

# **New Harbourough Local Plan – Regulation19 Proposed Submission**

## **Draft Harbourough Local Plan 2020-2041 – Representations on behalf of EQT Exeter**

**May 2025**

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### **1. Introduction**

We write on behalf of our client EQT Exeter ('EQT') in response to the above Local Plan consultation and the invitation for comments.

The representatives relate to draft Policy DS02 (Development Strategy: Creating Jobs and Diversifying the Economy) and the amount and location of land currently identified (criteria 7 and 8) to accommodate large-scale Warehousing (units larger than 9,000sqm) up to 2041.

The representations are set out as follows:

2. Site Context
3. Evidence Base Findings
4. Future Supply of Strategic Employment Land
5. Apportionment of Need
6. Candidate Site Assessment
7. Conclusions

### **2. Site Context**

EQT is actively promoting land at Rugby Road, south of Lutterworth for large scale warehousing and distribution use. The full extent of the site is shown on the Site Location Plan enclosed at Appendix 1. The site is in single land ownership.

The entire site covers 81.4 hectares (ha) across two undeveloped parcels of land, separated by the A426 Rugby Road. Plot 1 to the west of Rugby Road covers 64.8ha. Plot 2 covers 16.6ha.

The site is bounded to the north by Lutterworth Golf Course and to the east by the A426 Rugby Road, Open Countryside and the M1 Motorway. Land to the south beyond the site confines comprises agricultural fields and Cotesbach village further south. The site is bounded to the west by the River Swift.

J20 of the M1 and the Market Town of Lutterworth are situated immediately north of the site beyond Lutterworth golf course. Magna Park, the UK and Europe's largest dedicated logistics and distribution park, is located c.1.5 kilometres west of the site.

The sites very strong transport connectivity, located within the 'Golden Triangle' and benefiting from direct access to J20 of the M1, make it an ideal location to support employment (strategic B8) growth in Leicester and Leicestershire FEMA and specifically Harbourough over the emerging Plan period (to 2041).

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### 3. Evidence Base Findings

Iceni’s Strategic B8 Needs Sensitivity Report recommends that a gross completion model (with stock recycling adjustment) is applied to determine Strategic B8 warehousing needs across the Leicester and Leicestershire FEMA to 2041.

Applying a long-term trend (2012/13 – 2023/24), historic completions based on Local Authority Monitoring data, have been considered and projected forward to provide an indication of future floorspace needs for the 2020 – 2041 forecasting period.

Under the gross completions model there is an identified need for 5,069,185 sqm of Strategic B8 floorspace, equivalent to 1,456 hectares (ha) using a plot ratio of 0.35.

	Average gross completions (2012/13-23/24)	Rolled Forward (2020-41)	5 year margin	Total	Ha
Gross completions (2012-23)	196,007	4,116,149	980,036	<b>5,096,185</b>	<b>1,456</b>

**Fig 1: Gross Completions Trend 2020-2041**

Taking account of a current supply of 551 ha (made up of 359 ha of completions between 2020-2024 and 192 ha of extant commitments) and then applying a stock recycling adjustment of 368 ha, the residual need is 537 ha.

To determine the distribution of development across the FEMA, the Sensitivity Report then applies historic net absorption rates (average 2012/13 – 22/23), reflecting the net change in strategic B8 floorspace leased in the district.

Historically, Harbourough has satisfied 25.5% of the study area’s total net absorption and when applied to the residual need to 2041, Harbourough would need to plan for 137 ha, on the basis Hinkley NRFI will not be delivered.

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The Sensitivity Report then considers potential broad locations which might contribute to strategic B8 development need, applying the Areas of Opportunity (AOs) identified in the 2021 Warehousing & Logistics in Leicester and Leicestershire Report.

Area of Opportunity 6 falls within the west of Harborough District and encompasses M1, J19 and J20. M1 J19 is a motorway interchange with no opportunity to enter or exit the network and is therefore discounted as a potential location to support strategic B8 development.

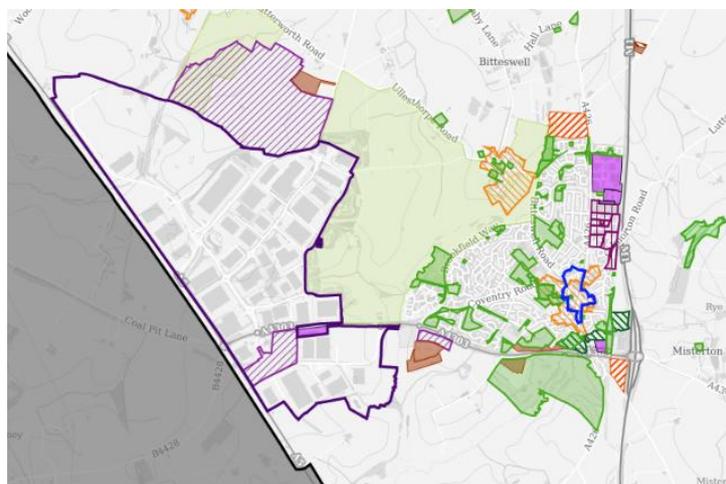
The Sensitivity Report concludes that there is therefore one single broad location within Harborough that could accommodate strategic B8 development when applying the 2021 AOs, being land within a 5-mile drive time of M1 J20, which includes Magna Park.

The analysis of historic net absorption rates and the Areas of Opportunity indicate that the Harborough should plan for between 100-140 ha on an interim basis, pending the completion of the updated L&L Strategic B8 Needs & Apportionment study.

On the basis above, emerging Local Plan Policy DS02 (Development Strategy: Creating Jobs and Diversifying the Economy) sets out additional development of 340,000 sqm floorspace for Strategic Distribution for large-scale Warehousing (B8 in units of more than 9,000 sqm (gross)) will be provided in the district, forming an extension of, or be on a site within, Magna Park in the following locations:

- 55,000 sqm on land south of George House, Coventry Road (15.8ha)
- 285,000 sqm on land at Mere Lane, Magna Park (122.8 ha)

Figure 2 below show proposed allocations for future Strategic B8 development at Magna Park:



**Fig 2: Extract from Emerging Policies Map**

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### 4. Future Supply of Strategic Employment Land

It is acknowledged that the analysis and conclusions in Icenis's Sensitivity Report are prepared on an 'interim basis' and subject to updated findings to be published in a new Needs and Apportionment Study, currently being prepared by the FEMA authorities and its partners (not currently available).

EQT welcome further assessment of the need position and its appropriate distribution across the FEMA area to inform Harbourough's large scale Warehousing land supply requirements.

