Business and Employment Topic Paper TPC3



Harborough Local Plan 2011-2031 Submission

HARBOROUGH LOCAL PLAN 2011-31

TOPIC PAPER: BUSINESS AND EMPLOYMENT

PURPOSE AND STRUCTURE

- 1.1 Topic Papers are an important source of information helping to outline and explain how policies in the Submission version of the Harborough Local Plan (2011-2031) have been prepared. For each topic the papers tell the 'end to end' story of how the policies have evolved, setting out the important milestones along the way.
- 1.2 Preparation of the plan has taken place over several years. The Topic Papers set out, for each topic identified, the approach taken to developing policies and the response to various overlapping factors that have been relevant to the process, such as:
 - Updating or refinement of evidence as the plan was being prepared. Decisions at different points in the plan preparation process can only take account of evidence available at that point in time.
 - Changes in planning legislation, regulations and government policy and indications of future changes, such as the Housing White Paper.
 - Development proposals emerging during plan preparation, which may present alternatives not previously considered, and as part of the development management process.
 - Taking account of how evidence and emerging proposals relate to plan-making activities in nearby authorities as part of the Duty to Co-operate.
 - The relationship with infrastructure provision, including the existing position, programme for future work and sources of available and required funding.
- 1.3 The Council has prepared a series of Topic Papers. The Spatial Strategy Topic Paper sets out the context to the plan's preparation as a whole. This is then supplemented by Topic Papers relating to Housing, Business and Employment, Countryside Protection, and Transport. There is also a separate Duty to Co-operate Statement and a Consultation Statement.
- 1.4 The intention is to signpost rather than to duplicate the detailed technical evidence which is already available in the evidence base and not to repeat the Explanation given under each policy in the Local Plan itself. The main aim is to demonstrate that the policies are sound and to assist the Inspector carrying out the Examination into the Local Plan, as well as others taking part in the Examination Hearing. It is assumed that these parties are familiar with the National Planning Framework and the national Planning Practice Guidance, so these are not repeated.
- 1.5 The Topic Papers have a common structure:
 - identifying the topic(s) covered and the Local Plan policies concerned (Section 2),
 - describing the main issues addressed in the paper (Section 3).
 - listing of that part of the evidence base especially relevant to the topic(s) (Section 4).
 - addressing the issues in the main body of the report (Section 5), and
 - making concluding remarks (Section 6).

2. THE TOPIC AND POLICIES

- 2.1 This Topic Paper addresses business and employment and covers the formulation of and justification for the following polices:
 - BE1 Provision of new business development

- BE2 Strategic distribution
- 2.2 It does not cover policies BE3, BE4 and BE5. These relate to specific sites which fall outside the provision of new business development. Sections 5 and 6 are subdivided to discuss general employment uses (BE1) and strategic distribution (BE2) separately.

3. THE MAIN ISSUES

- 3.1 The following key questions are addressed in Section 5 of this Topic Paper:
 - What is the Functional Economic Market Area (FEMA)?
 - How has the business and employment land requirement (excluding strategic distribution) been determined?
 - How has the amount and distribution of new provision for business development been justified?
 - How were the business and employment land allocations arrived at?
 - How has the policy on rural economic development evolved?
 - What strategic distribution land requirement figures are used as a basis for the plan and why?
 - What national, regional and local demand is there for strategic distribution?
 - What are the implications of strategic distribution growth for housing?
 - How was the policy for strategic distribution at Magna Park derived and justified?

KEY EVIDENCE STUDIES

4.1 There is a comprehensive evidence base that sits behind the Local Plan that has helped to inform policy development at each stage of plan-making. All the documents are listed and are available from the Council's website at the following url:

http://www.harborough.gov.uk/supporting-evidence.

4.2 The key evidence documents relevant to this topic are:

Harborough Strategic Employment Land Availability Assessment (SELAA), 2017 Update (EMP1)

HDC Existing Employment Area Review (EEAR), 2012 (EMP2)

Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA), 2017 (HSG8)

Leicester and Leicestershire Strategic Distribution Sector Study (L&L SDSS), 2014 (EMP6)

Leicester and Leicestershire Strategic Distribution Study: Update and Refresh of Outputs and Conclusions, (L&L SDSS Update), 2016 (EMP7)

Magna Park Employment Growth Sensitivity Study (MPEGSS), 2017 (HSG12)

Other relevant evidence includes:

Harnessing Harborough District Economic Development Strategy (2018/2023), 2018 (EMP15)

HDC Employment Land Availability Assessment (ELAA), 2012 (EMP3)

The Leicester and Leicestershire Growth Deal, 2014 (EMP5)

Leicester and Leicestershire HMA Employment Land Study (PACEC, 2013), (EMP14)

Leicester and Leicestershire Strategic Economic Plan (SEP) (2014-2020), 2015 (EMP8)

LLEP Logistics & Distribution Sector Growth Plan, June 2015 (EMP9)

Local Plan Viability Assessment, 2017 (HSG10)

Midlands Engine for Growth, 2017 (EMP10)

Specialist Advice on the Land and Property Market of Harborough, 2017 (EMP12)

5. EVOLUTION OF BUSINESS AND EMPLOYMENT POLICIES

The Starting Point

- 5.1 The existing Core Strategy was adopted in November 2011. It set out an approach to employment and business development which required Harborough to fulfil a predominantly local need. The overall spatial strategy, which applied to employment and business, was to strengthen Market Harborough and reinforce the strategy for settlements (CS1) by focusing business and employment development at Key and Rural Centres. Employment development in the countryside was strictly controlled. At the time there was no need to provide new employment land during the period to 2026, to supplement retained employment allocations from the Harborough District Local Plan 2001.
- 5.2 The Core Strategy supported in principle:
 - the delivery of existing sites with planning permission;
 - a review of existing employment sites and allocations and the confirmation of a 'fit for purpose' portfolio of sites to replace losses and meet any identified shortfalls in future need:
 - the designation and safeguarding of Key Employment Areas;
 - the delivery of an Innovation Centre in Market Harborough and the provision of starter units through conversions and new developments; and
 - no further expansion of Magna Park.
- 5.3 The Core Strategy was adopted before the introduction of the NPPF and the Council decided in December 2012 that it needed to be replaced with a new Local Plan incorporating strategic allocations. In relation to business and employment policy, it was recognised that it needed to be more positive and flexible to ensure compliance with the NPPF requirements to:
 - promote sustainable economic growth by pro-actively planning to ensure sufficient land for employment is provided to meet identified need (para 20-21), and
 - support economic growth of all types in rural areas (para 28)
- 5.4 An update of joint employment evidence, forecasting for timeframe 2010 to 2031, followed. The Leicester and Leicestershire HMA Employment Land Study (PACEC, 2013) (EMP14), was reported on in November 2012, and indicated that the overall number of new jobs needed in Harborough to 2031 was 6,400 full time equivalents (FTE). Resulting land requirements, based on an assessment of the demand / supply balance, were presented for the HMA, Leicester PUA and individual districts. For Harborough a surplus of office land (B1a/b), and a deficit of industrial (B1c/B2/ small B8) and strategic storage and distribution land (B8) was forecast. Notably the study separated B8 land requirements into small (units <10,000sq.m.) and strategic (units > 10,000sq.m) provision recommending that the latter be planned for on a sub-regional, as opposed to district, basis and that the evidence base for employment land planning for super-sized warehouses be strengthen. This recommendation resulted in the subsequent commissioning of the L&L SDSS in 2013 (EMP6).

