

Representor Organisation - Daventry District Council

Representor Name – Tom James

Response to Matters and Issues - Harborough Local Plan 2011 to 2031

Matter 5. Meeting employment needs

5.0.1 Thank you for providing Daventry District Council with an opportunity to comment on the Matters and Issues. The comments below are provided in the context of our response to the submission consultation.

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?

5.1.1 Daventry District Council does not consider that the amount of floorspace proposed under policy BE2 is appropriate when judged against the evidence established in the 2016 Leicester and Leicestershire Strategic Distribution Study (L&SDSS).

5.2 Is there satisfactory evidence-based justification for the allowance of 700,000 square metres 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?

5.2.1 It is not considered that there is satisfactory evidence to justify the allowance of 700,000 square metres of storage and distribution. The high replacement scenario in the L&SDSS study (para 2.58) identified around 153 ha of new land to be provided for across Leicestershire by 2031. The sum-total of the applications that form the basis of the 700,000 square metres (approximately 427,200 and 278,709 sqm) equates to 327 hectares.

5.2.2 Consequently it is considered that the scale of uplift beyond this identified need is so significant (more than double the need across the whole county) that it is highly likely to impact on the delivery of DIRFT, situated 7 miles South East of Magna Park along the A5. The importance of planning to deliver against need is well established, the NPPF (2012 – para 21, 2018 – para 81) is clear that policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet identified needs over the plan period, not to significantly exceed it.

5.2.3 It is acknowledged that Daventry District Council have not provided further evidence however it is not considered appropriate for Daventry District to do so. It is for Harborough District Council to justify the plan and no such evidence has been produced to demonstrate that the level of planned growth, significantly in excess of the need, would not have an impact on the employment strategies of other local

authorities. This could include market based evidence indicating that there is demand for the level of floorspace proposed however Daventry District Council is not aware that such evidence exists.

5.4 Is Policy BE2 an adequate means of controlling and mitigating the impact of this amount of strategic storage and distribution?

5.4.1 Whilst criterion B of part 2 of the policy is welcomed it is not clear how it could be implemented as a policy. If this is based on responses to future planning applications it is not clear how the policy would then be delivered if objections were received by other site promoters or Local Planning Authorities.

5.4.2 Such an assessment, including market evidence, should have informed the quantum of floorspace established in the policy, particularly given that this is so significantly in excess of the needs identified in the L&SDSS study.

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 plan-led system should not the relevant land be identified as an allocation?

5.5.1 Notwithstanding our answers to the above questions it is considered that for matters such as strategic distribution (because of their scale, and the importance of locating them appropriately) the relevant land should be identified as an allocation, at a scale that is informed by proportionate evidence including evidence of market demand to mitigate the impact of the proposed development on other planned Strategic Railfreight Interchanges (SFRI's).

5.6 Policy Modifications

5.6.1 It is considered appropriate to suggest modifications to the policy to assist with helping the plan to move forward.

5.6.2 Firstly Daventry District Councils preference would be to remove part 2 of the policy, given that consent has been granted for 278,709 square metres of floorspace equating to 88.67 ha, over half of the need identified for the whole county in the L&SDSS study, and there is no known reason why the remaining need could not be met elsewhere in the county..

5.6.3 If the examiner is not content with this, then DDC's next preference would be that an allocation, at an appropriate scale and informed by a market assessment be made as set out in our answer to question 5.5.

5.6.4 Failing these two, part of the policy could be amended as follows;

2. Additional development ~~of up to 700,000 sq.m.~~ for non rail-served strategic storage and distribution (Class B8) use will be permitted where it would:

a. be of an appropriate scale when assessed against identified needs for non rail-served strategic storage and distribution (Class B8)

~~a~~b. form an extension of, or be on a site adjoining, Magna Park;

~~b. support or at least have no adverse impact on the viability and deliverability of existing or further Strategic Rail Freight Interchanges (SFRIs) within or serving neighbouring authorities and Leicestershire;~~

c. increase employment opportunities for local residents, including training and apprenticeships;

d. include measures to enable an increase in the proportion of the workforce commuting from locations within Harborough District;

e. not lead to severe traffic congestion anywhere on the nearby strategic and local road network, particularly the A5, whether within Harborough District or outside; and

f. ensure 24 hour operations do not have an unacceptable environmental, community or landscape impact in the immediate and wider surrounding area. the reference to 700,000 square meters