

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL
LOCAL PLAN COMMITTEE – WEDNESDAY 19 NOVEMBER 2025



Title of Report	NEW LOCAL PLAN – STRATEGIC WAREHOUSING	
Presented by	Sarah Lee Principal Planning Policy Officer	
Background Papers	<u>Leicester & Leicestershire Needs Update and Apportionment Study (2025)</u> <u>Employment Site Assessments;</u> <u>Additional Employment Site Assessments (2024);</u> <u>Additional and Updated Employment Site Assessments (2025)</u> <u>Sustainability Appraisal of Sites (2025)</u> <u>Landscape Sensitivity Study Part 1 (2019)</u> <u>Further Landscape Study: Sensitivity Parcel Appraisals (2021)</u> <u>Landscape Sensitivity Parcel Appraisals (2024)</u> <u>National Planning Policy Framework</u> <u>Local Development Scheme (February 2025)</u>	Public Report: Yes
Financial Implications	The cost of the Local Plan Review is met through existing budgets which are monitored on an ongoing basis.	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	The Local Plan must be based on robust and up to date evidence.	

	Signed off by the Monitoring Officer: Yes
Staffing and Corporate Implications	No staffing implications are associated with the specific content of this report. Links with the Council's Priorities are set out at the end of the report.
	Signed off by the Head of Paid Service: Yes
Purpose of Report	This report presents the key findings from the Leicester and Leicestershire Strategic Warehousing Need and Apportionment Study (2025) and, in response, recommends strategic warehousing sites for allocation in the new Local Plan
Recommendations	<p>THAT THE LOCAL PLAN COMMITTEE:</p> <ol style="list-style-type: none"> 1. NOTES THE FINDINGS OF THE LEICESTER & LEICESTERSHIRE STRATEGIC WAREHOUSING NEED AND APPORTIONMENT STUDY (2025) AS SUMMARISED IN SECTION 3 OF THE REPORT. 2. AGREES, IN PRINCIPLE, THE INCLUSION OF LAND SOUTH OF EAST MIDLANDS AIRPORT (EMP90) AS A STRATEGIC WAREHOUSING AND GENERAL NEEDS EMPLOYMENT SITE IN THE REGULATION 19 VERSION OF THE LOCAL PLAN. 3. AGREES, IN PRINCIPLE, THE INCLUSION OF LAND NORTH OF A453 KEGWORTH (EMP73 (PART)) AS A STRATEGIC WAREHOUSING SITE IN THE REGULATION 19 VERSION OF THE LOCAL PLAN. 4. AGREES, IN PRINCIPLE, THE INCLUSION OF LAND SOUTH OF KEGWORTH BYPASS (EMP97) AS A STRATEGIC WAREHOUSING SITE IN THE REGULATION 19 VERSION OF THE LOCAL PLAN. 5. AGREES, IN PRINCIPLE, THE INCLUSION OF LAND AT ELLISTOWN TERRACE ROAD AND WOOD ROAD (EMP98) AS A STRATEGIC WAREHOUSING AND GENERAL NEEDS EMPLOYMENT SITE IN THE REGULATION 19 VERSION OF THE LOCAL PLAN. 6. AGREES, IN PRINCIPLE, THE INCLUSION OF LAND NORTH OF J11 A/M42 (EMP82) AS A STRATEGIC WAREHOUSING SITE IN THE REGULATION 19 VERSION OF THE LOCAL PLAN. 7. AGREES, IN PRINCIPLE, THE INCLUSION OF LAND NORTH EAST OF J11 A/M42 (EMP83/84/94)

	<p>AS A STRATEGIC WAREHOUSING SITE IN THE REGULATION 19 VERSION OF THE LOCAL PLAN.</p> <p>8. AGREES, IN PRINCIPLE, THE INCLUSION OF LAND AT CORKSCREW LANE (EMP80) AS A STRATEGIC WAREHOUSING SITE IN THE REGULATION 19 VERSION OF THE LOCAL PLAN.</p> <p>9. AGREES THAT THE INCLUSION IN THE REGULATION 19 PLAN OF THE SITES AGREED IN RECOMMENDATIONS 2 TO 8 IS SUBJECT TO THE OUTCOMES OF A) TRANSPORT MODELLING; B) VIABILITY ASSESSMENT; AND C) INFRASTRUCTURE REQUIREMENTS.</p> <p>10. NOTES THAT SPECIFIC SITE ALLOCATION POLICIES WILL BE PREPARED AS DESCRIBED IN PARAGRAPH 6.2 FOR EACH OF THE SITES AGREED IN RECOMMENDATIONS 2 TO 8 FOR INCLUSION IN THE REGULATION 19 VERSION OF THE LOCAL PLAN.</p>
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1 INTRODUCTION

