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Harborough District Local Plan

Representations on Proposed Submission Draft (Regulation 19)

Iceni Projects Limited on behalf of
GLP

April 2025

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ON BEHALF OF GLP

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Harborough District Local Plan

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1. INTRODUCTION

- 1.1 These representations pertain to the Harborough District Local Plan Proposed Submission Draft (Regulation 19) March 2025 Document, which was approved for consultation from 10 March to 6 May 2025. They are submitted on behalf of GLP, who hold commercial land interests at Mere Lane and south of George House, Magna Park, identified as allocations MP1 & MP2 in the draft Local Plan. Location Plans for both sites are provided in Appendix 1.
- 1.2 The land at Mere Lane comprises 123 ha of undeveloped land which is allocated in the emerging plan under Draft Policy SA01 (MP2) for B8 Strategic Warehousing and Distribution Uses. The site is free from any ecological, historical or other relevant designations and is well located in relation to the strategic road network. The site is approximately 2km (3 minute drive) from Lutterworth which affords easy access to a wide range of services, facilities, shops and a working population of approximately 8,000 people according to the 2021 Census.
- 1.3 The land south of George House comprises a parcel of approximately 16 ha within the existing Magna Park estate which has not yet been developed (aside from a temporary construction use on part of the site, associated with the construction of Magna Park South). The site is identified as a proposed allocation under Draft Policy SA01 (MP1) for B8 Strategic Warehousing and Distribution Uses. The site is free from any significant constraints and is well enclosed within the existing employment park. A significant part of this site was identified as an existing commitment in the adopted Harborough Local Plan (reflecting planning permission 15/01531/OUT), safeguarded for strategic distribution under Policy BE2 (as highlighted on the plan enclosed at Appendix 1).
- 1.4 GLP supports the Council's decision to focus additional large-scale strategic distribution uses (Class B8) at Magna Park, agreeing that the strategic road access and availability of space to support both current and future business needs provides unique advantages and that "there are no other locations within the district which benefit from the same level of access to the Strategic Road Network (Draft Plan paragraph 4.28).
- 1.5 Further to the above, GLP seek to deliver a c. 300,000 sqm strategic warehousing and logistics scheme at Land at Mere Lane (alongside a 24 ha extension to Bitteswell Country Park) and a c. 70,000 sqm scheme south of George House, which will together provide a significant contribution towards the large scale strategic distribution (Class B8 units of more than 9,000 sqm) need within the District. Plans showing illustrative development parcels for each site are included at Appendix 2.
- 1.6 A Vision Document has also been prepared for the land at Mere Lane, highlighting the opportunity and setting out GLP's vision for the site, including both the extension to Magna Park and the extension of Bitteswell Country Park. The document highlights the suitability and deliverability of the

site, having regard to the technical work undertaken to date. The Vision Document is included at Appendix 3.

- 1.7 The emerging proposals for both sites have been informed by a range of technical work undertaken to date, including:
- Transport Note prepared by Apex Transport Planning (Appendix 4)
 - Ecological Review prepared by EDP (Appendix 5)
 - Heritage Note prepared by RPS (Appendix 6)
- 1.8 GLP is one of the UK's leading industrial and logistics providers and have a long history of delivering successful employment schemes in the Midlands. Magna Park in Harborough is their flagship scheme and is considered to be one of the most successful employment schemes in Europe, accommodating strategic warehousing developments which are occupied by some of the world's leading distribution operators, providing significant local employment and economic benefits.
- 1.9 GLP welcome the opportunity to work with Harborough District Council and the local community in relation to the Land South of George House and Land at Mere Lane allocations (MP1 & MP2). In this context, we set out below our comments on the draft Local Plan document published by the Council, to ensure the forthcoming Plan is sound and legally compliant.

2. REPRESENTATIONS ON THE DRAFT LOCAL PLAN (PROPOSED SUBMISSION DRAFT)

2.1 We set out below our comments on the specific policies within the draft Local Plan document.

Policy DS02 Development Strategy: Creating Jobs and Diversifying the Economy

Employment Need and Requirement

2.2 GLP broadly support the aims and objectives of Policy DS02 and consider that it provides an effective means of addressing employment needs at all scales, particularly in relation to strategic B8 development.

2.3 Draft Policy DS02 identifies (at Part 2 of the policy) an employment land requirement of 60 ha over the Plan period, derived from the 2024 Harborough Local Housing and Employment Land Evidence, as detailed in Table 3. It should be noted that the 60 ha figure relates to local employment needs, excluding strategic B8 development. Strategic B8 needs are considered separately by the Council's 2024 Strategic B8 Needs Sensitivity Report, and separate provision is made under Part 7 of the policy. Therefore, for the sake of clarity, we consider that Part 2 of the policy should explicitly state that the 60 ha employment land requirement relates to local employment needs, excluding strategic B8 development.

2.4 Regarding the strategic B8 need, the Council's evidence base¹ identifies a significant increase in demand for strategic logistics in Leicester & Leicestershire since the 2021 Warehousing & Logistics Report, with a gross need of 1,103-1,456 ha of land identified to 2041. Taking account of anticipated supply, a residual need of 537 ha is identified. In advance of the conclusion of ongoing joint work between the Leicestershire authorities to finalise and apportion the strategic B8 need, Harborough's interim evidence recommends that the District plans for **100-140 ha** of additional B8 development over the Plan period. This is in addition to the existing commitments at Magna Park.

2.5 Against this need, Part 7 of the draft policy identifies a requirement to deliver 340,000 sqm of floorspace for strategic B8, to be delivered at the two Magna Park sites (Land South of George House and Land at Mere Lane). These two allocations, as detailed in draft Policy SA01, comprise a total of 137.8 ha, thereby broadly achieving the 100-148 ha identified in the Council's evidence base, albeit resulting in a shortfall of approximately 10 ha against the upper end of the range identified.

