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ID

Rep
No:

Proposed Submission Draft

Harborough Local Plan 2020-2041

Representation Form



This form has two parts, A & B. Part A only needs to be completed once. Please complete Part B for each Policy you wish to comment on.

Please send completed forms by email to localplan@harborough.gov.uk or by post to: Strategic Planning, Harborough District Council, The Symington Building, Adam and Eve Street, Market Harborough, Leicestershire, LE16 7AG.

The consultation is open from 9am on Monday 10 March and closes at 9am on Tuesday 6 May 2025. Forms received after the closing date cannot be considered.

Part A: Part A only needs to be completed once

1. Personal details

Title

First Name

Last Name

Organisation
(where relevant)

Address Line 1

Address Line 2

Address Line 3

Post Code

Email



2. Agent's details (if applicable)

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
Email	<input type="text"/>

Part B:

Please complete a new Part B form for every Policy/Map/Paragraph you wish to comment on

Representation Form

You do not need to return this form if you have sent the same response using the Council's online form for this consultation. Duplicates will not be considered.

Which part of the Local Plan document does this representation relate to?

E.g. Paragraph/Policy/Map/Other

Policy DS02 and Strategic B8 Needs Sensitivity Report

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan is sound?

Yes No

Does it comply with the Duty to Cooperate?

Yes No

If you do not consider the Local Plan is sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Please give details below why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the statutory Duty to Cooperate, please also use this box to set out your comments

Summary

Nurton Development Ltd's (NDL) objection is limited to the amount of floorspace proposed for strategic distribution for large scale warehousing – 340,000 sqm – as set out in Clause 7 to Policy DS02 – Development Strategy: Creating Jobs and Diversifying the Economy. NDL contends that the projected need is an under-estimate. This is for two principal reasons: -

- Misinterpretation by the draft Local Plan of the principal related evidence base – Strategic B8 Needs Sensitivity Report, IcenI, December 2024 (the IcenI Report) – in respect of the quantum of the recommended projected need.
- Analysis and assumptions contained in the IcenI Report which are either flawed or not evidenced.

These two reasons are expanded on below under the heading of Analysis of Need. However, NDL contends that the projected need for large scale warehousing in the District should be a minimum of 623,000 sqm.

NDL does **not** object to the allocation of MP1 (15.8 ha) or MP2 (122 ha) at Magna Park. Magna Park is an obvious economic development success. It is an established business community, situated close to and accessible to existing main settlement in Lutterworth and Rugby, with a clear focus on the logistics and freight sectors. It is a logical and sustainable platform for future growth and has been rightly recognized by the draft Local Plan and associated evidence base as suitable for further strategic scale development.

The potential to extend Magna Park within the District east of the A5, beyond the two allocations of MP1 and MP2, is strictly limited. However, there is clear potential for strategic scale development for industry, logistics and freight on land west of Magna Park, directly the other side of the A5 on land principally within Rugby Borough.

In conjunction with GLP (the owners of Magna Park and promoters of MP1 and MP2), NDL is promoting a strategic scale site through the Rugby Local Plan review process (currently at Reg 18 stage). The site measures 166.62 ha and has the potential to accommodate over 500,000 sqm of industrial and distribution floorspace. This land is available, unconstrained, lies outside the Green Belt, and is uniquely well placed to meet any shortfall between need and supply of strategic scale distribution land. Assuming a projected need of 623,000 sqm (according to NDL's analysis), this shortfall will be in the order of 283,000 sqm.

Analysis of Need

It is not clear how the figure for need for strategic distribution of 340,000 sqm has been derived. The principal evidence base – the IcenI Report – recommends that 137 ha should be apportioned to Harborough District (Table 6.1) in the event that Hinckley SRFI is not delivered. Since the publication of the IcenI Report, the Secretary of State for Transport has confirmed the refusal of the DCO application for this scheme.

The IcenI Report derives land quantities (in hectares) by first deriving floorspace figures (in sqm). The land quantity is achieved by applying a plot ratio of 35% to the projected floorspace figures. This is confirmed at various places in the IcenI Report (paras 2.7, 5.11, 5.13, 5.31, 5.35 and Table 5.5). On this basis, the 137 ha of land apportioned to Harborough should be accommodating 479,500 sqm of floorspace. At the very least, this alternative figure should replace the 340,000 sqm figure referenced by Policy DS02, although for reasons set out below NDL still considers this to be an under-estimate.

Table 5.5 of the IcenI Report provides a useful summary of the net need for land to cover the plan period (2020 to 2041). It gives a breakdown of the four principal methodologies: -

- Gross Completions
- Net Absorption
- Net Absorption +8% Suppressed Demand
- Net Absorption +5% Suppressed Demand

For ease of reference, Table 5.5 is extracted and provided below.

