

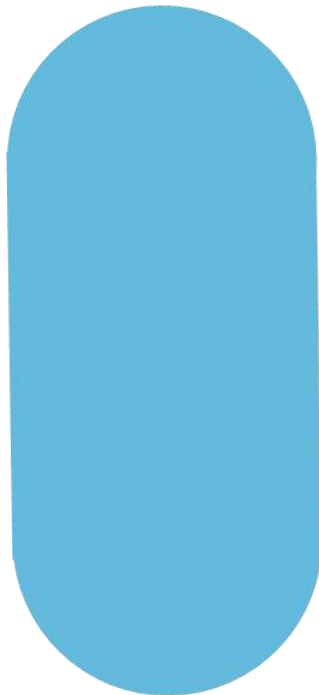
Harborough Local Plan Examination

Matter 5 – Meeting Employment Needs

Hearing Statement

Landowner Consortium for East of Lutterworth SDA

Respondent Reference: 6054





This Hearing Statement is submitted on behalf of the Landowner Consortium for East of Lutterworth SDA (ref: 6054) in respect of their interest in the East of Lutterworth Strategic Development Area. Representations submitted to the Proposed Submission Local Plan sets out their case in full.

***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?***

1. Yes, the plan provides for an appropriate amount of employment land and floorspace, however it is recommended that the plan is amended in order to be effective.
2. The Consortium support the allocation of about 23ha of employment land at the East of Lutterworth SDA (Policy SS1b.ii) to meet future economic development needs and replace losses in the stock of employment land.
3. The amount of employment land proposed at Lutterworth is consistent with the Spatial Strategy and compliments the amount of planned housing growth for the town. It is also consistent with Lutterworth's planned growth as a Key Centre within a location identified as a priority growth area for development, infrastructure investment and sustainable transport in the Leicester and Leicestershire Strategic Economic Plan and the Draft Strategic Growth Plan.
4. Providing a supply of employment land in this location will increase the choices available for business, provide an opportunity to attract inward investment and jobs to the District, as well as the opportunity for the re-location and expansion of existing businesses in the older, more constrained employment areas to the north of Lutterworth town centre. The accessibility of the allocation to a growing workforce, the motorway network, and the infrastructure and facilities within the SDA and the wider town, will make this attractive to the market.
5. The allocation of employment land at East of Lutterworth SDA is an appropriate and effective approach to the allocation of employment land.
6. Representations have been made that question the need for 13ha of non-strategic storage and distribution (B8 uses) on land to the south of the A4304 (criteria e. of Policy L1). The allocation is sound for the following reasons:
  - i. The evidence of need for employment land to 2031, including non-strategic storage and distribution (B8 uses), is a minimum figure as explained in TCP3, and no upper limit or maximum figure is provided;
  - ii. The Framework requires the Council to proactively meet the development needs of business, and be flexible enough to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in economic circumstances;
  - iii. The Council have therefore allocated land for employment across the District having regard to the evidence of need and in order to provide flexibility to ensure need is met, and in this specific case have also responded positively to wider



- opportunities for economic development along the M1 corridor in accordance with the Leicester and Leicestershire Strategic Economic Plan and the Draft Strategic Growth Plan;
- iv. The SDA provides for a greater level of housing and employment than can be delivered within the Plan period in order to plan for a comprehensive development that can deliver the benefits of the development as outlined in the plan;
  - v. For the reasons identified above, the SDA is a suitable location for employment having regard to the spatial strategy, its location, and market appeal;
  - vi. With specific reference to the land to the south of the A4304, this allocation addresses the specific locational requirements of non-strategic distribution who would otherwise have to compete with other employment land uses in less accessible locations (an approach which accords with the 2018 Framework (paragraph 82) albeit it is acknowledged the Plan is not being assessed against these policies); and,
  - vii. The potential development of the land to the south of the A4304 within the early phases of development could help to accelerate delivery of the spine road and therefore the wider allocation (as explained in 21.7.4 of the IDP (INF2)).
7. Whilst the Plan therefore provides the right amount of land of the right quality in the right locations to meet business needs, the Consortium's residual concern is that the approach to the land south of A4304 may undermine its effectiveness in meeting the needs of storage and distribution businesses.
  8. Paragraph 15.2.11 of the Local Plan states that no single unit should have a floorspace greater than 9,000 sq.m gross, this being the definition the Plan gives for 'non-strategic storage and distribution' referred to in Policy L1.
  9. Removing this constraint, or at the very least providing greater flexibility, would allow distribution businesses to scale their buildings according to their business needs and the parameters of the site, rather than being constrained to an artificially set floorspace figure that serves no meaningful planning purpose. Other planning factors such as visual impact, access, parking requirements, drainage, and landscaping will impose legitimate limitations on the appropriate size of building.
  10. The evidence that there is no harm caused by allowing distribution buildings greater than 9,000 sq.m can be found on the opposite side of the M1 Junction 20, where a building of 12,232 sq.m has recently been constructed.
  11. Further, it is evident that this allocation could not provide for strategic distribution of the scale that should be accommodated at Magna Park (i.e. at least 23,000 sq.m). Indeed, paragraph 15.2.11 accepts that the site is too small for 'strategic storage and distribution', implying that 'strategic' is far greater than 9,000 sq.m. In this context, it is questioned whether a floorspace limitation is necessary at all.



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12. The Consortium therefore request the wording of Paragraph 15.2.11, and the definition of 'strategic' and 'non-strategic' be amended to provide flexibility.
  13. In addition, Policy L1 proposes that all 10ha of B1/B2 employment land should be located between the spine road and the M1. Masterplanning undertaken to date as confirmed that it will not be physically possible to achieve this requirement whilst also meeting other requirements of the policy. The Consortium therefore request that the policy is amended to provide some flexibility as follows:

*f. 10 hectares of business uses within Use Class Orders B1 and B2 on land **predominantly** between the spine road and the M1;*

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