¹ Strategic B8 Needs Sensitivity Report (2024)

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- 2.6 Accordingly, we consider that the policy is positively prepared in this regard, in accordance with paragraph 35 of the NPPF (December 2023), as it seeks to deliver a sufficient quantum of B8 development to broadly meet identified needs for strategic B8 development over the Plan period.
- 2.7 We also support the identification of Land South of George House and Land at Mere Lane as the two locations where the identified strategic B8 need will be met, which is justified by the Council's evidence base. The Council's 2024 Strategic B8 Needs Sensitivity Report emphasises that the area around Lutterworth and Junction 20 of the M1 is the only potential broad location in Harborough District that could accommodate strategic B8 development, when applying the Areas of Opportunity from the 2021 Warehousing and Logistics in Leicester & Leicestershire study, reflecting the excellent connectivity of this area to the strategic road network. The site assessment exercise in the 2024 Report then indicates the suitability of the two sites identified, which we discuss further below in response to Policy SA01.
- 2.8 However, we consider that Part 7 of the policy could be made clearer by identifying the total area in hectares that the Plan is seeking to deliver against the identified need. This would make it easier to compare the strategic B8 requirement against the need identified in the evidence base, and would also provide flexibility in relation to the quantum of floorspace delivered by each allocation.
- 2.9 Furthermore, GLP have undertaken a masterplanning exercise (attached at Appendix 2) which indicates that the Mere Lane and Land South of George House sites are capable of providing a quantum of development in excess of the figures identified in Policy DS02. The initial work undertaken by GLP indicates that up to approximately 300,000 sqm could be delivered at Mere Lane (at a site density of 23%), incorporating the Country Park extension, and up to approximately 70,000 sqm could be achieved on the land South of George House (at a site density of 41%, reflecting the infill nature of this site). This results in a total of up to approximately 370,000 sqm (with a site density across the two allocations of 27%), compared to the 340,000 sqm identified in the draft policy.
- 2.10 We are concerned that the policy wording as currently drafted specifies that 340,000 sqm will be delivered, rather than identifying an approximate or maximum figure. In our view this is too prescriptive and whilst the Council may be anticipating that the site capacities are identified as approximate figures, this is not sufficiently clear in the policy text, and could lead to a situation where a future application would be considered contrary to policy if it did not deliver the precise quantum of floorspace identified in the policy. Such a limitation would not be justified given the potential to deliver an acceptable scheme that exceeds (or in theory delivers less) than the specified floorspace figures.
- 2.11 Therefore, in addition to specifying the scale of B8 development being planned for in hectares, we consider that any floorspace figure referenced in the policy should be identified as an approximate total. Furthermore, given the work undertaken by GLP to date, we consider that the policy text should reflect that a greater quantum of floorspace could be delivered than is currently identified.
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- 2.12 Accordingly, we consider that Part 7 of the policy should be amended to indicate that up to approximately 370,000 sqm will be delivered at Magna Park, with up to approximately 300,000 sqm at Mere Lane and up to approximately 70,000 sqm at Land South of George House. This is necessary in order to avoid any misinterpretation of the policy requirements and thereby make the policy sound, by ensuring it is justified.

Magna Park

- 2.13 GLP support the identification of Magna Park in Part 8 of Policy DS02 as a Strategic Distribution Employment Area safeguarded for strategic B8 uses. This reflects the existing role and importance of Magna Park, and ensures its continued success over the Plan period.
- 2.14 We note that Part 8 c) seeks to limit the development of alternative uses at Magna Park that would undermine its strategic function. Whilst we support the general aim of this section of the policy, we consider that it is necessary to amend the policy wording, as discussed below.
- 2.15 Firstly, the reference to “any non-strategic storage and distribution use” could be interpreted as solely relating to storage and distribution uses that are not strategic in scale (i.e. less than 9,000 sqm). We assume the intention of the policy is to refer to any alternative uses, rather than solely non-strategic B8, and thus we consider that for clarity, the policy should be updated to refer to any alternative uses to strategic storage and distribution.
- 2.16 Furthermore, we consider that the requirement to identify significant benefits to the district and achievement of Local Plan objectives is unduly vague and is not justified. We consider that certain alternative uses, such as small scale retail / food and beverage facilities / gyms (Class E) and small scale on-site training and education facilities (Class F1) could support and enhance the core strategic function of the park. Whilst a limited number of such facilities across the park could effectively support and complement the employment uses, it is unclear how an individual proposal could be objectively assessed to determine whether it would deliver significant benefits to the district and achieve Local Plan objectives. A small-scale proposal for a complementary use could be proportionate in scale and beneficial to the operation of the park, and in such circumstances we do not consider that it should also be necessary to demonstrate a district-wide benefit, which in our view would be unduly onerous and unjustified.
- 2.17 Occupiers of the strategic units might also have an ancillary element of non-B8 use (such as a small element of B2 as part of their wider distribution operations), and therefore we consider the policy should allow for ancillary uses that are not B8 but which are subservient to the main B8 use of a site.
- 2.18 We note that the supporting text to the policy (paragraph 4.28) indicates that alternative uses will be acceptable provided they “are small scale, proportionate, and beneficial to the overall functioning of the strategic distribution park”. There is no reference here to wider significant district-wide benefits.

2.19 We further note that Policy BE2 (part 3b) of the adopted Harborough Local Plan has a similar policy restricting alternative uses, but does not include the requirement to demonstrate significant district-wide benefits. As discussed above, we do not consider that this additional test now proposed is justified.

2.20 As a result, in order to ensure the policy is sound, we consider that it is necessary to delete the final part of the sentence, which states “and the benefits to the district and achievement of local plan objectives are significant.”

Summary

2.21 GLP supports the overall aims of Policy DS02, particularly in terms of meeting strategic B8 needs through the allocation of additional land at Magna Park. However, in order to ensure the policy is sound, we consider that it is necessary to update the overall quantum of development identified at Part 7 of the policy as discussed above, and to amend the wording of Part 8 c) to ensure the requirements associated with alternative uses is not unduly onerous.

2.22 We set out below our proposed amendments taking account of the above comments:

Policy DS02 Development Strategy: Creating Jobs and Diversifying the Economy

...

2. The **local** employment land requirement for Harborough District (**excluding strategic storage & distribution**) is 60 hectares between 2020 and 2041...

...

7. Additional development of ~~340,000 sqm floorspace~~ **137.8 ha (up to approximately 370,000 sqm)** for Strategic Distribution for large-scale Warehousing (use class B8 in units of more than 9,000 sqm (gross)) will be provided in the district. Additional development should form an extension of, or be on a site within, Magna Park in the following locations:

a) **up to approximately 70,000** ~~55,000~~ sqm on land south of George House, Coventry Road, in accordance with Policy SA01.

b) **up to approximately 300,000** ~~285,000~~ sqm on land at Mere Lane, Magna Park, in accordance with Policy SA01.

