

Representor 57

57/1/51/0



# LOCAL PLAN

Ref:  
  
(For official use only)

## Publication Stage Representation Form

### North West Leicestershire Local Plan Proposed Submission

Please return this form to North West Leicestershire District Council either by post:

Planning Policy, North West Leicestershire District Council, Council Offices, Whitwick Road, Coalville LE67 3FJ or email [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) no later than **5pm on 15 August 2016**.

This form has two parts-

**Part A** – Personal Details

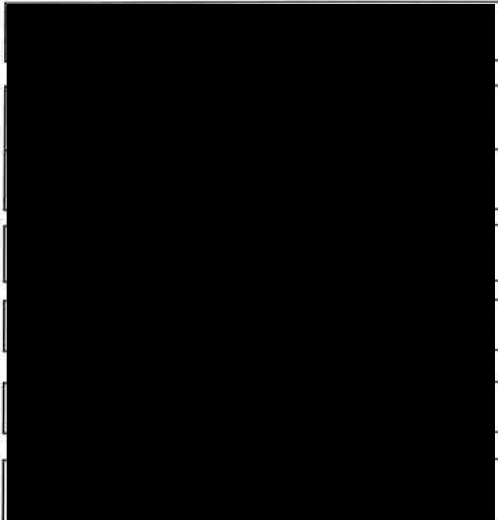
**Part B** – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details

#### 2. Agent Details

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Jason
Last Name	<input type="text"/>	Tait
Job Title <i>(Where relevant)</i>	<input type="text"/>	Director
Organisation <i>(Where relevant)</i>	St Modwen Developments	Planning Prospects
Address Line 1	c/o Planning Prospects	
Line 2	<input type="text"/>	
Line 3	<input type="text"/>	
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	
Email Address <i>(Where relevant)</i>	<input type="text"/>	

## **Part B - Please use a separate sheet for each representation**

### **Name or Organisation:**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)  Policy  Policies Map

4. Do you Consider the Local Plan is:  
*(Please tick as appropriate)*

- |  |     |  |    |  |
|--|-----|--|----|--|
| i) Legally Compliant                         | Yes | <input checked="checked" type="checkbox" value="x"/> | No | <input type="checkbox"/>                             |
| ii) Sound                                    | Yes | <input type="checkbox"/>                             | No | <input checked="checked" type="checkbox" value="x"/> |
| iii) Complies with the<br>Duty to co-operate | Yes | <input checked="checked" type="checkbox" value="x"/> | No | <input type="checkbox"/>                             |

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 duty to co-operate, please also use this box to set out your comments.

It is essential that the Plan provides for an appropriate level of employment growth and opportunity. Government policy strongly supports economic development and seeks to ensure the planning systems does all it can to support economic growth. The Plan recognises at paragraph 5.4 that it is "essential that there is a sufficient supply of land for future business needs in order to ensure that the local economy continues to grow".

Against the above, it is essential that the evidence base to support the Plan, including evidence of employment needs is up to date, yet it is evident that the assessment of economic needs used to underpin the plan was originally undertaken in 2008 and only updated in 2013 and is out of date. Further a new Housing and Economic Needs Assessment (HEDNA) is underway and could have significant, more up to date evidence for the plan to consider. This is more critical today where past trends could have been strongly influenced by the previous recession and the Plan needs to do all it can to plan positively for growth.

A detailed assessment of specific concerns in this regard is set out in a Report by Regeneris for St Modwen. Regeneris are leading specialist in economic assessments in planning and development and highlight a number of concerns in respect of the evidence which supports

the Plan's proposed requirement of 96ha of employment land for the plan period not least;

- The out dated evidence base which is not fully comprehensive in terms of its assessment of future needs
- The potential for more up to date forecasts to highlight a greater need for land and the used assumptions and forecasts are not defensible or sound.
- The likelihood of the 96ha being a limiting factor in achieving local and strategic economic growth aspirations
- The misalignment of the housing and employment requirements which contrary to the Issues identified in Section 4 of the Plan could act as a constraint to sustainable development

Reference is made in Policy S1 to the provision of 96ha of employment land for the Plan period. The justification for this level of employment land provision has not been fully justified in the Plan or supported by sound and up to date evidence. Paragraph 158 of the NPPF states that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing and relevant to our concerns here, employment uses, are integrated, and that they take full account of relevant market and economic signals. Paragraph 161 highlights that assessments should identify the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period.

Whilst Policy S1 seeks to respond to the out of date nature of the evidence and the current review of needs by offering an early review of the Plan it doesn't justify the progression of an unsound evidence base and Plan. Progress on the Plan should await up to date evidence of employment needs. Alternatively, additional sites should be identified and added flexibility included in the Plan such that the lengthy and time-consuming process of an early review can be avoided. If a review of the Plan is found to be the only acceptable way forward in the absence of up to date evidence of need, then a timeframe for the Review and its terms and triggers are essential and should be more clearly explained in the Plan. The concerns here also bring into focus the need for a greater degree of flexibility in the Plan to provide and/or support opportunities for further economic growth as future needs are evident or delivery on sites included in the Plan and supply stall or are delayed. This is a matter which is highlighted in further representations in respect of the Implementation and Monitoring Section of the Plan.

*(Continue on a separate sheet/expand box if necessary)*

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The 96 ha requirement for employment land should be increased.

The evidence base to support the plan should be updated to more appropriately reflect the

need for employment land.

The terms of reference and triggers for an early review of the Plan should be set out and greater emphasis and flexibility should be given to supporting further additional economic and employment growth where opportunities come forward with updated evidence of need.

*(Continue on a separate sheet/expand box if necessary)*

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination.

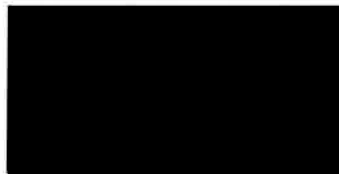
**Yes**, I wish to participate at the oral examination

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

The representations raise detailed and complex matters which interrelate to other representations and we believe that the Inspector would benefit from exploring and understanding our representations further and orally at the Examination

**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.

9. Signature:



Date:

**regeneris**

ECONOMICS · RESEARCH · ANALYSIS

North West Leicestershire  
Employment Land and Policy  
Review

A Report by Regeneris  
Consulting

# North West Leicestershire Employment Land and Policy Review

8 August 2016

Regeneris Consulting Ltd  
[www.regeneris.co.uk](http://www.regeneris.co.uk)

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## Executive Summary

- i. St. Modwen is seeking the allocation of employment land for a proposed Commercial Park south of Junction 1 of the A50. Regeneris Consulting have reviewed the Council's employment land policies and evidence base of their publication version of the North West Leicestershire Local Plan.
- ii. In relation to the draft Local Plan employment land policies, we make the following observations:
  - The requirement for 96 ha of employment land set out in the draft Local Plan is likely to be a limiting factor in achieving local and strategic economic growth aspirations.
  - The draft Local Plan requirement for 96 ha of employment land is misaligned with the Council's housing provision target and therefore likely to act as a constraint to sustainable development
  - The supply of employment land set out in the draft Local Plan (commitments of 127.04 ha) does not adequately reflect the current deliverability and availability of employment land. A more realistic review of the supply situation indicates a much lesser level of available supply and therefore indicates that Policy Ec2 of the draft Local Plan is inadequate in quantity to address the shortfall in supply.
- iii. A review of the evidence base underpinning the Council's employment land policies has revealed the following:
  - The evidence base is not fully comprehensive in its assessment of future need.
  - The data and forecasts used within the evidence base, and therefore relied on to inform the Plan requirement for 96 ha, are outdated.
  - The evidence base is not clear and transparent in all of its assumptions and forecasts and therefore not robustly defensible or sound.
- iv. The findings above are supportive of the site's allocation in the Local Plan, which would contribute to a deliverable supply and ensure a sound Local Plan which identifies sufficient land for employment development.



# 1. Introduction

- 1.1 Regeneris Consulting has been commissioned by St. Modwen to review North West Leicestershire Council's employment land evidence and the provisions made for employment land in the district's proposed Publication Version Local Plan (June 2016). This report has been prepared to assist St. Modwen in their representations to the Local Plan consultation.
- 1.2 St. Modwen is seeking the allocation of employment land south of Junction 1 of the A50 for a proposed commercial park development. This review of the Council's employment land evidence contributes to St. Modwen's case for the site's allocation in the Local Plan.
- 1.3 The report is structured as follows:
- Local Plan Employment Land Policies – a review of the draft Local Plan employment land policies
  - Evidence Base – a review of the evidence base which underpins the Council's employment land policies.

## 2. Local Plan Employment Land Policies

- 2.1 The North West Leicestershire Local Plan Publication Version (the draft Local Plan) was published for public consultation in June 2016 and sets out the Council's proposed planning policies up to 2031.
- 2.2 Paragraph 5.4 of the draft Local Plan states the District employment land requirement is 96 ha for the plan period. Section 8, Table 5 of the Local Plan then sets out the position of the 'current employment land provision' (see table 2.1 below).

Table 2.1 Draft Local Plan Employment Land Position

Requirement 2011-31	96 ha	A – this is the figure determined by the PACEC Employment Land Study <sup>1</sup> , although the Council have adjusted it to include a conversion of B1a floorspace (sq m) to hectares
Starts 2011-15	7.75 ha	B – this is based on the council's annual monitoring data
Commitments	127.04 ha	C – This figure is derived from Table 4 of Background Paper 6 <sup>2</sup>
Residual requirement (A-B-C)	-38.79 ha	D
Allowance for potential loss of employment land	45 ha	E – this is the Council's own assumption based on the amount of land lost to housing in recent years.
Residual requirement (D-E)	6.21	

Source: NW Leicestershire Local Plan Publication Version, June 2016, Section 8, Table 5

- 2.3 In summary, the employment land position is a residual requirement for an additional 6.21 ha of employment land based on a requirement for 96 ha and a supply of 127.04 ha taking account of starts and allowances for potential losses.
- 2.4 Having stated the current employment land position, the Plan sets out three key policies in relation to employment land, as follows:
- **Ec1 Employment provision: permissions** – seeks to protect sites EC1a-Ec1f that have existing outstanding permissions and renew them where permissions may lapse, subject to deliverability.
  - **Ec2 Employment allocations: new allocations** – In order to address the residual requirement identified in Table 2.1 above, the Plan seeks to make a new allocation of up to 16 ha on land north of Ashby de la Zouch (Money Hill). This proposed allocation is based on an assessment of sites set out in the Council's Employment Land Availability Assessment (2013/14).
  - **Ec3 Existing employment areas** – seeks to protect and retain the Council's existing Primary Employment Areas
- 2.5 We question the robustness of the employment land position on which the above policies are based for the reasons summarised below.

<sup>1</sup> Leicester and Leicestershire HMA Employment Land Study, PACEC, January 2013

<sup>2</sup> North West Leicestershire Local Plan Publication Stage Background Paper 6

The requirement for 96 ha of employment land stated in the draft Local Plan is likely to be a constraint to achieving economic growth aspirations at both the local and strategic level.