5.5 The L&L HMA ELS Update (2013) (EMP14) formed the evidence base for the scoping and options stages of plan making.

Scoping Consultation

- 5.6 The Scoping Consultation took place in March April 2013, and set out the proposed purpose, format and content of the new Local Plan. It is described in more detail in the Interim Consultation Statement. Alongside the proposed identification of strategic allocations for residential, employment, retail and other land uses, it undertook to:
 - amend CS7f and CS17 to achieve NPPF compliance,
 - identify existing employment areas to be safeguarded as Key Employment Areas, and,
 - include a specific policy framework for Magna Park and Bruntingthorpe Proving Ground.
- 5.7 The results of the consultation were taken into account in agreeing the final scope of the plan. There was a more or less equal split of opinion on the approach to identifying strategic allocations, with feedback that a degree of flexibility would need to be applied depending on the settlement.
- 5.8 The majority of respondents were in broad agreement with amending CS7f / CS17. Many responses highlighted the need to ensure conformity with the NPPF's support for economic growth in rural areas, while others highlighted the need to protect the countryside. A number of specific comments were made in relation to both Magna Park and Bruntingthorpe Proving Ground. Some comments highlighted the uniqueness of each and their need for specific policy treatment, with others expressing satisfaction with the past policy approach.
- 5.9 The Council decided to continue with the overall scope of the new Local Plan, as set out in the Scoping Consultation, with the following notable change relevant to business and employment:
 - Policies for business and employment development to consider existing and emerging evidence on sub-regional employment land requirements and the local economic strategy prepared by Leicester and Leicestershire Enterprise Partnership.
- 5.10 There was also a need for additional evidence documents to support the preparation of the Local Plan. Subsequently, local authority partners and the Local Enterprise Partnership (LEP) jointly commissioned the Leicester and Leicestershire Strategic Distribution Sector Study.

Options Consultation – General Employment

- 5.11 An options consultation was carried out in September and October 2015 and is described in more detail in the Spatial Strategy Topic Paper and in the Statement of Consultation. It focused on meeting the District's future need for homes and jobs, and set out 9 alternative options for locating housing and employment provision across the District to 2031.
- 5.12 In terms of provision for general employment uses (office, industrial and small B8), the nine Options were very similar as follows:

OPTION 1: RURAL – about 10 hectares in Market Harborough, at least 4 ha. in Lutterworth, and about 3 ha. in Fleckney (to balance its relatively high housing growth).

OPTION 2: CORE STRATEGY DISTRIBUTION – as in Option 1.

OPTION 3: URBAN – as in Option 1.

- **OPTION 4: SCRAPTOFT / THURNBY SDA** as in Option 1. No employment provision was included in the Scraptoft SDA but this was to be considered further.
- **OPTION 5: KIBWORTH SDA** as in Option 1 plus a further 5 ha. in the Kibworth SDA.
- **OPTION 6: LUTTERWORTH SDA** as in Option 1, but with 10 ha. (rather than 4 ha.) in Lutterworth
- OPTION 7: SCRAPTOFT / THURNBY SDA and KIBWORTH SDA as in Option 5.
- **OPTION 8 SCRAPTOFT / THURNBY SDA and LUTTERWORTH SDA** as in Option 6.
- **OPTION 9: LUTTERWORTH SDA and KIBWORTH SDA** as in Option 6 plus 5 ha. in the Kibworth SDA.
- 5.13 The Options Consultation document set out the residual amount of general employment land required to 2031, based on the evidence of the Leicester & Leicestershire Employment Land Study Update 2013 (EMP14), and taking into account completions and commitments at March 2015. This showed a requirement of 7 ha. of land for light industrial (B1c), industrial (B2) and small storage and distribution (B8 < 10,000 sq.m.) uses and an over-supply of offices (B1a/B1b) and research and development (B1b) of 25,600 sq.m. floor-space.
- 5.14 It also described and justified the proposed distribution of land for general employment uses (NPPF para.118-122), taking account of the allocation of sites through made Neighbourhood Plans in Broughton Astley and Billesdon and the shortage of employment sites in Kibworth outside the potential SDAs. A pool of potential employment site allocations was set out for illustrative purposes, based on the evidence of the Harborough Employment Land Availability Assessment (2012) (EMP3) since superseded by the SELAA (2017) (EMP1).
- 5.15 In the case of Options 1-4, a total of 17ha of new land was proposed providing more land than the residual requirement in order to: give choice and flexibility, enable a better response to future market demand, and offset the potential loss of existing employment sites (evidenced by the EEAR (EMP2)). For Options 5-9 the addition of developer specific proposals for employment associated with particular SDAs resulted in total provision ranging from 22 to 28 ha., higher again when compared with the residual need. This extra flexibility recognised the long lead time for implementing SDAs with the expectation of delivery towards the end of the plan period.
- 5.16 The Options Consultation also set out a list of important existing employment sites proposed to be protected for B Class employment uses, based on the EEAR (EMP2). The EEAR also identifies some sites that may be developed for other uses.
- 5.17 The consultation response to these options is described in the Consultation Statement. In brief, no objections were expressed to the alternative scale and distribution of general employment provision across the options, although the lack of an option aimed specifically at higher growth to reduce out-commuting was identified. Support was expressed for; new land in Lutterworth, the principle of balancing employment and housing provision at settlements and in SDA's, improvements to broadband, and the use of farm buildings for employment purposes. Detailed comments were made in respect of Compass Point Business Park and Land at Airfield Farm, although no extra sites were put forward.

Options Consultation – Strategic Distribution

- 5.18 All options stated that there would be additional provision for strategic distribution use close to Magna Park, the scale of which was yet to be determined. The document described the findings of the L&L SDSS (EMP6). This did not break down requirements by individual district, but recommended that Harborough District contributes towards meeting a shortfall (under-supply) of 107ha of land required at non-rail served strategic distribution sites during the plan period to 2031. (Rail served sites are not relevant to Harborough.)
- 5.19 The Options document set out three options for the allocation of land adjoining Magna Park. These reflected sites that had been or were to be submitted as planning applications:

OPTION A: based on application 15/00919/FUL, about 37ha of operational land to the north of the existing Magna Park, increasing its size by about 20% with up to 100,844sq.m. of strategic distribution buildings;

OPTION B: based on application 15/00865/OUT, a separate but adjoining distribution park to the south of Magna Park, providing up to 278,709 sq.m. of storage and distribution on a site of 89 ha. This would enable significant growth during the middle to end of the plan period.

OPTION C: based on developer submissions, this option would include a substantial expansion of the existing Magna Park to enable up to 500,000 m² of distribution warehousing on 220ha of land with space for a Country Park, and other ancillary uses. This option incorporated the 37ha of land identified under Option A. It would enable the District and wider sub-region to capture a larger share of forecast growth in the strategic distribution sector. This would enable the site to continue to grow at historic development rates to 2031 and potentially beyond. Provision on this scale would considerably exceed the minimum requirement of 107ha.