1.1 The two primary purposes of this report are:

- To present the key findings from the [Leicester and Leicestershire Strategic Warehousing Need and Apportionment Study](#) (October 2025) ('the Study') and
- To recommend strategic warehousing sites for allocation in the new Local Plan

1.2 The report is structured as follows:

- Section 2 provides a recap and timeline of the Committee's decisions on strategic warehousing to date.
- Section 3 provides an overview of the Study's key findings and describes the implications for the new Local Plan
- Section 3 also deals with the comments to the [Proposed Policies Regulation 18 consultation](#) (January 2024) concerned with strategic warehousing which have not previously been reported to the Committee. Linked Appendix A provides summaries of the comments, the names of the respondents and officer responses to the matters raised.
- Section 4 summarises the findings of the assessment of potential strategic warehousing sites, including Sustainability Appraisal, and recommends a number of sites for allocation in the new Local Plan. Linked Appendix B provides details of the site assessments and maps of the sites.
- Section 5 presents the need/supply balance and recommends a way forward.
- Section 6 explains the approach to site allocation policies.
- Section 7 sets out next steps and discusses consultation options.

2 TIMELINE OF PREVIOUS DECISIONS

2.1 The list below provides a recap and timeline of the Local Plan consultations and Committee decisions concerning strategic warehousing.

[Development Strategy and Policy Options Reg 18 Consultation \(January 2022\)](#).

Based on the Warehousing and Logistics in Leicester & Leicestershire (2021), this consultation proposed an initial policy option that 50% of the outstanding road-served requirement in Leicester and Leicestershire to be met in North West Leicestershire, equalling approximately 106,000sqm by 2039 (the Plan end date at the time).

[Local Plan Committee 12 July 2022](#) considered the consultation responses and decided a working provisional figure for the Plan of 100,700 sqm of strategic warehousing, pending the outcome of any agreement with the other Leicester and Leicestershire authorities in respect of the distribution of the outstanding requirement.

[Proposed Housing and Employment Allocations for Consultation \(Reg 18\) \(January 2024\)](#). At the time of this consultation, a new study was in preparation to advise on how best to distribute the future need for strategic warehousing across the Leicester and Leicestershire area. (This work evolved into the study which is discussed later in this report). The consultation included two Potential Locations for Strategic Warehousing:

- EMP90(part) - Land south of East Midlands Airport (Freeport land)
- EMP82 – Land north of J11 A/M42

[Local Plan Committee 14 August 2024](#) considered the consultation responses concerned with overall housing and employment requirements in the **[Proposed Policies Regulation 18 consultation](#)** (January 2024). Comments about the future need for strategic warehousing were deferred from consideration until updated information on requirements was available. These comments are now addressed as part of this report (see Section 3 and Appendix A).

[Local Plan Committee 13 November 2024](#). In the absence of confirmed up to date requirements, the Committee agreed a working figure of 200-250 ha of land for strategic warehousing to inform the transport modelling for the Local Plan.

[Local Plan Committee 16 December 2024](#). This report presented and responded to the matters raised in connection with the two Potential Locations for Strategic Warehousing from the 2024 Reg. 18 consultation. The Committee did not make any specific decisions in relation to these sites. The Committee did agree a) a broad approach to the Freeport in the Local Plan; and b) specific sites for inclusion in the transport modeling to achieve the working figure of 200-250ha agreed at the previous month's meeting.

3 LEICESTER AND LEICESTERSHIRE NEEDS UPDATE AND APPORTIONMENT STUDY (2025)

- 3.1 The [Leicester and Leicestershire Needs Update and Apportionment Study \(2025\)](#) ('the Study') was jointly commissioned by the Leicester and Leicestershire authorities. It provides a) an updated assessment of the need for additional strategic warehousing in Leicester and Leicestershire for the period 2024-46; and b) proposes how that need could be distributed ('apportioned') to different locations within the partnership area.
- 3.2 The Study will be part of the evidence base for the Leicester and Leicestershire authorities' respective Local Plans. It does not set the policy for strategic warehousing which is a matter for the Local Plans themselves.

