has been considered.	
<ul style="list-style-type: none"> • It signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. • Reduces potential costs for small developments 	<ul style="list-style-type: none"> • Cost to applicants • Need for training of Development Management Officers • Additional burden for officers to check a checklist

Preferred Approach

- 9.35. Of the options, Option 3 to include a policy requirement for major developments to undertake a Lifecycle Carbon Assessment and smaller developments to use a simple checklist to demonstrate that Lifecycle Carbon has been considered is the preferred option.
- 9.36. We have drafted a single, comprehensive policy that covers energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change. It is included in this document at paragraph 9.55.

Consultation question

Q21- Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?

Overheating

Introduction

- 9.37. There is not a specific policy in the current Local Plan regarding overheating however, there is text in both the Local Plan and in the Good Design SPD that refers to measures that can be used to reduce overheating.

Background

- 9.38. Overheating relates primarily to domestic properties and the UK Green Building Council identify that “*there is strong evidence that excessive or prolonged high temperatures in homes can have severe consequences for occupants*”. With summer temperatures predicted to rise

between 2 and 4 degrees by 2050, it poses an increased risk to the vulnerable of suffering from severe heat stress.

- 9.39. At the individual building level, the geometry, orientation and form of buildings can have a significant impact on overheating risk. Also, increasing levels of building airtightness and fabric efficiency require greater focus on the risk of overheating and strategies to mitigate this. The UK Green Building Council identify that it is not a choice between the two and that it is reasonable to expect efficient, low carbon homes which also minimise risks posed by overheating.
- 9.40. The NPPF states that *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for...the risk of overheating from rising temperatures”*(Paragraph 153).
- 9.41. AECOM identifies that, at an individual building level, the priority should be to minimise unwanted heat gains before considering alternative cooling strategies. The AECOM Study recommends that the council should also consider:
- Requiring developments to follow a ‘Cooling Hierarchy’ that prioritises passive cooling measures. This could be demonstrated e.g., through the Design and Access Statement currently required by Policy D1 of the adopted Local plan.
 - Encouraging all schemes to consider overheating risk at an early stage, and to undertake a full appraisal if this indicates a high risk of overheating. Major developments should be required to undertake a full overheating risk assessment as standard. There are industry recognised assessments such as [The Good Homes Alliance Domestic Overheating Checklist](#) in the ‘Energy Assessment Guidance’ (2020).
- 9.42. The Government recognise the significance of overheating. In its response to the Future Homes Standard consultation the Government has set out proposals for requiring modelling of overheating risk in residential properties or for meeting pre-defined parameters for maximum glazing areas and window/shading design characteristics, as part of the update to Part L of Building Regulations for New Homes.
- 9.43. The Government has regulated for a new part to the Building Regulations (Part O) that covers overheating mitigation requirements. This is due to take effect in June 2022.

Policy Options

- 9.44. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 – no change to the Local Plan	
<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Does not respond to Council’s climate change emergency declaration. • The plan would not be planning positively to government requirement for plans to take a proactive approach to the risk of overheating
Option 2 - include a policy to require applicants for major developments to address potential overheating.	
<ul style="list-style-type: none"> • Responds to requirements in NPPF for strategic policies to provision for plans to take a proactive approach to the risk of overheating 	<ul style="list-style-type: none"> • Additional requirements for applicants • Potential viability issues • Additional burden for officers to check a as part of planning applications
Option 3 – include a policy to require major developments to address overheating through an industry recognised assessment and minor developments to use a simple checklist to demonstrate that the risk of overheating has been considered.	
<ul style="list-style-type: none"> • Responds to requirements in NPPF for strategic policies to provision for plans to take a proactive approach to the risk of overheating 	<ul style="list-style-type: none"> • Additional requirements for applicants • Potential viability issues • Additional burden for officers to check a as part of planning applications

Preferred Option

- 9.45. Of the options, Option 3 is the preferred option.
- 9.46. We have drafted a single, comprehensive policy that covers energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change. It is included in this document at paragraph 9.55

Consultation question

Q22 - Do you agree with the preferred policy approach for overheating? If not, why not?