- 2.6 The Plan acknowledges that the strategic employment developments and job opportunities within the district are of *'considerable importance to the wider regional economy'* (para 8.7). It notes that B use class jobs *'are by far the most significant sector for job opportunities and the creation of prosperity'* (para 8.16). The Plan also refers to the recently published Local Growth Plan<sup>3</sup> (LGP), which sets out the growth priorities for the District for the period 2014-2018. Key targets set out within the LGP include creating over 15,000 new jobs within the District; halving youth unemployment; and increasing female participation and wage rates to the regional average.
- 2.7 The LGP supports the Leicester and Leicestershire Strategic Economic Plan (SEP) which was submitted in March 2014. Amongst other things, this seeks to deliver projects and investments that will generate an additional 45,000 private sectors jobs over and above what is forecast within the Office for Budget Responsibility (OBR) employment estimates. It also seeks to reduce levels of unemployment by 50% and support 15,000 businesses to accelerated growth and support 1,000 new business starts.
- 2.8 It is acknowledged within the draft Local Plan that the LGP target of 15,000 new jobs is higher than the figure underpinning the requirement for 96 ha of employment land on the basis that it post-dates the recession and takes account of employment growth from strategic developments that have occurred within the district. It is also acknowledged that the Council's evidence base in relation to employment land requirements *'does not make sufficient allowance for jobs in the B8 sector'* (Local Plan Publication Version, para 5.6).
- 2.9 The delivery of the targets set out in the both the LGP and SEP rely on the District being able to deliver employment development opportunities that are commensurate in both quality and quantity with the number and type of jobs the district is aiming to support.
- 2.10 The draft Local Plan does not make any more specific reference to the number of jobs that it is planning for and refers only to the requirement for 96 ha of employment land, which is underpinned by a jobs target that is **lower** than that of the both of the LGP and the SEP.

The draft Local Plan requirement for 96 ha of employment land does not take account of the linkages between housing provision and economic growth and may therefore act as a constraint to sustainable development.

- 2.11 The linkages between a competitive economy and a strong and vibrant community are recognised at the national level through the National Planning Policy Framework (NPPF). The NPPF asserts that the economic, social (including housing provision) and environmental roles of the planning system *'should not be undertaken in isolation, because they are mutually dependent'*. It goes on to note that in order *'to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system'* (para 8).
- 2.12 The evidence base on which the above employment land policies are based pre-date the June 2014 publication of the Leicester and Leicestershire Strategic Housing Market Assessment (LLSHMA) as well as the Council's 'Review of Housing Requirements 2011-2031, JG consulting'.
- 2.13 The first of these documents identified an objectively assessed housing need for North West Leicestershire of between 285 and 350 dwellings per annum (dpa). The upper range of this

<sup>3</sup> North West Leicestershire Local Growth Plan 2014-2018

requirement 'would support stronger delivery of both market and affordable housing taking account of the need for affordable housing and market signals and support proportionate economic growth'. The employment forecasts<sup>4</sup> used by the LLSHMA to inform the housing requirement were more up to date and more optimistic than those used in the Council's employment land evidence base and anticipated that North West Leicestershire would see employment growth of 17.4% in the period 2011-2031, second only in terms of growth levels within the remaining HMA authorities to Harborough (20.7%).

Table 2.2 North West Leicestershire Employment Forecasts

	2011	2031	% Change	Annual Change
Experian autumn 2013 forecasts (LLSHMA)	59,045	69,341	17.4%	515
	2010	2031	% Change	Annual Change
PACEC forecasts	56,300	65,700	16.7%	429

Source: PACEC Employment Land Assessment, January 2013; LLSHMA June 2014

- 2.14 The second of these documents was commissioned by the Council in recognition that the housing requirement identified in the LLSHMA may not adequately reflect the economic development activities of the district, particularly when taking into consideration the impact of strategic developments such as the Strategic Rail Freight Interchange (SRFI). This document provided an update of the demographic projections used to inform the housing requirement and took account of the housing needs resulting from the likely increase in employment levels associated with the SRFI. The document concluded a requirement of 520 dpa (10,400) for the District up to 2031 and this figure has been put forward within the Local Plan. This is well above the upper range set out in the LLSHMA and therefore reflective of significantly higher levels of employment growth than anticipated in the employment land requirement.
- 2.15 In spite of this, there has been no re-visit of the employment land requirement of 96 ha for the purposes of the publication version of the Local Plan. We understand the Council has recently commissioned a Housing and Economic Development Needs Assessment (HEDNA) which will identify new housing and employment requirements. The study has been scheduled for completion in September 2016<sup>5</sup> but for the time being, the employment land requirement **remains misaligned** with the District's housing target.

The supply of employment land set out in the Local Plan (commitments of 127.04 ha) does not adequately reflect the deliverability and availability of employment land.

- 2.16 Table 2.1 above details the Council's employment land position set out in the draft Local Plan Publication version and includes a commitments figure (e.g. available supply) of 127.04 ha. The detail behind this figure is provided in Table 4 of the draft Local Plan Publication Stage Background Paper 6 which lists sites within the Council's employment land portfolio and comprises outstanding planning commitments and employment land allocations and provides an update to the supply picture set out in the Council's 2013 Employment Land Assessment.
- 2.17 Unlike the Employment Land Assessment, there is no attempt to assess or rate the sites listed in Table 4 in terms of their deliverability or suitability to meet the various types of employment land demand arising from B1, B2 and B8 uses. This therefore fails to assess the employment land

<sup>4</sup> Experian autumn 2013 employment forecasts

<sup>5</sup> North West Leicestershire Local Plan Publication Stage Background Paper 1

position in qualitative terms, which is contrary to Planning Practice Guidance. It is also not clear therefore, whether there is an adequate supply of land for warehousing, for example, to meet the future requirements set out in the Council's Employment Land Assessment. Furthermore, it is not clear whether there is an adequate supply of warehousing land given that the Council acknowledge in their Local Plan publication version that the forecast demand for B8 requirements does not adequately reflect jobs in the B8 sector (see para 2.8 above).

- 2.18 St. Modwen have taken advice from Knight Frank, leading commercial real estate advisors and property market consultants, and together with their own considerable knowledge of employment land delivery, have undertaken a review of the sites included in Table 4 of Background Paper 6 and provided an update on their status in terms of availability and/or deliverability (see Table 2.3 below).

Table 2.3 NW Leicestershire Employment Land Supply Position

Site Name	Site Area (Ha)	Use Class	Comments	Residual Site Area (Ha)
Battleflat (Interlink)Bardon	1.77	B1,2,8	Goodmans have speculatively developed this site with 130,000 sq ft and it is currently under offer	0
Lounge Disposal Point Ashby*	25.5	B8	Proposed HS2 route, intersects part of site including entrance to site, which is now in the safeguarding zone.	12.64
West of Smisby Road (Ivanhoe Business Park) Ashby	5.8	B1,2,8	Mixed use business park for small-medium size development. Pre-lets / sales to Fisher German, Children's Day Nursery, Woodward Vets and DADC Office Solutions.	2.5
Ashby Business Park	6.57	B1,2	Proposed 235,000 sq ft single unit building. Site currently marketed as a development plot on 3.54 hectares.	6.57
East Midlands Distribution Centre Castle Donington	20.39	B8	Site part-committed through pre-lets. Plot 1 (550,000 sq ft on c. 11.33 hectares and Plot 5a (115,000 sq ft on c. 3.43 hectares).	14.76
Pegasus Business Park East Midlands Airport	10	B1	Site currently being marketed.	10
Swainspark Albert Village	2.11	B1,2	Not relevant to industrial uses	2.11
Rear of Charnwood Arms Bardon*	1.14	B1 offices	Site currently being marketed.	1.14
Beveridge Lane Ellistown*	25	B2, 8	Site fully committed through pre-let of 1.05m sq ft and spec build units of 314,500 sq ft and 63,000 sq ft. Pre-let to Amazon for 1.05 million sq ft, with spec units under construction in 2016.	0
Off Beveridge Lane/South Lane Bardon*	3.88	B1,2,8	Land has been fully committed by spec build and currently being marketed.	0
Land at Sawley Crossroads*	24.88	B1,8	Sold to Aldi Stores Ltd in Oct 2015 for a new bespoke distribution centre. Phase 1 committed c. 13 hectares, phase 2 future expansion c. 11.88 hectares.	0
<b>Total</b>	<b>127.04</b>			<b>49.72</b>

Source: NW Leicestershire Local Plan Publication Background Paper 6; Knight Frank August 2016

- 2.19 A realistic review of available employment land results in a substantial reduction in the overall quantity of available supply, reducing it from 127.04 ha to 49.7 ha (-61%) and therefore falling short of the requirement for 96 ha of employment land. This would result in a residual requirement significantly greater than the 6.21 ha set out in the Local Plan and implies that the proposed allocation of 16 ha of new employment land set out within Policy Ec2 of the Local Plan is **inadequate** to address this shortfall.

### 3. Evidence Base

- 3.1 Paragraph 5.4 of the Local Plan Publication version states: *'It is essential that there is a sufficient supply of land for future business needs in order to ensure that the local economy continues to grow. We have had regard to work undertaken on behalf of the Leicester and Leicestershire Enterprise Partnership in 2013 by the Public and Corporate Economic Consultants (PACEC) on this matter. This identified that up to 2031 there would be 5,600 employment jobs created (that is those uses which fall within the B Use Class of the Use Classes Order 2015). This then translates in to a need for about 96 hectares of land for employment. This is the basis upon which the employment land needs of the plan are based'*.
- 3.2 The Leicester and Leicestershire Employment Land Study, PACEC, January 2013 (ELA) was undertaken by PACEC, Lambert Smith Hampton and Warwick BML who were commissioned by the Leicester and Leicestershire Enterprise Partnership (LLEP) to undertake an update of the 2008 Employment Land Study in order to inform the emerging Local Plan policies. The study provides an assessment of the future demand for employment land, updates the supply of employment land and identifies gaps or surpluses in supply. The study provides data and analysis at the district, PUA and HMA level and makes recommendations for phasing, allocations and measures to protect and bring forward employment sites.
- 3.3 In reviewing this document, we have focussed on the assessment of future need (96 ha) set out within the ELA. The supply assessment within the ELA has been superseded by the Council's Local Plan publication version Background Paper 6, which we have already discussed above (para 2.16).

#### Evidence Base: Future Need

The evidence base is not fully comprehensive in its assessment of future need

- 3.4 The ELA states that the forecasts of floorspace and land requirements are based upon the methodology set down within the ODPM 2004 Employment Land Review Guidance Note. On this basis, the land requirements are derived from sectoral employment forecasts (labour demand) produced in-house by PACEC and also take account of demand arising from renewal and pipeline allowances.
- 3.5 The ODPM 2004 Employment Land Review Guidance Note was withdrawn in March 2014 and has been superseded by Housing and Economic Development Needs Assessments (HEDNA) Planning Practice Guidance. The Planning Practice Guidance asserts that *'local authorities should develop an idea of future needs based on a range of data which is current and robust'*. It goes on to suggest Plan makers should consider:
- *'Sectoral and employment forecasts and projections (labour demand);*
  - *Demographically derived assessments of future employment needs (labour supply techniques);*
  - *Analysis based on the past take-up of employment land and property and/or future property market requirements;*
  - *Consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics'*
- 3.6 Although the Planning Practice Guidance was not available at the time of the undertaking of the ELA, the above approaches were also recommended by the former Employment Land Review Guidance Note (ODPM). The ELA focuses on the first of these points (labour demand) with no

explanation or justification for ruling out other approaches. As a consequence, the derived figure of employment land need is at risk of being misaligned with sustainable economic development associated with future housing requirements (labour supply) as well as out of kilter with actual market demand and take-up. The first of these issues (labour supply) is also discussed above at paragraph 2.12 where we highlight that the level of proposed housing growth is based on economic and employment growth that far exceeds that set out within the Local Plan employment land requirement.

The data and forecasts used within the evidence base, and therefore relied on to inform the Plan requirement for 96 ha, are outdated.