Need

- 3.3 The Study finds that there is need for **some 3.06million sqm** of strategic warehousing floorspace in Leicester and Leicestershire for the 22-year period 2024-46. This figure is in addition to sites which already have planning permission.

Table A: Leicester and Leicestershire Need for Strategic Warehousing 2024-46
(additional to sites with planning permission)

Rail-served need	1,349,600 sqm
Road-served need	1,709,600 sqm
Total	3,059,200 sqm

- 3.4 The Study provides an up to date assessment of the need for strategic warehousing. Its predecessor, produced in 2021, informed the Proposed Policies Regulation 18 consultation (January 2024). In overview, the consultation comments received in 2024 made two broad points; a) the 2021 Leicester and Leicestershire Strategic Distribution Study is out of date and its methodology underestimates the need for strategic warehousing; and b) others argued that the need figures are unrealistic (too high) and unjustified.
- 3.5 Summaries of these comments, which have not previously been reported to this Committee, are included in Appendix A.
- 3.6 Matters have moved on with the publication of the new Study. This study provides an up to date assessment of the need for strategic warehousing based on the testing of alternative approaches, including estimation methods advocated by the development industry in their Regulation 18 consultation responses. In the light of this, the 2024 consultation comments, of themselves, do not require any further action or proposed changes to the Plan at this stage.

Apportionment

- 3.7 The second purpose of the Study is to recommend how the measured need for strategic warehousing floorspace (in sqm) could be apportioned to locations within Leicester and Leicestershire.
- 3.8 Table B below shows how the Study apportions the floorspace to locations in North West Leicestershire. In Table B officers have additionally; a) adjusted the figures to

correspond with the Local Plan end date of 2042 (18 years rather than 22 years); and b) added an estimate of the amount of land required.

Table B: NWL apportionment (2024-2042)

Location	Floorspace	Land (estimate) ¹
M1 J23a/J24; A50 J1	728,673 sqm	209 ha
Bardon (J22)	93,109 sqm	27 ha
A/M42 J11,12,13	269,345 sqm	77 ha
Total	1,091,127 sqm	313 ha

- 3.9 To put this in context, the total amount of floorspace at East Midlands Gateway (EMG) is some 435,000sqm. The apportionment above equates to 2½ times the floorspace at EMG.
- 3.10 The Study apportions some 44% of the total need for Leicester and Leicestershire to North West Leicestershire. This is the highest percentage by some margin; the figures for the other authorities are Blaby (21%), Harborough (18%), Hinckley & Bosworth (14%) and Charnwood (3%).

4 SITE ASSESSMENT

- 4.1 Local Plans must be positively prepared and seek to meet the area's objectively assessed needs in full (NPPF paragraph 36a). The starting intention must be to identify sufficient suitable sites to meet the Study's recommended requirements in full. Officers have assessed potential sites in this context. The outcomes are presented in three sections to correspond with the locations identified in the Study.

1 - M1J23a/J24; A50 J1

- 4.2 Sites which could potentially be suitable for strategic warehousing in this location are listed in Table C below. With the exception of Plot 16 at East Midlands Gateway, these have been taken from the Strategic Housing and Employment Land Availability Assessment (SHELAA) and subsequent Call for Sites submissions.

Table C: Candidate sites at M1 J23a/J24; A50 J1

Ref	Site	Area
EMP90	Land south of EMA (Freeport) [DCO] ²	87 ha
n/a	Plot 16 at EMG1 [MCO] ³	6.4 ha
EMP73 (part)	Land north A453, Kegworth	8.6 ha
EMP73 (part)	Land north of Derby Road, Kegworth	10.2 ha
EMP14	Land south of Sawley Marina	22 ha
EMP97	Land south of Kegworth bypass	39.5 ha
EMP99	Land north of railway line, Hemington	6.8 ha
	Total	180.5 ha

¹ Assumes 1ha of land can accommodate 3,500sqm of floorspace but, in practice, this ratio will vary from site to site.