Demonstrating that new development is addressing climate change

Introduction

- 9.47. The building and construction sector has a crucial role to play in reducing carbon emissions. Some of the key components of this are reducing energy demand through efficient building fabric, reducing embodied carbon associated with the products and construction stages of development as well as measuring the in-use performance of low carbon technologies.
- 9.48. There are recognised industry assessments that can be used to assess the environmental performance of a building and how it contributes to residents’ wellbeing. Two of these standards are the Home Quality Mark (HQM) for residential developments and the Building

Research Establishment’s Environmental Assessment Method (BREEAM) for non-residential developments.

- 9.49. BREEAM and HQM adopt similar approaches by rewarding credits or points for actions that reduce the lifecycle environmental impacts of the building.

Background

- 9.50. Mandatory standards for energy use and CO₂ emissions are set out in Part L of the Building Regulations. As discussed above these are progressively updated and, despite the current policy uncertainty, will generally include more ambitious standards over time as the UK moves towards a Net Zero economy. In addition, there are various voluntary industry standards and assessment methods that set higher targets including BREEAM and HQM.
- 9.51. Requiring developments to incorporate appropriate measures is only part of the solution. It is important that when making decisions about proposed developments that the council has confidence that what is proposed will help to address the issues. One way to do this is through the use of recognised standards and assessment methods.
- 9.52. The AECOM Study identifies that the council could consider requiring or encouraging developers to meet some of these higher standards as part of a future Local Plan policy. This is an approach that has been widely adopted elsewhere in the UK. The use of BREEAM and HQM standards can help deliver buildings where energy efficiency is a key driver for the design and where as-built performance is more likely to align with the design intent.
- 9.53. AECOM identify that it is often the case that local authorities will only set BREEAM/HQM requirements for major developments, or certain types of schemes that are known to have fewer technical and viability constraints (e.g., large developments on greenfield sites). However, this would mean that not all developments are required to demonstrate how they would comply with any requirements.

Policy Options

ADVANTAGES	DISADVANTAGES
Option 1 – No change to the Local Plan	
	<ul style="list-style-type: none"> • Not requiring specific assessment tools could result in confusion and inconsistency of approach
Option 2 – include policy to require applicants for all developments to undertake a recognised industry assessment - HQM for domestic properties and BREEAM for non-residential properties	
<ul style="list-style-type: none"> • It signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. • Requiring recognised assessment tools should ensure consistent approach and be easier to monitor 	<ul style="list-style-type: none"> • Additional costs to developers could result in potential viability issues

<p>Option 3 - Include a policy to require applicants proposing major developments to undertake a recognised industry assessment - HQM for domestic properties and BREEM for non-residential properties</p>	
<ul style="list-style-type: none"> • It signals that the council sees this as an important issue and one which applications for major development should actively consider as they are preparing planning applications. • Requiring recognised assessment tools should ensure consistent approach and be easier to monitor 	<ul style="list-style-type: none"> • Additional costs to developers could result in potential viability issues • Not all developments would be required to produce an assessment, so there is no guarantee that developments will help to meet energy efficiency targets

Preferred Option

9.54. Of the options, Option 3 is the preferred option.

Consultation question

Q23 - Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?

9.55. We have drafted a single policy to cover energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change.

Policy XX - Reducing Carbon Emissions

Development is required to achieve net zero carbon to contribute to the Council’s aim for a carbon neutral district by 2050. To achieve this, all new development will be required to:

- 1) Reduce carbon dioxide emissions by following the steps in the energy hierarchy, within the design of new buildings by prioritising fabric first in the following sequence:
 - a) Energy reduction through ‘smart’ heating and lighting, behavioural changes, and use of passive design measures; then,
 - b) Energy efficiency through better insulation and efficient appliances; then,
 - c) Renewable energy of heat and electricity from solar, wind, biomass, hydro and geothermal sources; then
 - d) Low carbon energy including the use of heat pumps, Combined Heat and Power and Combined Cooling Heat and Power systems; then
 - e) Conventional energy.
- 2) Achieve a 31% reduction in regulated CO2 emissions against the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on the 2013 Edition of

the 2010 Building Regulations (Part L) (or future equivalent legislation). This reduction is to be secured through on-site renewable and other low carbon technologies and/or energy efficiency measures.