3.7 The forecasts of future employment and floorspace requirements used within the study are based on several data components and assumptions which are now out of date and reflective of a different set of economic and market circumstances. This is acknowledged within the Local Plan itself (see paragraph 2.8 above) but has not been addressed in the proposed employment land requirement figure. The key issues can be summarised as follows:

- The ELA uses historic employment data up to 2010 to help inform the employment forecasts. Data is now available up to 2014 and more likely to reflect the post-recession phase.
- The ELA uses national level GDP forecasts to inform the forecasts for individual employment sectors. More up to date forecasts are now available and will better reflect the post-recession period.
- The study uses the HCA's 2010 2<sup>nd</sup> edition Employment Densities Guide to translate employment growth to floorspace requirements. A 3<sup>rd</sup> edition has since been published in November 2015 which takes account of changing working practices across the various employment sectors as well as the variations in densities across specific sectors within each use class.
- Whilst the ELA does consider the commercial property market to some degree, the analysis of the property market was undertaken towards the end of the market down turn and has not been updated for the purposes of the Local Plan publication version. A more recent market outlook, focussing on the industrial and warehousing sector across the Midlands, by Knight Frank, highlights the importance of maintaining an up to date picture of the commercial property market when planning for future requirements.

Table 3.1 Industrial and Logistics Market Summary, August 2016

Overall market outlook	-	Five year average (2011-2015) take-up of 11.59 million sq ft per annum and an upward trend over this period
	-	Growth in retail is driving take-up levels accounting for over 1/3 <sup>rd</sup> of all take-up in 2015
	-	New build space accounted for around 54% of take-up in 2015
	-	There has been significant transaction activity across the East Midlands over the past couple of years, including some of the District's employment land supply sites, which has resulted in a shortage of supply across the region
Demand	-	Knight Frank are currently tracking in excess of 4 million sq ft of requirements equating to 81 ha of land in the East Midlands
	-	Of the current supply, over 3 million sq ft is currently under offer

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Supply	<ul style="list-style-type: none"><li>- A lack of supply has led developers to bring forward a number of sites for speculative development in Leicestershire. These include four buildings in excess of 200,000 sq ft and are expected to trade within the next 6-12 months.</li><li>- A lack of supply means any major occupier with a sizeable requirement in the area would therefore need to consider new build sites to satisfy their requirement in the region.</li><li>- The total supply of space is equivalent to approximately 9 months take-up</li></ul>
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Source: Knight Frank, August 2016

- The ELA precedes the update to Permitted Development Rights (PDR) legislation and the employment land requirement therefore does not take account of the recent and ongoing impacts of PDR on the stock of employment floorspace.

The evidence base is not clear and transparent and therefore not robustly defensible in all of its assumptions and forecasts

3.8 In order to derive the future requirements for employment land the ELA makes a number of necessary assumptions to translate expected employment growth into floorspace and land requirements. However, in a number of cases these assumptions are not explicit and/or have not been scenario tested. Both the 2004 ODPM Employment Land Review Guidance Note and the updated Planning Practice Guidance suggest that deriving a range of future requirements based on a variety of methods and scenario testing is a more robust approach to take. The key issues can be summarised below:

- As already noted above, there is no Justification for the ELA's sole use of the labour demand approach versus the other recommended approaches of labour supply and past trends.
- The ELA converts the forecast employment growth by individual SIC codes to B use classes (B1-B8). This is a standard step necessary to create a picture of future requirements. However, the conversion matrix is not included in the published study leaving us unable to confirm the robustness of the approach.
- Historic employment data sets and data on self-employment, both of which form a key component of the employment forecasts, is also excluded from the published study.
- The ELA bases its assumptions on converting employment to floorspace on the 2<sup>nd</sup> edition HCA Employment Densities Guidance. The 3<sup>rd</sup> and more recent edition emphasises the variety of densities across different sectors within each use class as well as the continual change in working practices. The sensitivity of the overall requirement to the assumed employment densities is therefore high and should have been scenario tested.
- Likewise, the ELA makes a number of assumptions in relation to the level of demand arising from renewal requirements as well as the need to maintain a pipeline of supply for choice and flexibility. Whilst we concur that these are necessary steps to take, the overall requirement is highly sensitive to these assumptions and therefore warrants scenario testing.



## North West Leicestershire Employment Land





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Representor 57

57/2/EC1/0



## LOCAL PLAN

Ref:

(For official use only)

### Publication Stage Representation Form

#### North West Leicestershire Local Plan Proposed Submission

Please return this form to North West Leicestershire District Council either by post:

Planning Policy, North West Leicestershire District Council, Council Offices, Whitwick Road, Coalville LE67 3FJ or email [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) no later than **5pm on 15 August 2016**.

This form has two parts-

**Part A** – Personal Details

**Part B** – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

#### Part A

##### 1. Personal Details

##### 2. Agent Details

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title		Mr
First Name		Jason
Last Name		Tait
Job Title <i>(Where relevant)</i>		Director
Organisation <i>(Where relevant)</i>	St Modwen Developments	Planning Prospects
Address Line 1	c/o Planning Prospects	4 Mill Pool
Line 2		Nash Lane
Line 3		Belbroughton
Line 4		Worcestershire
Post Code		DY9 9AF
Telephone Number		01526 734090
Email Address <i>(Where relevant)</i>		Jason.tait@planningprospects.co.uk

## **Part B - Please use a separate sheet for each representation**

### **Name or Organisation:**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)  Policy  Policies Map

4. Do you Consider the Local Plan is:  
*(Please tick as appropriate)*

- |  |     |                                |    |                                |
|--|-----|--------------------------------|----|--------------------------------|
| i) Legally Compliant                         | Yes | <input type="text" value="x"/> | No | <input type="text"/>           |
| ii) Sound                                    | Yes | <input type="text"/>           | No | <input type="text" value="x"/> |
| iii) Complies with the<br>Duty to co-operate | Yes | <input type="text" value="x"/> | No | <input type="text"/>           |

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 duty to co-operate, please also use this box to set out your comments.

St Modwen's representations elsewhere have highlighted significant concerns about the robustness and justification for the plan only providing for 96ha of employment land. Without prejudice to those concerns about the overall amount of employment land provided for, St Modwen also have concern that the supply identified in terms of both permissions and addition allocation will not appropriately support the economic objectives of the Framework, the Strategic Economic Plan (SEP) or the aims and objectives of the Plan itself. Separate representations are set out in respect of Policy EC2 including highlighting the opportunity for additional, high quality, market focused and deliverable employment land to be identified south of J1, A50.

Paragraph 161 of the NPPF requires that Local Planning Authorities in preparing Local Plans should ensure the existing and future supply of land available for economic development is sufficient and suitable to meet the identified needs. It specifically requires a review of land available for economic development to be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land and relevant here we suggest sites with permission or commitments which are heavily relied upon to meet needs.

A detailed assessment of specific concerns in this regard is set out in a Report by Regeneris for St Modwen. Regeneris are leading specialist in economic assessments in planning and development and highlight a number of concerns in respect of the deliverable supply of land for employment in the District. Reference is made to the supporting evidence base however a number of concerns arise, not least;

- The supply of land set out in the draft Plan and supporting evidence (allocations and permissions) of 127 ha does not adequately reflect the current deliverability and availability of employment land.
- A more realistic assessment of the supply indicates a much less level of available supply with deliver and availability of land within those sites identified with permission being less.
- Both policies Ec1 and 2 are inadequate to provide for a quantity of employment land to meet needs
- There is a greater shortfall in supply than suggested in the Plan.

In setting out these concerns and noting Table 5 which sets out the overall employment land calculation at 1/10/15, St Modwen are already contesting that the need is greater than 96 ha. Further however we would highlight that starts to employment land since 2011 at 7.75 ha is low and that a greater amount, range and choice of employment sites is needed to increase take up and ensure that the planned level of employment land in the District is delivered in the Plan period. Commitments do not currently amount to a deliverable and market focused supply of 127 ha. The residual requirement is greater if the need is in excess of 96 ha and/or the supply less than 127 ha. The allowance for the potential loss of employment land is supported and its appropriate that a cautionary approach is taken to this figure, particularly given past trends and the nature of some existing out dated employment areas. Additionally, however greater consideration could be given to the potential for lapse or non-delivery of sites. A number of sites have the potential not to deliver during the plan period, may lapse or stall. Whilst Policy Ec1 gives support to renewal of permissions, this does not necessarily add any further confidence or certainty to delivery. The extent of take up versus requirement is evidence in itself that there is considerable potential for the delivery on some sites to be delayed.

St Modwen also believe that it is critical that there is a rolling supply of employment land in order to support needs throughout the plan period. Reference is made in Policy Ec1 to the extant planning permission for the proposed Strategic Rail Freight Interchange at Junction 24 of the M1 which has been granted planning permission through the Nationally Significant Infrastructure Project process. Whilst the development has the potential to deliver a significant number of jobs, it is a development which also requires considerable up front infrastructure improvement and commitments. It is supporting economic needs well beyond NWL and over a period well beyond this Plan period. Its employment proposals are focused upon a specific rail connected sector (and scale/size of units) and national need in this regard and therefore its contribution to meeting the more diverse and general economic and employment needs of NWL are somewhat more limited particularly in the early and middle phases of the Plan period. Equally there are some sites within the supply of permissions which are currently stalled or face problems in delivery, again particular in the early period of the plan. Greater provision is needed to ensure a sound and ongoing deliverable range of employment sites throughout the plan period, including early years.

*(Continue on a separate sheet/expand box if necessary)*

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The likely delivery and provision of employment from sites with planning permission should be reviewed more critically to understand fully the likely level of employment which could realistically be delivered through the plan period including providing an appropriate rolling supply throughout the phases of the plan.

A greater level of supply is needed in order to ensure the identified employment needs are met, particularly in the early and middle years of the Plan.

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9. Signature:



Date:

15/8/16

Representor 57

57/3/1m1/0



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First Name	<input type="text"/>	Jason
Last Name	<input type="text"/>	Tait
Job Title <i>(Where relevant)</i>	<input type="text"/>	Director
Organisation <i>(Where relevant)</i>	St Modwen Developments	Planning Prospects
Address Line 1	c/o Planning Prospects	
Line 2	<input type="text"/>	
Line 3	<input type="text"/>	
Line 4	<input type="text"/>	
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	
Email Address <i>(Where relevant)</i>	<input type="text"/>	

**Part B - Please use a separate sheet for each representation**

**Name or Organisation:**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)  Policy  Policies Map

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*(Please tick as appropriate)*

- |  |     |                                |    |                                |
|--|-----|--------------------------------|----|--------------------------------|
| i) Legally Compliant                         | Yes | <input type="text" value="x"/> | No | <input type="text"/>           |
| ii) Sound                                    | Yes | <input type="text"/>           | No | <input type="text" value="x"/> |
| iii) Complies with the<br>Duty to co-operate | Yes | <input type="text" value="x"/> | No | <input type="text"/>           |

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The Implementation and Monitoring section of the plan is particularly critical in the context of wider representations from St Modwen about the overall level of employment land which is planned for. Commitment to an early review of the Plan is set out in Policy S1 and this is important with the need for additional clarification on triggers and mechanisms for review. Policy IM1 also seeks to respond to circumstances where delivery rates fall short of that which has been anticipated and this is particularly important for employment land provision. Criterion (3) of Policy IM1 sets out responses to these circumstances but should also be extended to include a review or partial review of the Plan; providing a positive and flexible approach to the consideration of additional windfall opportunities even where conflict with other policies of the plan may occur.

*(Continue on a separate sheet/expand box if necessary)*

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duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Further flexibility could be included in Policy IM1 to positively respond to windfall opportunities and additional employment sites even where conflict with other aspects of the Plan may exist.