Based on the current analysis and conclusions set out in the Sensitivity Report, EQT consider that a more comprehensive approach to defining the FEMA's Strategic B8 future supply and distribution is needed.

Determining future strategic warehousing land supply requirements across the FEMA based on historic completions data does not provide a complete and accurate picture of need up to 2041.

Reliance on the average (2012-2024) gross completions model can be overly simplistic as it fails to accurately account for various factors such as the quality, availability and location of land, market circumstances, demand fluctuations and changes in industry composition. It also fails to consider the potential for increased demand due to a lack of supply.

Paragraph 23 of the National Planning Policy Framework (NPPF) seeks to ensure strategic policies provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. EQT consider that the historic gross completions model will not achieve these aims and will fail to deliver sufficient space in the right locations.

In terms of Harbourough District specifically, the latest published Annual Monitoring Report (AMR) indicates that there were relatively few employment land completions during the period 2011/12 – 2022/23, given Magna Park Central was largely complete through 1990-2006.

Year	Total (Hectares)
2011/12	1.6
2012/13	1.4
2013/14	2.3
2014/15	-4
2015/16	7.2
2016/17	1.4
2017/18	5.9
2018/19	0.3
2019/20	58.7
2020/21	26
2021/22	7.1
2022/23	63
<b>Total all years</b>	<b>171</b>

**Fig 3: Net Completions in Harbourough 2011/12 – 2022/23**

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Net completions increased significantly during the 2019/20 – 2023 period, a direct result of the Magna Park North and Magna Park South extensions securing permission in 2018, during a period when the warehousing and logistics market was experiencing significant growth, bolstered by:

- continued growth in e-commerce resulting from the COVID-19 pandemic.
- the effects of Brexit on stock holding requirements.
- a shift to 'just in case' model requiring higher stock volumes
- changing occupier requirements for new and modern space that is energy efficient and delivers sufficient height and power to support automation.

Driven by strong warehousing and logistics demand, 392,000sqm of strategic B8 floorspace was completed within the allocated Magna Park extensions between the period 2020/2021 – 2023/24. This is equivalent to 112ha of employment land built out over a 4-year period, using a plot ratio of 0.35. On average this equates to 28ha of employment land per annum.

The 2019 Local Plan allocations at Magna Park North and South amounting to 700,000sqm are now largely complete and occupied.

At Magna Park South, eleven B8 units were granted permission in July 2018, all of which were completed by 2024. It is now fully built out and largely occupied. At Magna Park North, of the seven units granted permission in 2018 (in addition to the Wayfair Unit), four units are built and occupied and one is under-construction.

The above indicates that in a buoyant market there is significant demand for units and when space is available there is high take up – particularly at the highly accessible and prime warehousing and distribution locations, such as Magna Park / J20 of the M1.

As it currently stands the emerging Harbourough Plan allocates an additional 340,000sqm for strategic B8 purposes on 138.6 ha of land at Magna Park. Less space than was delivered during the period 2020-2024.

If strong market conditions returned to the levels experienced in 2019/20-2022/23, when applying the 28ha delivered per annum, the proposed allocations at Magna Park would provide approximately 5 years supply.

While 262,964 sqm of built B8 space remains available at Magna Park North and South, it is expected this space will be taken up in the short-term period. When applying the average of 28 ha per annum delivered during 2020-2024, the remaining units would provide 2.67 years supply.

Overall, existing commitments at Magna Park can reasonably be expected to be taken up within the next three-year period and the additional allocations proposed at Magna Park could be built out and occupied within a five - ten-year period, should completions and take

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up reflect the levels experienced during 2018/19-2023. This would ultimately lead to a serious land supply issue in the medium term of the emerging plan period.

Applying a more conservative approach of 12 ha per annum would set a requirement of 252 ha for the emerging plan period, equating to c.882,000 sqm of new B8 floor space using a plot ratio of 0.35.

Taking account of the available B8 units at Magna Park (262,964sqm) and proposed allocations (340,000sqm) there would be a need for a further 279,036 sqm of strategic B8 floorspace over the plan period, equivalent to 79.5ha.

As shown in Figure 3 above this level of additional growth is not unrealistic over a 15-20-year plan period.

In North-West Leicestershire (NWL) for example and since April 2011, permissions have been granted for some 423Ha of strategic warehousing including East Midlands Gateway (139Ha), plots at East Midlands Distribution Centre (22Ha), Mercia Park (97Ha), and Aldi at Sawley (39Ha). The level of provision in NWL alone has exceeded what was predicted for the whole of Leicester and Leicestershire up to 2031 in the Strategic Distribution Study (2017).

The above demonstrates the particular market strength of the sector. It also indicates that the availability and deliverability of supply is critical to ensure there is sufficient space to meet fluctuations in demand.

Overall, EQT consider that the supply identified in terms of both consented and committed space at Magna Park and the additional site allocations is insufficient and will not appropriately accommodate the growing and evolving warehousing and distribution sector over the plan period.

### **Continued Growth in the Sector**

While recent market conditions have shown signs of cooling, driven by high interest rates since 2022 impacting construction costs and funding viability, the long-term effects of global challenges, including the COVID-19 pandemic, Brexit, and more recently, geopolitical tensions, are likely to persist, potentially accelerating their impact on the logistics sector.

The Savills UKWA Report 2024 (The Size and Make-Up of the UK Warehousing Sector), drawing on data since 2015, forecasts continued growth and sustained demand within the warehousing industry. The report provides an in-depth analysis of the evolving market, with the following key insights:

- Warehouses are increasingly central hubs in supply chain operations, taking on tasks traditionally managed by manufacturers or retailers. These spaces now serve functions beyond storage, including reworking, assembly, customisation, packaging, and

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dispatching, all of which require more space, a larger workforce, and advanced technology.

- Global geopolitical instability has underscored the vulnerabilities of long supply chains, prompting more manufacturers to hold higher levels of inventory closer to consumer markets. This shift towards greater supply chain resilience will drive demand for larger, modern warehouse spaces.
- The growing emphasis on Environmental, Social, and Governance (ESG) considerations is leading to increased demand for warehouses with higher EPC ratings. Currently, 66% of UK warehouse stock has an EPC rating of C or below. By April 2030, all new leases will require a minimum EPC rating of B, which will further accelerate the need for new and energy-efficient facilities.
- Online retail has seen significant growth, with warehouse footprints for e-commerce retailers expanding from 8 million square feet to 69 million square feet over the past decade, a staggering increase of 813%. This trend is expected to continue, with online retail penetration predicted to exceed 30% in the UK by 2028, further driving demand for warehouse space.

