

From: [REDACTED]
Sent: 13 February 2019 16:30
To: localplan@harborough.gov.uk
Subject: [EXTERNAL] Comments on modifications to Harborough Proposed Submission Local Plan (2011 to 2031)

This Message originated outside your organization.

I am submitting these comments on behalf of the Board of Harborough Energy community energy organisation. [The Minutes of our meeting of 12/2/19 record the request of our Board that I should make this submission].

We note with pleasure the positive mention of our organisation (Harborough Energy) in part MM23, section 10.3.7.

Regarding section 10.3.7. you may wish to add that a third project was completed in 2018 [this is the 100kW solar photovoltaic installation at Husbands Bosworth on the land pf NJB (London) Ltd.]

Our main comment is that the beneficial impact of increased renewable energy development in substituting for existing or otherwise-planned fossil fuel use is not explicitly recognised. The reason for our raising this is the national and local governmental duty of Climate Change mitigation.

Thus in section CC2 (Renewable energy generation) page 137, we suggest including a further section (best positioned as section b) with wording as below here:

=====
MM23 CC2: Renewable energy generation, page 137.

1. Development for renewable and low carbon energy generation will be permitted where:
- (a) [as is]
 - (b) there is significant substitution by renewable energy of the use of fossil fuels as otherwise planned or used; the criteria for this should be the reduction in climate change impact per unit of otherwise-used fossil fuels.

(c) [previous (b)]

etc

=====

Sincerely

-
-
-
f
l

L. BITTESWELL, LUTTERWORTH

Tel: /

Email: /

Strategic and Local Planning Team
Harborough District Council
Adam and Eve Street
Market Harborough, LE16 7AG
f.a.o.

3 February 2019

Dear

MAIN MODIFICATIONS TO THE LOCAL PLAN

On behalf of the Magna Park is Big Enough campaign, I wish to express our concerns in relation to the main modification ref.MM15 proposed in response to the National Inspector's examination, as set out below.

- The total 700,000 sq m of space allocated in this small area of Harborough District for non-rail-served storage and distribution exceeds the need identified for such additional space for the whole of Leicester & Leicestershire.
- It does not take into account several of the many other developments already committed or planned close to the A5 and the M1 locally, for example the existing Rugby Gateway development and potential developments near the M69-A5 junction at Hinckley and Burbage, all within 5-6 miles of Magna Park at Lutterworth.
- The total allocation of 700,000 sq m includes 380,000sq m already committed by approved planning applications for two adjacent sites. The balance of 320,000 sq m exactly matches the remainder of the site defined by planning application 15/01531. It is clear, therefore, that Harborough Council's motivation is primarily to satisfy the commercial aspirations of Gazeley as developer, demonstrating their demand rather than any assessed need, as we have claimed previously.
- The inclusion of this precise figure in the Local Plan as an allocation expanding Magna Park seeks to overturn the earlier refusal of planning permission by a full Council meeting in January 2018 and pre-determines the outcomes of Gazeley's appeal yet to be heard at the end of March 2019.
- Against the remaining short span (12 years) of the Plan period to 2031 it is not sensible to confirm this huge allocation to satisfy the current applicant, as a lesser amount of space around 100,000 sq m would satisfy all

RECEIVED

11 FEB 2019

CORPORATE SERVICES
Harborough District Council

foreseeable needs. Allocations can be reviewed at a later date, when the Local Plan will need to be updated anyway.

- Ultimately, there will be a solid block of warehousing development joining Magna Park to other developments in close proximity alongside the A5.
- The total space allocation proposed will introduce substantial additional traffic, both commercial transport and commuting workforce vehicles, to an extent that will severely damage the local environment adversely for residents who will be impeded in pursuing their own lives and work.

We note also that main modification MM8 acknowledges that additional housing will be needed in Lutterworth specifically to accommodate the influx of workers to an expanded Magna Park. This is suggested to support the objective of increasing the proportion of local employees and decreasing the outflow of skilled residents (most of whom are unlikely to want to work in a vast warehousing environment) from the District. However, there is no evidence offered to show how this objective might be achieved and our concern, therefore, is that the speculative offer of new-build housing will simply result in more multiple-occupancy properties and a further influx of affluent purchasers who will not provide a labour force for Magna Park in any case.

Over the period 2015 - 2018, while attending Planning Committee and full Council meetings, we have been aware that our concerns are shared by some elected members. Several have voiced doubts about the wisdom of committing so much space to the development of the storage and distribution industry, essentially offering the wrong jobs in the wrong place, rather than a more diverse employment which could afford better economic benefits to the local area. Our impression is that local elected members find the vagaries of changes in planning legislation difficult to prioritise.

As background information we attach our earlier written submissions to the full Council meeting of 18 December 2018.