² Development Consent Order application

³ Material Change Order application

- 4.3 Officers have considered these sites' suitability for strategic warehousing. The outcome of this assessment, including Sustainability Appraisal of the sites, is presented in Appendix B. These outcomes are informed by the findings of the Study and supplement the [site assessments](#) previously published.
- 4.4 Based on this analysis, the sites in Table D are recommended for allocation in the Local Plan.

Table D: Recommended sites at M1 J23a/J24; A50 J1

Ref	Site	Area	Floorspace
EMP90	Land south of EMA (Freeport)	87 ha	240,000 sqm
n/a	Plot 16 at EMG1	6.4 ha	26,500 sqm
EMP73 (part)	Land north A453, Kegworth	8.6 ha	33,540 sqm
EMP97	Land south of Kegworth bypass	39.5 ha	98,750 sqm
Total		141.5 ha	398,790 sqm

- 4.5 **Land south of East Midlands Airport (EMP90).** At its meeting on 16 December 2024 the Committee agreed the following approach to the designated Freeport land, including the land parcels within EMG itself:

“It is recommended that the Local Plan takes the following approach to the designated Freeport land i.e. land south of the airport and the designated Freeport land within the airport boundary and at East Midlands Gateway:

- *Identify key issues and matters of concern which need to be addressed as part of any proposed planning application relating to the proposed development south of the airport (site EMP90). This could form the basis for this Council’s Statement of Local Impacts for the DCO inquiry.*
- *For the purposes of the plan, it will be assumed that the quantum and type of development on EMP90 will be as currently being proposed i.e. 100Ha/279,000sqm of B2/B8 uses. This is important for the planning of strategic warehousing and general needs employment overall and for considering the cumulative impacts of development in this part of the district (e.g. transport). This does not mean that the Council supports the proposals in their current form. This approach does, however, recognise that the decision on the acceptability of the development will be made through the DCO process and enables the Local Plan to progress.*
- *Set out any planning considerations for development on the parts of the airport and East Midlands Gateway which are also part of the designated Freeport.”*

(paragraph 4.8 from [Local Plan Committee 16 December 2024](#))

- 4.6 Notwithstanding the above, it is now considered that the Local Plan should take a position on the suitability of the site. The reasons for this advice are:
- a. Whilst it is not a planning designation, the site's Freeport status is a clear signal of the Government's support for advanced logistics development in this

location. It is for the respective planning processes (Local Plan, Development Consent Order, planning application) to determine an acceptable form of development.

- b. The Freeport (including land within EMG1) can make a substantial contribution to the need for strategic warehousing **and** general needs employment. The Local Plan would be relying on it (with other sites) to help deliver the district's development needs. There are no alternative sites which could substitute for the Freeport site in this part of the District. It is logical for the Plan to support its development.
 - c. The Freeport designation is unique to this site and the incentives and freedoms it brings will make it highly attractive to occupiers.
 - d. "The planning system should be genuinely plan-led" (NPPF paragraph 15). A Local Plan Inspector is likely to expect the plan to take a definitive stance on this site.
- 4.7 Provided there are sufficient policy safeguards in place to address the complex environmental and other impacts identified, it is recommended that Land south of the airport (EMP90) be included as a proposed allocation in the Local Plan.
- 4.8 **Plot 16 at EMG.** In conjunction with the DCO application, there is also a linked Material Change Order (MCO) which, amongst other things, is seeking consent to provide some 26,500sqm of additional storage floorspace at EMG1. The suitability of this site will be determined through the MCO process. Whilst it is not necessary to allocate this site in the Local Plan, it can contribute to the overall supply position.
- 4.9 **Land north A453, Kegworth (EMP73 part).** This site was included in the 2024 Proposed Housing and Employment Allocations Reg. 18 consultation as a site for general needs employment. The Committee subsequently agreed changes to the policy wording for this site at its meeting on 16 December 2024 (recommendation iii) but did not decide on its use until there was more information about the need for strategic warehousing.
- 4.10 In view of the site's location, and in the face of the substantial need for strategic warehousing, it is now considered that the site could be best used for strategic warehousing.
- 4.11 **Land south of Kegworth bypass (EMP97).** This is a large tract of rural land. Development here would 'jump' the clear boundary of the A6 Kegworth bypass and it would result in large scale development in an area of open, agricultural fields divorced from the built-up area of Kegworth. However, [the Landscape Sensitivity Assessment \(2024\)](#) identifies this location is heavily influenced by the strategic road network infrastructure and there are detracting elements in the wider context such as Ratcliffe Power Station and the complex of buildings associated with the airport and EMG1 to the west of the motorway. There are also limited opportunities for unscreened views of the site.
- 4.12 LCC Highways has concerns about the achievability of acceptable access arrangements having regard to the function of the Kegworth bypass. The overall capacity of the strategic road network in this location is a significant unknown in view

of the other large-scale developments proposed in this part of the district. The transport modeling which is underway will provide further evidence on this point.