- 3) demonstrate actions taken to reduce embodied carbon and maximise opportunities for reuse of materials.
- 4) demonstrate how development proposals have considered overheating risk at an early stage and followed the cooling hierarchy.
- 5) be designed to ensure that the proposed heating systems can be easily replaced with heat pumps or other low carbon energy systems at a later date, including the installation of the necessary infrastructure to facilitate future installation.

(Major) Residential proposals will be required to use the Homes Quality Mark scheme to show compliance with the above.

(Minor) Residential proposals will be required to submit a statement demonstrating how they satisfy requirements 1 to 5 above

Development proposals for non-residential development should demonstrate how they achieve BREEAM 'excellent'.

Where the use of onsite renewables to match the total energy consumption is demonstrated not to be technically feasible or economically viable, renewable energy generation should be maximised as much as possible; a financial contribution must be made to the council's carbon offset fund to enable residual carbon emissions to be offset by other local initiatives.

Consultation question

Q24 - Do you agree with the proposed policy for reducing carbon emissions? If not, why not?

Carbon Offsetting Fund

- 9.56. 'Carbon offsetting' refers to compensating for carbon dioxide (CO₂) or other greenhouse gas (GHG) emissions in one area by taking actions that reduce emissions elsewhere.
- 9.57. Depending on the type of development in question, it may not be feasible to deliver the requisite level of CO₂ emissions reduction onsite. In this instance, an option available to the council is to allow developers to make a financial contribution towards a carbon offset fund.
- 9.58. The money can then be used to pay for interventions off-site that would result in an equivalent amount of CO₂ being avoided (e.g., through energy efficiency measures or LZC projects) or removed from the atmosphere (e.g., through afforestation).
- 9.59. The AECOM Study states that "when developing a strategy for carbon offsetting, the most important guiding principle is that **it should be a last resort where other opportunities for reducing direct and indirect CO₂ emissions have been prioritised**" (paragraph 6.1.2).

- 9.60. The Council is currently considering the potential for a carbon offset fund.

Water Efficiency

Introduction

- 9.61. All new homes already have to meet the mandatory national standard of water efficiency as set out in Part G of the Building Regulations to limit consumption to 125 litres per person per day. To help manage demand for water, the [Optional Technical Standards for water efficiency](#) confirms that councils can set out Local Plan policies requiring new dwellings to meet the Building Regulations optional requirement of 110 litres per person per day, where there is a clear local need based on existing sources of evidence.
- 9.62. The higher standard could be met through either imposing maximum consumption rates for various fittings such as WCs, basin taps, and showers, or calculating the whole house water consumption using a 'water efficiency calculator' for new dwellings.
- 9.63. Water efficiency can bring a number of benefits including:
- Reducing water use automatically reduces water charges if a meter is installed;
 - There will be less waste water, reducing the risk of flooding and reducing the cost of treating the water;
 - It reduces a household's carbon footprint – contributing to national carbon reduction targets;
 - It preserves natural resources to help tackle climate change; and
 - Reducing the use of hot water and so reducing consumption will also deliver lower energy bills.
- 9.64. There is no policy in the adopted Local Plan requiring tighter water efficiency standards but Policy D1 (Design of New Development) requires development to have regard to sustainable design and construction methods. The supporting text encourages developers to consider the integration of environmental optional extra features for residential developments, including those that would exceed the environmental performance of new homes required by Building Regulations, although there is no explicit reference to tighter water efficiency standards for residential and non-residential buildings.

Background

- 9.65. The PPG states that a clear need for an alternative water efficiency standard can be informed by a range of evidence, including consultation undertaken with the local water and sewerage company, the Environment Agency and catchment partnerships, river basin and water resource management plans and the Environment Agency's Water Stressed Areas Classification. Councils should test the impact of applying the preferred standard on viability and housing supply.
- 9.66. The [Environment Agency's report on water stress areas](#) was updated in July 2021. The report provides formal advice to the Secretary of State on which areas in England are areas of serious water stress.
- 9.67. North West Leicestershire is located within the area covered by Severn Trent. This area has been classed as 'seriously water stressed' – the most significant classification. This is a change

from the 2013 classification of moderate stress across all demand scenarios with a ‘final stress’ of ‘not serious’. One of the reasons for the change in this classification is the use of the latest data from the Water Resource Management Plans (WRMP) published by the water companies in 2019 – including the [WRMP for Severn Trent](#).