Yours sincerely,

(On behalf of
of the Magna Park is Big Enough campaign)

STATEMENT BY MAGNA PARK IS BIG ENOUGH

To all HDC Councillors

HARBOROUGH DISTRICT DRAFT LOCAL PLAN 2011-2031

At the Extraordinary Council meeting to be held on Tuesday 18th December you will be asked to approve changes to the Local Plan 2011-2031 to meet the requirements for soundness as outlined by the Inspector. We detail below why we do not believe that the proposal meets the Inspector's requirements. In particular we do not believe that the evidence presented in relation to need for additional warehouse space at Magna Park is independent (the Savills report for Gazeley) and the evidence is that there is an adequate supply of warehouse space for the period of the plan. We would therefore ask you to consider reducing the figure for warehouse space at Magna Park to 400,000 sq mts, the area already agreed by the Planning Committee.

The Magna Park is Big Enough (MPisBE) campaign is most concerned about Policy BE2 on strategic distribution, with a massive space allocation of 700,000 sq. m. included at a late stage of drafting the submission Local Plan. At its meeting on 13 November the Council's Executive accepted your officers' recommendation that, in order to meet the National Inspector's reservations expressed during his examination of the Plan last October, the site boundary of the expansion proposed by Gazeley in planning application 15/01531/OUT should be defined and allocated as the maximum limit in District's forward planning. This application, however, is currently under appeal against Council's refusal in January this year (on the grounds that the landscape impact is severe and outweighs the economic benefits and also that it is contrary to Policy CS17). That appeal is not due to be determined until Spring 2019.

Your officers' recommendation does not address the issues raised by the Inspector, From attending the final day of the examination hearings on 11 October, we are aware that when summing up his advice he said that:

- Policy BE2 would not withstand the test of soundness and its criteria-based approach was insufficient to determine large development proposals;
- more research work was required to provide evidence of need vs. demand for such large space allocation for strategic distribution, and to make better comparison with allocations to non-logistics development;
- development should be shown to be 'non-harmful' to local residents' interests;
- therefore, more and better information needed to go out to public consultation, with subsequent analyses of responses;
- a revised policy BE2 should be provided for his further advice.

Your officers expressed anxiety about the delay, which would result from the extra work outlined, as they wished to proceed rapidly towards full Council approval, but the Inspector said firmly that he could not advise them on their calendar, and that the work needed to be done. We do not recall the Inspector suggesting Gazeley's application site should be specified as a potential solution and we are therefore surprised that the Council's Executive has approved this option.

We recollect that the Inspector clearly asked for renewed public consultation on any proposed amendments to policy BE2 in order to gauge local residents' views and for the Council then to re-draft and re-submit this policy for his further advice. This requirement must precede the completion

of his examination, but Paper 1 before you for consideration on Tuesday makes no mention of the public being involved in any fresh round of consultation. Is the public to be left out?

Policy BE2 locates an excessive amount of space for growth of strategic distribution in one limited corner of one District, almost four times the projected minimum future space requirement of 185,000 sq.m. for growth *for the whole of Leicester & Leicestershire* by 2031, and does not take into account the scale of pending railhead developments nearby. Neither does it take into account the huge amount of new strategic distribution space approved in the county since forecasts were adopted in 2016 (as shown in our addendum). It deserves more careful evidence-based consideration rather than the "quick fix" now advocated. It would not be proper for Gazeley's application data to be accepted as supporting evidence of need for such a large allocation of distribution space. Demand is not the same as need. Gazeley's application 15/01531 is based entirely on their commercial aspirations for expansion on land on which they have had an option for decades, and for financial gain, regardless of independent evidence.

The way in which this proposal is being brought to Council confirms our fears that policy BE2 was framed specifically to accommodate the huge site identified in that application, which not only consumes yet more productive land in open countryside but leads inevitably to huge increases in both commercial and commuting traffic: it will clearly be harmful to the environment and to local residents' interests, thus failing the Inspector's 'non-harmful' test. The proposed development and its over-provision of additional labour-force, with the wrong jobs in the wrong place, is too big for the surrounding area and its infrastructure. It will bring little benefit the economy of Leicester and Leicestershire for the longer term, particularly as there are more suitable locations both with and without railhead access currently being developed nearby, which are more accessible and which offer much needed employment.

We are concerned that you are advised to adopt the recommendation of the Executive, as a matter of both development principle and poor planning practice. Limiting Policy BE2 to 400,000 sq.m. (approximately area adjoining Magna Park already approved and which cannot be reversed) would more than adequately meet forecasts of future growth requirements and would at a stroke remove any potential obstacle to the Local Plan being approved. We urge you to amend this proposal.