(Continue on a separate sheet/expand box if necessary)

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Date:

15/8/16



Representor 57

57/4/03/0



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First Name	<input type="text"/>	Jason	<input type="text"/>
Last Name	<input type="text"/>	Tait	<input type="text"/>
Job Title <i>(Where relevant)</i>	<input type="text"/>	Director	<input type="text"/>
Organisation <i>(Where relevant)</i>	St Modwen Developments	Planning Prospects	<input type="text"/>
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Post Code	<input type="text"/>		<input type="text"/>
Telephone Number	<input type="text"/>		<input type="text"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>		<input type="text"/>

**Part B - Please use a separate sheet for each representation**

**Name or Organisation:**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	<input checked="" type="checkbox"/> Profile (Section 3)	Policy	<input type="checkbox"/> Issues, Vision and Objectives (Section 4)	Policies Map	<input type="checkbox"/>
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4. Do you Consider the Local Plan is:  
*(Please tick as appropriate)*

i) Legally Compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

In general, the vision and objectives are supported however we have some concerns that the aspirations and objectives in respect of employment and economic development underplay its importance and are misaligned with the NPPF. Section 1 of the NPPF sets out policy to build a strong and competitive economy. Paragraph 18 states "the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future".

Paragraph 19 of the NPPF is particularly relevant as it states "the Government is committed to ensuring that the planning system does everything it can to support economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system". Paragraph 20 goes onto state that "to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> Century".

The NPPF also seeks to ensure that business is given every advantage to grow and in paragraph 21 it states that “investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing”. It further adds that local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; further it should support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs and to allow rapid response to changes in economic circumstances.

The plan at section 3.1 does recognise that NWL enjoys a highly accessible position in the centre of the country with good road links and access to a growing international airport which has proved attractive to investors and seen recent high levels of employment. It also notes a particular specialism in the transport and logistics sectors which is unsurprising. Yet the “issues” identified under Table 1, section 4.2 merely suggest that for employment and economic development the issue is one of complementing economic growth with housing growth. Whilst this is a planning matter, a key issue for the Plan, aligned with the Framework should be the aim to support economic growth through the plan; proactively meeting economic needs of business and do everything it can to support economic growth. These are the appropriate Framework references and should be reflected in the issues. They should also be reflected in the Objectives, adding further emphasis to the importance of economic development within Objective 5, which merely expresses support for economic growth.

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The “Issues” identified under Table 1, section 4.2 should be more closely aligned with the more positive and proactive terms of the Framework and aligned to support economic growth through the plan; proactively meeting economic needs of business and do everything it can to support economic growth. The Objectives including Objective 5, should add further emphasis to the importance of economic development.

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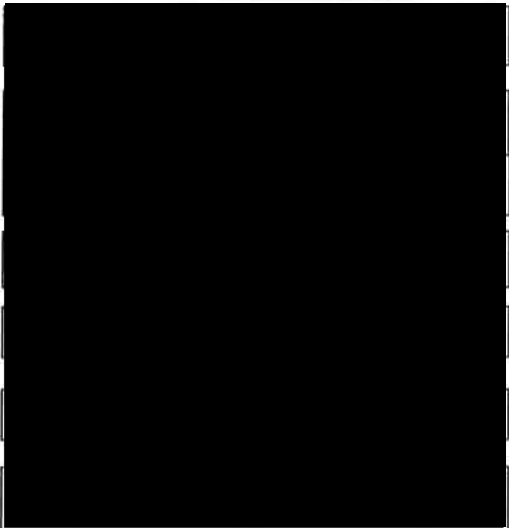
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Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="Director"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="St Modwen Developments"/>	<input type="text" value="Planning Prospects"/>
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**Part B - Please use a separate sheet for each representation**

**Name or Organisation:**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	Profile (Section 3)	Policy	Issues, Vision and Objectives (Section 4)	Policies Map	
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i) Legally Compliant	Yes	x	No	
ii) Sound	Yes		No	x
iii) Complies with the Duty to co-operate	Yes	x	No	

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Date:

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Representor: 57  
57/G/EC2



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The allocation of merely 16 ha of additional employment land at Money Hill is insufficient to meet the needs for employment development in the District over the Plan period. St Modwen's representations elsewhere to the Plan have highlighted that the evidence base supporting the plan's need for employment land is not up to date, the current suggested supply of land for employment is not robust, there is a more limited range of employment opportunities in the District than suggested, particularly over the short to medium term and additional flexibility is essential for the plan to do all it can to support economic development in line with NPPF requirements. An additional allocation of land is needed.

St Modwen suggest the allocation of land south of Junction 1 of the A50. The site is identified on the Site Location plan A001 attached. The site extends to 40 ha (gross), 32 ha (net) with the potential to provide up to 150,000 sq m of additional employment development over the plan period focused upon the B1(c), B2 and B8 sectors. The summary case for the allocation of the site is set out in the attached Planning Promotional Document. The site and proposed development is suitable, available and achievable for employment development which will support the need for employment in the District and in particular;

- The proposed development is positioned in a location which is highly attractive to the market and the development will be strongly deliverable during the plan period
- There are no constraints to the site's development moreover;
  - The site has limited and contained landscape impacts
  - The site can be accessed from the local and strategic highway network with limited impacts
  - The site is sustainably located in accessibility terms and would be developed alongside a Travel Plan
  - There are no ecological impacts which could not be otherwise be mitigated
  - The site can be developed with a comprehensive flood risk and drainage strategy with the provision of flood defences which will provide significant, wider sustainable public benefits by bringing a large number of existing more vulnerable residential properties out of risk of flooding for the first time whilst also reducing risk of flooding to the proposed development.
- The site's location aligns closely to the aims and objectives of the Strategic Economic Plan (SEP) and the general East Midlands Enterprise Gateway focused on the A50/M1 around junctions 24 and 24a.
- It also aligns with the SEP's aim to create 45,000 new jobs and £2.5bn of investment in the region to 2020 given its significant potential for early delivery. In the absence of this allocation, the Local Plan in fact makes no new allocation in the Enterprise Gateway.
- The site has significant advantage being located in a highly sustainable location located along key strategic public transport corridors, including Skylink, as well as other potential planned improvements and proximity to the East Midlands Parkway
- The site can be delivered early in the Plan period without delays and minimal enabling works required.
- The site performs strongly against a comparative SEA evaluation and accords with the dimensions of sustainable development defined in the NPPF.
- The potential for land in this location to be allocated to meet employment needs is recognised in the Local Plan at 8.28 but is ruled out given the level of commitments in this location and given suggested perceived concerns with the settlement hierarchy however;
  - The site is accessible by public transport to the main town at Coalville, it is not distant from Ashby and has a considerable resident population within close proximity (see Planning Promotion Document) such that it is a sustainable location for growth which also balances market deliverability and attraction comparative to other locations which may struggle with take up in for example Coalville.
  - The accessibility of this location is recognised in the Local Plan at paragraph 8.7 where it states that the area is accessible as possible to employees from elsewhere other than Kegworth and Castle Donnington including Coalville and other centres in the District.
  - The availability of land within the Enterprise Gateway is more limited than suggested, with land at the East Midlands Distribution Centre now part developed, land north of Junction 1, M50 (Sawley Crossroads) now secured by an occupier and the SRFI Gateway site facing significant early enabling infrastructure before delivery can be secured.
  - The allocation of this site will promote early delivery of employment land in the plan period.
- The allocation will support further flexibility in the delivery of employment land, providing a greater choice and range of sites for employment development in the

District.

(Continue on a separate sheet/expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The allocation of merely 16 ha of additional employment land at Money Hill is insufficient to meet the needs for employment development in the District over the Plan period. An additional allocation of land is needed.

Land identified by St Modwen south of Junction 1 of the A50 should be included as a further allocation under Policy Ec2 to support the need for additional employment land in the District.

(Continue on a separate sheet/expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination.

**Yes**, I wish to participate at the oral examination

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

The representations raise detailed and complex matters which interrelate to other representations and we believe that the Inspector would benefit from exploring and understanding our representations further and orally at the Examination

**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.

9. Signature:



Date: 15/8/16



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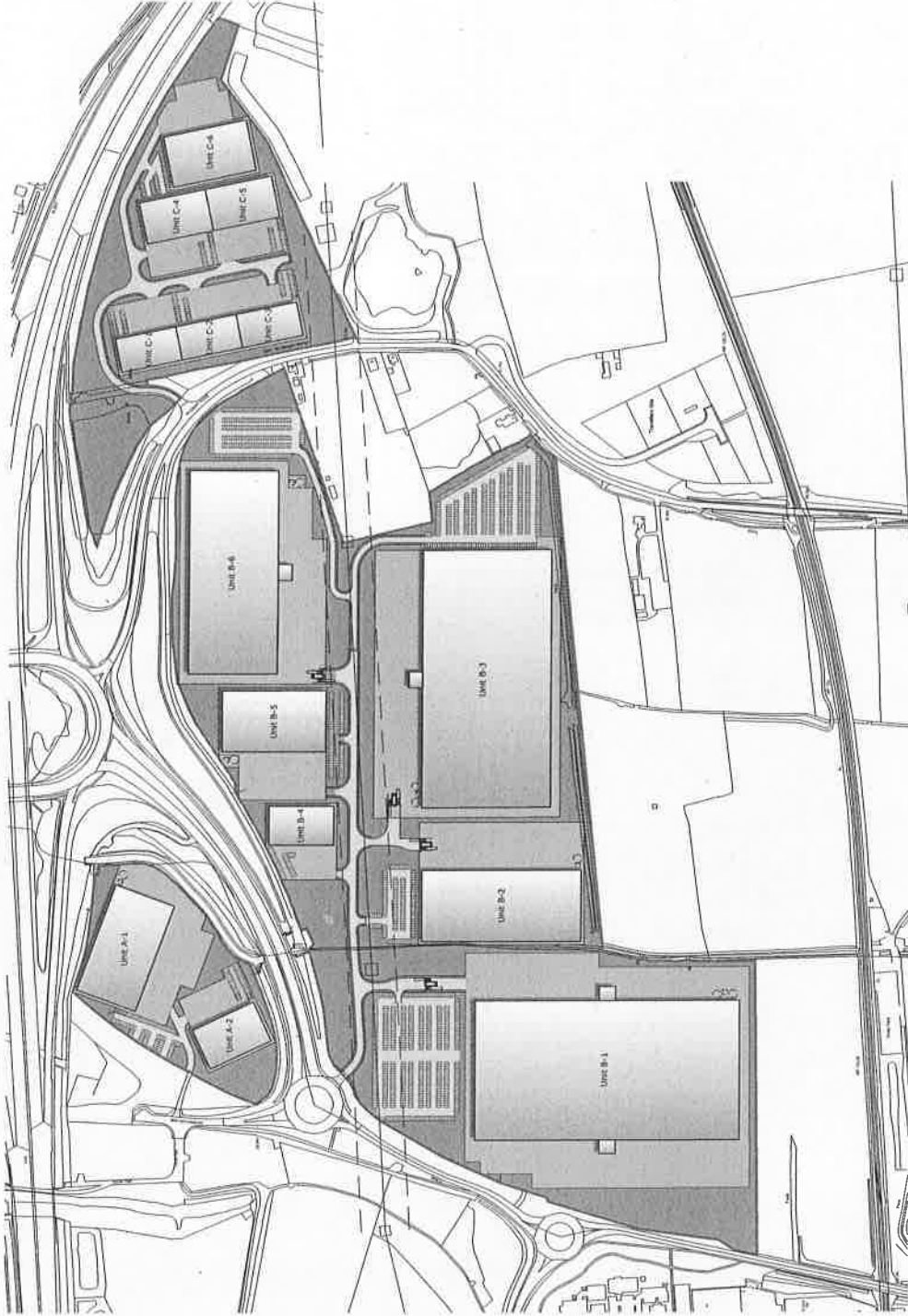
Junction 1 A50

Location Plan

Drawing area: Preliminary  
CAD reference: 16-115-A  
Sheet: 1P  
Date: July 2016  
Scale: 1:25000 A3

