

**NORTH WEST LEICESTERSHIRE LOCAL PLAN PARTIAL REVIEW  
EXAMINATION**

**POSITION STATEMENT OF NORTH WEST LEICESTERSHIRE DISTRICT  
COUNCIL**

**ISSUE 3 - WHETHER THE PROPOSED CHANGES TO PARAGRAPH 5.8 ARE  
JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY AND  
GUIDANCE?**

**Issue 3. Whether the proposed changes to paragraph 5.8 are justified, effective and consistent with national policy and guidance?**

**Q1. Is the change to the supporting text at paragraph 5.8 justified and what are the implications for the rest of Policy S1?**

The change to the supporting text is considered to be necessary because the wording in the adopted Local Plan reflects the situation as it was at the time of the Examination. It is, on reflection post adoption, misleading because the reference to 291 hectares is to all employment land, including strategic B8 uses which are not part of the requirement identified in the Housing and Economic Development Needs Assessment (HEDNA) (and hence Policy S1) which is only concerned with B1, B2 and small scale B8 uses (i.e. less than 9,000sq m) B8 uses.

Policy S1 itself only refers to the 66 hectares required by the HEDNA and so there is a confusion between what was said in paragraph 5.8 and Policy S1.

The proposed wording therefore, of paragraph 5.8 provides a more accurate and less confusing picture.

Because the figure of 291 hectares in paragraph 5.8 is to something different to the 66 hectares referenced in Policy S1, the deletion of that part of paragraph 5.8 does not have any implications for the rest of Policy S1.

**Q1a. Having regard to the proposed deletion of the supporting text at paragraph 5.8, are the remaining references to the Housing and Economic Development Needs Assessment elsewhere in Policy S1 justified?**

As set out at paragraph 7.1 of the North West Leicestershire Local Plan Partial review Statement of Common Ground (LP/08), the Housing and Economic Development Needs Assessment (HEDNA) provides the most recent Leicester and Leicestershire based evidence study in respect of housing and employment land. It has provided the basis for all recently adopted Local Plans in Leicester and Leicestershire, including those of both Harborough and Melton which were adopted after the North West Leicestershire Local Plan.

Since the HEDNA was prepared and the Local Plan adopted, the government has introduced the standard method to identify individual authorities housing requirements. As set out at paragraph 7.1 of the Statement of Common Ground the implications of the standard method for Leicester and Leicestershire as a whole are negligible. In the HEDNA the requirement up to 2031 (the end date of the adopted Local Plan) is 4,829 dwellings, whereas using the standard method (2014-based as advise by the government), the comparable figure is 4,867 dwellings.

As set out in the Topic Paper (LP/12) the outcome from the HEDNA and application of the standard method (2014-based) for North West Leicestershire are very different in terms of housing requirements. The latter is much lower (379 dwellings per annum) than the former (481 dwellings per annum).

The government has made clear its intentions to review the standard method, whilst new 2018-based household projections, which will feed in to the standard method as it stands, are according to the Office for National Statistics due to be published in spring/summer 2020. This will provide a greater degree of certainty than is currently the case. The Council is of the view that as the HEDNA figures are significantly higher than those derived from the standard method, then it is appropriate to continue to refer to the HEDNA in Policy S1 in terms of housing requirements as it represents "positive planning".

This approach is consistent with the National Planning Policy Framework. Paragraph 73 is clear that when determining planning applications and considering the issue of 5-year land supply, an assessment against the local housing need (as derived from the standard method) are only required for plans that are more than 5-years old. As the North West Leicestershire Local Plan was only adopted in November 2017, it clearly does not fall in to this category. Therefore, it is appropriate to continue to retain reference to the HEDNA in Policy S1. The implications of the outcome from the standard method is a matter more properly left to the substantive review.

In terms of employment land, there is no more up-to-date evidence regarding future requirements than that provided by the HEDNA. The Leicester and Leicestershire authorities have commissioned a study to look again at the issue of strategic B8 needs, but nothing else to date.

Therefore, the HEDNA provides the only evidence in respect of employment land and so deletion of reference to the HEDNA in Policy S1 would not, from the point of view of employment land, be appropriate.

If references to the HEDNA were deleted from Policy S1, then this would also have consequences for other parts of the plan which either rely upon the HEDNA to inform policies (for example Policy H4 Affordable Housing) or which can inform decisions made against policies (for example, Policy H6 House types and Mix).

**Q2. Will paragraph 5.8 be effective having regard to the other employment policies in the Local Plan and will there be any effect on the flexibility of Policy Ec2 (2)?**

Policy Ec2(2) was included specifically at the request of the Local Plan Inspector (LP/05). The Inspector considered that *"This is to provide an appropriate level of flexibility in the choice and location of employment sites, including within the M42 corridor, in response to evidence of need or demand and subject to transport and amenity considerations"*.

Policy Ec2(2) requires a demonstration of a need or a demand, and that while need (in terms of hectares/floorspace) based on the HEDNA figures may now have been met, this doesn't mean that there wouldn't still be a demand for additional floorspace. The operation of Policy Ec2(2) would thus continue as per the adopted Local Plan.

In terms of other employment policies Ec1 to Ec3 deal with general employment land, policies Ec4 to Ec6 relate specifically to East Midlands Airport, policy Ec7 to

Donington Park, policies Ec8 to Ec12 town and local centres and policy Ec13 Tourism development. Therefore, only policies Ec1 to Ec3 deal with employment land per se. These are considered in more detail below.

Ec1 – Employment provision: permissions

This policy confirms that the sites listed as having planning permission will be renewed if they lapse, subject to any other material considerations. The changes to paragraph 5.8 would not change the effectiveness of this policy.

Policy Ec2 – New employment sites

Part 1 of this policy allocates land at Money Hill Ashby de la Zouch for employment purposes. There would not be any change to the status of this site and hence the effectiveness of this policy as a result of amending paragraph 5.8.

Part 2 is considered above.

Policy Ec3 – Existing employment areas

This policy sets out the Council's approach to proposals that could impact upon existing employment sites, with different criteria applied depending upon the relative importance of such sites. There would no change to the status and hence the effectiveness of this policy as a result of amending paragraph 5.8.

**Q3. What would be the implications for the delivery of strategic warehousing/logistics within the area as a result of the proposed changes to Policy S1 and supporting text?**

As outlined in the response to question1, the issue of strategic warehousing/logistics was not considered as part of the HEDNA. Instead , as outlined at paragraph 5.5 of the adopted Local Plan (LP/04a) it was the subject of a separate study. This did not identify requirements below the Leicester and Leicestershire level. As such, therefore, Policy S1 was not relevant to strategic warehousing/logistics. Instead ,any such planning applications would fall to be considered under policy Ec2(2). This has happened recently when the Council granted planning permission in 2019 for the creation of a 97ha strategic distribution campus for Jaguar Land Rover at Junction 11 of the M/A42 having assessed the application against the provisions of Policy Ec2(2)