On behalf of Magna Park is Big Enough

14 December 2018

ADDENDUM

Warehouse availability

The 2014 LLEP Strategic Distribution Sector Study estimated that the additional growth (i.e. non-replacement) requirement for large (9000 + sq.m.) warehousing/distribution facilities in Leicester and Leicestershire up to 2031 is a minimum of 185,000 square metres. This figure was confirmed in 2016 but has already been exceeded many times over. The following figures are for starts, existing vacant spaces, approvals in outline or in full and yet to be completed, since publication of the 2014 report. They also include:

- (1) one scheme which pre-dates 2014 but, while having been advertised for many years, still is not built (Ashby de la Zouch)
- (2) post-2014 schemes outside the district but within 10-12 miles of Magna Park and
- (3) applications which are awaiting a decision by planning authorities in Leicestershire and an expected application for a national SRFI yet to be submitted (and on which no assumption is made)

These figures were checked on 3 December 2018. All figures are in square metres (sq.m.). They are taken from developers', agents' or local planning authorities' websites and, if anything, are an underestimate.

Summary of warehouse availability

Location	Square Metres
Total rail and non-rail-linked in Leicestershire, approved in full or outline since 2014, awaiting decision, or long term vacant since before 2014 A + C + D	2376679
Total rail and non-rail linked up to 12 miles of Magna Park, approved in full or outline since 2014, awaiting decision or long term vacant since before 2014 E + F	1,108,187
Applications pending B	<u>850,000</u>
<u>Total (potential minimum availability of warehouse space)</u>	<u>4,334,866</u>

Details of warehouse availability

Location	Square Metres
<i>A: Rail linked in Leicestershire</i>	
East Midlands Gateway NSRFI (Clowes). Consent granted by Secretary of State in January 2016	547,414
East Midlands Distribution Centre (Roxhill)	230,000 (50,911 still available)
North West Leics., Ashby de la Zouch (Gazeley). Rail linked, still undeveloped and advertised for many years.	<79,000
A Total	<u>856,414</u>

B: Rail-linked applications pending

Burbage/Stoney Stanton NSRFJ (dbSymmetry proposal)	<850,000
<u>B Total</u>	<u><850,000</u>

C: Non-rail linked in Leicestershire

Leicester Distribution Park (Blaby)	69,677 Completion expected 2019
Hinckley for DPD	30,658 opened Sept. 2015
Hinckley for DPD	25,083 approved 2018
Hinckley Park (beside A5)	49,424 speculative build underway
Magna Park Lutterworth (dbSymmetry)	278,709 approved 2017
Magna Park Lutterworth (Gazeley)	100,844 approved 2016, under construction
Lutterworth adjoining J.20 of the M1	11,947 speculative build approved in 2016. Currently advertised.
Crosslink 646, Rothley Lodge, LE7	<18,580 currently advertised.
North West Leics. (Bardon - Mountpark Phase I)	133,735
North West Leics. (Bardon - Mountpark Phase II)	120,773 outline approved
Watermead Business Park, Syston	<14,000 currently advertised

C Total **853,430**

D: Applications awaiting decision

Magna Park Gazeley 15/01531/OUT	319,800
North West Leics at Appleby Magna	334,450
North West Leics at Bardon Road, Coalville	12,585

D Total **666,835**

*E: Rail-linked adjoining Leicestershire and
within 10 miles of Magna Park*

Daventry International Rail-Freight Terminal (DIRFT) expansion (Prologis)	793,751 approved, some in outline, some in full.
--	--

E Total **793,751**

*F: New build (non-rail linked) outside
Leicestershire but within 12 miles of Magna Park*

Rugby Gateway (Rexhill)	113,249 completed since late 2014 (16,722 still vacant)
Rugby Central Park	14,687 new build and vacant
Rugby, Symmetry Park	186,500 outline
<u>F Total</u>	<u>314436</u>

Comments on the Icení report (December 2018)

The Icení report, commissioned by the Council in order to assist it respond to the Local Plan Inspector on the matter of Policy BF2, uses a quite different set of figures in justifying its support for the Plan's allowance of 700,000 sq.m. adjoining Magna Park. While it also uses the 2014 Strategic Distribution Sector Study forecast for 2031, it conflates replacement build and growth, resulting in a figure of 1,445,000, while we have adhered solely to the growth figures, given that the Policy BF2 is about growth, not replacement. Growth forecast for the whole of Leicestershire is for a minimum of 185,000 sq.m., and 700,000 growth in just *one district* is almost 4 times that figure. By limiting growth in the Local Plan to what has recently been approved at Magna Park (379,553 sq.m.) and which cannot now be reversed, Harborough will still meet twice the minimum forecast for the whole of the county while preventing possible further delay in obtaining approval of the entire Plan.