These trends underscore a continued and growing need for modern, larger warehouse facilities in the coming years.

In response, Harborough must strategically plan to accommodate this demand, leveraging its exceptional transport connectivity at Junction 20 of the M1 and the proximity to the established National Distribution Park. The district should ensure an adequate and deliverable supply of land to support the ongoing growth of this evolving sector, meeting the needs of a modern economy and ensuring the flexibility to accommodate unanticipated demand (NPPF, paragraph 86).

To remain responsive to shifting economic conditions and industry trends, a greater variety of employment sites is necessary across the Harborough and FEMA areas. The supply should also account for the need for larger sites, as demand within the distribution sector continues to rise, particularly for substantial facilities.

EQT recommends that additional land be identified for strategic allocation, prioritising sites with exceptional connectivity to the strategic road network, in accordance with the AOs presented in the 2021 Warehousing & Logistics in Leicester and Leicestershire Report.

### **5. Apportionment of Need**

The Icen Sensitivity Report identifies a residual need of 537ha of strategic B8 employment land across the Leicester and Leicestershire FEMA. This requirement stems from evidence of sustained demand within the logistics and distribution sector and is a direct response to the shortfall exacerbated by the refusal of the Hinckley NRFI proposal. The Report apportions this

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residual requirement based on historic net absorption rates (2012/13–2022/23). NWL has historically delivered 59.1% of the FEMA's net absorption of strategic B8 floorspace, while Harbourough District has delivered 25.5% (paragraph 6.5).

Applying these historic proportions to the residual 537ha requirement, NWL would be expected to plan for approximately 317ha of additional strategic B8 land, with Harbourough District expected to accommodate 137ha. However, the evidence emerging from NWL's Local Plan review demonstrates that NWL is unlikely / unwilling to deliver sufficient floorspace to meet its share of the FEMA's need.

NWL's Regulation 18 Site Allocations Consultation (January 2024) identifies two sites as potential locations for Strategic B8 distribution:

- EMP90 (Land south of East Midlands Airport) – 81ha
- EMP82 (Land north of Junction 11, M42) – 28ha

These sites together provide a maximum of 109ha of Strategic B8 land. Even under NWL's own provisional policy option, agreed by its Local Plan Committee in July 2022, to accommodate 50% of the FEMA's outstanding road-served requirement (equating to 268ha), there would still be a shortfall of approximately 159ha.

When compared to the Icení Sensitivity Report's apportionment (317ha), the shortfall increases to approximately 208ha. Furthermore, NWL's Additional Allocations Consultation (March 2025) explicitly states at paragraph 2.2 that the authority is not seeking additional strategic-scale warehousing sites for consideration as draft allocations at this stage. This confirms that NWL's contribution will likely be limited to EMP90 and EMP82 (subject to Secretary of State assessment).

It is important to recognise that NWL has already delivered significant levels of strategic B8 development since 2011, totalling approximately 423ha (including East Midlands Gateway (139ha), East Midlands Distribution Centre plots (22ha), Mercia Park (97ha), and Aldi at Sawley (39ha)). Given this high historic delivery and evidence of a shift in policy approach within NWL, the likelihood of further large-scale strategic allocations emerging in the short term is minimal.

This situation creates a clear and pressing policy imperative for other authorities within the FEMA and particularly Harbourough District to plan for an increased share of the unmet need.

Harbourough's historic absorption rate of 25.5% positions it as the second most significant contributor within the FEMA, and the District benefits from substantial locational advantages. It is strategically positioned within Area of Opportunity 6 (AO6), centred on M1 Junction 20 and Magna Park, an established national-scale logistics location. Icení's site assessments confirm capacity for at least one new 100ha strategic B8 site (paragraph 6.29), in addition to existing Magna Park commitments (paragraph 3.12). The report concludes that, in the absence of Hinckley NRFI, provision of up to 100ha would be reasonable to support the distribution of sites within the south of the County (paragraph 6.29).

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Moreover, reliance solely on historic net absorption rates risks underestimating future demand. Continued growth in online retail, evolving operational requirements in the logistics sector, and the need for renewal and modernisation of existing stock (which may not be deliverable in situ) all point to an ongoing upward trajectory in demand for high-quality strategic B8 floorspace. Icenis sensitivity testing acknowledges that availability rates were consistently below healthy market levels (5–8%) between 2012–2019 (paragraph 5.18), indicating that past absorption data does not fully capture actual market demand (paragraph 5.19). This reinforces the case for a proportionate uplift in provision.

A robust and justified approach is therefore to uplift Harbourough's share of FEMA residual need to 35–40%, equating to 188–215ha (derived from Icenis residual FEMA need of 537ha at paragraph 5.35). This reflects Harbourough's strategic locational advantage, market strength, capacity to accommodate growth, and the necessity to redistribute unmet demand from NWL. This scale of provision would ensure that Harbourough positively supports the FEMA in meeting its wider employment land needs and aligns with national and local policy objectives to plan proactively for economic growth.

Increasing Harbourough's share of the FEMA residual need to 30% - 40% would require additional allocations in Harbourough of between 51-78 hectares, taking account of the 138ha already proposed for allocation at Magna Park.

Additional growth should be directed to AO 6 and Junction 20 of the M1.

### **6. Candidate Site Assessments**

Icenis has undertaken an assessment of seventeen candidate sites in Harbourough submitted as Potential B8 Sites.

Sites were ruled out after initial assessment if they did not meet the size threshold, strategic road access or topography criteria.

Ten of the seventeen sites submitted were excluded at the initial assessment based on the criteria above, with seven progressing to the 'detailed assessment' stage:

<b>Site #</b>	<b>Site Name</b>	<b>Developable Area / indicative capacity</b>	<b>Icenis Conclusions</b>	<b>Overall</b>
1	Land South of George House, Coventry Road (Magna Park)	15.8ha / 285,000sqm	<b>Proposed Allocation</b>	

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2	Land at Mere Lane, Magna Park	122.8ha / 55,000sqm	<b>Proposed Allocation</b>
3	Warren's Farm (West)	20ha / 157,000sqm	<b>Potential Allocation</b>
4	Land off Rugby Road, Cotesbach	46ha / 245,000sqm	<b>Potential Allocation</b>
5	Land South of Gibbet Lane	16.27ha / 54,600sqm	<b>Potential Allocation</b>
6	Land North-West of Catthorpe Interchange, Shawell	76ha / 266,000sqm	<b>Potential Allocation</b>  Site not considered suitable for strategic development given detachment from existing larger settlements, lack of public transport accessibility and potential impacts on nearby conservation areas and listed buildings.
7	Land North of the A4303 and West of Lutterworth	10.6ha / 37,000sqm	<b>Potential Allocation</b>  Site not recommended for allocation, being long, thin layout constraining potential layout of development. Site is separated from Magna Park by a woodland buffer. Development at the site would result in merging of Lutterworth with Magna Park.