8. Magna Park including allocated sites MP1 and MP2 in Policy SA01, as identified on the Policies Map, is safeguarded for strategic storage and distribution (Class B8). Proposals for redevelopment at Magna Park including allocated sites will be permitted where:

a) each unit has at least 9,000 sqm gross floorspace; and

b) any new building or the change of use of an existing building(s) is for Class B8 and uses ancillary to this main use only; or

c) ~~the proposals for any non-strategic storage and distribution use is alternative uses to strategic storage and distribution are~~ small-scale, proportionate in scale to the strategic storage and distribution use and ancillary to the use of individual plots or beneficial to the functioning of Magna Park as a strategic storage and distribution park ~~and the benefits to the district and achievement of local plan objectives are significant.~~

...

Policy DS04 Development Strategy: Preserving and Enhancing our Heritage and Rural Character

2.23 We note that Areas of Separation are identified on the Policies Map between Magna Park and Ullesthorpe to the north and Bitteswell/ Lutterworth to the east, as referenced in draft Policy DS04. These areas are based on the evidence set out in the 2024 Settlement Gaps Assessment, and will ensure that an appropriate degree of separation is achieved between the extension of Magna Park to the north (allocation MP2) and the nearby settlements. GLP therefore support the principle of the proposed Areas of Separation.

2.24 The proposed Area of Separation between Magna Park and Ullesthorpe overlaps with the western part of allocation MP2. This is consistent with GLP's emerging proposals for the site, which include a significant extension of Bittesby Country Park and structural landscaping on the western and northern boundaries of the allocation. Accordingly, the proposed Area of Separation designation will not impede the delivery of the allocation and is aligned with the emerging development proposals (detailed in the attached Vision Document at Appendix 3).

2.25 More broadly, issues of landscape and heritage have been carefully considered through the development of the emerging proposals for Magna Park, as detailed in the enclosed Vision Document and discussed further in relation to Policy DM03. In relation to landscape considerations, the proposals will include significant landscape and green infrastructure elements, including an extension to Bittesby Country Park, and the design of the new buildings will also be underpinned by

a strong emphasis on the landscape, thereby preserving the character of the surrounding landscape in accordance with Policy DS04.

Policy DS05 Development Strategy: Supporting Strategic Infrastructure

- 2.26 We support the overall aim of Policy DS05 to ensure new development is supported by the necessary infrastructure, and that as part of the planning application process, a comprehensive assessment will be required to consider the infrastructure requirements associated with MP1 and MP2.
- 2.27 We note that part 2 of the policy requires development proposals to incorporate site-specific mitigation schemes identified in Policy SA01, and that Harborough is committing in part 4c of the policy to continuing work with the relevant highway authorities to identify targeted improvements to the road network.
- 2.28 In relation to MP1 and MP2, GLP have commissioned Apex Transport Planning to prepare a Transport Note, enclosed at Appendix 4, to address relevant transport considerations. The Transport Note highlights the sustainability of the proposed allocations, with Magna Park already benefiting from an extensive network of infrastructure catering for sustainable transport modes and various initiatives to encourage sustainable transport. The proposed allocations will take advantage of and enhance this existing infrastructure and in-built sustainability.
- 2.29 The Transport Note also considers the evidence base supporting the Plan, including the Strategic Transport Impact Assessment (STIA), which is considered to provide a robust high-level framework from which to establish the potential implications of the proposed allocation sites. It includes possible mitigation solutions, with cost estimates totalling £14.2 million across MP1 and MP2, including walking, cycling, public transport, and highway improvements.
- 2.30 The Transport Note identifies that the STIA includes several layers of robustness, which leads to the conclusion that the impacts of the proposed allocation sites may not be as extensive as the modelling indicates. These factors include:
- The PRTM modelling is based on 2019 base flows, and projections from these base levels are robust given traffic flows on the road network have reduced or changed significantly since pre-Covid levels
 - Magna Park generates significantly fewer trips than has previously been the case, with a 26% reduction in daily vehicle trips compared to 2013.
 - No vision-led scenario testing has been undertaken, which would otherwise factor future trends

in traffic flows/trip generation, and the positive effects of mitigation strategies and travel planning

- 2.31 It is further noted that some mitigation cost apportionments appear overlapping, particularly for active and public transport upgrades. Meanwhile more than £5.2 million in contributions have already been secured and pooled for improvements to the A5 Gibbet Hill roundabout, with the STIA estimating upgrade costs at £4.2 million indicating a potential funding surplus.
- 2.32 Taking account of the above, we consider that the site allocations at Magna Park are supported by a detailed and robust evidence base, which confirms the acceptability of the Council's strategy and identifies potential mitigation measures and infrastructure to support proposed development. Apex Transport Planning's review of the evidence has however identified that the indication of potential mitigation measures may be overly-robust for the reasons detailed in their Transport Note at Appendix 4. Future applications should be supported by detailed Transport Assessments which will consider up-to-date traffic data, appropriate junction modelling and vision-led scenario planning. This will then inform a more detailed understanding of any mitigation required.

Policy SA01: Site Allocations

MP1 – Land South of George House, Coventry Road

- 2.33 GLP strongly supports the allocation of Land South of George House, Coventry Road as a logical infill site within the existing Magna Park estate. The allocation will support the development of this vacant plot and make a significant contribution towards the identified need of 100-140 ha of strategic B8 development over the Plan period in an established and suitable location for such uses. Accordingly, this site will enable Harborough to meet its identified needs and thus ensure that the Plan is positively prepared, in accordance with paragraph 35 of the NPPF. The Sustainability Appraisal supporting the Local Plan emphasises the significant positive effect of the proposed allocation in relation to economic growth, reflecting the significant employment opportunities that will be generated.
- 2.34 The Council's Strategic B8 Needs Sensitivity Report assesses the site as suitable for allocation to meet strategic B8 needs, noting that it is subject to very few environmental constraints, and relatively unconstrained in terms of other considerations such as heritage and landscape. It further highlights that the site relates strongly to the existing Magna Park development, which surrounds the site, and that overall the site is considered suitable and available for development, thereby supporting the allocation.
- 2.35 Initial technical work has been undertaken by GLP to inform the emerging development principles illustrated in Appendix 2, confirming the suitability of the site and supporting the conclusion that the site can accommodate approximately 70,000 sqm of employment floorspace, as discussed above. The efficient development of this site will be supported by the biodiversity enhancement strategy

outlined in the Ecological Review report prepared by EDP (Appendix 5), which indicates that there are a number of locations within the existing Magna Park estate where enhancements to biodiversity can be achieved. This will result in an overall net gain of at least 10% which can be directly attributed to the development of the MP1 allocation. The Ecological Review report also confirms that there are not expected to be any significant constraints to development from an ecological perspective.

