

## APPENDIX A

### RESPONSES TO PROPOSED POLICIES (2024 Reg 18 consultation)

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| CHAPTER 4 | POLICY S1 | POLICY NAME – FUTURE DEVELOPMENT NEEDS<br>re Strategic Warehousing only |
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| MAIN ISSUES RAISED<br>[Strategic warehousing]  | COUNCIL RESPONSE  | ACTION     | RESPONDENTS<br>ID | RESPONDENTS<br>NAME |
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| We challenge the decision to assume that 50% of the outstanding Leicester and Leicestershire requirement for road-served strategic distribution floorspace needs to be met in this district. This is highly disproportionate and will only lead to yet more warehousing spoiling our countryside.  | The proposal to take 50% of the remaining requirement for strategic warehousing was an interim position based on a 2021 strategic warehousing study. This is now superseded by the findings of the Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025). This is further explained in the main, covering report for Local Plan Committee 19 November 2025. | No change. | 92                | Ashby Town Council  |
| 1 - There is a lack of any meaningful modelling of an accurate forecast requirement of Strategic B8 warehousing.<br>2 – The proposal that NWL provides for 50% of the county requirement for strategic distribution is pernicious and unrealistic. This deprives other districts of employment opportunities and overburdens NWLDC with both eyesore | 1 & 2 - This is answered by the findings of the Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025).  | No change. | 115               | Protect Diseworth   |

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| and loss of countryside as well as massive over-development. A more realistic and even-handed distribution is required. What is the relationship between the Apportionment Study and this figure? Deferring the requirement of strategic B8 warehousing is unsatisfactory.   |  |            |                   |   |
| 1- a fresh review of strategic B8 need is required, as it is clear that the 2021 study has substantially under-estimated the need for new floorspace, particularly for road-based distribution, and is not reflective of current market demand. The Study was based on research undertaken in 2020 when there was great uncertainty about the economy and market because of the Covid-19 induced lockdown. Since 2020, the market has outperformed expectations to a phenomenal degree, with demand fuelled by growth in e-commerce and structural changes to operating practices in both the industrial and logistics sectors (e.g. 'Just-in- Case' instead of 'Just-in-Time' practices and re-shoring following Brexit). Occupiers are increasingly seeking site proximity to their suppliers/ markets. Whilst the market has steadied, with developers and investors taking a more cautious | The Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025) provides an up-to-date assessment of strategic warehousing needs and further explained in the main, covering report for Local Plan Committee 19 November 2025. | No change. | 158               | The Trustees of Lord Crawshaw 1997 Discretionary Settlement (the Whatton Estate) and Bryan and Colin Jarrom |

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| <p>approach because of the hike in interest rates, demand levels from occupiers remains healthy</p> <p>2 - Notional NWL figure of 106,000sqm equates to 1.2 to 1.55 years supply (road-based). Plan makes no allowance for rail based needs despite EMG RFI and the site selection sequence in the 2021 study (para 11.19).</p> <p>3 - In summary, given the strong demand experienced in North West Leicestershire, we would encourage the local authority to update the evidence informing Policy S1(3) and express any employment floorspace targets under Policy S1 as a minimum at the least, so as not to constrain the district's ever burgeoning offer for strategic warehousing distribution sites.</p> |   |            |                   |  |
| Strategic B8 sites will not have been scrutinised in the same way as general needs sites. Interim SA doesn't consider strategic employment options   | The proposed site allocations will be subject to full scrutiny at Regulation 19 stage. At this stage a Plan will be accompanied by a final Sustainability Appraisal Report. | No change. | 186               | Wilson Bowden Developments Ltd         |
| We propose that a further Regulation 18 consultation is held to specifically address the options regarding strategic employment land. This will ensure that relevant bodies and persons have had the opportunity to make representations   |   |            | 215               | Secretary of State for Transport (HS2) |

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| on this matter prior to a preferred approach being decided by the Council.  |   |               |                       |                         |
| <p>1 - 2021 Strategic B8 study substantially underestimates need. 45% of projected rail-served need for 2020-41 has been met in first 4 years. The equivalent figure for road-served is 66%. Since 2020, the market has outperformed expectations to a phenomenal degree, with demand fuelled by growth in e-commerce and structural changes to operating practices in both the industrial and logistics sectors (e.g. 'Just-in- Case' instead of 'Just-in-Time' practices and re-shoring). Whilst the market has steadied, with developers and investors taking a more cautious approach because of the hike in interest rates, demand levels from occupiers remain healthy.</p> <p>2 - Notional NWL figure of 106,000sqm equates to 1.2 to 1.55 years supply (road-based). Plan makes no allowance for rail based needs despite EMG RFI and the site selection sequence in the 2021 study (para 11.19).</p> | 1 & 2 - This is answered by the findings of the Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025) with further explanation of the Council's proposed approach in the main, covering report for Local Plan Committee 19 November 2025. | No change.    | 197                   | Nurton Developments     |
| 1 - Take up of industry/warehousing in NWL has been nearly half of that for the county as a whole. Both Stantec and the Strategic B8 study fall grossly short of  | The Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025) provides an up-to-date  | No change.    | 204                   | Paul Fovargue           |