Iceni's assessment indicates that two of the seven sites (nos. 6 and 7 above) should not be considered further (reasons highlighted red).

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EQT consider that the proposed allocations adjoining Magna Park (nos. 1 and 2) should be progressed, given their proximity and relationship to Magna Park.

On the basis above, of the initial seventeen sites considered and in addition to the two proposed allocations adjoining Magna Park, there are three remaining sites that could be suitable for B8 purposes (nos. 3, 4 and 5), including land being actively promoted by EQT, situated off Rugby Road and located 0.65km from the settlement edge of Lutterworth (no. 4).

### **Gibbet Lane (5)**

While land south of Gibbet Lane falls within the M1 Junction 20 five-mile drive-time area identified in Figure 6.2 of Iceni's Sensitivity Report, the site is relatively isolated within the rural area and located approximately 3 miles from both Junction 20 of the M1 and the settlement of Lutterworth, limiting its proximity to key transport infrastructure and access to a local labour force. Strategic B8 development in this location would represent an unsustainable, standalone form of development, likely to generate a significant increase in both private vehicle and HGV movements along the A426 (Rugby Road), past the village of Cotesbach.

In order to bring the site forward, substantial highways upgrades would be required to both Gibbet Lane and the Gibbet Roundabout junction (A5/A426), representing a considerable infrastructure burden that may undermine deliverability.

The developable area at Gibbet Lane is limited to 16.27 hectares. As noted in paragraph 6.26 of Iceni's Sensitivity Report, strategic employment locations are generally expected to comprise a minimum of 50 hectares to support the level of infrastructure required and to achieve viable economies of scale. In this context, the ability of the Gibbet Lane site to make a meaningful or deliverable contribution to the future supply of B8 land is questionable. Given these constraints, it is considered that the remaining alternative sites (Sites 3 and 4) represent more suitable and sustainable options for allocation for strategic B8 development.

### **Warren's Farm West (3)**

Land at Warren's Farm (West) (Site No. 3) lies immediately adjacent to the Lutterworth East Strategic Development Area (SDA), which benefits from outline planning permission for 2,750 dwellings and associated uses north of Lutterworth Road, along with 23 hectares of employment land to the south of the road.

However, the site's configuration poses notable constraints. Its long and narrow shape, less than 400 metres deep in some sections, limits flexibility in terms of layout and could increase the landscape and visual impact of any development. Furthermore, the site relates poorly to the existing built form of Lutterworth and extends into open countryside, raising further concerns about its integration and visual containment.

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Due to environmental and physical constraints, the site assessment concludes that only the northern portion of the site, approximately 20 hectares, may be suitable for strategic B8 development. Importantly, access to this area is heavily dependent on the timely delivery of the Lutterworth East SDA and, in particular, the associated road infrastructure and approved employment land to the south of Lutterworth Road. Any delay in the implementation of the SDA could therefore significantly impact the viability and deliverability of this site.

The assessment also highlights potential ransom issues relating to access, which remain unresolved and could further hinder deliverability. In addition, the M1 motorway acts as a barrier to movement between Lutterworth and the site, presenting further challenges in terms of accessibility and integration with the local workforce.

Given the critical importance of deliverable land supply in meeting strategic employment needs over the plan period, only those sites that are demonstrably available, accessible, and free from significant deliverability constraints should be considered for allocation. In this context, Warren's Farm (West) raises material concerns that undermine its suitability as a strategic B8 allocation.

#### **Land off Rugby Road (no.4)**

A review of the assessment criteria and identified constraints within Icen's Potential B8 Sites Assessment has been undertaken to evaluate whether the key development challenges can be effectively addressed through a comprehensive and coordinated scheme at the site.

An alternative 'RAG' rating assessment, included at Appendix 2, demonstrates that many of the previously identified issues are capable of being mitigated or resolved through appropriate design and infrastructure provision. In light of these findings, the site's suitability, availability, and achievability have been considered and are set out in the following sections.

#### **Suitability**

The site extends to approximately 81.63 hectares. The illustrative masterplan enclosed at Appendix 3 demonstrates that the site can accommodate 264,180 sqm of Use Class B8 (storage and distribution) employment floorspace, delivered across eight flexible units. The development is contained within a net developable area of 49.89 hectares and framed by a comprehensive landscape buffer designed to mitigate visual and environmental impacts.

The landscape-led approach ensures environmental and visual integration with its surroundings. This extensive green infrastructure will provide effective visual screening from the surrounding area, while also enhancing local biodiversity, delivering ecological connectivity, and contributing to natural carbon offsetting. The landscape strategy also safeguards the setting and special character of nearby listed buildings and helps preserve the rural context of the village of Cotesbach.

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The site is strategically located immediately south of Lutterworth, offering direct access to Junction 20 of the M1, one of the country's key logistics corridors. Its proximity to Magna Park, a major regional logistics hub, reinforces its commercial appeal to national and regional occupiers seeking high-quality, well-connected warehousing space.

All vehicle and HGV movements are directed northwards, fully avoiding Cotesbach village and minimising local traffic impacts. Primary access is proposed via a new roundabout on the A426 Rugby Road, serving both eastern and western development parcels.

A dedicated lorry parking area on the western side of the A426 is included to assist in alleviating existing lorry parking pressures around Junction 20.

Following Government refusal of the Hinckley National Rail Freight Interchange (NRFI), there remains a residual need for strategic logistics capacity, which can be partially met through well-located road-based 'satellite' sites with strong connectivity to existing rail freight infrastructure. Land at Rugby Road is particularly well positioned in this regard, located less than 10 miles from the DIRFT rail freight interchange via Junction 20 of the M1, and with direct access along the A5 corridor to the Birch Coppice RFI. Its strategic location enables it to function as a complementary site, capable of supporting modal shift objectives and wider freight distribution networks without the need for a dedicated on-site rail terminal.