- 4.13 Subject to these highways concerns being resolved, it is recommended this land south of Kegworth bypass is identified for strategic warehousing.
- 4.14 The site could be seen as a competitor to the Freeport site (EMP90) in view of their proximity to one another. However, the incentives associated with the Freeport means it is more likely that land south of Kegworth bypass will come forward in the longer term, after the Freeport site.
- 4.15 **Supply position at M1 J23a/J24; A50 J1.** Table E below compares the sites' floorspace capacities (i.e. the supply) with the apportionment figures from the Study. Sites with planning permission can also contribute to the supply position. Whilst the permissions at J1 A50 (24/00074/REMM) and Netherfield Lane (22/00954/REMM) have already been accounted for in the Study's findings, the planning permission at land adjacent to the Aldi Regional Distribution Centre at Sawley (24/01200/FULM) has not. Table E shows that the combined floorspace of the recommended sites plus this permitted site. This total does not match the full apportionment figure. The gap is some 270,000 sqm.
- 4.16 Notwithstanding this gap, based on the site assessments, officers do not consider that there are other sites capable of being allocated in this location.

Table E: Supply at M1 J23a/J24; A50 J1 compared with apportionment figure

Ref	Site	Area	Floorspace
EMP90	Land south of EMA (Freeport)	87 ha	240,000 sqm
n/a	Plot 16 at EMG1	6.4 ha	26,500 sqm
EMP73 (part)	Land north A453, Kegworth	8.6 ha	33,540 sqm
EMP97	Land south of Kegworth bypass	39.5ha	98,750 sqm
24/01200/FULM	Land adj. to Aldi RDC, Sawley	15 ha	59,910 sqm
Total		156.5 ha	458,700 sqm
		Apportionment	728,673 sqm
		Gap	-269,973 sqm

2 - Bardon (M1 J22)

- 4.17 Sites with access to J22 of M1 which could potentially be suitable for strategic warehousing are listed in Table F below.

Table F: Candidate sites at Bardon (J22)

Ref	Site	Area
EMP98 (part)	Land between Ellistown Terrace Road and Wood Road, Battram	7 ha
EMP101	Land north of Wood Road, Battram	11 ha
EMP58	Barralochen Farm, East Lane, Bardon	5.6 ha*
Total		23.6 ha

* site straddles the boundary with H&B. Ha figure is for land in NWL only.

- 4.18 The outcome of the sites assessments, including Sustainability Appraisal, is presented in Appendix B. Based on this analysis, one site is recommended for allocation.

Table G: Recommended site at Bardon (J22)

Ref	Site	Area	Floorspace
EMP98 (part)	Land between Ellistown Terrace Road and Wood Road, Battram	7 ha	30,000 sqm
Total		7 ha	30,000 sqm

- 4.19 **Land between Ellistown Terrace Road and Wood Road Battram EMP98.** This site was included in the [Additional Proposed Housing and Employment Allocations \(March 2025\)](#) Reg 18 consultation. It was noted at the time that the site (16.4ha) could deliver a mix of general needs industry/warehousing units and strategic warehousing units. Local Plan Committee (30 July 2025) subsequently agreed its allocation to deliver 20,000 sqm of general needs floorspace on part of the site (9ha), allowing space for an element of strategic warehousing on the remaining part (7ha) if that should prove necessary and appropriate.
- 4.20 With the findings of the Study, and the significant level of need apportioned to North West Leicestershire, it is recommended that this site does include an element of strategic warehousing. It is estimated that it could deliver some 30,000 sqm.
- 4.21 At the July meeting of this Committee, a Member asked officers to consider whether land between this site and Battram should have some form of additional policy protection in the new Local Plan. Officers will report back on this matter.
- 4.22 **Supply position at Bardon (J22).** The gap between the apportionment figure and the capacity of EMP98 is shown in Table H. Officers do not consider that there are other sites capable of being allocated in this location (see site assessment commentary in Appendix B).