2.36 In terms of the Policy Requirements, we note the reference to a sequential approach to site layout. It is unclear precisely what is meant by this reference. Whilst a small portion of the site is currently subject to surface water flood risk, this reflects the existing topography of the site, which will be altered by the proposed development. Furthermore, surface water will be appropriately dealt with in the development proposals through a sustainable drainage strategy. Accordingly, we do not consider that the reference to a sequential approach is justified, and this should be deleted in order to ensure the policy is sound.

2.37 Reflecting the above, we propose the following amendment to MP1 in the Site Allocations Schedule:

1. Parts of the site are affected by surface water flood risk. A site-specific Flood Risk Assessment will be required to assess the risk of surface water flooding and access/egress arrangements. A carefully considered and integrated flood resilient and sustainable drainage design will also be required, including a site-specific Surface Water Drainage Strategy, and SuDS maintenance and management plan. ~~The sequential approach to site layout should be taken.~~

MP2 – Land at Mere Lane, Magna Park

2.38 GLP strongly supports the allocation of Land at Mere Lane, Magna Park as a key location for strategic logistics development in the district. The allocation of 122 ha will make a significant contribution towards the identified need of 100-140 ha of strategic B8 development over the Plan period in an established and suitable location for such uses. Accordingly, this site will enable Harborough to meet its identified needs and thus ensure that the Plan is positively prepared, in accordance with paragraph 35 of the NPPF. The Sustainability Appraisal supporting the Local Plan emphasises the significant positive effect of the proposed allocation in relation to economic growth, reflecting the significant employment opportunities that will be generated.

2.39 The overall suitability of MP2 is detailed in the Council's Strategic B8 Needs Sensitivity Report, which highlights the site's connectivity to the strategic road network, good public transport accessibility, and overall suitability having regard to relevant constraints. The assessment notes that the site would form an extension to the existing successful Magna Park, which is located within the only potential broad location in the district capable of accommodating strategic B8 development, and could enable delivery in the early years of the Plan. The development will build on and complement the existing infrastructure across the Magna Park estate, which is a commercially attractive location for strategic logistics development.

2.40 GLP have undertaken a range of technical studies to inform their emerging proposals for the development of this site, resulting in the emerging development areas identified at Appendix 2. Further details are included in the attached Vision Document (Appendix 3) and technical notes relating to transport (Appendix 4) and heritage (Appendix 6) matters. This technical work confirms that there are no fundamental technical constraints to development of this site, and that it is entirely suitable for the allocation as identified in MP2.

2.41 In relation to the Policy Requirements identified for MP2, we set out below our comments on several points which we consider will require amendment or clarification in order to ensure that the policy is sound.

Light Impact Assessment

2.42 Points 1 and 3 refer to a light impact assessment. It is unclear exactly what is required in this regard, but we anticipate that the intention is to ensure any external lighting does not result in unacceptable impacts on the local environment and nearby residents. Accordingly, we consider that the policy text should clarify that the assessment relates to any external lighting associated with the proposed development.

Solar PV Panels

2.43 Point 5 refers to giving consideration to the use of Solar PV Panels on warehouse units where appropriate.

2.44 GLP are committed to delivering a highly sustainable development in accordance with their industry-leading standards. Solar PV provision is one option for on-site renewable energy generation that will be explored in detail as part of future development proposals. Alongside this, there are also other renewable technologies that will be assessed, such as heat pumps, and consequently we consider that the reference solely to Solar PV is unduly narrow in focus, and instead we consider that the policy should encourage developers to give consideration to renewable energy generation more broadly where appropriate.

Transport

2.45 As discussed above in relation to Policy DS05, the proposed allocation is a suitable and sustainable location to focus strategic logistics growth, building on the existing sustainable transport infrastructure and measures at Magna Park.

2.46 We support the principle that a Transport Assessment at the application stage will address potential impacts and identify appropriate mitigation, and this will refine the work undertaken to date in the STIA in relation to the Magna Park sites.

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- 2.47 However, the last sentence of point 8 then implies that mitigation will be required on the A5, A4303 and surrounding villages. We do not consider that it is appropriate for the allocation policy to be so specific in advance of the detailed Transport Assessment work, and there is a risk that the policy could identify a requirement for mitigation that subsequent assessment finds is not required, and consequently the policy requirement would not be justified. Therefore in order to make the policy sound, we consider that additional text should be added to the final sentence to clarify that such highway mitigation should be provided where necessary.

Flood Risk

- 2.48 It is unclear what is meant by the final sentence of point 11, which states that a sequential approach to site layout should be taken. We assume this may be referring to developing a layout which seeks to direct development in the first instance towards areas at lower risk of surface water flooding.
- 2.49 Whilst a small portion of the site is currently subject to surface water flood risk, this reflects the existing topography of the site, which will be altered by the proposed development. Furthermore, surface water will be appropriately dealt with in the development proposals through a sustainable drainage strategy. Accordingly, we do not consider that the reference to a sequential approach is justified, and this should be deleted in order to ensure the policy is sound.

Travelling Showpeople

- 2.50 We object to the requirement at Point 12 of the Policy Requirements to include a 3 ha site for Travelling Showpeople within the allocation. We have concerns regarding the assessment of need for Travelling Showpeople Plots, and we do not consider that the land at Mere Lane is suitable or available for such uses. We consider that the relevant need can be best met elsewhere in the district.
- 2.51 With regards to the calculation of need for TSP plots within the district, the GTAA24 identifies a need for 69 plots for those who meet the 2023 Planning Policy for Traveller Sites (PPTS) definition and 34 plots for undetermined Travelling Showpeople that are estimated to meet the PPTS definition. This results in a total identified need of 103 TSP plots to be planned for across the 2024 – 2041 Plan period.
- 2.52 Paragraph 7.37 of the GTAA24 states that the needs figure relating to plots which meet the PPTS definition (69) was reached following an analysis of “household interviews [which] indicated that there is a need for 41 plots from concealed/doubled-up/over-crowded households or single adults; 12 plots from a 5-year need from teenage children; and for 16 from new household formation using a rate of 1.20% derived from the household demographics”. The estimate of undetermined households that meet the planning definition was then reached by applying the “local proportion of households that meet the definition (92%)” to the undetermined plot figure (37) resulting in a final needs figure of 34 plots from undetermined households.