The final scheme design will incorporate a wide range of sustainability measures, including:

- Energy-efficient building design
- Provision for solar PV infrastructure
- Electric vehicle charging points
- Sustainable urban drainage systems (SuDS)
- Integrated pedestrian and cycle infrastructure to support low-carbon commuting

### **Availability**

The site is in single ownership and is being actively promoted by EQT, a well-funded and experienced developer with the capability to deliver the entire scheme in the short term. There are no known legal, physical, or ownership constraints preventing development, confirming that the site is available now.

### **Achievability**

The proposal reflects a commercially robust and deliverable logistics offer. The range of unit sizes provides choice and flexibility to meet current and future market demands. The strategic location and planned access improvements, enhances market confidence in the site's viability.

Development can be delivered in phases, aligning with market take-up and ensuring a flexible delivery trajectory. The inclusion of site-specific infrastructure (such as the new roundabout and

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lorry park) is practical and achievable using standard planning obligations and construction processes.

Given its scale, location, sustainability credentials, and developer backing, the site is demonstrably:

- Suitable – for large-scale B8 warehousing in line with market and policy objectives
- Available – under single ownership with no significant delivery constraints
- Achievable – with funding and market interest in place.

In conclusion, the illustrative masterplan ensures a sustainable development that integrates well with its surroundings, while addressing environmental and operational needs. With clear access to major transport networks and proximity to established logistics hubs, the site is well-positioned to meet both regional and national demand for modern, flexible logistics space.

Moreover, the site is available for immediate development, with no significant constraints, and is backed by a well-funded, experienced developer capable of delivering the project in a timely manner. The allocation and proposed development of the site would have strong market interest, making it commercially viable and adaptable to future growth.

Given these factors, the site is demonstrably deliverable and should be allocated for strategic B8 development to meet the ongoing and future demand for logistics space, supporting economic growth and contributing to the region's logistics infrastructure.

The sites suitability for large scale warehousing development will be further assessed and presented in a Delivery Statement.

### **7. Conclusions**

- The current approach of relying on historic gross completions data (2012–2024) as the primary basis for assessing future strategic warehousing land needs across the FEMA is fundamentally flawed and does not provide a sound or complete basis for forward planning to 2041. This methodology fails to account for key factors including the availability, quality, and location of land, evolving market dynamics, and the increasing operational demands of the warehousing and logistics sector. It also does not reflect latent or suppressed demand arising from current supply constraints.
- The identified supply, comprising existing consents and proposed allocations (including at Magna Park), is inadequate to support the continued growth of the sector. The warehousing and distribution industry is undergoing structural change, characterised by a shift towards larger, modern, energy-efficient buildings located on well-connected, strategic sites.

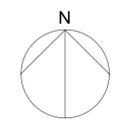
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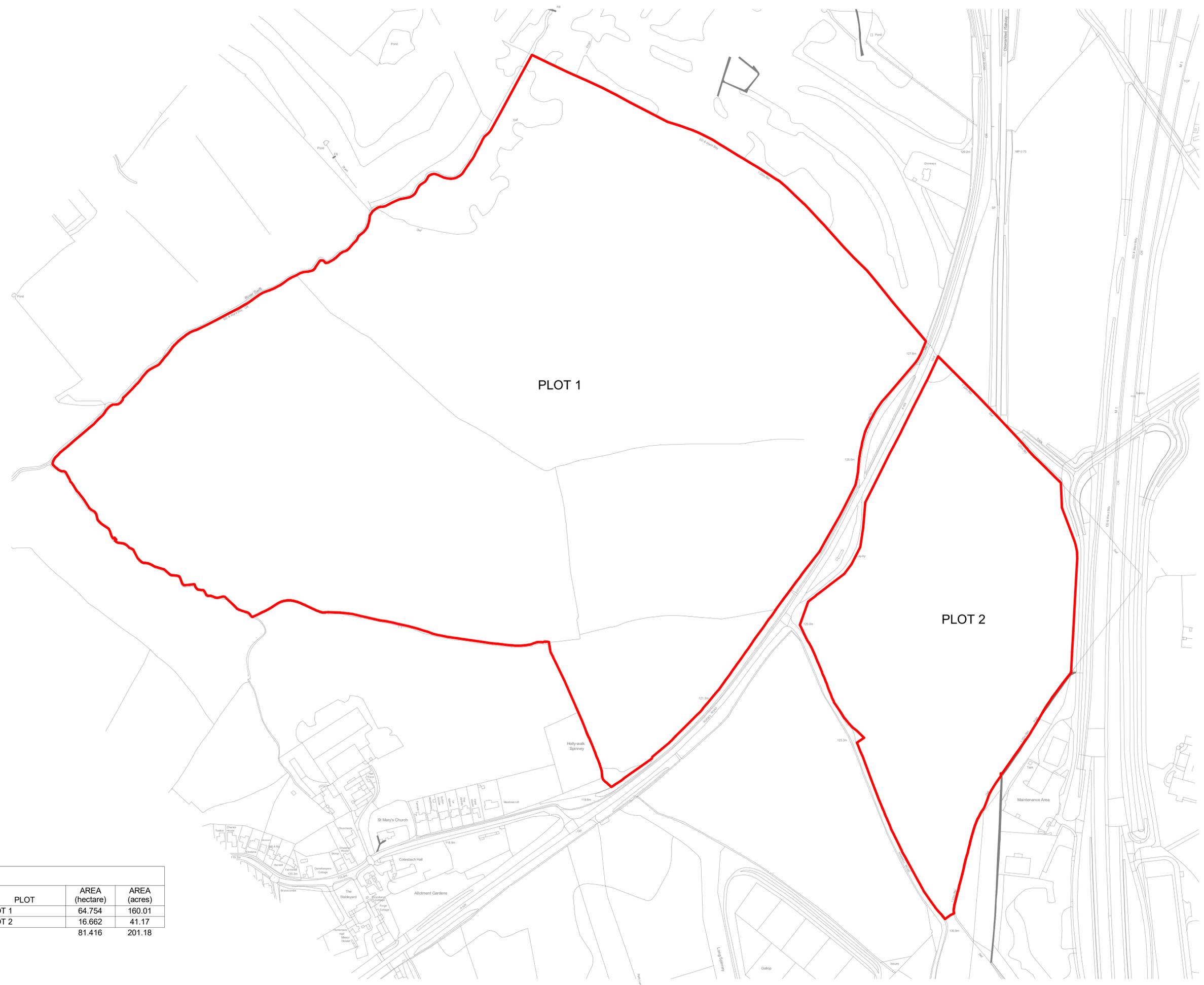
- Given its exceptional connectivity at Junction 20 of the M1 and its relationship with the established Magna Park logistics cluster, Harborough District is uniquely positioned to play a leading role in meeting regional and national logistics needs. To support economic growth and respond to market signals, the Local Plan must make provision for a greater quantum, range and flexibility of large-scale warehousing employment land. This will ensure that the supply pipeline remains robust, responsive to fluctuations, and capable of accommodating modern occupier requirements, including large-scale units.
- A more ambitious and responsive land supply strategy is essential to ensure the Local Plan is positively prepared, justified, and effective in meeting the needs of a modern and evolving economy over the plan period.
- For the reasons set out above an additional allocation of 50ha on land off Rugby Road, 0.65km south of Lutterworth and with ease of access to J20 of the M1, should be progressed through the emerging Plan and emerging Policy DS02 should be updated to reflect this.