- 5.20 The interim SA report on the Options Consultation did not appraise the alternative options for strategic distribution. At the time it was considered beneficial to gather further evidence to support a sustainability appraisal of strategic distribution, not least because strategic distribution tends to draw labour from a large travel to work area straddling counties and regions. Subsequently the availability of further information enabled a detailed appraisal of the options for strategic distribution to be undertaken, leading to a Second Interim SA Report Appraising Options for Strategic Distribution Growth (Feb 2016) (PRE11).
- 5.21 The consultation on the second Interim SA took place between 17th February and 16th March 2016. The alternative options appraised in the report comprised the three options set out in the Options Consultation Paper, and two further combinations of these options. These two combinations were appraised to support the consideration of the planning applications then pending determination. They were:
 - A combination of Options A and B
 - · Combination of Options B and C
- 5.22 In response to this consultation a significant additional site option was submitted by Prologis and supported by relevant landowners for development of land centred on the A426 adjoining a proposed new Junction 20A of the M1 in both Blaby and Harborough District. In support of this, a critique of the second Interim SA was submitted. This raised a number of issues with the process, concerning the consideration of alternative options, the interpretation of recommendations from evidence (SDSS, EMP6) and the role of planning applications in the SA process.
- 5.23 Following consideration of responses to the consultation and in dialogue with the Council's Sustainability Appraisal consultants (AECOM) it was decided to re-appraise options from the perspective of 3 alternative growth scenarios and then the 7 sites

- which could provide for such a scale. It was considered appropriate to include the new site in this appraisal.
- 5.24 Since there was no requirement to consult on the report, it was used for internal purposes only. Chapters 18/19 of the Proposed Submission SA report effectively present the content of the revised SA, but in an updated form. It assesses 4 growth scenarios, including an additional one of 700,000sq.m. (representing the maximum amount being proposed at Magna Park, as assessed in the MPEGSS) and 7 site options.

Further Work- General Employment

- 5.25 Following completion of the Options stage of plan-making, the HEDNA for Leicester and Leicestershire was commissioned to support:
 - the current round of Local Plans;
 - the preparation of a non-statutory Strategic Growth Plan and a refresh of the LLEP SEP; and
 - the distribution of growth beyond 2028 (not covered by the MOU, 2014).

The HEDNA replaced earlier employment land studies and, as the most up to date evidence, provides the basis for the Proposed Submission Local Plan.

Functional Economic Market Area (FEMA)

- 5.26 The HEDNA (HSG8) identifies Harborough District as part of the Leicester and Leicestershire Functional Economic Market Area along with the 7 other local authorities that comprise the administrative area of Leicester City and the County of Leicestershire. The detailed analysis that has informed the definition of the FEMA, and which takes account of factors set out in Guidance (PPG, Para: 012, Reference ID: 2a-012-20140306), is provided in Appendix B of the HEDNA. The FEMA is common with the HMA, as shown in the HEDNA Figure 1.
- 5.27 The HEDNA recognises that the economic geography can vary for different sectors of the economy, and that for logistics and distribution in particular the area forms part of the wider Midlands market area with a particular concentration of activity within the 'Golden Triangle' formed broadly by the M42, M1 and M6 motorway network.

Need for General Employment (B1/B2/small B8)

- 5.28 The HEDNA provides a consistent, objective assessment of economic development needs for the HMA/FEMA and individual authorities, following the approach prescribed by Government in Planning Practice Guidance (PPG).
- 5.29 Future need is calculated according to the methodology set out in PPG, Para 030-034 Methodology: assessing economic development and main town centre uses. The approach draws together a number of strands of analysis including labour demand and trend based forecasts and interrogates the economic growth potential of the FEMA, the area's economic structure and past performance. It also assesses baseline forecasts and overlaid economic drivers and planned investment to derive a Planned Growth Scenario (PGS). Consequently, it meets the requirement to have a clear understanding of business needs within the economic markets operating in and across the area (NPPF, para 160-1).
- 5.30 Under the recommended PGS employment growth of 9,500 jobs is expected for Harborough district (2011-31), representing a percentage growth per annum which exceeds that expected across the FEMA, region and UK. Within the District strong growth is expected in the professional, scientific and technical sectors (drivers of

- office uses), with continued strong growth in the transportation and storage sector and relatively strong growth in the arts, entertainment and recreation sector.
- 5.31 The HEDNA converts job growth into employment land need by relating sectors to B class uses, and using standard job densities (taking account of the HCA Employment Densities Guide: 3rd edition, 2015¹). It then makes assumptions about the density of development and includes a margin for modelling error and flexibility (equivalent to 5 years' past take-up for office and industrial uses, based on long term trends). The result of this for the period 2011-2031 is set out in the table below (ref. HEDNA, Table 83).

HEDNA	Gross Forecast Employment Land Need 2011 – 2031 (ha.)							
	B1a/b	B1c / B2	Small B8 (units<9,000sq.m.)	Strategic B8 (units>9,000sq.m.)	Total			
FEMA	142-198	132	93	361	728 - 784			
Harborough	14-21	22	8	Not disaggregated	44 - 51			

- 5.32 HEDNA advises that the need figures be regarded as minima, as the quantitative analysis (except for strategic B8) does not take account of potential demand arising from the loss (planned or otherwise) of poorer quality existing employment floorspace.
- 5.33 The level of need for all uses, most notably offices, is higher than that forecast by studies at earlier stages in the plan making process. This is due largely to variations in methodology, different forecasting timeframes, updated baseline economic projections, and other factors used to inform the HEDNA's PGS.
- 5.34 HEDNA provides the most robust and up-to-date information currently available on employment land requirements for Harborough District. The Local Plan seeks to meet Harborough's needs, including the upper end of the range for office, in full. HDC has not been advised of any unmet employment need by other authorities in the FEMA or neighbouring the district.

Progress against requirements

- 5.35 In considering progress to date there are several components to factor in:
 - employment land completions (sites built-out since 2011/12),
 - commitments (sites granted planning permission since 2011/12 or allocated via made NDP's since 2011); and
 - the loss of employment land to other uses (planned or otherwise, including via permitted development rights introduced in 2013).
- 5.36 Monitoring is undertaken annually, the latest being for the year 1 April 2016 to 31 March 2017. (A further update will be undertaken as at 31 March 2018, after submission of the Local Plan). A summary of net completions (gains minus losses) consolidated by B class use, which amends Table B.11 (Proposed Submission Local Plan, page 78), is provided in the table below.

Summary of Net Completions by Use and Year (has.)