Project no: 16-115  
Draw no: A003  
Rev: 1





Architects | Masterplanners

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J1 A50

Commercial Park

Proposed Masterplan

Drawing status:	For Comments
CDM reference:	NP
Drawn:	June 2016
Check:	June 2016
Scale:	1:20000 A1

Project no:	J1 A50	Drawn by:	EM
Project name:	Commercial Park	Checked by:	EM
Project location:	Commercial Park	Scale:	1:20000 A1

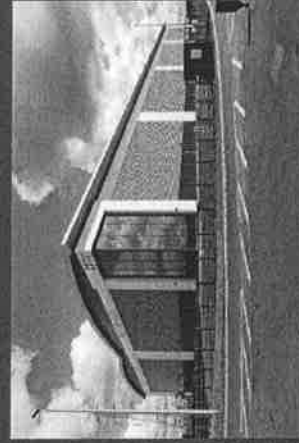
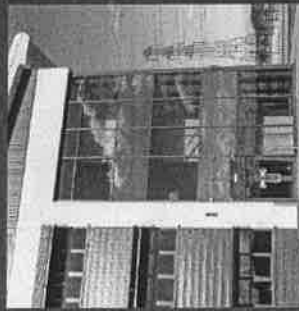
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J1 A50

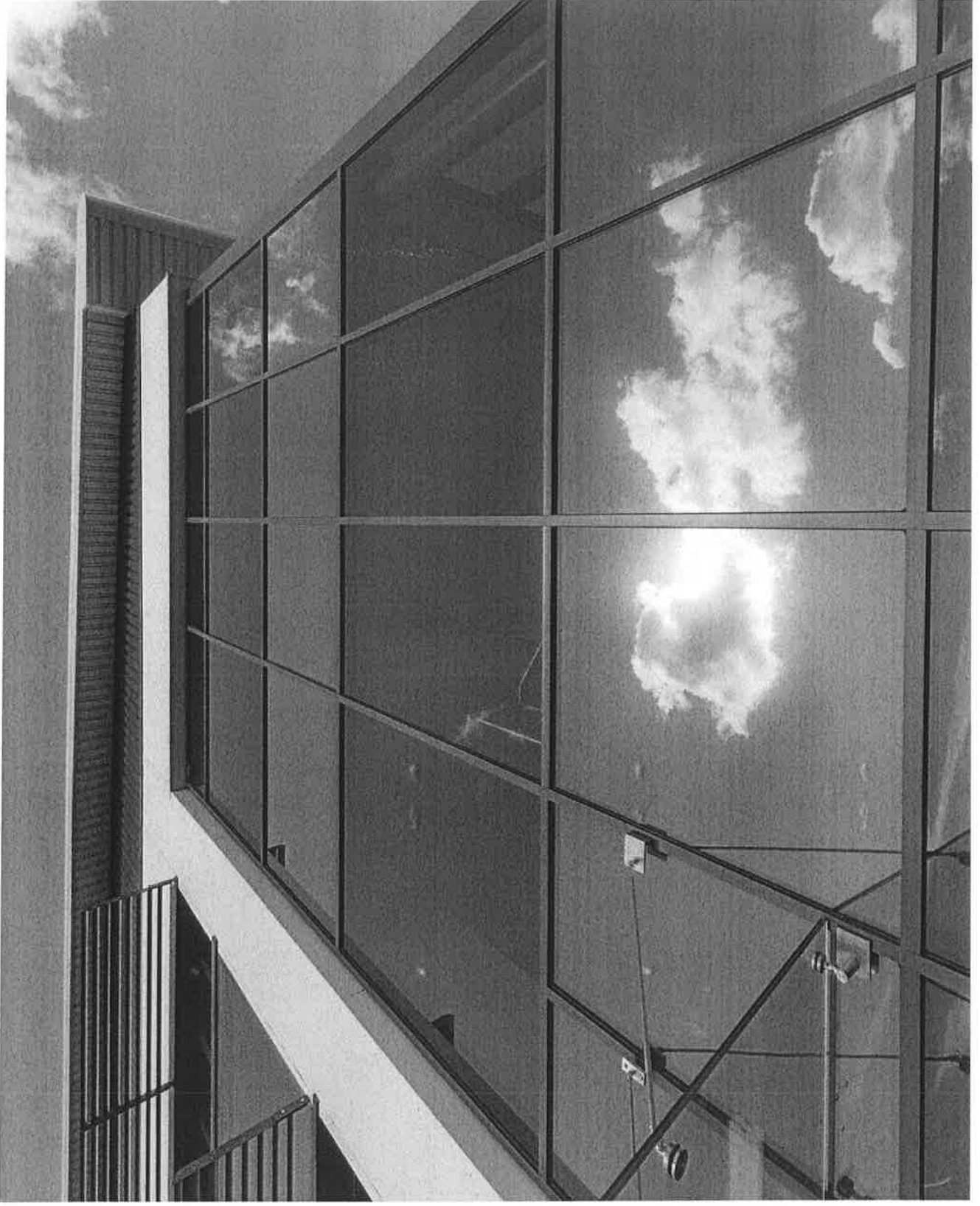
Commercial park

Planning Promotion Document

15/8/2016



 **ST.MODWEN**



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## Introduction

This document has been prepared to present and explain the planning and development proposals associated with the potential employment land by Junction 1, A50, Leicestershire.

The document draws together a range of relevant considerations in order to present a comprehensive case for the allocation of this site within the emerging North West Leicestershire

Development Plan and inform consultations and discussions in advance of a planning application being submitted. It has

potential to inform a number of interested parties, but is focused principally upon a planning case and sets out the merits of the site's development and the contribution it can make to the future economic growth needs of North West Leicestershire.

It provides information about the proposals which would also benefit the local community, interested groups, statutory undertakers and other generally interested parties and in so doing seeks to demonstrate a thorough understanding of the site's development constraints and opportunities. In so doing it explains the value and benefits the site's development can bring.

It will continue to evolve over a period of time to take on board further consultation feedback and refinement of the proposals.

The development is proposed in the context of national planning policy set out within the National Planning Policy Framework which sets out policy to build a strong and competitive economy. Paragraph 18 states "the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future". Paragraph 19 of the NPPF states "the

Government is committed to ensuring that the planning system does everything it can to support economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the

planning system". Paragraph 20 goes on to state that "to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st Century". The NPPF is clear

that local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; further it should

support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs and to allow rapid response to changes in economic

circumstances. North West Leicestershire are advancing their new Local Plan which is seeking to identify and allocate land to meet economic and other needs to 2031.

The District of North West Leicestershire presents a key opportunity to deliver a range of employment opportunities which will support further economic investment and benefit the District and wider region's growth. This will only be achieved through the allocation and delivery of a sufficient range of suitable and market focused employment sites, giving

sustainable and deliverable opportunities to the employment sector to maximize growth and business investment. Provision of high quality and a varied range of sites and development opportunities in key locations such as this will ensure delivery and the attraction of high quality business investment. The

proposals here seek to grasp this opportunity, with a comprehensive masterplan and vision for a leading business park in a high quality location, attractive to the market and with the ability to attract regionally and nationally significant business to maximize economic opportunities.

The economic benefits of the proposed development are considerable. They include jobs created during both the construction and operational phases of the development

The gross development value here amounts to in excess of £80M, with a potential employment generation re excess of 2500 FTE. These jobs will directly benefit employment opportunity and the local and regional economy. The proposals include a varied range of employment buildings, across a range of use classes. The range of unit sizes, types and uses has been informed by St Modwen's experience of the local and regional market taking specialist agency advice. The range of uses and units will also maximise the opportunities for inward investment and interest from a wide range of occupiers. Such employment opportunities are promoted and encouraged through the NPPF.

The proposed development also delivers significant environmental gains through a new flood defence system and drainage strategy for the site which will benefit a much wider area including houses in Hemington and Lockington

Sustainable access and travel to the site is also a key aspect to the proposed development as well as a high quality business park environment with considerable landscaping. All of these aspects are explained further in this promotional document.

# INTRODUCTION





## Location

The site is strategically situated 1 mile west of M1 junction 24 and within the northern edge of the 'golden triangle'. Access is via Junction 1 on the A50. It is currently an area of low grade agricultural land and sits at approximately 32 AOD. The site is separated into three sections by the existing highways infrastructure with smaller plots north of Trent Lane and Ryecroft Road. Scattered trees and typical highway grassland verges form the majority of the boundaries, while the remainder boundaries are hedgerows with some scattered trees. Further to the west of the site is Willow Farm Business Park and EMDC.

The site is very well situated in the East Midlands being broadly equidistant from Nottingham, Leicester and Derby, and as such offers substantial benefits to establishing north west Leicestershire as a major distribution hub and complementing currently planned employment sites in the area.

- Direct Access to A50, Junction 1
- 1 mile from M1, Junction 24A
- 2 miles from M1, Junction 24
- 3 miles from proposed East Midlands Gateway SRF1
- 4 miles from East Midlands Airport

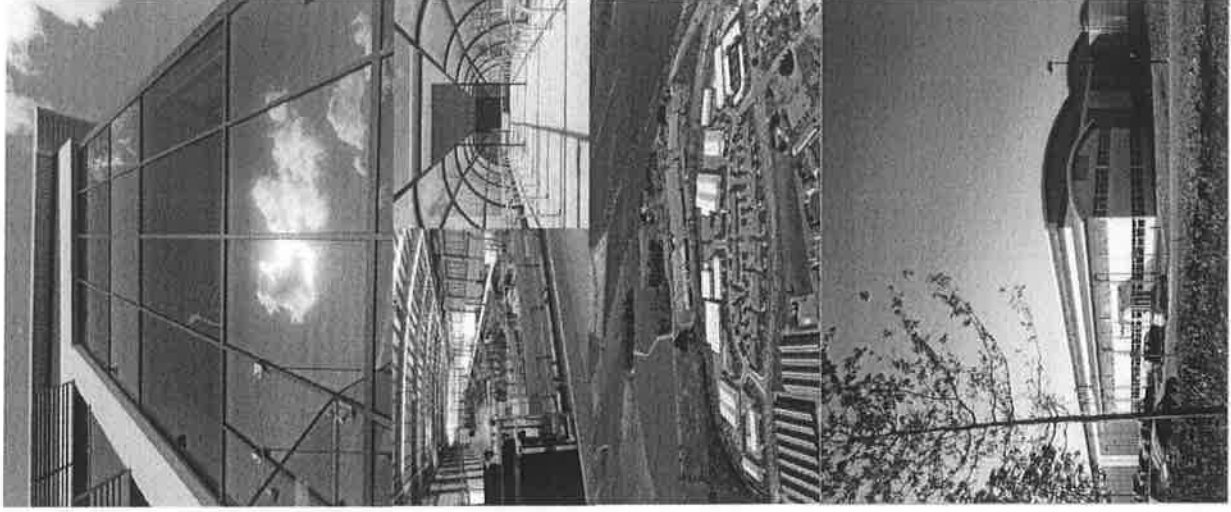


LOCATION PLAN

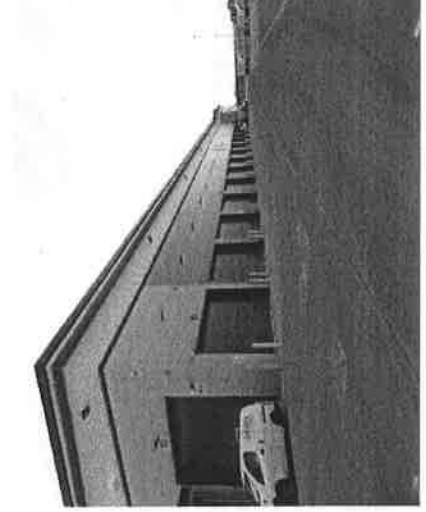
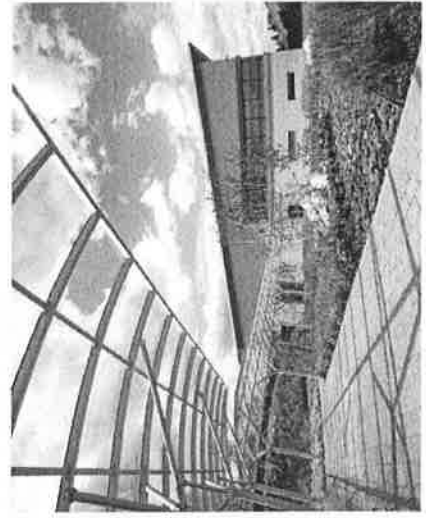


SITE PLAN





*" Quality , consistency , colour palette are key factors in creating development which will attract high quality businesses and employers "*



## The Vision

The proposed commercial park represents an opportunity for a consistent, coherent and high quality development encompassing a range of building sizes, mainly industrial and warehousing with ancillary office space. The range of unit sizes will be carefully judged to complement existing and proposed future land uses in and around the area and to meet the increasingly high quality requirements of a growing logistics industry.