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- 2.53 Whilst GLP agree that it is preferable to use demographic analysis over caravan count data to project future population and household growth, there appears to be an over-reliance on interviews to inform the TSP need figures. This is concerning as interviews are based on personal opinions making them inherently unreliable if used as the sole source of evidence to inform projections, and as discussed in the report, the response rate was limited. GLP consider that relying on interviews in this way is risky and could result in exaggerated projections of TSP need, especially if existing vacant plots have not been taken into consideration (as highlighted in paragraph 7.39 of the GTAA24).
- 2.54 This uncertainty regarding the number of plots needed creates concerns with the strategy to meet this need over the plan period. Table 5.5 of the Gypsy and Traveller and Travelling Show People Site Assessment (2024) reflects the GTAA findings that 77 of the 103 plots are needed within the first 5 years of the plan. Despite this, the study states that it has identified capacity for 108 TSP plots for delivery within the first 5 years. This significantly exceeds the identified need in the first 5 years. GLP consider that the uncertainty around the need for TSP necessitates a more cautious approach when allocating land for TSP plots.
- 2.55 In terms of site selection and the distribution of sites, as identified in the 2024 Harborough Gypsy and Traveller Accommodation Assessment, a significant portion of the Travelling Showpeople population is located in the Fairacres site to the south of the A4303. A desktop review has shown there to be ample space to expand this site on the surrounding land which is owned by Leicestershire County Council. GLP consider that all options to expand existing allocations should be assessed before opting to include this requirement within draft employment allocations which are considered to be less compatible with residential type uses.
- 2.56 Additionally, the 2024 Gypsy & Traveller and Travelling Showpeople Site Assessment methodology focussed on existing sites, but does not appear to have assessed the potential for new development in close proximity to existing sites, either as extensions or stand-alone developments nearby. Table 5.1 suggests that no Leicestershire County Council land was identified on the initial long list for Stage 1 assessment, and consequently it appears that the land around Fairacres has been overlooked.
- 2.57 Meanwhile the Site Assessment identifies the land at Mere Lane as a deliverable site for TSP development, however the site is not available, as it has not been promoted by GLP for TSP uses, and the use of 3 ha for such purposes would reduce the land available for employment purposes in accordance with allocation MP2.
- 2.58 As a result, we do not consider that the requirement to include TSP provision within the MP2 allocation is justified, and it is necessary for this item to be removed from the policy text in order to make the policy sound.

Proposed Amendments

2.59 Reflecting the above, we propose the following amendments to the Policy Requirements for MP2:

1. The layout, building and landscape design must include an appropriate acoustic and visual screen buffer to mitigate potential acoustic and visual impacts on existing residential properties abutting the northwestern boundary of the site. This should be informed by noise, visual and **external** lighting impact assessments.

...

3. An **external** light impact assessment will be required to address potential impacts and mitigation measures arising from the development, including on the amenity of existing residents close by and in Ullesthorpe.

...

5. Consideration should be given to ~~the use of Solar PV Panels on renewable energy generation for~~ warehouse units where appropriate.

...

8. The development should be informed by a Transport Assessment to address the potential impacts and identify appropriate mitigation. Priority should be given to sustainable transport measures as far possible, alongside a package of measures to encourage behavioural change. Appropriate highway mitigation should also be provided, including on the A5, A4303 and surrounding villages **where necessary**.

...

11. There is risk of surface water flooding on parts of the site. A site-specific Flood Risk Assessment will be required to assess the risk of surface water flooding and access/egress arrangements. A carefully considered and integrated flood resilient and sustainable drainage design will also be required, including a site-specific Surface Water Drainage Strategy, and SuDS maintenance and management plan. ~~The sequential approach to site layout should be taken.~~

~~12. Provision of a site or sites of 3 hectares of land to meet the needs of travelling show people within Harborough District.~~

Policy HN06 Housing Need: Gypsy and Traveller and Travelling Showpeople Accommodation

2.60 Part 2 of the draft policy identifies Land at Mere Lane, Magna Park as one location where provision will be made for Travelling Showpeople plots. GLP object to this part of the policy for the reasons

outlined above in response to the MP2 Site Specific Requirements set out in Policy SA01. Accordingly, it is necessary to delete the reference to the land at Mere Lane, as this is not justified and thus not sound.

Policy DM03: Heritage Asset Conservation and Design Standards

- 2.61 We note that Policy DM03 broadly reflects the approach to assessing proposals identified in paragraphs 207-209 of the NPPF. However, Part 6 of the draft Policy is not entirely consistent with the requirements of paragraph 209 of the NPPF. Whilst paragraph 209 indicates that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, with a balanced judgement required having regard to the scale of any harm or loss and the significance of the heritage asset, Part 6 of the policy requires justification of any harm or loss to the significance of the non-designated heritage asset. The reference to justification within the draft policy text is materially different from the 'balanced judgement' set out in the NPPF, and in our view places a greater burden of proof on an applicant to justify a development proposal in such circumstances.
- 2.62 Accordingly, we encourage the Council to amend the wording of the policy to more accurately reflect the wording in the NPPF, in order to ensure that the policy is consistent with national planning policy and therefore sound.
- 2.63 Specifically in relation to the Land at Mere Lane, Magna Park allocation (MP2), the emerging proposals have been carefully designed having regard to heritage considerations, as required by the draft policy. An initial heritage and archaeology assessment has been prepared by RPS (attached at Appendix 6), which anticipates that given the size of the application area and the nature of the proposed development, impacts upon heritage assets are assessed to be relatively low in relation to comparable sized schemes in Leicestershire and beyond. Accordingly, the site is considered suitable for development and capable of complying with the requirements of Policy DM03.