- 9.68. Severn Trent is responsible for preparing the WRMP for managing supply and demand across its network. North West Leicestershire is located in the Strategic Grid Water Resource Zone. The WRMP indicates that in the absence of future investment, supply and demand shortfalls within the Strategic Grid are likely. However, the Strategy aims to tackle this predominantly by reducing leakage and connecting the grid to new supply sources. The WRMP also proposes several interventions for managing demand such as water efficiency advice and products.
- 9.69. The [Humber River Basin Management Plan](#) (RBMP) provides a framework for protecting and enhancing the benefits provided by the water environment. The RBMP highlights area of land and bodies of water that have specific uses that need special protection, such as those used for drinking water. A significant water management issues identified by the Plan, is the changes to the natural flow and level of water – affecting 6% of all water bodies in the Plan area. Reduced flow and water levels in rivers and groundwater caused by human activity such as abstraction or less rainfall than usual can result in reduced supply of drinking water and impact and damage habitats – including the potential impact on the River Mease Special Area of Conservation (SAC).
- 9.70. The RBMP sets how this issue can be managed by the various regulators, water management companies and policy makers. For councils, the Plan specifically states to make sure water is used efficiently, *“Local Government – sets out local plan policies requiring new homes to meet the tighter water efficiency standard of 110 litres per person per day as described in Part G of Schedule 1 to the Building Regulations 2010”* (Section 3.2, page 46).
- 9.71. The [North West Leicestershire Water Cycle Study](#) (WCS) was prepared to inform the adopted Local Plan. The WCS identifies long term solutions for preventing further deterioration in water quality and water resources facilitating development. It identifies water resources that supply the district are under significant pressure. As part of a wider strategy to address water efficiency, the study recommended that all new homes be built to the Code for Sustainable Homes (CSH) level 3/4 for water (105 l/h/d). The Government’s [optional technical water efficiency standards for housing](#) have superseded the CSH and so the 110 l/h/d is the alternative solution.
- 9.72. There is currently no nationally applied standard for water efficiency of non-domestic buildings, such as offices, industrial buildings and schools (only minimum performance requirements for individual water using fixtures). However, BREEAM sets out standards for minimum water performance of non-residential buildings. This is achieved using the BREEAM water calculation method (BREEAM Wat 01 calculator). This is the method for the assessment of water efficiency in most common types of new non domestic buildings and is considered to provide the most suitable equivalent mechanism to ensure high standards of water efficiency in new non-residential development

Policy Options

- 9.73. **Option 1** – Do not include a policy requiring a tighter water efficiency standard and maintain the Building Regulations requirement of 125 litres per person per day. The evidence is clear that since the adoption of the Local Plan, the District is located in an area of seriously water

stressed. This option would not contribute towards addressing the issue of water resource management in the Humber River Basin.

- 9.74. **Option 2** – At its meeting on [7 July 2021](#) the Local Plan Committee considered the option of requiring a more ambitious standard of no more than 105 litres of water to be consumed per person per day – reflecting the former Code for Sustainable Homes standard. The council will continue to test this option through the Local Plan Viability Assessment, however having reviewed this matter further at Local Plan Committee on [8 September 2021](#), it is considered appropriate that the proposed standard is consistent with the optional national water efficiency standard and the recommendation of the WCS.

Preferred Option

- 9.75. It is evident that the district is in area of serious water stress, and there is a clear need for the issue of water efficiency to be addressed by the responsible authorities. The council proposes that all new residential development will be required to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day.
- 9.76. For all non-domestic buildings, the Council will require all proposals to achieve the maximum available credits under BREEAM Wat 01.

Policy XX - Water Efficiency Standards

All proposals for new residential development are required to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day.

All proposals for new non-domestic buildings will be required to be designed to achieve the maximum available credits under BREEAM Wat 01 or equivalent best practice standard.

Consultation questions

Q25 - Do you agree with the proposed policy for water efficiency standards? If not, why not?

Q26 – What additional comments do you have about the Local Plan Review not covered by the preceding questions?