Initial occupiers will 'buy into' a long-term vision. High quality businesses employ high quality staff by definition.

This shows that occupiers creating the right environment in which to work and the ability of their staff to enjoy work can be more creative, more productive and stimulated. It helps to attract and retain the best people in the future. A sense of community created by building design, landscape and the public realm, with active on-site management will ensure an environment which is both a relaxing atmosphere, yet with a bustle and energy through interaction which is attractive to occupiers.

The ability to provide a diverse range of accommodation, in size, specification and tenure will also be important to ensure that the development appeals to the widest possible occupier market. The development could provide

accommodation ranging from small, medium enterprise units to large scale logistics buildings all designed to current industry standards. In this way, the scheme will respond and accommodate requirements from small, medium and larger scale occupiers, with flexibility to facilitate growth over time.

Specifically the scheme should accommodate:

- A layout which is flexible enough to accommodate a wide range of sizes, integrated into a landscaped setting and incorporating a landscaped central boulevard.
- An access strategy that is sympathetic to the existing highway layout and maximises opportunities for modal shift.
- The use of appropriate building design striking a balance between expressions of individual identity whilst providing an overall harmonious built form.
- Integration of built forms into the landscape both visually and physically.

## THE VISION

In order to achieve a consistent, coherent and high quality scheme the development will be undertaken in accordance with a strong masterplan and Design and Access Statement.

The Design and Access Statement, in conjunction with the site masterplan, will provide a description of the overall objectives of the Business Park; it will set requirements for the provision of infrastructure and set standards for site planning and building design.

Whilst ensuring an overall cohesiveness, the DAS is intended to allow a high level of flexibility for building and plot design.

The DAS will include reference to:

- **Urban structure** - Setting out principles for: scale, density, land use, heights and massing.
- **Movement** - Establishing a street hierarchy and principles for parking, cycling and walking.
- **Landscape and open space** - Hard and soft landscaping will be a key factor in establishing the Park's identity.
- **Colour** - Whilst it is not expected that all buildings will use the same combination of colours, a unified effect of sympathetic shades will be required.
- **Materials** - Robust, quality materials; flexible but with attention to detail and a high level of uniformity.
- **Ancillary structures** - Seek to avoid proliferation of small structures around the site.
- **Roof forms** - Design to be considered as an integral part of building design from the outset. Durable, hardwearing and smart finish.
- **Lighting** - High quality from a specified range. Lighting for safety, convenience and visual impact.
- **Signage** - Entrance, directional and occupants' signage from a family of modular signage, appropriate in scale and form.
- **Street furniture** - Use of distinctive and selective street furniture throughout.

The DAS will be a positive and flexible document designed to expedite decision making and protect the long-term environment and integrity of the development.



## Masterplan

The vision is to provide a high quality business park based on good sustainable principles creating new employment and to further promote north west Leicestershire as a central distribution hub. The scale of the development will accommodate for a range of business sizes, thus providing a sustainable and holistic development which complements the existing and future proposals for the area.

The masterplan is a direct response to both the physical constraints of the site, and hierarchy of scale, created to establish a visual order to seek to enhance the visual aspect of the site.

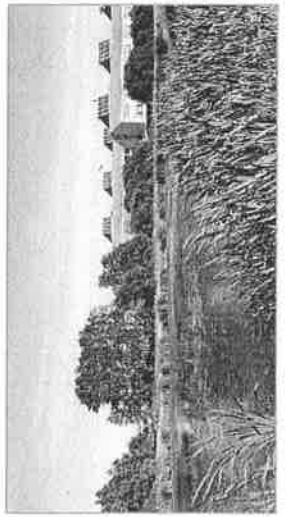
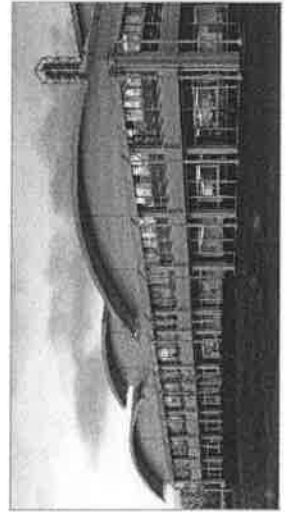
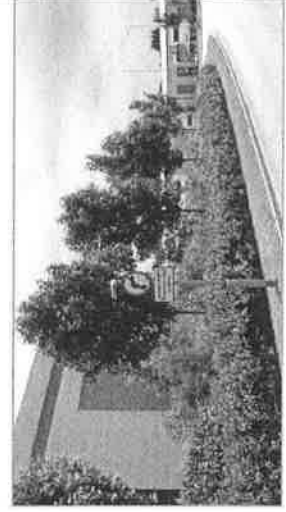
The key feature of the masterplan is the central boulevard through the site which gives opportunities to enhance and link pedestrian and cycle routes to proposed units north east of Rycroft Road. Tree species along the boulevard will be carefully chosen to maximise the impact on the development, whilst retaining a sense of place to the locality and mindful of the proximity of East Midlands Airport.

Although the site is physically separated from any major residential settlement, landscape boundaries to the site will provide screening for the residential properties adjacent and will help break down the massing of the various development plots.

The building design will seek to create a new identity for the park with consistency in quality, scale and colour. Detailing and material selection will be carefully coordinated to provide an attractive cohesive park, thus realising a contemporary and innovative architectural solution.

This is seen as a key factor to create a distinctive and high quality industrial park, that will attract inward investment, whilst retaining expansion capacity for local business. It is envisioned that the site will be able to accommodate units ranging in size from 25,000 sq ft to 450,000 sq ft.

# MASTERPLAN



CONCEPT PLAN

## Landscape

### Landscape Components

The planting design creates the landscape structure for the site, providing definition to public and private spaces while also adding colour and seasonal interest to the environment.

The careful location of trees, shrub and groundcover planting defines routes and spaces, provides landmarks and focal points and defines views and vistas.

The types of trees and plants used will be dependent upon the areas to ensure they are the appropriate species, size and form to fulfil the role required in those spaces.

### Gateway Entrance

Large stature trees will be used to frame views and emphasise the entrance to the site and buildings. These trees will need to be of an appropriate scale, with strong forms in order to provide the structure and sense of arrival needed in these areas. More ornamental style planting will be introduced here which will blend out to a more naturalised rural type planting in the structural landscape buffer beyond. A combination of hedgerows and groups of shrub planting together with clever use of lighting and a palette of hard landscape materials will exploit the potential to create a gateway entrance to the site.

### Internal Landscape and "Green Links"

Formal decorative tree and shrub planting is proposed along the central spine, open spaces and within the development.

The plots will be designed to allow for wide areas of planting between on a grid layout. These will provide opportunities to create a series of green links across the site for biodiversity, SUDS and pedestrian and cycle routes. It will also help to break up the scale and massing of the development as the planting matures.

### Structural Landscape Buffer

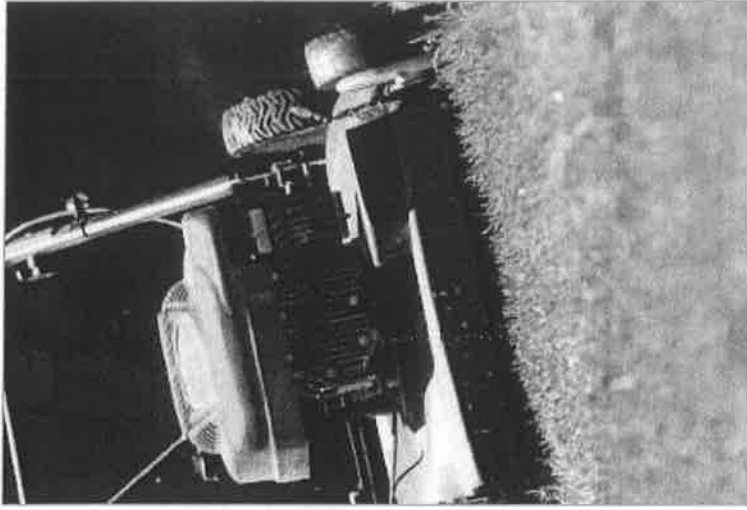
The structural landscape buffer will be applied to the external site boundaries. Localised earth mounding will be incorporated into the design to help with screening the buildings. The structural landscape buffers will also contribute to the enhancement of the biodiversity of the site by planting native and species of local provenance.

New hedgerows will be planted where required and will be planted with a species mix to create a 'species rich' hedgerow. The species list for the structural planting will be confirmed once the design for the site has been developed further. This may be subject to change depending on the recommendations forthcoming from any formal biodiversity assessments of the site proposals.