				Strategic	
	Office	Industrial	Small B8	B8	Total
Year	B1a & B1b	B1c & B2	(<9,000sqm)	(>9,000sqm)	
2011/12	1.08	0.22	0.25	0	1.55

¹ Employment Densities Guide: 3rd Edition - GOV.UK

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2012/13	0.1	1.22	0.05	0	1.37
2013/14	0.95	1.31	0	0	2.26
2014/15	-0.32	0.01	-3. 7	0	-4.01
2015/16	1.41	1.27	0.37	4.11	7.16
2016/17	-0.05	1.25	0.18	0	1.4
Total All Years	3.18	5.27	-2.85	4.11	9.71

(totals may not sum due to rounding)

5.37 A summary of net employment land commitments at 31 March 2017 is provided below:

Summary of Net Commitments at 31 March 2017 (2011/12 – 2016/17)

	Office (B1a/b)	Industrial (B1c/B2)	Small B8 (<9,000sqm)	Strategic B8 (>9,000sqm)	Total
Net Commitments (with planning permission or allocated in NDP)	5.3	4.9	1.4	55.9	67.5

- 5.38 Several sites are excluded from the total in the table above to avoid double counting, as they have planning consent but are also proposed for allocation in the Local Plan.
- 5.39 Notably, commitments include two single unit schemes for strategic B8 use (the largest for a specific user, the smaller speculative), and one outline proposal for a mixed office / industrial use scheme. However, the vast majority of commitments comprise small-scale, often occupier-specific developments, either on existing employment sites in Market Harborough or in rural parts of the District, which do not add to the readily available supply of premises / sites to the commercial market.
- The PPG (Housing and Economic Needs Assessment) advises that in considering 5.40 future need regard should be given to "loss to other uses". The HEDNA quantitative analysis does not take account of the potential 'replacement' demand (planned or otherwise) of poorer quality existing employment floor space. Losses due to permitted development rights introduced in 2013 (originally temporary, becoming permanent in 2016) have to date been negligible, and are assumed to remain so. However, there is little certainty on whether the rate of loss experienced during the early part of the plan period, as reflected in the net completions table above, is typical and therefore how much land might be lost in future. Actual loses 2011/12 to 2016/17 total 8.52ha, this incl. 1 single site of 3.7ha which is unlikely to be replicated. Excluding this it equates to an average loss of approx. 0.8ha pa. If projected forward for subsequent years of the plan (0.8 x 14) an estimated 11.2ha could be lost. However, this is assumed to be slightly on the high side. Nevertheless, as evidenced by the EEAR (EMP2), the loss of 6 existing employment areas is identified and considered as likely up to 2031.
- 5.41 These 6 sites were adjudged by the EEAR (EMP2) to be of low quality and, given their locations and the relative need for alternative land uses, not to warrant protection under policy BE3 (Existing Employment Areas). The effect of this would be a reduction in the number of jobs available, and a need to ensure that the amount of new provision is sufficient to compensate for these possible losses. Two of these sites are undergoing redevelopment for residential use (with likely completion in the 2017/18 monitoring year), with the others anticipated to follow suit or undergo changes to alternative non-B class uses during the remainder of the plan period.
- 5.42 The residual requirement for land for general employment uses to 2031 is therefore calculated as follows:

Requirement (ha.) to 2031 (min.)		Office (B1a/b)	Industrial (B1c/B2)	Small B8 (<9,000 sq.m.)	Total
Forecast demand 2011-2031		21	22	8	51
 Completions 	В	3.2	5.3	-2.9	5.6
 Commitments 	С	5.3	4.9	1.4	11.6
Allowance to replace potential EEAR losses	D	2.3	4.3	0	6.6
Residual requirement to provide for in Local Plan (A-(B+C)+D)		14.8	16.1	9.5	40.4

Scale and Distribution of Employment Land Provision

- 5.43 As noted above there is a shortfall in employment land of 40.4ha. Policy BE1 proposes the allocation of 58.5ha on a range of sites across the district, which exceeds the residual requirement. As set out below, this additional flexibility is justified by:
 - the Lutterworth SDA proposal;
 - a sustainable distribution of sites;
 - corporate and LEP economic development priorities;
 - widening market choice;
 - the need for short term land availability;
 - unanticipated inward investment; and
 - any delay or failure in the delivery of committed sites.
- 5.44 Future employment land distribution across the district is based on the spatial strategy and settlement hierarchy (Policy SS1), as discussed in the Spatial Strategy Topic Paper, involving a Strategic Development Area on land east of Lutterworth.
- 5.45 The provision of 23ha of employment land at the East of Lutterworth SDA is an integral part of the promoters' proposal, the delivery of which is critical to the spatial strategy. The inclusion of 13ha for small B8 use is provided, over and above the minimum HEDNA requirement for Harborough (of 8 ha to 2031), on the basis that it is essential to support the viability of the wider scheme. The SDA, including this development site, has been assessed as viable by the Local Plan Viability Assessment, 2017 (HSG10). The assessment assumed an amount of profit from the B8 site and this contributing to the viability of the overall scheme. Cash flow information has been provided which demonstrates that the early sale of this land will assist in funding infrastructure required before the rest of the SDA can progress.
- 5.46 The remaining 35.5 has. are distributed to strengthen Market Harborough's established role as the district's primary economic centre, to achieve a balance between jobs and areas of housing provision (e.g. Fleckney) and to ensure development takes place in locations which are most suitable in sustainability terms, are accessible and are also attractive to the market. As evidenced by the Specialist Advice on the Land and Property Market of Harborough, 2017 (EMP12) most demand originates from companies already situated in Leicestershire and is focussed on existing sites, established centres and the transport corridors between them. In distributing future employment provision, account has also been taken of land availability (evidenced by the SELAA, 2017 (EMP1)), the results of the Sustainability Appraisal, and other more localised evidence including the application of Policy GD2 criteria.

- 5.47 Regard has also been had to the Council's commitment within its Corporate Plan to develop an enterprising and vibrant place, and to the vision and priorities for the area of the Harnessing Harborough Economic Development Strategy 2018/2023 (EDS) (EMP15) which seek to address:
 - the shortage of Grade A property and 'move-on' space in Market Harborough,
 - a lack of innovation / incubation space in Lutterworth, and
 - the need to bring forward key sites to improve market choice.
- 5.48 In turn the EDS reflects wider economic policy for the FEMA including the ambitions for place, business and people set out in the LLEP Strategic Economic Plan (SEP, 2015) (EMP8) which focus on 5 Growth Areas including South Leicestershire.
- 5.49 Policy BE1 also aims to widen choice in the market and improve short-term supply, particularly in Lutterworth given the reliance on the East of Lutterworth SDA. The perspective of agents provided within the HEDNA (HSG8) reports a tight supply in particular of Grade A / new-build office premises across the FEMA, with demand mainly from SME's. The level of available stock for industry / warehousing is identified as falling to relatively low levels with replenishment required in the mediumterm, and demand at a range of locations across the FEMA. Within the district only 2 sites (i.e. Airfield Business Park, Compass Point Business Park) are currently supplying the market with employment land, specifically on a design & build basis. Local evidence (EMP12) suggests no significant sites have been delivered which cater for the demand for smaller units of less than 500sq.m.
- 5.50 The scale of provision provided by Policy BE1 also gives flexibility to accommodate inward investment needs not anticipated in the plan (NPPF para 21), although historically such needs are uncommon, as evidenced by the Specialist Advice on the Land and Property Market of Harborough, 2017 (EMP12) which suggests that the majority of enquiries originate from companies looking to invest locally. The provision above the minimum HEDNA requirement also provides scope to offset any slow or non delivery of those employment commitments or NDP allocations that are potentially less suitable to meet market requirements. Based on monitoring records underpinning AMR's, it is not uncommon, for employment consents to occasionally lapse.
- 5.50 A total of 50 sites have been notified via calls for sites, undertaken as part of the ELAA (EMP2) and its replacement the SELAA (EMP1), or directly via plan-related consultations at earlier stages. The SELAA (EMP1) provides a policy off assessment of the future supply of economic land in the district. Taking forward the outcome of the Scoping Consultation, only sites of a strategic nature, over 1ha and required to deliver the spatial strategy and meet employment needs, have been considered.
- 5.51 The vast majority of sites put forward in the SELAA (EMP1) are greenfield. There is also a lack of sequentially preferable sites for B1a office uses located either within or on the edge of the main town centres of Market Harborough and Lutterworth, as evidenced by the SELAA (EMP1) and the Harborough District Retail Study 2013 (RTL1).

