

Revised 70.  
70/1/13-1.21/0

Please ask for: Grant Butterworth  
Telephone: [REDACTED]  
Email: [REDACTED]  
Our ref: NWL Local Plan June 2016  
Date: 11<sup>th</sup> August 2016



Leicester  
City Council

Ian Nelson  
North West Leicestershire District Council  
Council Offices  
Whitwick Road  
Coalville  
Leicestershire  
LE67 3FJ  
Via [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

Planning  
115 Charles Street  
Leicester LE1 1FZ

[www.leicester.gov.uk/planning](http://www.leicester.gov.uk/planning)

**RE: North West Leicestershire Local Plan – Consultation Version (June 2016)**

Thank you for consulting Leicester City Council on the North West Leicestershire Local Plan.

Strategic Planning Matters

70/1/  
1.13-1.21/  
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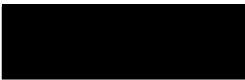
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Representor 70  
7013/Economy/10

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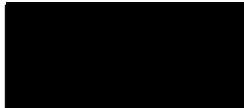
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70/4/1F4/S

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Strategic Planning Matters

Leicester City Council, North West Leicestershire District Council and the other authorities within the Leicester and Leicestershire Housing Market Area (HMA) have a strong track record of ongoing effective cross-boundary co-operation on strategic planning matters. Paragraphs 1.13-1.21 set out the significant level of co-operation in detail and 1.16 refers to the HMA wide Housing and Economic Development Needs Assessment (HEDNA) commissioned by all the HMA authorities. The purpose of the assessment is to provide an updated housing and employment objectively assessed need. The HEDNA is a policy off document with the intention to deal with matters related to spatial distribution through a new Memorandum of Understanding (MoU).

Whilst the City Council appreciates that waiting for the outcomes of the HEDNA and MoU to conclude would lead to delays to the local plan, at this time Leicester City Council is unable to support the North West Leicestershire Local Plan in advance of the final HEDNA report. At this time, there remains uncertainty over overall levels of housing and employment needs for the HMA and how the overall need will be distributed across the HMA.

However it is acknowledged that the HEDNA and MoU will be progressed in the next few months. Dependent on the satisfactory outcomes of the HEDNA and MoU the City Council may then be in a position to support the plan.

It is noted that policy S1 states that North West Leicestershire District Council will continue to work collaboratively with other authorities with regard to the scale and distribution of long term housing and economic growth amongst those authorities. The council has committed to

an early review of the plan should this work indicate an additional need in North West Leicestershire which could not be addressed through flexibility in the current plan.

### Strategic Warehousing Provision

With regard to strategic warehousing provision, the report by "MDS Transmodal & Savills" (the Leicester and Leicestershire Strategic Distribution Sector Study 2014; approved by the Strategic Planning Group) confirms that there is a need for a second strategic rail freight interchange in the county, to supply the 52% of the total market demand required to be served by rail. (It is noted that since then, the market has only brought forward road based sites, which presently make up 48% of the identified demand.) Rail provision is an important sustainable option which needs to be prioritised. The report identified only three key areas of opportunity for these, due to the limited areas served by adequate rail infrastructure (i.e. with an appropriate gauge width over "W9"). It is assumed that (as with the other authorities), this issue has been considered.

The report also confirms that in the HMA, there are 89 existing strategic warehouses (over 9,000sqm each) totalling 2.25million sqm, on around 382ha of land. (See section 2.3 and table 4.3 in part A of the MDS report). Only 90ha of this (less than a quarter) was forecast likely to be used for "on site-redevelopment" over the report period. Therefore consideration of the development potential of three quarters of this land will need to be addressed within the local Plan, in terms of possibly redeveloping for an alternative use or retention within the employment land supply. The above report identified the need to assess the existing strategic warehouses in your area, to forecast in more detail the likely remaining lifespan i.e. opportunities for the reuse of existing buildings and facilities.

Background Data Assumptions (applying a range of 2 possible densities based on industry practice). The "MDS Transmodal & Savills" report confirms around 351,000sqm existing floorspace exists in NWLDC

- Assuming a density of 5000/ha = 70ha of land, where re-use not addressed.
- Assuming a density of 4000/ha = 88ha of land, where re-use not addressed.

There is therefore a need to commission clear evidence on whether or not the existing stock of large scale warehousing will reach the end of its economic life during the plan period and if so, provide equivalent new land for their replacement and inform policies for either change of use to housing or other uses of the existing sites.

### Other employment matters

The assessments of losses of land seem too high. It has significantly increased in the last three years to 2.48ha per year = 48ha, however it was only 24ha for the 20 year period between 1991 -2011 equivalent to 1.8ha per year). The last three years are not considered to be typical and a lower trend than this is suggested to be used going forwards.

## Transport

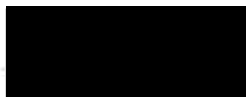
Policy IF4 Transport Infrastructure - we support the policy of improving the A511 corridor, especially the need to deal with Junction 22 of the M1. Current work to improve access to the city along the A50 – Leicester North-West project compliments this.

Policy IF5 sets support for the provision of public transport services on the Leicester to Burton rail line. Whilst the City is generally supportive of proposals to improve public transport within and around the city, we would need to be reassured on issues around the old Knighton North Chord and the existing congestion issues at Leicester Station. It is noted that Leicestershire County Council have resolved to undertake no further investigatory work, following their recent report on the Leicester Burton Line, at this time.

## Gypsy, Traveller and Travelling Showpeople Accommodation

Finally with regard to the provision of accommodation to meet the needs of gypsies, travellers and travelling showpeople (policy H7) it is noted that the council is working with the City Council and the majority of other districts in Leicestershire to undertake a new assessment of needs. The City Council will look forward to discussions around the identification of sites to meet the needs established in the new assessment with North West Leicestershire District Council and the other authorities within the HMA.

Yours sincerely,



Grant Butterworth  
Head of Planning  
Leicester City Council

