

Matters and Issues

Representation from the Magna Park is Big Enough campaign

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?

MPisBE's response

As explained in the MPisBE response to the Inspector's question 5.2, the Local Plan has clearly over allocated for strategic distribution business land according to the evidence base and existing market conditions. In relation to non-strategic distribution allocation, the allocation made in the Local Plan (59 hectares) barely meets the HEDNA recommended volumes (up to 51 hectares). Importantly, storage and distribution (<9,000sq.m) allocation within the Local Plan (13 hectares) exceeds that of the HEDNA recommended land requirements (8), and HDC have located this allocation 100% at Lutterworth on a site already packed with warehouses from the original Magna Park Development. Little evidence is provided on distribution-site land in other regions or close to the District. It is also worth highlighting how the Local Plan's overarching objectives emphasise the need to reduce out-commuting and retain employability within the district, yet such a significant allocation of land for logistics businesses near Lutterworth will not solve this problem.

The Local Plan is not effective in its approach to new employment development given the massive emphasis on strategic distribution site allocation as employment land. This conflicts substantially with the NPPF paragraphs 85 and 179, which advocate, linking new development to existing community facilities. It commits employment opportunities in the district to high volumes of low-skilled labour in the logistics industry, or at best technology-based employment associated with logistics, for which the workforce will continue to be drawn from outside. Little attention is paid to other forms of entrepreneurial, creative and technological business development.

There is also a disproportionate scale of employment land allocation, an approximate 50-50 split, between Market Harborough and Lutterworth, which as the smaller town with less generous infrastructure provision, will also absorb at least 60% of the new housing allocation between the two towns.

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?*

MPisBE's response:

Harborough District has the lowest level of unemployment in Leicestershire. There were 96 job seeker allowance (JSA) claimants in July 2018, representing 0.001% of the population (approximately one in a thousand). Of the age group 16-64, 88.8% are economically active, compared to 77% in the East Midlands and 78.4 % in Great Britain (The 11.2 % economically inactive in that age group include students, the long term sick and the early retired). (Source: ONS annual population survey, April 2017-March 2018) In terms of employment by occupation in Harborough, 59.1% are in managerial, professional and technical positions, a significantly higher proportion than regionally or nationally. This profile also differs considerably from nearby Coventry in the West Midlands. Likewise, the Harborough population is markedly better qualified than the regional average and the median gross weekly income in the district is approximately 30% higher than in the regional as a whole. In summary, Harborough has a well-paid, well qualified population, with extremely little unemployment. Therefore, while there will be employment opportunities for local residents if the proposal to allow a further 700,000 sq.m. of warehousing and distribution to go ahead on land adjoining the Magna Park, take-up will be very limited. The council's wish to reduce out-commuting from the District will not be achieved, as the occupation profile of the District and that of Magna Park do not match. However, neighbouring local authorities experiencing greater unemployment and seeking opportunities to create jobs, will find their efforts undermined by an enormous development in Harborough sucking in employees from a wide area. Over 80% of the current labour force at Magna Park in 9,300 full-time-equivalent jobs (more workers when part-time employment is taken into account) travel more than 10 miles to work, and the current owner, Gazeley, acknowledges that Magna Park's workforce is drawn from a 45-minute travel range, about 30 miles by car. Significant factors in out-commuting from Harborough District include the relative lack of high-quality jobs locally, combined with the proximity of both main population centres to the District boundaries, with good rail connections to several major cities including London, Leicester, Birmingham etc. all of which have a wider range of professional and managerial jobs available.

700,000 sq.m. is not justified by the Plan's reliance on the forecasts of need in Leicester and Leicestershire Strategic Distribution Sector Study (LLSDSS) of 2014 (and reviewed and confirmed in 2016) and the 2017 HEDNA report, as since 2014 over a million sq.m. of non rail-linked warehousing and distribution space has already been approved in full or in outline, by district authorities in Leicestershire, exceeding significantly the study's forecast minimum need of 792,000 sq.m. by 2036. Given that our surveys show that many tens of thousands of sq.m. have not been taken up and continue to be advertised, there is a clear danger that supply will far outstrip demand.