Table 5.5 Demand-Supply Balance (Ha*)

	Gross Completions	Net Absorption	Net Absorption +8% Supressed Demand	Net Absorption + 5% Supressed Demand
Need (2020-41) sq.m	5,096,185	4,548,268	4,935,972	3,860,315
Need (2020-41) Ha	1,456	1,300	1,410	1,103
Recycling of stock	-368		-	
Completions (2020/21-23/24)	-359			
Commitments	-192			
Residual Need	537	389	859	552
Hinckley NRFI	-260			
Residual Need incl. Hinckley NRFI delivery	277	121	599	292

*plot ratio 0.35

The gross need for both the Gross Completions and Net Absorption methods has been reduced by an allowance for the Recycling of Stock (368 ha). However, in para 5.32 and 5.33 it is explained that this adjustment should only be made in respect of the Gross Completions method and not in respect of the Net Absorption methods. This is because Net Absorption methods “intrinsically capture the replacement of older stock”. If that is the case, then the Residual Need for the Net Absorption method should be 749 ha (i.e. 1,300 less 359 less 192) and not 389 ha.

In paragraph 5.36, it notes that the Gross Completions model is used as it represents a mid-point estimate between the Net Absorption model and high Suppressed Demand Adoption model. With the correction to the Net Absorption model, from 389 ha to 749 ha, this is no longer the case. Instead, as seen below, the gross Completions model now represents the lowest projection.

- Gross Completions – 537 ha
- Net Absorption – 749 ha
- Net Absorption +8% Suppressed Demand – 859 ha
- Net Absorption +5% Suppressed Demand – 592 ha.

The mean of these four estimates is 674 ha. The mid-point estimate between the highest and lowest estimates is 698 ha. NDL considers that the mid-point estimate of 698 ha represents a reasonable baseline figure.

Employing the apportionment rate of 25.5%, used by Table 6.1 of the Icen Report, this would derive a land need of 178 ha for Harborough (i.e. 698 x 0.255), as opposed to 137 ha. In turn, this would represent 623,000 sqm of floorspace required for Harborough District over the plan period assuming a plot ratio of 35%. This is 283,000 sqm greater than the projected need of 340,000 sqm referred by Policy DS02.

NDL considers that 623,000 sqm represents a realistic projected need for strategic distribution for the District. However, it is in all probability a minimum figure. This is for two principal reasons: -

- The assumption that the recycling of old stock will provide 368 ha of development land to net off the projected need under the Gross Completions model seems very high. It certainly has not been evidenced at Magna Park, which contains units older than 30 years, and enjoys a very low vacancy rate.
- No allowance has been made for the non-delivery of any of the committed supply of 192 ha which also nets off the gross need projections for all four models. Indeed, it appears that this supply has been taken at face value with no critical analysis as to its capacity or deliverability.

Land West of Magna Park

The land west of Magna Park is a logical extension to Magna Park. The Icen Report rightly recognises the importance of Magna Park to the local, sub-regional and regional economy and its success in attracting national and international companies to invest in this location. It is a centre of excellence for the logistics and freight sector and a self-sustaining business community in its own right.

The land west of Magna Park provides a strategic opportunity to build on this success. The extent of the opportunity, and its direct relationship with Magna Park, is illustrated on the attached site plan (with its boundaries marked in red). The land measures 166.62 ha (of which a strip of land running directly west of the A5 of 10.36 ha falls with Harborough District). It has the capacity to accommodate over 500,000 sqm of industrial and distribution floorspace.

The land is not constrained in terms of landscape, heritage, ecology and flooding. The land lies outside the Green Belt and is not designated or protected for any environmental reason.

The land is being actively promoted through the Rugby Local Plan review. The promoting partners, NDL and GLP, consider the site is well placed to meet the identified need for strategic scale warehousing for Coventry and Rugby. However, the site has capacity also to meet any unmet need from Harborough and is ideally located to absorb the additional unmet need of 283,000 sqm that NDL has identified.

Please specify the modifications needed to make the Local Plan sound/legally compliant
(Please note any non-compliance issue relating to the statutory Duty to Cooperate cannot be resolved through modification at examination).

Policy DS02 should be modified to refer to a “minimum of 623,000 sqm floorspace for Strategic Distribution for large-scale Warehousing” instead of “340,000 sqm”. This modification should follow a review of the Icen Report taking into account the points raised above.

The new requirement will require the identification of additional land to accommodate an unmet need of 283,000 sqm. Land west of Magna Park would be the most obvious commercial and sustainable location. NDL recommends that the District Council engages with Rugby Borough Council, through the Duty to Co-operate, to review and appraise this option.

If your representation is suggesting a modification do you wish to participate at the oral hearing part of the examination?

Yes No

If Yes - you wish to participate at the oral hearing part of the examination, please outline why you consider this to be necessary.

The representations cover issues of complexity which are best covered through participation at the relevant hearing sessions.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Do you wish to be notified?

When the Plan is submitted for independent examination?

When the Inspector’s Report is published?

When document is adopted?

**Please return completed forms no later than
9am on Tuesday 6 May 2025.**