Policy IM01: Monitoring and review of the Local Plan

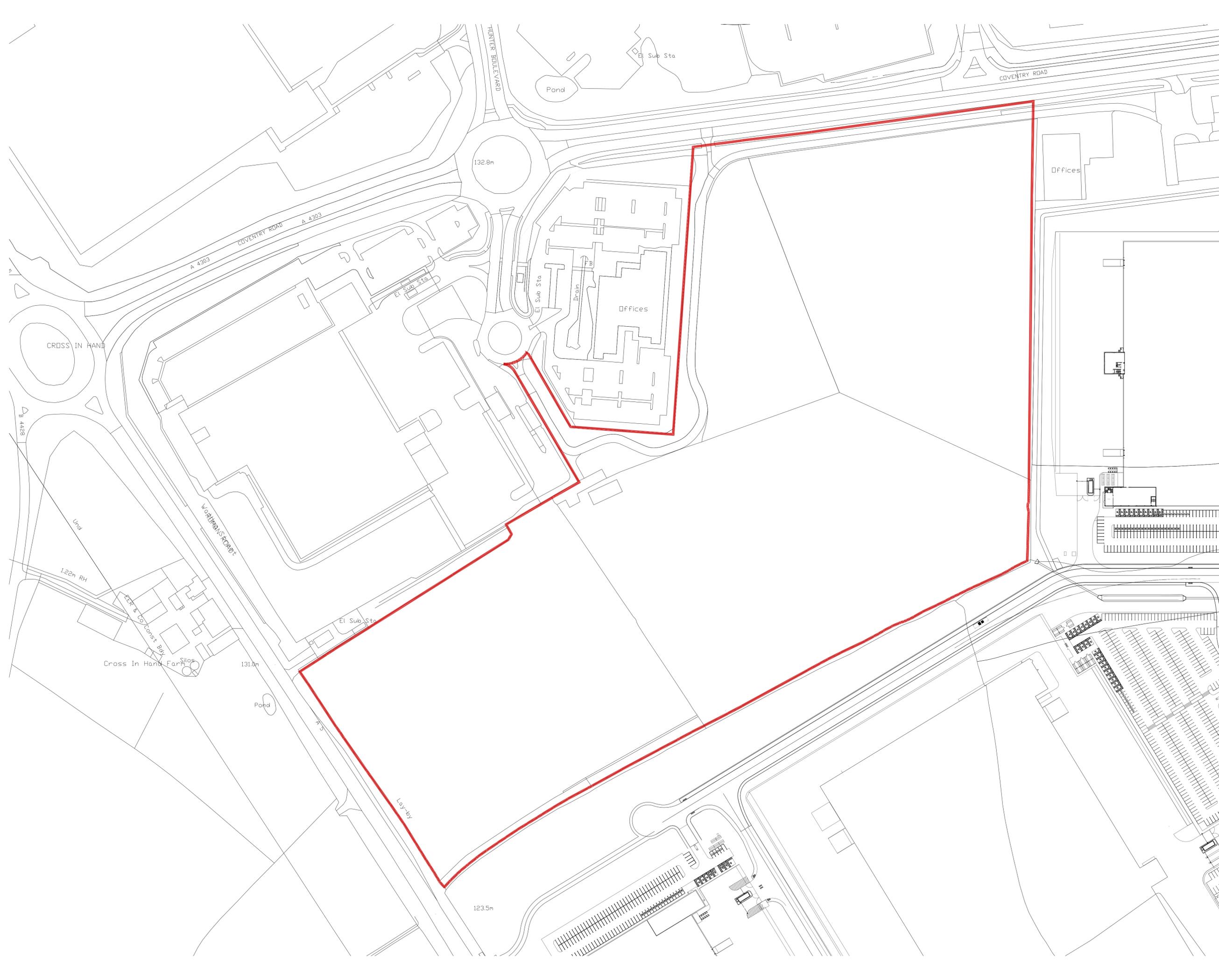
- 2.64 We support the inclusion of a policy requirement to undertake a review of the Local Plan where relevant criteria are met, including the identification of a need for a significantly greater quantum of strategic B8 floorspace than the emerging Plan currently provides for.
- 2.65 We consider this to be a pragmatic and sound approach to dealing with the fact that the Leicestershire authorities are in the process of preparing the joint evidence relating to such issues, and further work will be required in due course in terms of apportioning the identified sub-regional need.

2.66 This mechanism allows Harborough to progress its Local Plan without undue delay and to plan positively for growth, whilst ensuring that provisions are in place to trigger a review of the Plan should this be necessary in due course. As such, we consider that this policy ensures that the Plan is positively prepared.

3. SUMMARY AND CONCLUSION

- 3.1 GLP broadly supports the Harborough District Local Plan, particularly its focus on strategic B8 warehousing and distribution uses at Magna Park. However, several amendments and clarifications are suggested to ensure the plan can be considered sound.
- 3.2 In particular, we have identified the need for additional flexibility in Policy DS02 in relation to anticipated site capacities and the potential for small-scale alternative uses. In response to Policy DS05, we consider that the proposed allocations at Magna Park are supported by a robust evidence base which confirms they are deliverable, however we have identified that potential mitigation measures set out in the evidence may be based on overly-robust assumptions and it will be important to test these in further detail at the application stage. We have also identified amendments required to site allocations MP1 and MP2 as set out in Policy SA01, including the removal of the reference to Travelling Showpeople development in MP2.
- 3.3 We look forward to working positively with the Council to address these issues raised, and we consider that it will be beneficial for GLP to attend the future Examination Hearing Sessions in order to discuss these points in further detail.

A1. LOCATION PLANS

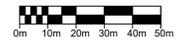


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Schedule Notes:
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 • **LAYOUT TO BE TRACKED.**
 • **RED LINE INDICATIVE ONLY.**