Rural Economic Development

5.52 Policy BE1(2) was formulated to support economic growth in rural areas where specific employment allocations are not proposed. It addresses the outcome of consultation at the scoping stage by seeking to balance the requirement to support a prosperous rural economy (NPPF Para 28) with the core principle to recognise the intrinsic value of the countryside. It uses a criterion-based approach to ensure development is positively managed by the Local Plan in locations that are sustainable and deliver local benefit. The inclusion and wording of specific criteria are informed by NPPF para 28, and are intended to enable development in certain circumstances.

Employment Allocations

- 5.53 Sites assessed as deliverable or developable within the SELAA (EMP1) were considered in order to identify potential sites for allocation for general employment uses. This resulted in a 'long list' of 21 sites. Further detail on the overall outcomes is provided in section 3.2 of the SELAA main report; individual site assessments are provided in the companion guide.
- 5.54 The sustainability effects of these sites were then assessed, as evidenced in the Sustainability Appraisal. Each potential site was assessed using the SA site appraisal framework, developed in the SA Scoping Report, to give an objective assessment of its constraints and benefits. The results are summarised in Appendix F of the Proposed Submission SA Report (S6), and provided in full in Technical Appendix B of the SA.
- 5.55 As a final step, each site's conformity with the criteria set out in the emerging Local Plan Policy GD2: Settlement development was assessed. This criteria-based policy applies to proposals for new development within or on the edge of sustainable settlements, to ensure development takes place on suitable sites. Evidence from Landscape Character Assessments (LAN1-11) and the SELAA (EMP1) was used to inform the assessment. The ability of each site to deliver particular B class uses required to meet need was also considered. A summary of the results, including reasons for allocation or rejection, is provided as Appendix A to this paper.
- 5.56 This process reduced the sites to a 'short list' totalling 8, including 2 sites forming part of the East of Lutterworth SDA but excluding 3 sites already allocated in NDP's and 1 on which construction started in April 2017. Two of the sites identified are the undeveloped parts of land previously allocated in the Harborough District Local Plan 2001, reappraised by the SELAA as suitable (as suggested by NPPF, para 161).
- 5.57 Further adjustments to individual site areas, estimated capacity (based on HEDNA assumptions), and B class use assumptions were made based on latest information at September 2017, including outline planning consents. Specifically the Compass Point Business Park site was reduced in size, in response to a representation made at the Options stage, to enable part of the site to be incorporated into the East of Blackberry Grange housing allocation (subject of Policies H1.2.b and MH2) and to facilitate access for this larger housing development in accordance with a masterplan to be prepared for both sites together (see Policies MH2.1.a and MH6.1.a).
- 5.58 This work resulted in the following list of allocated employment sites set out at Policy BE1 of the Proposed Submission Local Plan:
 - Land at Airfield Farm about 13 ha.
 - Airfield Business Park about 6 ha.
 - Compass Point Business Park about 5 ha.
 - East of Lutterworth SDA –10 ha.
 - South of A4304, East of Lutterworth SDA –13 ha.
 - Land South of Lutterworth Road / Coventry Road, Lutterworth about 3 ha.
 - Land of Marlborough Drive, Fleckney about 3 ha.
 - Land south & west Priory Business Park, Kibworth about. 6 ha.
- 5.59 Appendix 2 provides a summary of assumed delivery for each allocation, set against the residual requirement (40.4ha) to provide for in the Local Plan as detailed in section 5.42 of this paper. It shows that Policy BE1 makes provision above the minimum HEDNA requirements as follows; Offices (3.9ha), Industrial (2.9ha) and Small warehousing (11.3ha). This provides important flexibility in provision across the district and plan period to accommodate potential variations in the mix and density of employment uses on some sites and reduces reliance on the 3 larger more complex SDA related sites.

- 5.60 Proposed allocations MH4 and MH6 comprise the remainder of existing partially developed business parks, currently on the market. L1e and L1f form part of the East of Lutterworth SDA and are proposed for the reason outlined in para 5.45. L2 is considered beneficial as it provides short-term supply in Lutterworth as outlined in para 5.49. Both L2 (Land south of Lutterworth Road / Coventry Road, Lutterworth) and K1 (Land south & west Priory Business Park, Kibworth) have gained outlined planning consent during the plan preparation process and, although now commitments, they are allocated to ensure that the minimum HEDNA requirement for both office and industrial uses can be met during the plan period.
- 5.61 Each employment allocation is supported by a site specific criteria-based policy in Section C of the Local Plan. In each case the criteria address the individual site characteristics and constraints. Policy sets out appropriate B class use/s based on the evidence of the SELAA, and in order to ensure that overall the HEDNA requirement for different types of use are met during the plan period. Additional guidance on the nature of development is restricted to the explanatory text so as not to over-burden and provide flexibility (NPPF, para 21).

Delivery

- 5.62 The delivery of each employment allocation has been assessed, as evidenced by the SELAA (EMP1). All sites are expected to be delivered in the next 5 years, except for those forming part of the East of Lutterworth SDA and MH4 Land at Airfield Farm (Market Harborough) which relates to the delivery of the North West of Market Harborough SDA, an undertaking dating back to the Core Strategy. These particular sites are anticipated to be started within 6-10 years, although delivery is unlikely to be completed until the end of the plan period. Liaison with landowners, site promoters and advice from local agents indicates support for the allocation and delivery of proposed sites.
- 5.63 Delivery will be monitored annual and reported in the AMR, in accordance with Policy IMR1 and the performance monitoring framework set out in Appendix K of the Local Plan, and where necessary stated remedial action will be taken.