Table H: Supply at Bardon (J22) compared with apportionment figure

Ref	Site	Area	Floorspace
EMP98 (part)	Land between Ellistown Terrace Road and Wood Road, Battram	7 ha	30,000 sqm
Total		7 ha	30,000 sqm
Apportionment			93,109 sqm
Gap			- 63,109 sqm

3 - A/M42 Junctions 11, 12 and 13

- 4.23 Sites which could potentially be suitable for strategic warehousing in this location are listed in Table I below.

Table I: Candidate sites at A/M42 Junctions 11, 12 & 13

Junction 11		
EMP82	Land north of J11 (Mercia Park II)	28 ha
EMP83/84/94	Land north-east of J11	45 ha
EMP92	Dingle Farm, south of J11	33.7 ha
Junction 12		
EMP05	Land NE of J12 (part Packington Nook)	25 ha
Junction 13		
EMP87	Land east of Ashby	81 ha
EMP80	Land at Corkscrew Lane	11.5 ha
	Total	224.2 ha

- 4.24 Officers have considered these sites' suitability for strategic warehousing, including Sustainability Appraisal. The outcomes are presented in Appendix B.
- 4.25 Based on this analysis, the sites in Table J are recommended for allocation in the Local Plan.

Table J: Recommended sites at A/M42 Junctions 11, 12 & 13

Ref	Site	Area	Floorspace
EMP82	Land north of J11 (Mercia Park II)	28 ha	96,625 sqm
EMP83/84/94	Land north-east of J11	45 ha	125,000 sqm
EMP80	Land at Corkscrew Lane (J13)	11.5 ha	46,451 sqm
	Total	84.5 ha	268,076 sqm

- 4.26 **Land north of J11 EMP82.** The site comprises open arable fields which are attractive in their own right and are also of higher agricultural land quality. The road infrastructure to the east and south and the substantial Mercia Park development to the west does have an urbanising effect and this effect is more pronounced towards the southern end of the site. The A42, A444 and the hedgerows along the northern boundary of the site provide a degree of containment to the site.
- 4.27 This site is the subject of a current planning application (25/00274/FULM). The planning application process so far has not revealed any technical constraints that could not be mitigated. In view of the site's location, and in the face of the substantial need for strategic warehousing, it is considered that the site could be allocated for strategic warehousing.
- 4.28 **Land north-east of J11 EMP83/84/94.** The site comprises open arable fields, also attractive in their own right and of higher agricultural land quality. Although the south western part of the site has some relationship to the commercial development and highway infrastructure at J11A42, overall it is a very open site and development could fundamentally alter the rural approaches to Appleby Magna and Measham from the west. It would also 'jump' the clear and definite boundary that the A42 creates in this location. The land falls away to the north/north west and development

here would be prominent in views from A42 southbound and also for users of the footpath which bisects the site in a north-south direction.

- 4.29 The landscape assessment concludes that the site's landscape sensitivity to new employment development is medium-low and its visual sensitivity is medium. It recommends that the views from the site to the villages of Measham, Oakthorpe and Appleby Magna are considered as part of any development proposals. It also recommends additional buffer planting where the site borders onto roads and identifies that the northern edge of the site is of higher landscape sensitivity.
- 4.30 The cumulative impacts of development at J11 on both the local and strategic highways network is being tested through the transport modelling.
- 4.31 It is possible that some strategic warehousing could be delivered on this site in an acceptable form provided the units were very carefully sited and designed, with substantial structural landscaping, including National Forest planting.
- 4.32 **Land at Corkscrew Lane (J13) EMP80.** The site comprises an arable field which is flat to gently sloping. It is adjacent to G-Park which has planning permission for up to 70,000sqm of strategic-scale warehousing (19/00652/FULM) and is bordered by the A511 to the north and east and the Leicester-Burton railway line to the south west and beyond that coppice woodland. It is not particularly well related to Ashby or any other sustainable settlement. The landscape assessment identifies that this site is of medium-low visual and landscape sensitivity. The assessment reports that there is an area of higher landscape sensitivity around the woodland to the north of the site and it would be appropriate to enhance tree cover and boundary vegetation, particularly fronting A511. This site is the subject of a current planning application (23/0042/OUT). The planning application process so far has not revealed any technical constraints that could not be mitigated.
- 4.33 In view of the site's location, and in the face of the substantial need for strategic warehousing, it is considered that the site could be allocated for strategic warehousing.
- 4.34 **Supply position at A/M42.** The apportionment figure for this location and the potential supply are compared in Table K. This shows that the requirement can be met in this location. The small gap of 1,269 sqm is considered marginal. The planning permission at G-Park, Ashby (19/00652/FULM) has already been taken into account in the Study's fundings and cannot be included as additional supply in Table K.