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— SITE BOUNDARY



PLOT 1

PLOT 2

PLOT	AREA (hectare)	AREA (acres)
PLOT 1	64.754	160.01
PLOT 2	16.662	41.17
	81.416	201.18

Rev	Description	Date	Dm	PJL
P1	FIRST ISSUE	22.04.25	BM	PJL

Status  
 SKETCH - NOT FOR CONSTRUCTION

**SMR**  
 SMALLLEY MARSEY RISPIN

**ARCHITECTS**  
 The Exchange Station Parade Harrogate HG1 1TS  
 01423 707 757 admin@smrarchitects.co.uk

Project  
 RUGBY ROAD, LUTTERWORTH

Client

Drawing Title  
 SITE LOCATION PLAN

Proj Ref	Origin	Zone	Level	Type	Role	Num	Status	Rev
7637 - SMR	- 05 - ZZ	- DR	- A	- 2001 - S3	- P1			
SMR Job Ref	Sheet	Scale	Drawn					
7637-05-2001	A1	1 : 2500	BM					

Land off Rugby Road (A426) – Alternative ‘RAG’ Rating

Assessment Criteria	RAG Rating	Iceni Site Assessment Findings	Comments	Alternative ‘RAG’ rating
Strategic Road Access	Green	The site provides good access to the SRN, with the M1 J20 located approx. 1 mile, accessed via the A426 Rugby Road and the A4303.	No comment	Green
Local Access	Orange	<p>The site to the west of the A426 Rugby Road currently has two access points from the highway, the first is directly on to the A426 Rugby Road, the second is via a layby off the A426 Rugby Road. Access to the site east of the A426 Rugby Road is taken via field gate to the south of the site off the Shawell Road. Shawell Road is a narrow lane that would be unsuitable for HGVs. Both sites benefit from long road frontage on to the A426 Rugby Road and new access routes could be created.</p> <p>A new roundabout or priority junction may be required on the Rugby Road to provide a suitable access for any proposed development. However the Highways Authority has expressed concern regarding the delivery of a new access onto the A426 given the presence of existing laybys potential issues around connectivity for sustainable modes of travel. National Highways would need to be consulted on any proposals that would affect the A5 and M1 J20 and increase congestion.</p>	<p>A suitable access can be delivered on the A426 in the form of a new roundabout junction with arms providing access to land on both sides of the A426.</p> <p>This will provide a direct and convenient access to a main road (A426) and good access to the SRN at a choice of M1 J20, M6 J1 and the A5 at Gibbet Roundabout, helping to spread development traffic and minimise reliance on sensitive local junctions (including the Sir Frank Whittle Roundabout to the north of the site).</p> <p>Access via Shawell Road would not be promoted for vehicles.</p> <p>There is sufficient land within the site boundary to re-provide / offset the existing lay-by space in a more efficient layout.</p> <p>Negotiations with local bus providers with a view to extending / diverting existing services and / or creating new services is high on the developer's agenda to ensure suitable connectivity to local population centres.</p>	
Junction Capacity	Orange	There are known constraints regarding the Sir Frank Whittle Roundabout which would be required to access J20 of the M1. Potential for improvements to be funded through contributions from multiple schemes, however the site alone is unlikely to fund improvements.	<p>The Sir Frank Whittle Roundabout junction is outlined as a constraint.</p> <p>There is an improvement scheme associated with the Lutterworth East SUE development, which converts the roundabout to a signalised crossroads junction. It is expected that this improvement scheme would provide additional capacity at the junction when implemented.</p> <p>Any application for the site would undertake a detailed review and assessment of all surrounding junctions likely to be impacted by additional traffic generated by development of the site, and suitable mitigation measures would be proposed where necessary</p>	
Air Quality	Green	Previous Lutterworth AQMA was revoked by an order of HDC in June 2024. Air quality will continue to be monitored to ensure ongoing compliance. Traffic is likely to travel directly onto the M1 avoiding Lutterworth.	No comment	
Public Transport Access	Red	The site is not currently served by public transport. The closest bus stops are located near Riverside Road, on the A426 in Lutterworth, approximately 0.8 miles from the site. Potential for diversion of bus services to serve site would require investigation	<p>It is acknowledged that the site is not currently served by public transport, understandable given that it is currently undeveloped.</p> <p>The emerging scheme would be designed to accommodate bus movements and the developer would set out to negotiate with local bus service providers from an early stage with respect to the potential to either extend existing services or create new / bespoke services.</p> <p>A Sustainable Transport Strategy (STS) would be developed at an early stage. This will set out a strategy for the movement of people using</p>	