For evidence to support a further 700,000 sq.m. Harborough relies on two outstanding planning applications which were already in existence at the time the local plan was drawn up: 15/00865/OUT and 15/01531/OUT, which together totalled that amount of floor space. BE2 of the local plan was expressly designed to enable the planning authority to approve both applications, as consideration of those applications was carried out before the consultation period on the draft local plan had ended and in contradiction of the Core Strategy 2006-20128 which was the only confirmed policy in existence at the time. The figure of 700,000 was only incorporated in the draft plan in July 2018, after one of the two applicants had withdrawn an application for judicial review of the authority's approval of 15/00919/FUL. In the autumn of 2015 the consultation document of the Local Plan 2011-2031 offered three options for Magna Park. Option C, which was for an area equivalent to 15/00865/OUT, 15/01531/OUT and 15/00919/FUL, was not favoured by the council on the grounds that (para. 136) "*Provision at this scale would exceed significantly the undersupply of non-rail strategic distribution land set out in the Leicester and Leicestershire Strategic Distribution Sector Study (2014) for the whole of Leicester and Leicestershire and would potentially be contrary to its recommended strategy of providing a range and choice of sites.*" No evidence was later adduced to justify a change of policy.

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

MPisBE response:

Policy BE2 sets a number of pre-conditions.

BE2.2b. States that additional development of up to 700,000 sq.m. should '*support or at least have no adverse impact on the viability and deliverability of existing or further Strategic Rail Freight Interchanges within or serving neighbouring authorities and Leicestershire.*' This condition requires an assessment to be made before approval is given of the likely impact on SFRIs, including those that may not yet have reached formal application stage. How such an assessment will be made is not stated. Promoters of applications to extend Magna Park, or to build on land adjoining it, will maintain that there will be no adverse impact. Owners of existing SRFIs in the region, e.g at DIRFT, will say the opposite. When 15/00865/OUT was approved in November 2017, no credible assessment of the likely impact of the project was made. Is there an independent expert body which will be able to forecast the impact of something which hasn't yet happened? Brexit forecasts and their surrounding disputes give little cause to be optimistic that such impact assessments will put an end to arguments.

BE2.2c states that development should '*increase employment opportunities for local residents, including apprenticeships.*' This issue has been dealt with in the response to question 5.2.

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BE2.2d requires measures to enable an increase in commuting within the District. Without a wide range of jobs, including those at management and professional level, this will not occur, as explained in response to question 5.2.

BE2.2e states that development should *'not lead to severe traffic congestion anywhere on the nearby strategic and local road network, particularly on the A5*. The existing local road network is already severely congested, especially approaching roundabouts on the A5, A426 and A4203, attributable principally to Magna Park traffic, causing great inconvenience both to private and business traffic and increased costs. There are no plans in the foreseeable future for improving the A5 between the M69 and the A428, or the A426 between the A5 and the M6, and S.106 conditions attached to 15/00919/FUL are minor and largely to suit the developer.

Lastly, BE2.2f states that 24 hour operations should not have *'an unacceptable environmental, community or landscape impact in the immediate and wider surrounding area.'* However, with the development of 700,000 sq.m., this scheme will inevitably cause more life-endangering NOx emissions, will worsen rat-running through villages as, day and night, if the promised jobs do come to fruition, employees take the quickest or least inconvenient route to and from work, and cause the loss of over 230 hectares of productive agricultural land in exchange for huge warehouse after warehouse. Experience of almost 30 years of the existing Magna Park tells us that landscaping does little to obscure buildings, except when viewed from very close by. Light pollution will increase, not decrease.

What mitigating measures will be taken to prevent an increase in NOx emissions? How can travel to work plans be made legally enforceable? They cannot, especially as the few slow and infrequent bus services offer little attraction except to those who have no alternative means of getting to work. You cannot mitigate the loss of agricultural land except by providing a replacement. This will not happen.

MPisBE believes that mitigation of the negative effects of BE2 are next to impossible and that the conditions attached to BE2.2. have already been ignored by Harborough in approving 15/00865/OUT.