



FAO: The Inspectors  
Charnwood Local Plan Examination  
c/o Ian Kemp, Programme Officer

Dear Inspectors

Thank you for your email letter of 1 November 2022 in relation to a query regarding the Council's employment land supply position that was raised at the Charnwood Local Plan hearing held on 26 October 2022, which the Council did not attend.

The HBBC Regulation 19 submission version of the Local Plan was informed by an Employment Land and Premises Study (ELPS) 2020<sup>1</sup>, which provided evidence of need and supply from 2020 to 2036. A summary of the borough's need and supply was set out in table 3 (page 28) of the Regulation 19 Local Plan and identified a need for between 35.3 ha and 46.8 ha of land for local employment needs (Class E (offices, R&D & light industrial), Class B2 and Class B8). Paragraph 4.17 of the Local Plan notes the ELPS concluded that there is sufficient supply to meet the identified need, albeit the majority of this supply is strategic scale B8 strategic distribution with a more limited supply of smaller scale local needs employment land. It also concluded that there is limited need for additional office space compared to general industrial and manufacturing and small local need warehousing.

The Reg 19 Local Plan goes on to explain that a Strategic Distribution Study and a Leicester wide employment land study was being prepared (i.e. the HENA) which would provide updated evidence on employment land needs. The Local Plan states that the Council "...will consider the latest evidence on employment land needs in the next iteration of the draft local plan" (para 4.19).

Table 3 further shows a total supply from 2020-2039 of 105.95 ha and draft Local Plan Policy SS02 Development Strategy makes provision: "...for a minimum of 105.95 ha of new employment land during the period 2020-2039, including:

- a) *62.85 ha of employment land already completed or committed including allocations in made neighbourhood plans, planning permissions or resolutions to grant permission*
- b) *32.1 ha of employment land allocated within the Local Plan*

<sup>1</sup> [https://www.hinckley-bosworth.gov.uk/info/856/local\\_plan\\_2006\\_to\\_2026/990/employment\\_land\\_and\\_premises\\_review](https://www.hinckley-bosworth.gov.uk/info/856/local_plan_2006_to_2026/990/employment_land_and_premises_review)

- c) 6.5 ha at the Barwell SUE (Policy SS04); and
- d) 4.5 ha at the Earl Shilton SUE (Policy SS05)" [emphasis added]

The draft Local Plan Policy SS02 references:

*"62.85ha of employment land already completed or committed including allocations in made neighbourhood plans, planning permissions or resolutions to grant permission".*

These are commitments and completions that have occurred since the plan base date of April 2020. The figure can be calculated within Table 3 which references 105.95 ha in total supply and subtracting 43.1ha outlined in employment allocations.

The HENA provides the latest assessment of employment land need and supply at FEMA level from 2021-2050. The HENA provides analysis on the future employment land needs by type from 2021 to 2036, 2041 and 2050. For HBBC, the employment land needs for these periods are forecast to be:

Period	Offices (in R&D)	Ind. & Distribution (small)	All employment land
2021-36	4.2 ha	53.4 ha	57.6 ha
2021-41	5.3 ha	65.3 ha	70.6 ha
2021-50	7.1 ha	86.8 ha	93.8 ha

(Extract from table 7.24, table 7.25 and table 7.26)

HBBC accept that the HENA provides a more up to date evidential position on employment land need and supply for the period 2021-36 and beyond. However, the periods used in the HENA reports are not perfectly aligned with the HBBC Regulation 19 Local Plan (2021-36 and 2021-2041 in HENA as opposed to 2020-2039 in the Regulation 19 Local Plan). It is therefore important to clarify that given the HENA provides analysis of future employment land needs in different timeframes, this will enable HBBC to adjust the figures to apply to a further version of the draft Local Plan and for future revisions of the Local Plan.

The HENA documents identify a need for 57.6 ha of employment land 2021-36 and 70.6 ha 2021-2041 in HBBC, whereas the HBBC Regulation 19 Local Plan 2020-2039 makes provision for 69.45 ha of employment land, not counting the commitments from April 2021– December 2021, which is 43.1 ha of new allocations in addition to 26.35 ha of existing commitments as of April 2021 (table 3, page 28).

Table 1.1 of the HENA Employment Land Distribution Paper (Exam 46) provides a summary of employment demand and supply, excluding strategic B8 distribution, for the period 2021-2036 for each local authority in the FEMA. For HBBC it shows:

Period	Need (ha)		Supply (ha)		Balance (ha)	
	B1	B2/B8(small)	B1	B2/B8(small)	B1	B2/B8(small)
2021-2036	4.2	53.4	4.2	38.9	0.0	-14.5
totals	<b>57.6</b>		<b>43.1</b>		<b>-14.5</b>	

(Extract from Table 1.1)

The information on supply in the table above is taken from the HENA table 7.24 and table 3 of the Regulation 19 Submission draft Local Plan (February 2022).

The HENA does not identify strategic B8 distribution needs for the FEMA as these are being assessed through a Leicestershire-wide Strategic Warehousing and Distribution Study. Table 3 of the HBBC Regulation 19 Local Plan provides for 20ha of strategic B8 at Land North of Neovia, Desford, and an undetermined split of B2/B8 at Land at Wood Farm, Stanton Under Bardon. The latter only has outline permission at this stage. Together this adds up to the 36.5ha of commitments April 2021 – December 2021.

The council's Regulation 19 submission version Local Plan did not use the HENA to inform the employment land needs policy as it had not been published at the time the plan was consulted on. At this stage HBBC had proposed to plan for 69.45ha of strategic employment land for the plan period to 2039 and were comfortable that this was in excess of the HENA proposed 57.6ha although accepted this was for the period to 2036 only as the uplifted employment need figure from 2036 onwards could be planned for in later revisions of the HBBC Local Plan. In late May 22, an error in the HENA was identified relating to the use of incorrect plot ratio figures. This resulted in HBBC moving from an approximate balance of need and supply to a shortfall of 14.5 hectares. This need was not reflected in the Regulation 19 Plan as the error was identified after the conclusion of the Reg 19 consultation.

As set out in our response to the MiQs, the Council is currently considering a new timetable for progressing the borough's Local Plan. A new timetable for progressing our Local Plan will allow us to reflect the latest employment land need position as set out in the HENA and the Strategic B8 Distribution Study as per our commitment at paragraph 4.19 of the Regulation 19 Local Plan. A revised Local Development Scheme (LDS) is expected to be considered by Council on 13 December 2022. Unfortunately, I am unable to share the detail of the revised LDS at this stage as it is still in preparation in readiness for the December meeting, at which time it will be in the public domain. However, I can confirm that the Council will not be publishing a new Regulation 19 submission version of the plan for consultation in 2023.

Yours Faithfully

Kirstie Rea  
Planning Manager (Policy)