Land off Rugby Road (A426) – Alternative ‘RAG’ Rating

			sustainable modes of transport between the site and the local population centres (Lutterworth and Rugby)	
SRFI Access		The closest SRFI is DIRFT, 7.8 miles from the site via the A5. Strong proximity to SRFI.	No Comment	
Labour Access		Reasonable labour access with a population of 62,000 within a 10 minute drivetime catchment; and 448,400 within a wider 20 minute catchment	No Comment	
Contaminated Land		Greenfield site. No evident potential contamination issues affecting the site	No Comment	
SSSI Impact Risk		No nearby SSSIs	No Comment	
Local Wildlife Site		NO LWS on site, but site sits approx. 360m from Shawell Wood	Shawell Wood is separated from the site by the M1. Extensive landscaping proposals within the site would provide further buffering.	
BAP Priority Habitat		Site does not contain and is not in close proximity to a Local Wildlife Site or nationally or internationally designated biodiversity or geodiversity site, therefore it may have a negligible effect on SA objective to protect, enhance and manage biodiversity and geodiversity.	No comment	
Landscape Sensitivity		<p>Site falls within the Lutterworth to Catthorpe Landscape Character Area 10a Transitional Rolling Farmland.</p> <p>The parcel (falls within LH6) is gently undulating with few dramatic changes in topography and has a predominant large-scale field pattern which results in a lower sensitivity to both employment and residential development.</p> <p>Although Lutterworth Golf Course includes some semi-natural features, elsewhere these are often limited to field boundaries or adjacent to roads, which also lowers the sensitivity of the landscape to development. The limited time depth and overt human influence in the form of busy transport corridors (such as the M1 and A4303), traveller sites and skyline views of wind turbines to the south all indicate a lower landscape sensitivity to development. The perceptual and experiential qualities are also heavily influenced by roads and other encroaching modern development, reducing the sensitivity to development.</p> <p>The relatively open character of the landscape in combination with areas of weak field boundaries creates views to areas outside of the parcel, which heightens the parcel's sensitivity to residential and employment development. In addition, the parcel is physically and visually detached from the edge of Lutterworth by the A4303 and a sense of separation between the settlement edge and Cotesbach, both of which increase the sensitivity to residential and employment development.</p>	<p>The landscape character is heavily influenced by the busy transport corridor in which the site sits. The perceptual and experiential qualities are also heavily influenced by other encroaching modern development, reducing the sensitivity to development.</p> <p>The sites topography and predominantly large-scale field pattern results in a low sensitivity to employment development.</p> <p>An extensive landscaping / buffering scheme brought forward as part of a development proposal and bordering the edges of the site, particularly to the south and north, could suitably screen a development from areas outside the site, resulting in a lower sensitivity to employment development than is currently assumed.</p> <p>Any future developments layout, the positioning of units, their height and scale, would be informed and guided by a landscape visual impact assessment to ensure the visual impact of development on any key views is appropriately minimised / acceptable.</p>	

Land off Rugby Road (A426) – Alternative ‘RAG’ Rating

		The overall sensitivity of the landscape to employment development is considered Moderate due to the increased scale and prominence of this type of development.		
Conservation Area		One conservation area located just over 1km away - Lutterworth Town Centre - but is physically separated and to the north of the A4303.	No comment	
Registered Park and Gardens		No registered parks/ gardens on site or in immediate vicinity.	No comment	
Scheduled Ancient Monument		No SAMs on site or in immediate vicinity	No comment	
Listed Buildings		10 listed buildings located in Cotesbach, including Grade II* listed Church of St Mary and Cotesbach Hall, within 1km from the site; and multiple listed buildings in Lutterworth Town Centre also within 1km of the site.	<p>The nearest listed building to the site is the Grade II* listed Church of St Mary, located in the village of Cotesbach, 0.3km's from the southern edges of the site. Cotesbach Hall and remaining listed buildings in the village are located on the southern side of Main Street, behind existing built residential development.</p> <p>St Mary's Church is enclosed by mature trees to the immediate north, providing an existing buffer that limits views through of the site.</p> <p>A carefully designed scheme informed through an LVIA assessment and incorporating extensive landscape buffering – as detailed on the submitted masterplan - can appropriately screen the development from the Church of St Mary's, ensuring the character, appearance and setting of the listed building, and other listed buildings within the village, would remain unharmed.</p> <p>Listed buildings to the north of the site in Lutterworth are separated from the site by open space, the A4303 and extensive tree planting, and Lutterworth Golf Course. Development at the site would not affect the setting of listed buildings to the north.</p>	
Air Quality Management Area		Previous Lutterworth AQMA was revoked by an order of HDC in June 2024. Air quality will continue to be monitored to ensure ongoing compliance. Traffic is likely to travel directly onto the M1 avoiding Lutterworth.	No comment	
Agricultural Land Classification		Mix of Grade 2/3/4 with c. 40% Grade 2; 20% Grade 3; and 20% Grade 4. Grade 2 land located centrally around A426	<p>It is accepted that there would be some loss of Grade 2 Agricultural land within the site.</p> <p>The final design and layout of any future employment scheme would seek to limit development within the areas designated as Grade 2 land.</p> <p>All land enclosing J20 of the M1 to the south is designated Grade 2 agricultural land (including at Warren's Farm West). Substantial areas of the Lutterworth SDA also comprised Grade 2 agricultural land.</p> <p>To achieve the economic aims of the FEMA and emerging Harborough Plan and deliver new development at the most accessible locations, some loss of Grade 2 agricultural land will likely be necessary.</p>	

Land off Rugby Road (A426) – Alternative ‘RAG’ Rating

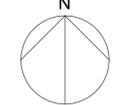
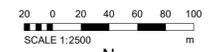
Fluvial Flood Risk		A narrow portion (approx. 10.2 ha) along the northern boundary of the western site (adjacent to the River Swift) falls within flood zones 2 and 3. Draft SFRA Screening identifies that the sequential test should be applied to see if there are other suitable sites with less flood risk.	The site is sufficiently sized to enable employment development to come forward within the site, without encroaching into flood zones 2 and 3, as shown on the current masterplan.	
Surface Water Flood Risk		A small proportion of the site is affected by Surface Water Flooding - significantly less than 20%	A future employment development at the site would be accompanied by a detailed drainage scheme, incorporate SUDs / attention ponds to appropriately manage surface water.	
Ground Water Source Protection Zone		No GWPZ issues present	No comment	
Loss of Open Space		A very small portion of open space on site, with golf course boundary overlapping - mitigation can be achieved	The scale of the site allows very small portions of designated open space to be retained and remain undeveloped. Extensive Landscape buffering can appropriately screen development from adjoining open space / Lutterworth Golf course.	
Minerals Safeguarding Area		Over 50% of the site falls within a mineral consultation area.	No comment (Magna Park and proposed allocations also fall within Mineral Safeguarding Area – sand and gravel).	
Loss of Existing Employment Site		Greenfield site. Not an existing employment site	No comment	
Tree Preservation Order		No TPOs affecting the site	No comment	
Loss of Local Green Space		No LGS coverage on the site	No comment	
PROW		Three PROWs traverse the site (X31, X18, X30). One through the centre of the western site from north to south, one across the northern portion of the eastern site and one along the eastern site boundary. Potential need for PROW diversion to support development	Two PROWS traverse the site. New development on the parcel east of the A426 would not impact footpath X18 (Gibbet Lane, Shawell, to Rugby Road, Lutterworth).  PROW X30 (running centrally through the main site) could be diverted as part of a development scheme, around the southern and western edges of the site, creating an attractive and enhanced walking/cycling route along the River Swift while maintaining connectivity with Lutterworth Road.  PROW X31 currently leads to the A426 and existing laybys. No footpaths exist at this point. It is therefore questionable whether the existing footpath serves a purpose. However, it could be diverted around the edges of the site as part of any development scheme.	
Historic Land Fill		No historic landfill within or in close proximity to the site	No comment	
Topography		Areas of steeper topography on western site which could impact on suitability for development	Consideration of the levels to ensure tie in to existing features, material balance and building heights for visual impact will be a key consideration through the site masterplanning work. The site is sufficiently sized to ensure level changes can be appropriately managed and designed into the scheme.	
Surrounding Uses		Site generally surrounded by farmland and Lutterworth Golf Course to the north. Residential development located to the south in Cotesbach village	No comment	