Table K: Supply at A/M42 Junctions 11, 12 & 13 compared with apportionment figure

Ref	Site	Area	Floorspace
EMP82	Land north of J11 (Mercia Park II)	28 ha	96,625 sqm
EMP83/84/94	Land north-east of J11	45 ha	125,000 sqm
EMP80	Land at Corkscrew Lane (J13)	11.5 ha	46,451 sqm
Total		84.5ha	268,076 sqm
Apportionment			269,345 sqm
Gap			-1,269 sqm

4.35 To conclude, all the sites recommended for allocation are shown in Table L below.

Table L: Proposed site allocations

Ref	Site	Location	Area	Floorspace
EMP90	Land south of EMA (Freeport)	J24	87 ha	240,000 sqm
n/a	Plot 16 at EMG1	J24	6.4 ha	26,500 sqm
EMP73 (part)	Land north A453, Kegworth	J24	8.6 ha	33,540 sqm
EMP97	Land south of Kegworth bypass	J24	39.5 ha	98,750 sqm
EMP98 (part)	Ellistown Terrace/Wood Road	Bardon	7 ha	30,000 sqm
EMP82	Land north of J11 (Mercia Park II)	A/M42	28 ha	96,625 sqm
EMP83/84/94	Land north-east of J11	A/M42	45 ha	125,000 sqm
EMP80	Land at Corkscrew Lane (J13)	A/M42	11.5 ha	46,451 sqm
Total			233 ha	696,866 sqm
24/01200/FUL	Land adj. to Aldi RDC, Sawley	J24	15 ha	59,910 sqm
			248 ha	756,776 sqm

5 NEED-SUPPLY BALANCE

- 5.1 There are considered to be sufficient suitable sites to meet the recommended apportionment figure for the A/M42 corridor, but not enough to meet the figures for the J24 area or for Bardon (J22).
- 5.2 **This is a risk to the soundness of the plan.** The NPPF directs that plans should seek to meet development needs in full.
- 5.3 In response, it is important to firstly record that the identified sites would make a major contribution towards the Study's recommendations:
- J24 – 55% of apportionment figure including two very substantial sites at the Freeport (240,000 sqm) and south of Kegworth bypass (98,750 sqm)
 - Bardon – 25% of the apportionment figure
 - A/M42 – 100% of the apportionment figure
- 5.4 In addition, it may be reasonable to treat the Study's findings with a degree of caution.
- Predicting future economic trends is inherently difficult, particularly over an extended time horizon such as a Local Plan period.
 - This is particularly true for the strategic warehousing sector. The sector has

grown rapidly in recent years, in particular post-Brexit and Covid. It is uncertain whether this expansion will continue at a similar rate over the 15+ years of the plan period or plateau to a more modest level. The Study has assumed that demand will continue to grow at broadly the same pace as over the past 12 years (2012/13 to 2023/24) but there is no certainty about this.

- There are some signs that the strategic warehousing units are not being built out promptly, despite applicants advocating that they are required 'immediately' to accord with Policy Ec2(2) of the adopted Local Plan. For example, a reserved matters application for G-Park at Ashby has only just been submitted (25/01411/REMM), nearly 4½ years after the part full/part outline application was approved in May 2021 (19/00652/FULM) [The site was first granted planning permission in 2012]. Land at Netherfield Lane, Sawley received outline consent in October 2021 (20/00316/OUTM) and reserved matters in July 2023 (22/00954/REMM) but the site did not progress beyond a technical start (and as confirmed under 24/00547/CLE, approved in June 2024) and a further application to vary conditions attached to the reserved matters approval was approved in September 2024 (24/00575/VCIM), nearly 3 years after the first approval. Land south of J1 A50 was approved (at appeal) in January 2023. Development has not started following reserved matters approval in March 2025 (24/00074/ REMM).
- The Study, by its nature, assessed locations' overall ability to accommodate new warehousing at a very high level. As the Study makes clear, it is for Local Plans to test whether its recommendations can be achieved:

“Detailed site allocations are expected to be explored through the preparation of individual Local Plans.....It will be for [Local Planning Authorities] to consider these recommendations in conjunction with their detailed appraisal of sites including localised transport modelling and assessments of landscape, biodiversity, land availability etc., through their Local Plans. This report therefore does not seek to pre-empt or replace ... the Local Plan process but is intended to provide strategic guidance on the reasonable spatial distribution of future strategic logistics needs.” (paragraph 8.13, emphasis added).

- 5.5 There are insufficient suitable sites to meet the Study's apportionment for J24 and Bardon (J22) locations. The apportionment for A/M42 corridor can be met although the Study identifies this as a more secondary location compared with the other locations identified in the Study.
- 5.6 In the light of the detailed findings, officers recommend that the sites described above are agreed 'in principle' for allocation in the Local Plan. Officers do not consider that there are other sites at the J24 and Bardon locations which are capable of being allocated at this stage (see Appendix B).
- 5.7 The NPPF states that Local Plans should be reviewed within 5 years of adoption (paragraph 34). The position described above will need to be re-evaluated when the new Plan is reviewed. This would include an assessment of any newly available land at J24 and at Bardon, and also an updated assessment of needs.

6 SITE ALLOCATION POLICIES

- 6.1 Strategic warehousing developments share some common characteristics. The buildings are large scale in both height and bulk, are box-like in shape with minimal fenestration (windows) or other detailing on the elevations. Developments require significant levels of parking for both cars and HGVs resulting in large areas of the site being devoted to hardstanding. Businesses often operate on a shift pattern, some with 24-hour working. Good connectivity to the strategic road network is a key requirement for most operators which generally means that HGVs are diverted away from local roads. However, such locations tend not to be well served by sustainable transport options (cycling, walking and public transport).
- 6.2 Each of the agreed sites will have a specific site allocation policy in the Regulation 19 version of the Plan, tailored to the specific circumstances of the site but the issues above are likely to be common to most. The types of criteria which could be included in the allocation policies are listed below.
- a. require the retention and enhancement of existing landscape features and for significant additional structural landscaping, including earthworks and planting, to be incorporated into the scheme's layout to help moderate the visual impact of large-scale warehouses in this location;
 - b. seek to achieve significant tree planting within and around sites equivalent to at least 30% site coverage, particularly for sites located within or close to the National Forest; stipulate the use of high quality materials and finishes with an overall design approach which also aims to moderate the visual impact of the development;
 - c. significantly upgrade walking and cycling connectivity and public transport links to make sustainable travel a realistic option for some;
 - d. ensure the potential for disturbance of nearby residents (e.g. lighting; noise) is fully addressed as part of the overall scheme design;
- 6.3 There could be value in preparing more specific design guidance for each of the proposed sites, potentially to be incorporated into the Local Plan at a later stage if resources to do this work are identified. In the meantime, Section 9 of the [draft Good Design Guide](#) includes very relevant guidance on the design of industrial sites.

7 NEXT STEPS

- 7.1 The Committee is being asked to agree these sites 'in principle' for inclusion in the Regulation 19 version of the Plan. Recommendation 9 recognises that the inclusion of these sites is subject to the outcomes of further work which is currently in train, namely transport modeling, infrastructure planning and viability assessment.
- 7.2 The sites will be subject to full, formal public consultation at Regulation 19 stage.
- 7.3 Ideally the sites would be published in the interim for 'informal' Regulation 18 consultation. This would help reveal key concerns and issues from residents and parish/town councils, national agencies and stakeholders as well as the development industry which could be considered and addressed before the Regulation 19 version

of the plan is finalised.

- 7.4 However, the resources required to prepare, administer, manage and respond to a consultation at this stage would be substantial. Significant officer time would be diverted from other critical tasks associated with finalising the Regulation 19 Plan for consideration by Council in late Spring 2026. Regrettably, officers do not consider that a further stage of consultation is feasible if the Government's December 2026 submission deadline of is to be met.