10. Next steps

- 10.1. This consultation deals with a select number of issues and does not cover all the matters to be included in the Local Plan Review. Subjects which will be covered in future consultations include:
- sites proposed for allocation
 - amended Limits to Development around settlements
 - policies for the design of development and for development affecting the historic and natural environment including biodiversity net gain
 - policies for affordable housing, included First Homes, and housing mix
 - town centre policies
 - infrastructure requirements, including for transport
- 10.2. The responses to this consultation will help to inform the Local Plan. However, we will also need to have regard to a range of evidence. Some of this [evidence base](#) is already in place. Some is specific to North West Leicestershire however some of it relates to Leicester and Leicestershire, including an updated **Housing and Economic Needs Assessment** which is in preparation and which will help inform our decision about the amount of housing and employment development that needs to be provided for as part of the Local Plan. In addition, such decisions will also be informed by the outcome from our joint work to address the issue of unmet housing and employment needs in Leicester City as outlined in Sections 4 and 6 of this document.
- 10.3. A key part of the Local Plan will be to identify specific sites for development for housing or employment. Work to **assess and identify such sites** is underway and we anticipate that we will consult on our preferred sites in the spring of 2022.
- 10.4. It will be important to ensure that new development includes the provision of new infrastructure to minimise the impact upon existing communities and to meet the needs of new communities. We are preparing an **Infrastructure Delivery Plan** to address this. In addition, we have also commissioned a study to identify opportunities for the provision of new **Green Infrastructure**. We will need to balance all the infrastructure needs against the national policy requirement to ensure that new development is viable. We have commissioned a **Viability Study** which will undertake testing of the various policy options outlined in this consultation to ensure that this is the case.
- 10.5. In addition to these, we will also undertake further technical work, for example in relation to **space standards** and **Health Impact Assessments**, to ensure that policies are consistent with national policies. Policies will also be subject a **Sustainability Appraisal** to help ensure that the plan delivers sustainable development.

Appendix 1 – List of evidence documents

- [Strategic Housing and Economic Land Availability Assessment 2021](#)
- [Review of Existing Employment Sites](#)
- [Need for Employment Land Report](#)
- [Start-up Workspace Demand Report](#)
- [Strategic Distribution Study](#)
- [Retail and Leisure Capacity Study](#)
- [Retail Study Update Report](#)
- [Renewable and Low Carbon Energy Study - February 2021](#)
- [Local Housing Needs Assessment - Report 1](#) , [Report 2](#) and [Report 3](#)
- [Potential Strategic Sites Infrastructure Study](#)
- [Landscape Sensitivity Study - Part 1](#), [Landscape Sensitivity Study - Part 2](#), [Appraisal of Sites A, B, C and D](#) and [Further Landscape Sensitivity Study](#)
- [Area of Separation Study \(with Appendices 1 & 2\)](#) and [Area of Separation Study \(Appendix 3\)](#)
- [Sustainability Appraisal Scoping Report](#), [Appendix A](#) and [Appendix B](#)
- [Sustainability Appraisal of the Spatial Options.](#)
- [Settlement Study 2021](#) and [Settlement Study 2021 Appendix B](#)

Appendix 2 – List of consultation questions

Q1	Do you agree with these Local Plan Review Objectives? If not, why not?
Q2	Do you agree with the proposed settlement hierarchy? If not, why not?
Q3	Do you agree with the approach to Local Housing Needs Villages? If not, why not?
Q4	Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.
Q5	Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant
Q6	Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?
Q7	Do you agree with the proposed policy on Space Standards? If not, why not?
Q8	Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?
Q9	Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?
Q10	Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?
Q11	Which general employment land strategy option do you prefer? Is there a different option which should be considered?
Q12	Do you agree with the initial policy option for strategic warehousing? If not, why not?
Q13	Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?
Q14	Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?
Q15	Which policy option for local employment do you prefer? Is there a different option which should be considered?
Q16	Do you agree with the proposed health and wellbeing policy? If not, why not?
Q17	Do you agree with the proposed Health Impact Assessment policy? If not, why not?
Q18	Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?
Q19	Do you agree with the proposed renewable energy policy? If not, why not?
Q20	Do you agree with the preferred policy approach for energy efficiency? If not, why not?
Q21	Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?
Q22	Do you agree with the preferred policy approach for overheating? If not, why not?
Q23	Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?
Q24	Do you agree with the proposed policy for reducing carbon emissions? If not, why not?
Q25	Do you agree with the proposed policy for water efficiency standards? If not, why not?
Q26	What additional comments do you have about the Local Plan Review not covered by the preceding questions?