Land off Rugby Road (A426) – Alternative ‘RAG’ Rating

Sensitivity Uses		Cluster of listed buildings in Cotesbach Village which sits close to the site, c. 0.3 km to the which would require creation of buffer, reducing developable area	Site is sufficiently sized to allow substantial green buffer along the southern boundaries of the site to assist in screening the development and ensuring setting of listed buildings is unharmed.	
<b>Suitability Ranking</b>				
Environmental Suitability		Presence of higher-grade agricultural land, flood risk and minerals safeguarding limit environmental suitability.	Land surrounding J20 M1 includes extensive areas of higher grade agricultural land. To meet the economic aims of the FEMA and Harborough District, some loss of higher-grade agricultural land / minerals safeguarding land will be necessary. Magna Park and Lutterworth SDA also feature Grade 2 agricultural land and mineral safeguarding designations.	
Built Environment Constraints		Cluster of listed buildings in Cotesbach Village which sits close to the site, c. 0.3 km, result in potential heritage impacts and would require creation of buffer, reducing developable area.	Substantial landscaping buffering will be incorporated to provide a clear separation / screen between the site and listed buildings to the south. With this in place the developable area of the site is reduced but still delivers a net developable area of 49.89 hectares – as detailed on the enclosed masterplan.	
Landscape & Visual		Landscape has a moderate sensitivity due to open character, areas of weak field boundaries, physical and visual detachment from the edge of Lutterworth and a sense of separation from Cotesbach.	As detailed on the accompanying Masterplan, the landscape-led approach ensures environmental and visual integration with its surroundings. This extensive green infrastructure will provide effective visual screening from the surrounding area, while also enhancing local biodiversity, delivering ecological connectivity, and contributing to natural carbon offsetting. The landscape strategy also safeguards the setting and special character of nearby listed buildings and helps preserve the rural context of the village of Cotesbach.	
Site Sensitivity to Change		Overall site is more sensitive to change than a number of other potential candidate locations.	As set out in the representations, it is considered that there are three potential sites within a five-mile drive of J20 M1, that could be suitable for large scale warehousing development. B8 development at Gibbet Lane would result in an isolated development in the rural area. Additional employment development at Warren’s Farm West would result in further incursion into open countryside. Development here is reliant on the Lutterworth SDA coming forward. It is considered that land at Rugby Road is less sensitive to change than the other potential locations.	
Overall Site Suitability Conclusions		Combination of close proximity to a range of listed buildings, presence of higher grade agricultural land, flooding issues and weak current public transport accessibility mean lower suitability performance. Development would result in a level of coalescence between Cotesbach Village and Lutterworth.	Extensive planting and landscaping would provide a suitable green buffer, screening the site and ensuring the special character and setting of listed buildings remain unharmed. Flood risk matters can be addressed by directing development away from key areas of flood risk within the site (outside flood zones 2 and 3). The use of SUDs / attenuation ponds within the site can appropriately manage any surface water flooding. Public transport accessibility could be enhanced by extending / diverting existing services and / or creating new services between the site and Lutterworth.	

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**WAREHOUSE AREAS - OPTION 1**

UNIT 1		
WAREHOUSE	68,000	731,900
HUB 1	360	3,800
OFFICE	4,760	51,200
HUB 1	360	3,800
HUB 2	360	3,800
HUB 2	360	3,800
	74,200	798,300

UNIT 2		
WAREHOUSE	23,990	258,300
OFFICE	2,390	25,700
	26,380	284,000

UNIT 3		
WAREHOUSE	33,150	356,800
OFFICE	1,390	14,900
	34,540	371,700

UNIT 4		
WAREHOUSE	36,400	391,800
OFFICE	1,670	18,000
	38,070	409,800

UNIT 5		
WAREHOUSE	11,250	121,000
OFFICE	530	5,800
	11,780	126,800

UNIT 6		
WAREHOUSE	23,100	248,600
OFFICE	1,350	14,500
	24,450	263,100

UNIT 7		
WAREHOUSE	14,020	150,900
OFFICE	980	10,500
	15,000	161,400

UNIT 8		
WAREHOUSE	37,160	400,000
OFFICE	2,600	28,000
	39,760	428,000
	264,180	2,843,100

**AREAS LEGEND**

- PROPOSED BUILT AREAS B8 USE
- PROPOSED GREEN CORRIDOR
- PROPOSED ATTENUATION PONDS
- PROPOSED VEHICULAR AREA - ROADS/YARD/CAR PARK AREAS
- PROPOSED RESIDENTIAL AREA
- EXISTING FOOTPATHS / TRACKS
- PROPOSED FOOTPATHS & CYCLE ROUTES AREAS
- SITE BOUNDARY 201.72 Acres (81.63 Ha)
- NETT DEVELOPABLE 123.29 Acres (49.89 Ha)

P03	LAYOUT UPDATED FOLLOWING SITE SURVEY REPORT FROM THE LOCAL AUTHORITY	02.05.25	AP	PL
P02	SCHEDULE OF AREAS ADDED	20.08.24	ALM	PL
P01	FIRST ISSUE	14.08.24	ALM	PL
Rev	Description	Date	Dm	Ckd

Status  
 SKETCH - NOT FOR CONSTRUCTION

**SMR**  
 SMALLLEY MARSEY RISPIN  
**ARCHITECTS**  
 The Exchange Station Parade Harrogate HG1 1TS  
 01423 707 757 admin@smrarchitects.co.uk

Project  
 LUTTERWORTH

Client  


Drawing Title  
 PROPOSED SITE PLAN - OPTION 1

Proj Ref	Origin	Zone	Level	Type	Role	Num	Status	Rev
7986 - SMR	- 00 - ZZ - DR	- A -	8001 - S3	- P03				
SMR Job Ref	Sheet	Scale	Drawn	AP				
7986-00-8001	A1	1 : 2500	AP					