



TOWN AND COUNTRY PLANNING ACT 1990

SUBMISSION IN RESPONSE TO
HARBOROUGH LOCAL PLAN 2011 TO 2031 EXAMINATION

MATTERS AND ISSUES FOR EXAMINATION

STATEMENT – MATTER 5
MEETNG EMPLOYMENT NEEDS

SEPTEMBER 2018

ON BEHALF OF DB SYMMETRY

PF/9061

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1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of db symmetry Ltd, who has land interests at land adjacent to Glebe Farm, Coventry Road, Lutterworth (which is adjacent to Magna Park), in response to the Inspector's Questions for the following hearing session: Matter 5.
- 1.2 Submissions have been made at previous consultations on the draft Local Plan and these representations should be viewed in the context of our previous comments.
- 1.3 db symmetry has recently been granted (July 2018) outline planning permission (15/00865/OUT) for 'the erection of up to 278,709 sqm of storage, distribution buildings (B8) with ancillary B1 (a) offices, creation of access onto A4303 and emergency services only access onto A5, formation of lorry park, creation of SUDS facilities and other associated infrastructure and demolition of Glebe Farmhouse (means access only to be considered)' at land adjacent Glebe Farm, Coventry Road, Lutterworth, Leicestershire.

2.0 MATTER 5 (MEETING EMPLOYMENT NEEDS)

5.1 Does the plan provide for an appropriate amount of land and floorspace for business purposes, and is the plan effective in its approach to new employment development?

5.2 Is there satisfactory evidence-based justification for the allowance of 700,000 square meters of strategic storage and distribution? Is there sufficient headroom in demand to enable this amount of development without compromising the employment strategies of other local authorities?

2.1 db symmetry consider that the plan is effective in its approach to new employment development. In particular, Policy BE2 is supported as it allows for additional development of non rail-served strategic storage and distribution (Class B8).

2.2 In December 2013 the Leicester and Leicestershire Housing, Planning and Infrastructure Group (HPIG) commissioned MDS Transmodal and Savills to undertake a study examining the strategic distribution sector in Leicestershire. The main objectives of the study were to enable a better understanding of the logistics sector and to determine future need objectively, whilst managing change and supporting sustainable economic growth.

2.3 The consultants produced the Leicester and Leicestershire Strategic Distribution Sector Study (LLSDSS) Final Report in November 2014. The report identified several significant challenges, which may be summarised as follows.

- The emergence of competing inland locations to the north and east of the 'golden triangle' and in ports; regions/locations which to date have not generally accommodated major national distribution facilities.

- Given a choice of sites, major distribution centre operators would be expected to locate at a rail-served site in the golden triangle as it continues to offer the most competitive location for national distribution.
- The key to addressing the emerging competition, and hence maintain and grow the established competitive advantage, is the continued development of new commercially attractive strategic sites in the East Midlands, a significant proportion of which will need to be directly rail-served (in addition to the usual requirements for high quality connections to the strategic highway network).
- Functional obsolescence of the existing warehouse stock, changes in market trading conditions (particularly the growth in on-line shopping) and technological advances have resulted in a trend towards a requirement for fewer but larger warehouse units. As a result, many existing sites no longer have the plot sizes now required by the market, implying a need to bring forward new/additional sites.

2.4 As explained in chapter three of the report, four overarching conclusions were drawn from the study.

- A need to identify and allocate new land at commercially attractive strategic sites to maintain and enhance the established competitive advantage within the area, enabling the sector to grow in a sustainable manner.
- To deliver the identified need through long-term, strategic and collaborative planning across the county of Leicestershire and potentially with authorities in neighbouring areas.

- To commence the preparatory work immediately, with the preparation of local plan policies to commence now so that the right sites in the most competitive locations can come forward for development as and when they are required by the market.
- The strategy requires the implementation of a number of highway and railway enhancement schemes requiring liaison with the Highways Agency and Network Rail to ensure that the enhancement schemes are ultimately delivered.

2.5 Supplements to and a partial update of the reports were completed in January 2017. The Wider Market Developments: Implications for Leicester and Leicestershire (Jan 2017), commissioned by Harborough District Council on behalf of the local authorities in Leicestershire, further supported the findings that the Golden Triangle has a distinct competitive advantage in the strategic distribution sector and that the main findings of the 2014 report remain relevant.

2.6 The LLSOSS identifies Lutterworth, Magna Park, and the symmetry park site as falling within the LLEP's identified 'South West Leicestershire' Growth Area, and within Key Area of Opportunity (KAO) 'D' for road-linked logistics development.

2.7 The study identified minimum gross land requirements for strategic B8 development across the HMA, including provision for non rail-served sites of 152 hectares by 2030 and db symmetry support the findings of the study.

2.8 The forecasts of land in the SDSS are minimum levels of provision and it is agreed that there is a strong case that Harborough should continue to make a substantial contribution to long term non-rail served strategic warehouse, logistics and distribution development in Leicester and Leicestershire. to help maintain and expand the established competitive advantage which Leicester and Leicestershire has in accommodating the sector.

2.9 Leicestershire's ability to maintain its substantial competitive advantages in the sector depends heavily on maintaining a supply of sites in locations which logistics businesses can operate most efficiently. Because the golden triangle is one of very few optimal locations, for national distribution centres particularly, a strategy that concentrates future provision in the area stands to generate still further efficiencies – benefiting the industry and its employees, the supply chains the sector serves and, because of the importance of efficient logistics to the performance of the wider economy, national productivity. Thus, in the absence of sound reasons to the contrary, artificially constraining growth in an optimal location for the sector would be contrary to the NPPF (NPPF 2012 paragraphs 17 bullet 3, 20, 21 bullet 3, 28, 160 and 180), the UK Industrial Strategy (e.g., pages 18, 68,84, 137, 188, 224-227 and 236) and to LLEP's Strategic Economic Plan.

5.3 What is the latest position regarding the planning applications for strategic distribution?

2.10 Please see paragraph 1.3 above which confirms the planning status of the db symmetry site.

5.5 As significant growth in strategic distribution is a major feature of the plan, with consequent housing, employment, transport and countryside effects, under the planned system should not the relevant land be identified as an allocation.

2.11 It is our view is that there should be a site allocation for BE2. All other equivalent policies in Local Plan have a site allocation and it is inconsistent not to make such an allocation for BE2.