Further Work- Strategic Distribution

Need and Demand for Strategic Distribution

- 5.64 Partly as a result of the planning applications at Magna Park and partly to assist with the Local Plan and the Strategic Growth Plan, in June 2016 an update of the L&L SDSS (EMP7) was commissioned. This was primarily to provide:
 - clarification on a number of the conclusions and recommendations reached in the earlier study (2014),
 - a refresh of outputs, and
 - an update on wider market developments and their implications for the area in the longer term.
- 5.65 A series of three separate but inter-linked scopes of work were commissioned from the original consultants MDS Transmodal Ltd., the first (Part A) solely funded by and relevant to Harborough District, the second (Part B) with elements relevant to all authorities and funded by HDC, and the third (Part C) funded collectively and relevant to partner authorities. Parts A and B reviewed current planning commitments, updated the previous evidence of need, and advised further on local plan approaches. Part C reviewed long term forecasts of floorspace need.
- 5.66 The L&L SDSS Update (EMP7) is a standalone report but should be read in the context of the original L&L SDSS (EMP6). Its key messages for the Harborough Local Plan are:

- Following review, the methodology and assumptions used in the L&L SDSS to forecast future demand (gross new-build and land required) and the resulting outputs are considered *robust*.
- Forecasts should be regarded as 'minimum' figures (not a maximum cap or target), in order that a geographical spread of commercially attractive sites is always available across the county.
- The supply of land at road-only sites in Leicestershire has increased (to104ha), reducing the forecast shortfall to 2031 to 48ha compared to the L&L SDSS.
- New road-only sites should be brought forward, to meet the forecast shortfall, in at least two 'Key Areas of Opportunity' simultaneously.
- Three (road-only) sites totalling 137ha, which were considered capable of meeting the L&L SDSS criteria for commercially attractive sites, were currently in the planning pipeline (awaiting determination by HDC).
- L&L SDSS recommendations for LCC, the LLEP and local authorities to work together on a long-term collaborative basis to allocate sites within the county to meet the identified shortfalls are re-iterated.
- 5.67 The wider and longer-term implications of the report are more aimed at the SGP but are also relevant background for the Local Plan. The relevant conclusions for Harborough were:

Existing Supply of Large Scale Warehousing:

- Whilst total supply nationally had fallen slightly, it had risen in Leicestershire;
- Average floor-space per unit remains higher in the small Golden Triangle and East Midlands, than nationally;
- The East Midlands, wider golden triangle (and by association Leicestershire) had, and continues to have, a distinct competitive advantage in this sector, and 'punches above its weight':
- 65-70% of the region's floor-space is playing a national rather than regional role;
- Supply within Leicestershire remains concentrated within North West Leicestershire and Harborough Districts and Leicester City.

Future Demand – Key Sector Trends Nationally:

- The sector behaves differently from other commercial sectors with respect to property: development of new warehouses is driven by factors other than employment growth;
- Key drivers of demand in the region include retail (including E-commerce) and the advanced manufacturing sectors;
- Recent transaction data confirms:
 - increasing take-up of larger units,
 - ¼ of floor-space since 2000 is within the 'wider golden triangle',
 - the current shortage of supply and the national vacancy rate is significantly lower than long-term averages, and
 - 'build to suit' is an important component of regional supply;
- The sector is characterised by continual and significant 'churn' (i.e. despite significant per annum build activity, total stock does not alter appreciably).

Leicestershire and the Logistics Market - Key Issues:

- Spatial advantages & disadvantages of Leicestershire / the golden triangle (wider / small) remain as per L&LSDSS;
- The six Key Areas of Opportunity (including those identified in the L&L SDSS) remain valid;
- forecast new-build rates and gross land requirements to 2031 / 2036 in the L&L SDSS remain robust.

Industry Requirements are:

• Locations that are highly accessible (i.e. equidistant between product / destination, close to the Strategic Road Network & transport nodes, close to workforce);

- Sites that offer flexibility (i.e. optimal layout / space / height standards, can accommodate ancillary / added value activities, are adaptable);
- Distribution clusters to allow agglomeration benefits (e.g. transport, supply chain, labour, technology).

Maintaining Leicestershire's Competitive Advantage:

- Balancing operational costs: acknowledging the locational balance struck by operators between rental, transport and labour costs;
- Delivery of planned and necessary infrastructure schemes (both road and rail) to improve the network and its capacity;
- Providing an adequate supply of land, including an additional SFRI;
- Supporting the sector in terms of policy, reduced bureaucracy, site characteristics / flexibility;
- Identifying commercially attractive sites, using the location and selection criteria of the L&L SDSS which remain valid.
- 5.68 Following receipt of the L&L SDSS Update reports Parts A and B, in February 2017 a second draft of the Local Plan included a positive, criteria based policy for development at Magna Park with no upper limit or 'cap', reflecting the conclusion of the L&L SDSS Update that the forecasts of need should be regarded as 'minimum' figures. At that time decisions on the pending applications were expected in June/July and it was anticipated that the outcomes would in due course be reflected in the Local Plan.
- 5.69 In May 2017 the Focussed Engagement and Duty to Cooperate Workshop revealed concern from partners about the 'open-ended' nature of this policy, leading potentially to uncontrolled growth at Magna Park having an adverse impact on housing numbers in adjoining districts outside the HMA, on DIRFT and on the A5. There was a clear need to ensure the relationship between employment growth and housing was sound and clearly evidenced and that any resulting Duty to Cooperate matters could be addressed. Advice was also given by the council's retained Counsel on the Local Plan that the Plan should balance the housing and employment provisions and not leave this to criteria and the development management process. This led to the decision to commission the Magna Park Employment Growth Sensitivity Study, as described below.

Relationship between Strategic Distribution and Housing Requirements

- 5.70 The Housing and Economic Development Needs Assessment (HEDNA) was prepared on a 'policy off' basis, that is it was able to take into account baseline forecasts for economic growth adjusted to reflect committed investment. This was known as the Planned Growth Scenario (PGS). It would still be open for individual authorities to plan for growth above the PGS but this would be regarded as 'policy on' and would not be part of any economically-led growth. The HEDNA states in para 4.22:
 - "We have only sought to adjust forecasts on the basis of developments which have planning permission, have funding in place and have a reasonable likelihood of delivery and occupation. Aspirational developments or sites which may have a reasonable chance of delivery but do not yet have planning permission have not been included."
- 5.71 As a result no major schemes (+100 jobs) were included as a specific uplift for the Planned Growth Scenario in Harborough. It was a conscious decision not to prejudice the Magna Park applications by including them in the HEDNA.
- 5.72 Paragraph 5.4 of the HEDNA states that there are: "some circumstances where an individual authority might consider a higher OAN to support employment growth, such as:

- a) In an area with low future population growth and potentially a minimal change in the economically active population (due to an ageing population). In such circumstances it may be sensible to suggest an above trend level of housing delivery to encourage a slightly younger age structure and to support economic growth.
 b) In an area with a known 'shock' to the employment base such as a major new employment site which will generate many more jobs above a baseline forecast position. In such a case it may be reasonable to consider that more homes will be needed to accommodate the growing workforce (although recognising commuting patterns and the 'draw' of workers will also be important along with an understanding of the displacement impacts of sizeable development)."
- 5.73 Circumstance a) resulted in an economic based OAN for Melton and North West Leicester but not in Harborough so its OAN was determined by demographic factors. Circumstance b) would apply to major extensions to Magna Park, but the HEDNA states in paragraph 11.29 that it:
 - "....has not sought to prejudge future policy choices regarding the location of strategic B8 warehousing development, recognising the sub-regional nature of the market and the degree to which the spatial distribution of future growth will be influenced by land availability/ releases. On this basis at this stage, the jobs distribution between HMA authorities is trend-based This is likely to focus growth in North West Leicestershire and Harborough."
- 5.74 On this trend basis Harborough did demonstrate a high rate of growth in 2011-2031/36 relative to most of the rest of the HMA. However, generally and nationally growth was expected to be slower going forward. This fall off for 2011 2031 was more marked in Harborough because it had very large growth in 1993-2010. However, in paragraphs 12.73 and 12.74 the HEDNA states that:
 - "The Planned Growth Scenario does not specifically take into account proposed major distribution schemes in Harborough District which are being considered through the planning process albeit that at a housing market area level growth in logistics/ distribution employment of 6,200 (2031) to 6,800 (2036) is forecast. This compares to potential growth in distribution employment of around 3,100 jobs which might arise from the 'Growth Build' element of the MDS Transmodal forecasts for strategic B8 development. Taking into account some potential additional jobs growth in smaller warehouse facilities, the HEDNA analysis shows that <u>at a HMA level</u> (my emphasis), major potential schemes such as those proposed in Harborough District are not expected to result in employment growth over that already considered in the Planned Growth Scenario forecasts.
 - "However future decisions on locations for new strategic distribution development may require some reconsideration of the distribution of housing need/ provision by the Leicester and Leicestershire local authorities through the Duty to Cooperate."
- 5.75 The HEDNA therefore does not explicitly take into account the proposed development at Magna Park. The HEDNA's forecasts for employment growth from strategic distribution HMA-wide (6,200- 6,800) do exceed the growth build (as opposed to the replacement element) of the demand predicted by MDS Transmodal (3,100) but this is driven by economic trends and not directly by the Magna Park proposals.
- 5.76 As described in the Spatial Strategy Topic paper, following concerns raised at a Duty to Cooperate workshop in May 2017 (S2), the HEDNA consultants (G L Hearn) were asked to carry out the MPEGSS (HSG12). It was based on three levels of growth in strategic distribution (100,000 sq.m., 400,000 sq.m. and 700,000 sq.m., deliberately selected to reflect possible decisions on the then pending planning applications) and three alternative assumptions about commuting into Magna Park from outside Harborough District (levels of 'self-containment of 19% (as existing), 25% and 35%, the latter two reflecting potential success in relation to Local Plan Objective 2).

- 5.77 The results of the Study in terms of employment growth for the highest level of development (700,000 sq.m.) are that Harborough would have an increase in jobs of 9,700 above the HEDNA Planned Growth Scenario. In all districts in the HMA, the resultant employment growth, while reduced, was still positive and in all but Blaby still above the HEDNA Baseline (trend-based) forecasts.
- 5.78 In terms of the middle level of development (400,000 sq.m.), Harborough's increase in jobs above the HEDNA Planned Growth Scenario was 5,200 jobs. At this level the reduction in employment growth in other HMA districts still left a scale of jobs growth above the HEDNA Baseline (trend-based) forecasts.
- 5.79 The housing market impacts of this scale of job growth, taking account of factors such as 'double jobbing' and scenarios for commuting patterns are set out in the Housing Topic Paper. The conclusion was that was that, with a self-containment assumption of 25%, the highest level of development (700,000 sq.m.) would result in an increase in housing need of 25 dwellings per annum, a figure which the Council considered could be absorbed within the flexibility allowance already built into the housing provision in the Local Plan.

Changes to Policy BE2: Strategic Distribution

- As mentioned above the May 2017 Duty to Cooperate Workshop with neighbouring authorities highlighted concerns about the 'open ended' nature of the policy on strategic distribution, leading potentially to uncontrolled growth at Magna Park having an adverse impact on housing numbers in adjoining districts outside the HMA, on DIRFT and on the A5. At about this time also, it became clear that, because of the need for further information, the Council would not be in a position to determine the planning applications in June/ July and that it was even more important for the policy to give positive guidance on the level of strategic distribution acceptable and on the factors to be taken into account in considering any application for development for such uses.
- 5.81 A revised Policy BE2 was formulated with the aim of ensuring that the provision for strategic distribution in the Harborough District was soundly and positively managed by the Local Plan to ensure that housing and employment development are in balance, thus achieving sustainable development objectives. The policy identified that a quantum, expressed in terms of square metres of strategic employment land near to Magna Park, was required in order that such a balance could be sought. The Magna Park Employment Sensitivity Study described above was commissioned to help provide this quantum.
- 5.82 The draft Magna Park Employment Growth Sensitivity Study (HSG12) was produced in July 2017. It found that the housing implications of a 700,000 sq.m. scenario combined with a medium level of improvement in 'self-containment' in terms of commuting could be accommodated without any increase in housing provision, given the flexibility already provided for in the Local Plan. This level of growth could therefore be accommodated without impact on housing provision. This does not of course mean that 700,000 sq. m. should necessarily be granted planning permission because it would also need to meet the other criteria set out in Policy BE2 as well as any other material considerations.
- 5.83 A further revision to Policy BE2, incorporating a cap' of 700,000 sq.m. was put forward in July 2017, subject to any further comments received from Duty to Cooperate partners (S2). The outcome of the further Duty to Cooperate consultation resulted in no significant changes being required to the Policy, incorporating the 700,000 sq. m. 'cap' and it was incorporated into the Draft Submission Local Plan in August for approval in September.
- 5.84 The pending planning applications were presented to the Planning Committee for decision on 23rd November 2017. Both were recommended for approval and the

Committee resolved to approve them subject to conditions, a Section 106 agreement and confirmation that the Secretary of State would not be calling them in for decision. However, one of the two applications (15/01531/OUT) was referred to the full Council for further consideration. This took place at a meeting on 10th January 2018 when the Council resolved to refuse the application for the following reason:

- "1. The landscape impact is severe and outweighs the economic benefits. Also it is contrary to Policy CS17."
- 5.85 As a result, there are now two commitments for strategic distribution development, totalling about 380,000 sq.m. for:
 - 100,844sq.m. of strategic distribution buildings on about 37 ha. of operational land to the north of the existing Magna Park (approved); and
 - up to 278,709 sq.m. of storage and distribution on a site of 89 ha. to the south of, but separate from, Magna Park (resolution to grant).

The Policies Map could be updated to show these as commitments.

- 5.86 As a result of representations made, the following further modification to the policy is now proposed:
 - amend Policy BE2 (2) (f) to read "ensure the development, including 24 hour operations, does not have an unacceptable environmental, community or landscape impact in the immediate and wider surrounding area."

6. CONCLUDING REMARKS

- The employment policies BE1 and BE2 together provide a positive strategy (NPPF, para 20) for meeting both Harborough's employment needs and the relative need for different B class uses, and contributing to meeting the needs of the Leicester and Leicestershire FEMA as a whole.
- 6.2 Policy BE1 provides approx. 40% more land than necessary to meet the objectively assessed minimum requirement set out in the HEDNA (2017). This largely relates to one site, included for viability reasons, and provides flexibility to accommodate needs not anticipated in the plan or to respond to changes in economic circumstances.
- Policy BE2 would enable development of up to 700,000 sq.m. at or near the Magna Park site, but subject to criteria set out in the policy. It does not allocate land for this development, nor does it commit the Council to permitting this quantity of development unless the criteria can be met. The purpose of the cap is to set an upper limit above which the sustainable balance between employment and housing provision in the Local Plan would be adversely affected.
- The Council is confident the approaches taken in both policies are sound. It sets out an appropriate scale of employment development at locations that are attractive to the market, and ensures housing and employment is co-located including at Market Harborough, Lutterworth, Fleckney and Kibworth to create sustainable communities. It is also effective, identifying the most appropriate and deliverable sites as allocations which are well located, served by infrastructure, and are accessible by sustainable modes of travel, while also enabling development at Magna Park to meet national and regional demands for strategic distribution without adverse impacts on the District's housing requirements, the economy of nearby authorities, the environment and landscape, transport or local communities.
- 6.5 The Plan is based on clear evidence from the HEDNA in terms of need, from the from the SELAA in terms of employment land availability, and from the Sustainability Appraisal in relation to the choice and distribution of sites across the district and has been informed by consultation at each stage.