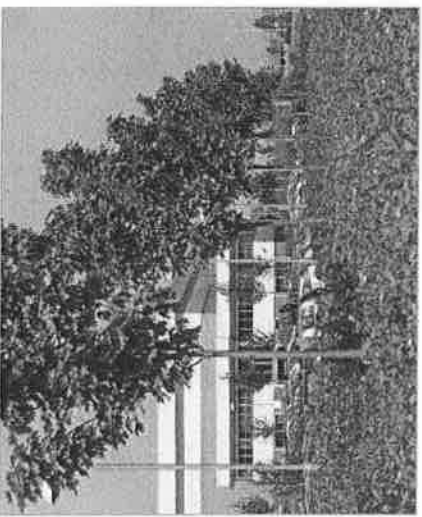
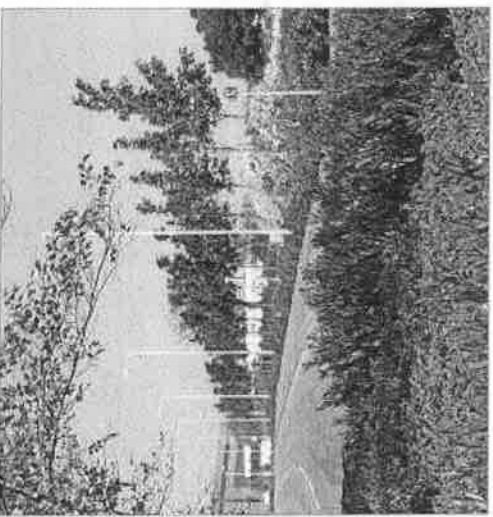
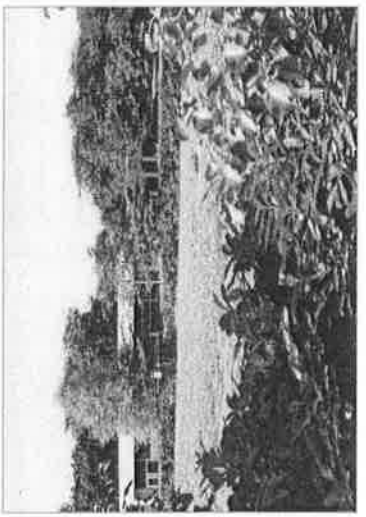
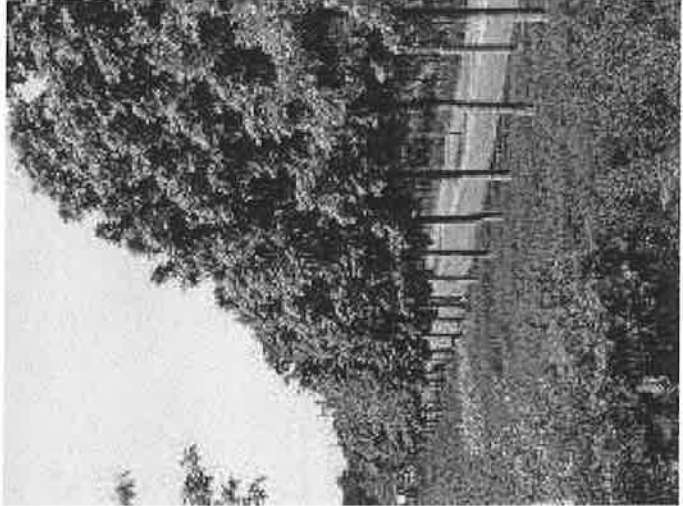
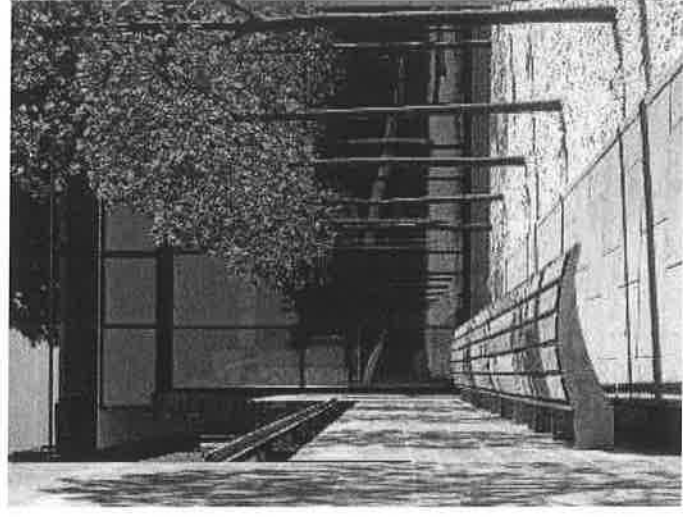
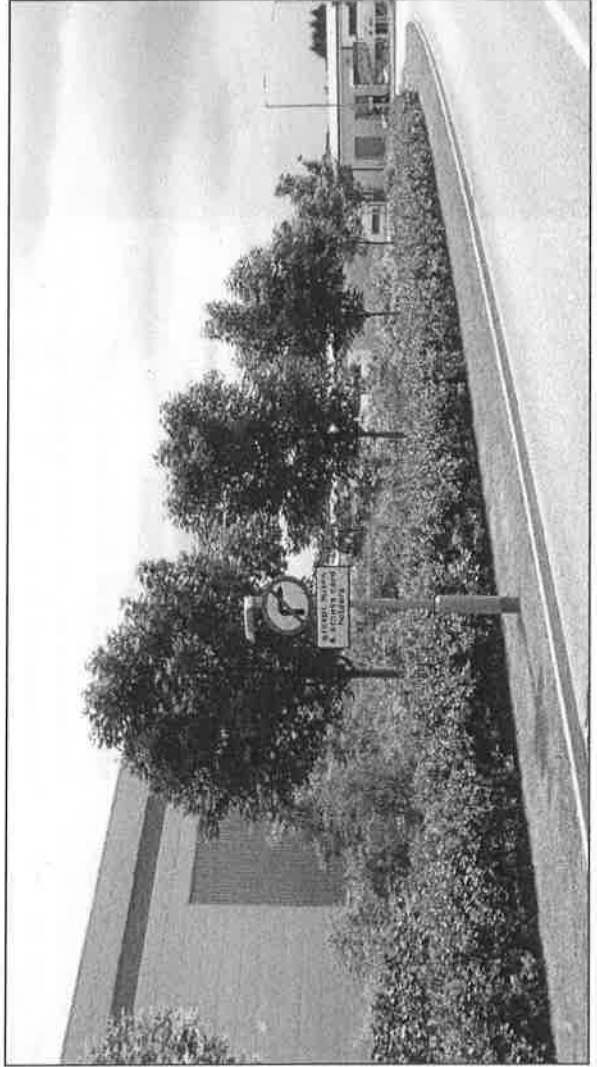
### Management and Maintenance

St Modwen have many years experience of actively managing similar developments and have a professional management team to ensure the landscaping and public realm is maintained to a high standard from the outset.

As part of any development of the design for this site, a management plan would be produced to ensure that the landscape proposals can be delivered and maintained in the future.



LANDSCAPE





## Flood Defence

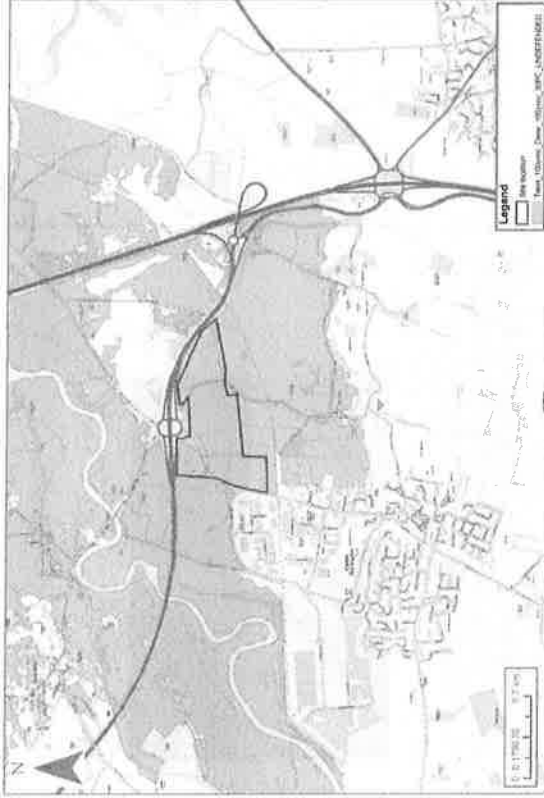
The site, and surrounding land including parts of Hemington and Lockington, are currently at risk of flooding from the Rivers Trent and Derwent. St Modwen Developments are proposing a multi element flood defence system to:

- Remove the site from flood risk;
- Remove upto 125 properties in Hemington and Lockington from flood risk;
- Ensure vital traffic routes retain access to Hemington and Lockington during flood events.

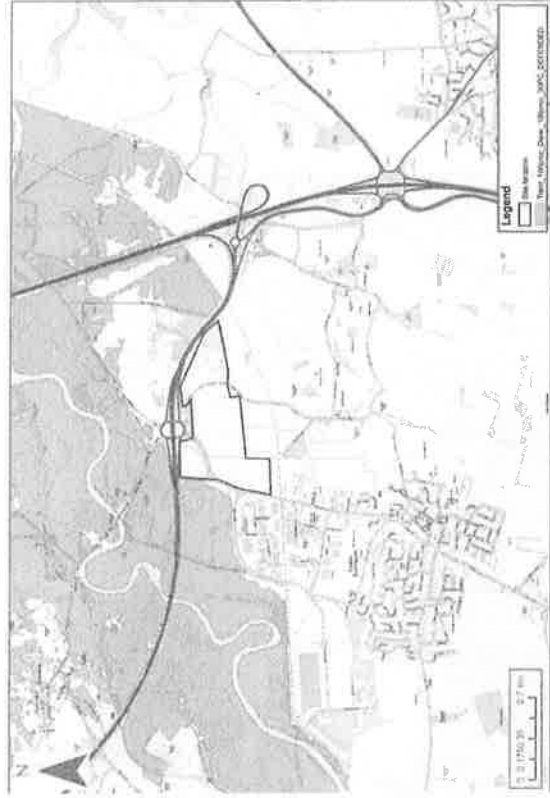
The scheme will deliver benefits to major infrastructure also. From the pre and post scheme flood outlines a section of the M1 and A50 will no longer flood. In addition, benefits to shorter lengths of the rail line will be improved. Local routes will also see benefits and be available allowing emergency access and egress to villages and commercial estates alike.

The proposed flood defence system has been tested using hydraulic modelling to prove the viability and benefits of the proposals.

Full details of the flood defence system will be set out in the flood Risk Assessment forming part of the planning application.



EXTENT OF FLOODING - CURRENT SITUATION



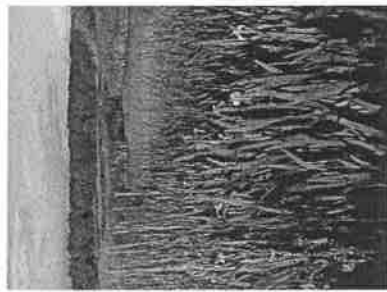
EXTENT OF FLOODING - PROPOSED RESPONSE

## Drainage Strategy

The site will incorporate Sustainable Drainage technologies to improve the water quality while managing the flow of water from the site. Greywater harvesting technology will be used on the site to reduce the amount of surface water discharged. Greywater harvesting will also reduce the amount of water the development uses from the local water supply.

Elements of the Design:

**Ponds** – The layout and landscaping of the site uses balancing ponds to create a visual amenity as you enter the site and balance flows. The ponds will retain a low water level at all times but will offer some capacity for balancing flows.



**Tree Planters** – The car parks could include tree and bio-beds for treating and retaining some of the surface water run-off from the car parking areas.

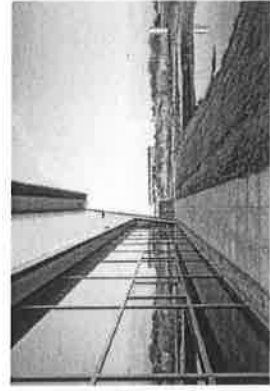


INDICATIVE DRAINAGE STRATEGY

**Open watercourses** – some of the current ditches and open channels will be retained to reduce the need for a piped drainage system. The open channels also allow for greater capacity for flow storage as well as water quality improvements.



**Underground Tanks** – Due to space constraints it may be necessary to utilise underground storage tanks. These will be maintained under agreement by either the water company or a private maintenance company.





## Traffic and transportation

### Site Access Options.

#### Preferred Access: Option 1

(See diagram on right)

A number of potential access points are being considered for the site but the preferred main access point is via a new arm on the existing Trent Lane/Station Road/Donington Lane roundabout. In addition, the parcel of land to the north of Trent Lane could be accessed via Donington Lane (see Option 1 diagram).

The existing roundabout does not serve any other development directly but it is large enough to easily accommodate another arm and the associated additional development traffic. Its close proximity to A50-Junction 1 affords quick, direct access to the strategic road network (SRN) without needing to route through existing built-up areas and it is already equipped with combined footway/cycleway facilities that provide sustainable links to nearby population centres and those facilities could be improved further as part of the new access arrangements.

As part of the design process, and through consultation with Leicestershire County Council Highway Authority, the new roundabout would be subject to a road safety audit and capacity assessment modelling to ensure that the junction meets all relevant standards and has sufficient capacity to cater for the development traffic.