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| <p>historic demand.</p> <p>2 - This shows that there is strong evidence of long term economic demand for industrial and logistics space in NWL and the district holds a predominant position compared to the County at a whole. In light of this, we would encourage the local authority to update the evidence informing Policy S1(2) and (3) and express any employment floorspace targets under Policy S1 as a minimum at the least</p>  | <p>assessment of the future need for strategic warehousing. Further explanation of the Council's proposed approach is in the main, covering report for Local Plan Committee 19 November 2025.</p>  |                   |                     |   |
| <p>1 - Strategic B8 study also does not assess unconstrained demand. Plot ratios are too high. The rapid and fundamental changes in the logistics sector in recent years (post pandemic; post Brexit; reshoring; stockpiling, e-commerce growth), and the planning and development constraints that have been in place, mean that past performance is not on its own a good guide to future requirements. 5 year flexibility allowance is not justified - should reflect what would actually be needed to address the historic shortfall - and is meant to deal with multiple issues (delays in delivery, uncertainty associated with forecasting, allow for churn/vacancy). The rail/road split is</p> | <p>The Leicester &amp; Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025) provides an up-to-date assessment of the future need for strategic warehousing. Further explanation of the Council's proposed approach is in the main, covering report for Local Plan Committee 19 November 2025.</p> | <p>No change.</p> | <p>225;<br/>229</p> | <p>St Modwen Logistics;<br/>P, W, C &amp; R Redfern</p> |

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| <p>arbitrary. Savills work has been revised and reissued. It includes as alternative assessment of demand.</p> <p>2 - there are serious concerns with the extent to which the evidence base properly and fully identifies the requirement for employment land. A common theme between the approach to the non-strategic and strategic sectors is the question of suppressed demand.</p>   |                  |            |                   |                       |
| <p>Para 4.15: It is important that the Local Plan provides for both general employment land and for the growth and development of economic activity. The district and the East Midlands region have significant sector strengths that are supported by strategic distribution facilities. These activities increasingly rely on the connectivity and the accessibility to EMA and the established global logistics business that are based at the Airport and in the immediate area. It is essential that the Local Plan continues to meet the needs the logistics and the strategic distribution sector, and that it allocates and provides the land for the sustainable development of strategic logistics and distribution activities that are an important strength in North West</p> | Noted.           | No change. | 230               | East Midlands Airport |

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| Leicestershire and the wider East Midlands region.   |  |               |                       |                         |
| 1 - Review of Strategic Warehousing Needs in North West Leicestershire, that has been prepared by Turley Economics (see Appendix 4). This finds the allocation of additional land towards the southern end of the A/M42 is justified by the need to maintain an appropriate supply across the 'Areas of Opportunity' and where there is an identified under-supply of strategic sites. Based on annual average take up over the past 5 years, Avison Young estimate that the existing built supply of strategic scale floorspace [in AoO5], equates to just 8.25 months-worth of supply. The available supply of land is also limited to just two sites, with only one of these sites being located in Area of Opportunity 5, offering limited scope to satisfy unmet need beyond the next 12 months. The scale of unmet demand also remains exceptionally high with over 5 million sq ft (464,500 sqm) of active enquiries for sites in the A/M42 corridor having been identified by Avison Young. This evidence provides a strong and compelling market justification for the allocation of additional land to meet strategic distribution needs, which in the | The proposal to take 50% of the remaining requirement for strategic warehousing was an interim position based on a 2021 strategic warehousing study. This is now superseded by the findings of the Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025). This is further explained in the main, covering report for Local Plan Committee 19 November 2025 which includes proposed site allocations for strategic warehousing. | No change.    | 234                   | IM Properties           |