Key
 Site Boundary

P2	MPS added in.	23.04.25	MK/PS
P1	First Issue.	15.04.25	MK/PS

Rev Revision Description Date Author/Reviewer

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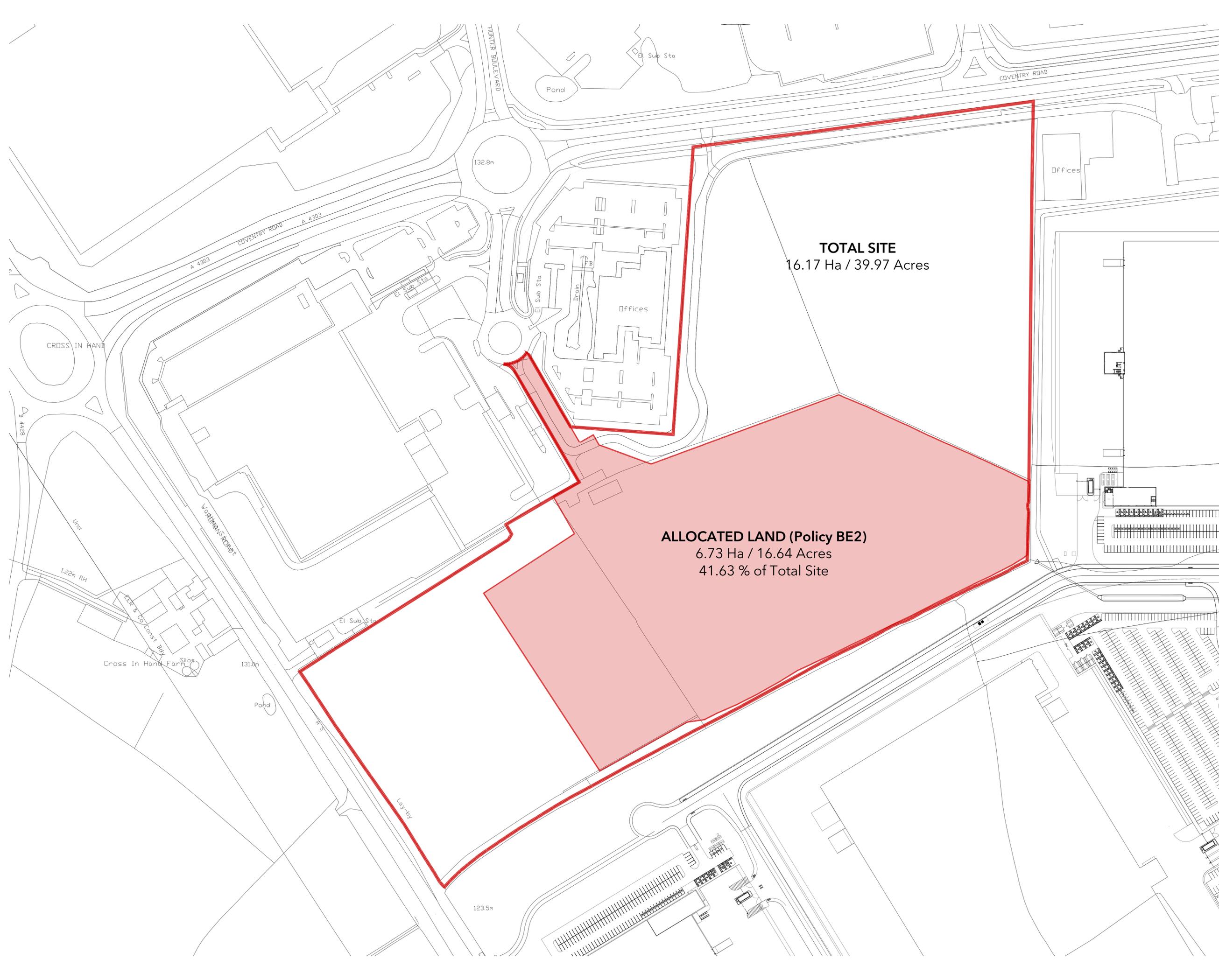
Project
Magna Park Lutterworth Phase 5



Drawing Title
Site Location Plan

Scale	Size	Drawn	Checked	Date
1:1250	A1	MK	PS	15.04.2025

Project	Original	Zone	Level	Type	Rate	Number	Rev.
4300	CA	00	00	DR	A	00050	P2



TOTAL SITE
16.17 Ha / 39.97 Acres

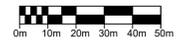
ALLOCATED LAND (Policy BE2)
6.73 Ha / 16.64 Acres
41.63 % of Total Site

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Key
[Red outline box] Site Boundary

P3	Allocated land added	25.04.25	MK/PS
P2	MPS added in.	23.04.25	MK/PS
P1	First Issue.	15.04.25	MK/PS

Rev	Revision Description	Date	Author/Reviewer
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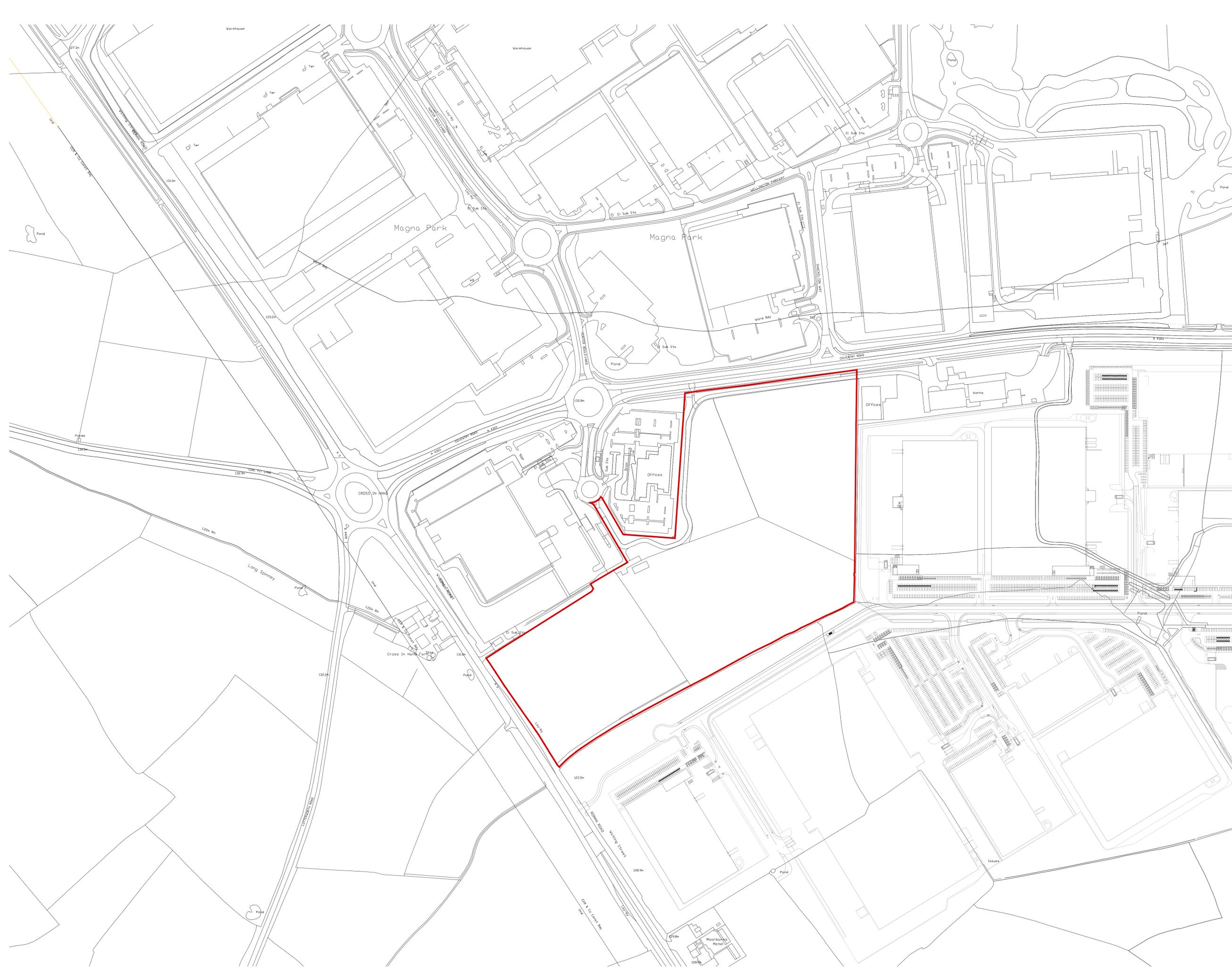
Project
Magna Park Lutterworth Phase 5