Appendices:

Appendix A: General Employment Sites – Preferred Option Summary Assessment

Appendix B: Summary of delivery for employment allocations

Appendix A: General Employment Sites – Preferred Option Summary Assessment

General Employ	ment Sites - Assessment Summary Pr	eferred Opti	on					
SELAA Ref		Estimated Provis		Estimated Provision Total Area (Ha)		Site Suitability for allocation (Y/N)	Reasons	Mitigations / Requirements for Site Policy
	Site	Office (B1a/b) sqm	Industrial (B1c/B2) Ha	Small S&D (B8 units <9,000sqm) Ha		anocasion (1714)		roncy
E/008RC/11	Land off Rolleston Road, Billesdon	0	6.6	0	6.6	N	Too large for settlement. Existing / other NDP allocation. Limited market demand.	n/a
E/009RC/11	LCC Highways Depot, Gaulby Road, Billesdon	U	0.0	Ü	1.8	N	Existing NDP Allocation	n/a
E/013OC/15	Land at Woodbrig House Farm, Lutterworth				49ha	N	Within Area of Seperation. Would lead to coalesence. Multiple constraints	n/a
E/001LT/11	Land south of Lutterworth Road/Coventry Road, Lutterworth	7,700sqm (2.2ha)	0.6	0	3.4	Y	Site has O/L planning consent. Deliverable 0-5yrs, provides short term supply in Key Centre (prior to SDA delivery).	Reduce area to (2.8Ha) to exclude alloments / omit flood zone. Base use split on outline consent. Mitigation may be required.
E/004LT/11	Land north of Lutterworth Road, Lutterworth				2.6	N	O/L consent. Commitment currently under construction 2017/18	n/a
E/005LT/11	Land south of Lutterworth Road, Lutterworth				2.5	Borderline	Site access constraint. Proximity to residential limits range of use.	ln/a
E/006LT/15(A)	East of Lutterworth SDA: Land adjacent to M1, Lutterworth	17,500sqm (5ha)	5	0	10	Y	Central to delivery of spatial strategy. Colocation hsg/emp integral to creation of sustainable SDA. At Key Centre. Deliverable 6-10yrs.	Infrastructure via SDA. Exclude small B8, given E/006LT/15(B). Mitigation may be required.
E/006LT/15(B)	East of Lutterworth SDA: Land south of A4304, Lutterworth	0	0	13	13	Y	loss.	Restrict to small B8, given strategic B8 focus at Magna Park
E/001B/11	Land at Coventry Road, Broughton Astley				6.9	N	Existing NDP Allocation	n/a
E/002B/15	Land east of Broughton Way, Broughton Astley				2.2	N	Existing NDP Allocation. Has plg consent & under construction 2017/18	n/a
5 /004 D 0 /44						.,	Extension of existing successful empl area. In Rural Centre. Balance with past/planned	
E/001RC/11	Land off Marlborough Drive, Fleckney	0	1.5	1.5	3	Y	housing growth Too large for settlement. Site constraints	No constraints.
E/007RC/11	Land to southern fringe of Great Glen, Great Glen				4	N	(flooding / access). Limited market / demand.	n/a
E/012/RC/17(A)	Kibworth North and East SDA, Land to north of West Langton Road, Kibworth				23.5	N	Dependent upon an SDA not part of preferred option	n/a
E/012/RC/17(B)	Kibworth North and East SDA, Land to east of A6,				1.5	N	Dependent upon an SDA not part of preferred option	n/a
E/00CDC/44	Land east of Harborough Road, Kibworth				7.1	Dordorling	Access constraint. In combination with E/013RC/15 excessive for market /	2/2
E/006RC/11 E/013RC/15	Land to south and west of Priory Business Park, Kibworth	1400sqm (0.4ha)	5.3		7.1 8.9	Borderline Y	demand. Deliverable 0-5yrs. Adj. to sucessful empl area. Ability to deliver small / starter units.	n/a Reduce total area to (5.7Ha) to exclude country park. Base use split on p/p
E/009M/15	Land at Airfield Farm, Market Harborough	4.3	4.3	4.5	13	Υ	In Sub-reg Centre. Adjacent to existing sucessful empl area. Integral to NW MH SDA (CS / masterplan Commitment)	Gas pipeline buffer. Mitigation likely. Boundary with NW MH SDA.
E/003M/11	Land off Dingley Road, Market Harborough				12.4	N	Within Area of Seperation. Would lead to coalesence. Flood / access constraints	n/a
							In Sub-reg Centre. Remainder of partially developed empl site. Market demand. O/L	
E/010M/15	Airfield Business Park, Market Harborough	3.6	0.5	1.9	6	Υ	planning consent	site under construction.
E/007M/11	East of Rockingham Road (Peaker Park), Market Harborough				1.1	Borderline	Edge of town centre location. Remainder of largely developed mixed use site. Potential for Town centre uses.	n/a
	East of Northampton Road (Compass Point), Market						In Sub-reg centre. Remainder of partially developed empl site. Market demand. O/L planning consent. Also potential housing	Reduce area to (4.9ha) to excl. completion and deduct 1.5ha for residential allocation (Blackberry Grange). Uses compatible with
E/006M/11	Harborough	1.6	1.6	1.7	4.9	Υ	allocation.	adjoining residential.

Suitable for allocation
Possible for allocation
Not necessary to allocate (NDP / commitment)
Not for allocation

Appendix B: Summary of delivery for employment allocations

На.		Offices B1a/b	Industrial B1c/B2	Small Warehousing B8 (<9000m2)	Total
Residual requirement to provide for in Local Plan (A)		14.8	16.1	9.5	40.4
Proposed Allocations					
Land at Airfield Farm	MH4	4.3	4.3	4.4	13
Airfield Business Park	MH5	3.6	0.5	1.9	6
Compass Point Business Park	МН6	3.2	1.8	0	5
East of Lutterworth SDA (south of A4303)	L1e	0	0	13	13
East of Lutterworth SDA	L1f	5	5	0	10
Land south of Lutterworth Rd / Coventry Rd	L2	2.2	0.6	0	2.8
Fleckney	F2	0	1.5	1.5	3
Land S&W of Priory Business Park	K1	0.4	5.3	0	5.7
Sub-Total all Allocations (B)		18.7	19	20.8	58.5
Provision above Minimum HEDNA Requirement (A-B)		3.9	2.9	11.3	18.1