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| <p>North West Leicestershire context, points strongly in favour of the southern end of the A/M42 and the J11 site (EMP82).</p> <p>2 - The study underestimates need a) novel approach to modelling need which does not comply with NPPG; b) rail/road split is speculative and untested; c) more conventional completions approach would result in a higher requirement;</p> <p>3 - NWL taking at least 50% of remaining requirement should be viewed as a minimum benchmark a) NWL has 30% of large scale warehouses in Leicester &amp; Leicestershire; b) 70% of the large warehouses developed since 2010 in L&amp;L are located in NWL; c) NWL met 50% of industrial demand 2019-2024; d) the industrial space completed in NWL 2012-19 equates to 50% of that provided in L&amp;L in the same period.</p> |   |                   |                    |                                       |
| <p>Paras 4.15 to 4.17. The Strategic Distribution requirement is unrealistic. The policy lacks substance as where the warehousing supposedly required should be best located and indeed how much is justifiable.</p>   | <p>The Leicester &amp; Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025) provides an up-to-date assessment of the future need for strategic warehousing. Further explanation of the Council's proposed approach is in the main,</p> | <p>No change.</p> | <p>285<br/>503</p> | <p>Garry Needham<br/>Helen Warren</p> |



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|   | covering report for Local Plan Committee 19 November 2025. This includes proposed sites for allocation.   |               |                       |                         |
| 1 -SEGRO agrees with the strategy for strategic warehousing which aims to accommodate 50% of the outstanding road-served strategic warehousing requirement of the Leicester and Leicestershire area to be met in North West Leicestershire. SEGRO disputes the quantum of employment land that is suggested as being needed and requests this be re-assessed prior to publication of the Regulation 19 Plan. Evidence prepared by Savills suggests the strategic employment land requirement should be almost double the current estimate. In any event, the requirement should be expressed as a minimum. GL Hearn study has a number of methodological issues, in particular that the outcome is that the demand estimation is lower than past completion trends. This is totally out of step with market reality. Other issues highlighted by the Savills report included the lack of consideration of strategic B2 floorspace, the growth build element of the preferred model not taking into account the role of air freight and LGVs associated with | 1 - The proposal to take 50% of the remaining requirement for strategic warehousing was an interim position based on a 2021 strategic warehousing study. This is now superseded by the findings of the Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025). This is further explained in the main, covering report for Local Plan Committee 19 November 2025 which includes proposed site allocations for strategic warehousing.<br>2 – Comments noted. | No change.    | 290                   | SEGRO                   |

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| <p>industrial and logistics demand, the use of different plot ratios for different demand models and the unrealistic apportionment of rail-served demand. As a result of these shortcomings, it was concluded that the GL Hearn Study significantly underestimates future demand, even suggesting a lower demand than past completion trends.</p> <p>2 - SEGRO generally supports the findings of the 'Implications of East Midlands Freeport on Housing Need in NW Leicestershire' study in principle. However, SEGRO considers that the report under-estimates the potential job creation of SEGRO's proposed EMG2 development on Land south of the Airport which is considered to be 4,000, rather than the current suggestion of 3,078.</p> |   |                   |                   |                     |
| <p>Para 4.15 refers to a requirement for "strategic distribution". This is being taken in isolation for NWLDC area. Around Castle Donington many of the warehouses already built are still unoccupied. There is also a lot of new warehousing development around the A453 into Nottingham, a proposed development based around the Ratcliffe Power Station Site, and more provision</p>   | <p>The Leicester &amp; Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025) provides an up-to-date assessment of the need for strategic warehousing. This Study covers the Leicester and Leicestershire area, taking account of available units.</p> | <p>No change.</p> | <p>336</p>        | <p>Kevin Walker</p> |

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| north of the A50 around the new Aldi distribution centre. How much strategic distribution does our area need?   |   |               |                       |                         |
| Paras. 4.13 to 4.15 expand on the perceived requirements for industrial employment land and Strategic Distribution warehousing [B8 sheds]. Much of this is speculative. Even so NWLDC is accepting that 104,000 sqm, 50% of the entire County requirement will be built in NWLDC. Having committed to this outrageously disproportionate volume, the issue is then left in the air pending reports from the “Leicester & Leicestershire Apportionment of Strategic Distribution Floorspace study”. This is highly unsatisfactory and must be re-visited by NWLDC. | The proposal to take 50% of the remaining requirement for strategic warehousing was an interim position based on a 2021 strategic warehousing study. This is now superseded by the findings of the Leicester & Leicestershire Strategic Warehousing Need and Apportionment Study (November 2025) which provides an up-to-date assessment of needs. The position is further explained in the main, covering report for Local Plan Committee 19 November 2025 which includes proposed site allocations for strategic warehousing. | No change.    | 376                   | Jim Snee                |