Drawing Title
Site Location Plan

Scale	Size	Drawn	Checked	Date
1:1250	A1	MK	PS	15.04.2025

Project	Originator	Zone	Level	Type	Rate	Number	Rev.
4300	CA	00	00	DR	A	00050	P3

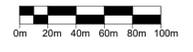


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Key
 Site Boundary

P2	MPS added in	23.04.25	MK/PS
P1	First Issue.	15.04.25	MK/PS

Rev	Revision Description	Date	Author/Reviewer
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Project
Magna Park Lutterworth Phase 5
 Client
GLP

Drawing Title
Site Location Plan Wider Context

Scale	Size	Drawn	Checked	Date
1:2500	A1	MK	PS	15.04.2025

Project	Original	Zone	Level	Type	Rate	Number	Rev.
4300	CA	00	00	DR	A	00050	P2

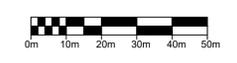
A2. DEVELOPMENT PARCEL PLANS

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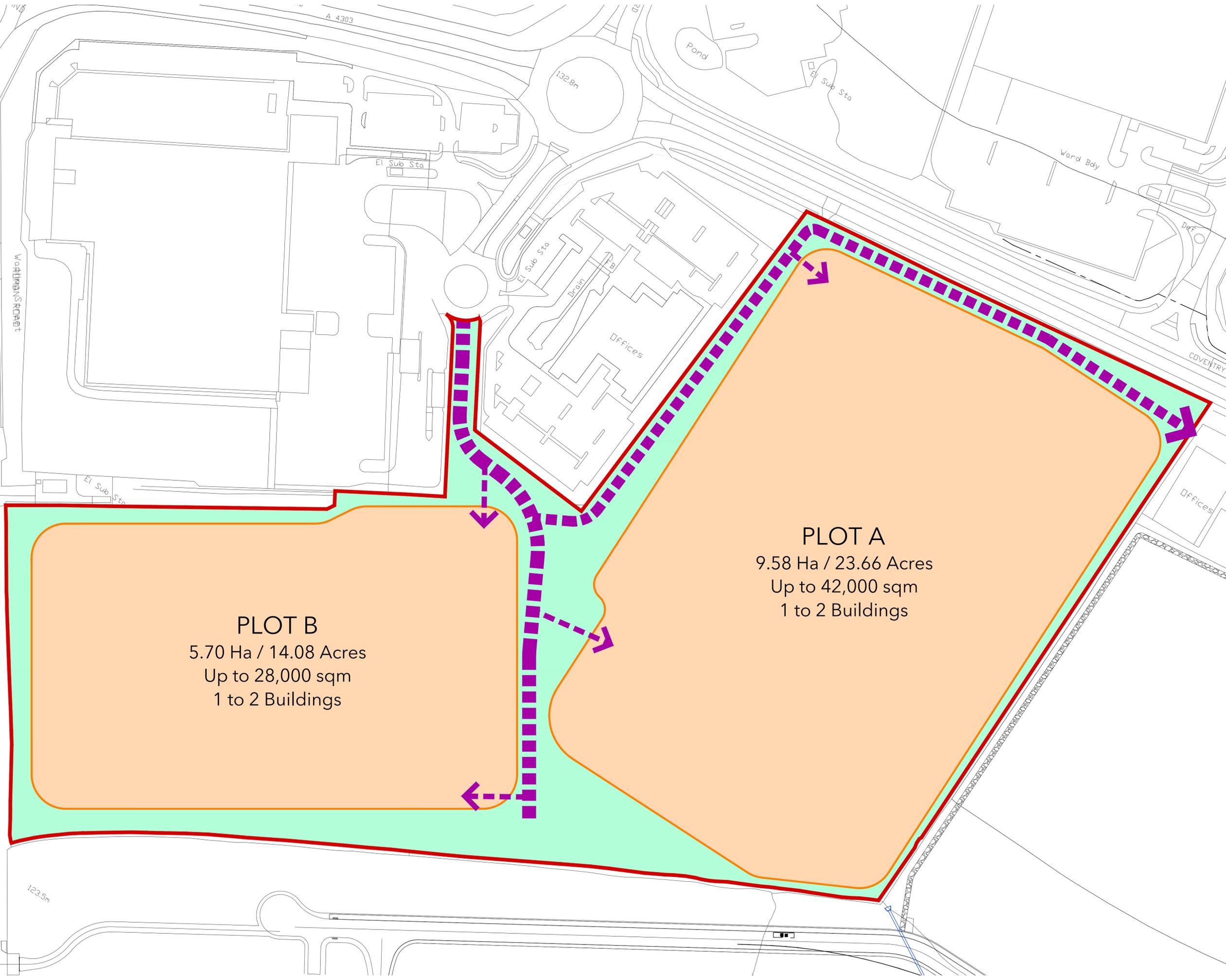
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Key
 Site Boundary
 Development Parcel



PLOT B
 5.70 Ha / 14.08 Acres
 Up to 28,000 sqm
 1 to 2 Buildings

PLOT A
 9.58 Ha / 23.66 Acres
 Up to 42,000 sqm
 1 to 2 Buildings

P3	Boundary updated	17.03.25	MK/PS
P2	Annotation updated	14.03.25	MK/PS
P1	First Issue	13.05.25	MK/PS

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Project
 Magna Park Lutterworth
 Phase 5
 Client



Drawing Title
 Parameter Plan

Scale	Size	Drawn	Checked	Date
1:1000	A1	MK	PS	22.04.2024

Project	Original	Zone	Level	Type	Rate	Number	Rev
4300	CA	00	00	DR	A	00055	P3

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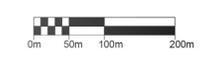
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Key

	Planning Boundary
	Development Plateau
	Country Park
	Landscape
	Road Infrastructure

P2	Vision Document Issue	25.03.25	MK/PS
P1	First Issue	24.01.25	MK/PS

Rev	Revision Description	Date	Author/Reviewer
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Project
 GLP Springfield Farm Lutterworth



Drawing Title
 Development Plateau Plan

Scale	Size	Drawn	Checked	Date
1:5000	A1	MK	PS	24/01/2025

Project	Originator	Zone	Level	Type	Role	Number	Rev
5824	CA	00	00	DR	A	00056	P2