### Access Option 2

The parcel of land located to the north-east of Ryecroft Road could be accessed via the existing simple priority T-junction. The Option 2 junction is located approximately 300m south of A50-Junction 1 and as with Access Option 1, it therefore provides a quick, direct link to the SRN without routing through built-up areas. In addition, a direct off-street link to the existing cycle path that traverses the northern site boundary could be provided – see Option 2 diagram.

It is noted that Ryecroft Road is subject to a 7.5t weight restriction (except for loading); the developer would seek to ensure that HGV routing agreements are reached to prohibit heavy traffic from travelling southbound towards Hemington village.

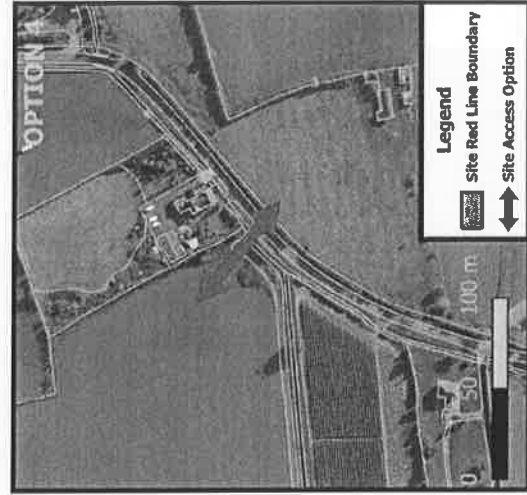
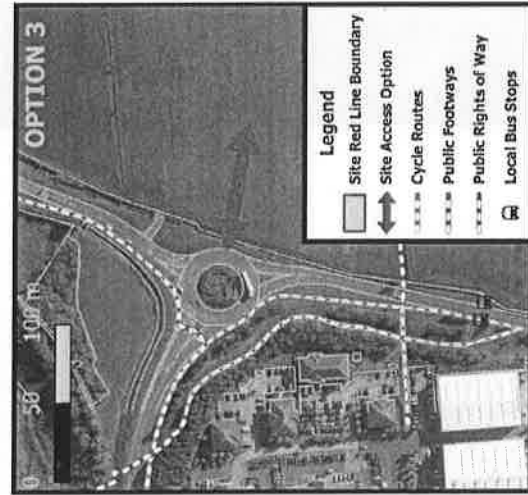
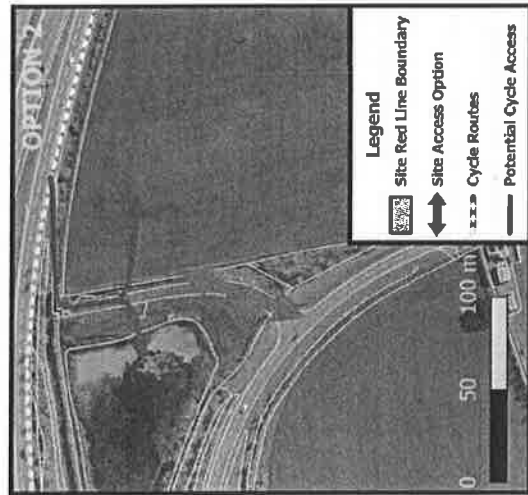
If necessary, alterations to the existing large bell-mouth and/or Ryecroft Road could be made to ensure that the junction caters for development traffic.

### Access Option 3

An additional arm on the east side of the existing Station Road / Broad Rushes roundabout could be provided – see Option 3 diagram. This potential access point is closer to nearest bus stops, as well as nearby businesses and Castle Donington, however, it is further away from the A50-Junction 1 and development vehicle traffic would need to pass through 2 roundabouts before accessing the SRN.

### Access Option 4

This potential access point is considered to be a viable option for only small vehicles, pedestrians and cyclists as HGV's would be restricted by existing geometric constraints. It could potentially serve as an emergency access during the development's construction.



## Transport Planning Introduction

Emphasis will be placed on supporting and sustaining long-term modal shift away from single occupancy vehicle trips. The development proposals will seek to encourage sustainable transport between the site and nearby population centres, businesses and transport hubs by incorporating and enhancing the already good levels of existing local sustainable transport infrastructure.

A comprehensive Travel Plan will be produced and key stakeholders will play an active role in encouraging a shift towards sustainable transport modes.

The site masterplan will prioritise walking, cycling and bus friendly routes to ensure good permeability and connectivity between site facilities and the wider network of pedestrian, cycling and public transport infrastructure. Key facilities such as safe, secure cycle parking, shower facilities, well lit, generous footways along desire lines and priority parking spaces for car sharers will be provided.

## Walking & Cycling

An existing combined footway/cycleway runs across the site's northern boundary with Trent Lane and the A50 and provides safe, direct, paved, well lit, off-street links with routes to Castle Donington, Willow Farm Business Park, Shardlow and Long Eaton. The existing routes (shown in Access Options 1, 2 & 3) could be linked to the potential site access points as part of the access junction designs but there are also opportunities to provide further off-road pedestrian and cycle links with the existing non-vehicular route around the perimeter. A new section of footway/cycleway would be provided on the east side of Station Road in order to link the site with the nearest bus stops without forcing pedestrians to cross the road.

## Bus Services

The site is well linked to key local and regional population and commercial centres by the following 2 local bus services:

- Skylink: Derby ↔ Airport – Loughborough – Leicester;
- Skylink: Nottingham – Long Eaton ↔ Airport – Loughborough (or Coalville)

Both services operate at a frequency of 3 buses / hour (Monday – Saturday, 0700-1900hrs); a reduced frequency of 2 buses / hour is provided on Sundays.

The routes run along the western (Station Road) and northern (Trent Lane) site boundaries and serve nearby Castle Donington, Shardlow, Kegworth, Long Eaton, Loughborough and Coalville as well as East Midlands Airport and the cities of Derby, Nottingham and Leicester.

The nearest bus stops are located on Station Road, approximately 440m south of the preferred Vehicle Access "Option 1" and only 170m south of vehicle access "Option 3".

There is potential to provide additional bus stops within the site itself and these opportunities will be explored with local bus operators and the Highway Authority

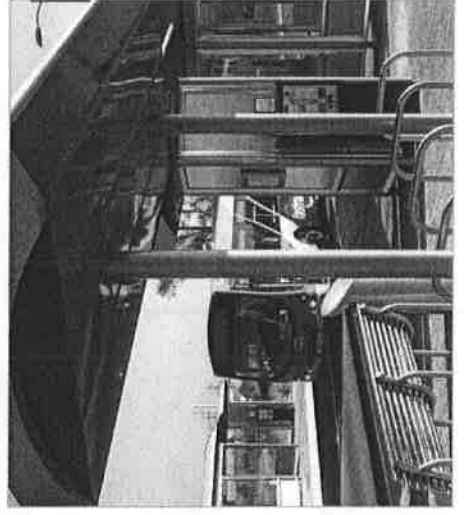
## Rail Services

The nearest railway stations to the site are Long Eaton Station and East Midlands Parkway – both stations are operated by East Midlands Trains and provide direct links to the nearby cities of Derby, Nottingham and Leicester, as well as other key regional destinations such as Birmingham, Sheffield and London.

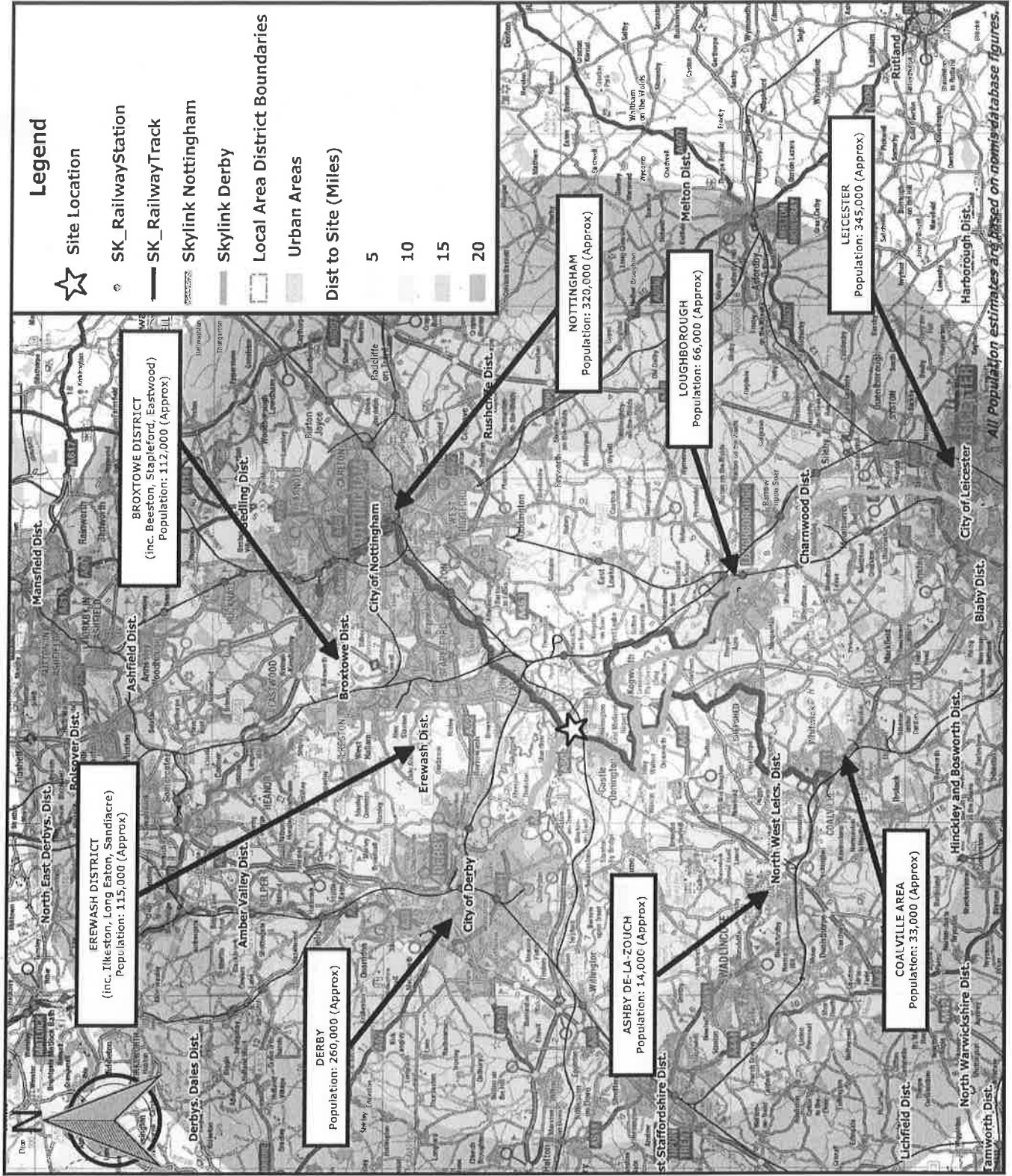
Although neither station is within a realistic walking distance of the site, both are easily accessible via the existing local on/off-street cycle paths and Long Eaton Station is also linked directly to the site via a 6minute journey on the Nottingham Skylink bus - making rail travel a viable option as part of a multi modal journey.

A summary of the cycle distance and "typical" journey time to/from Vehicle Access Option 1 is provided below:

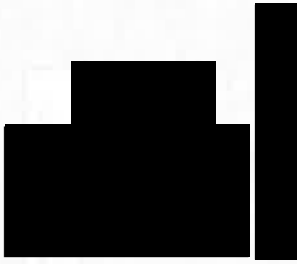
- 3.6miles/5.7km/18mins via bike & 6mins via bus to Long Eaton Railway Station;
- 5.8miles/9.3km/30mins via bike to East Midlands Parkway Station,







Contact: Ian Romano  
St Modwen Properties plc



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Planning Prospects



together with:  
Rodgers Leask  
Stephen George & Partners LLP