

**Savills on Behalf of Wilson Bowden Developments**

**Matter 2: Vision, Objectives, Sustainable Development and the Development Strategy**

**Issue 1: Are the Vision for Charnwood 2037 and the Plan’s objectives soundly based and will they contribute to the achievement of sustainable development?**

**2.1) Do the Plan’s vision and objectives cover the full range of opportunities, challenges and priorities that need to be addressed in the Borough over the Plan period? Is it clear how the policies will help to deliver the vision and objectives over the Plan period?**

No – the need for large-scale employment land provision including a site comprising a minimum 10ha with excellent access to the M1 (identified in the Employment Land Review (ELR) 2018, p.63-64) has not been adequately considered or planned for. In the absence of this type of allocation, the Plan is not positively prepared and has not adequately addressed the evidence base which clearly recommends the allocation of a site for large scale warehousing in the Borough.

Supply and demand research concerning warehousing and logistics units of over 100,000 sqft (9,290 sqm) undertaken by Savills (Big Shed Briefing, January 2022) estimates that vacancy rates in the East Midlands are at an all-time low of 1.69% (Figure 1), with take up continuing to increase beyond the long term average (Figure 2). This demonstrates the significant market demand for large warehousing units in the East Midlands, in particular within the ‘Wider Golden Triangle’ (Figure 3) which covers Charnwood and its strategic road network.

Figure 1: East Midlands Big Shed Supply (Source: Savills Big Shed Briefing January 2022)

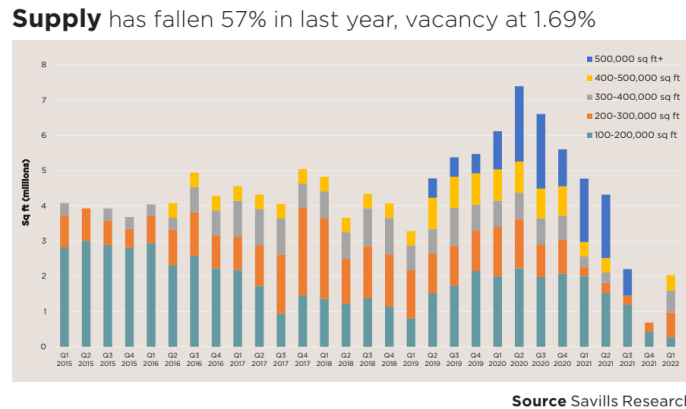
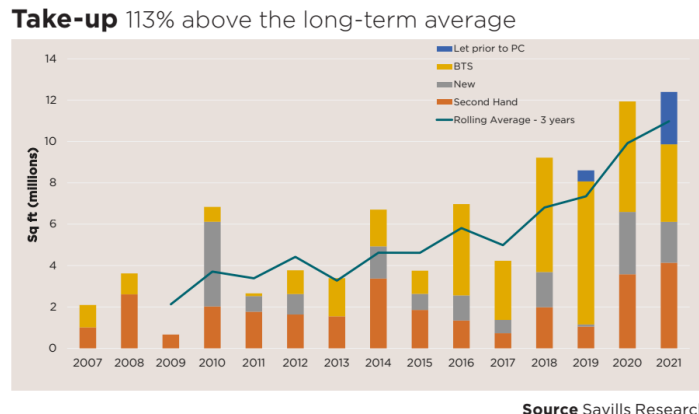
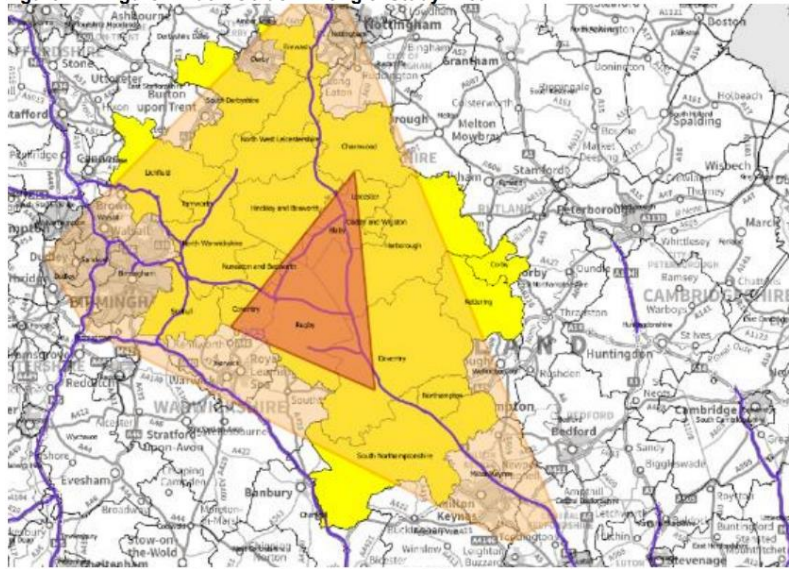


Figure 2: East Midlands Big Shed Take-up (Source: Savills Big Shed Briefing January 2022)



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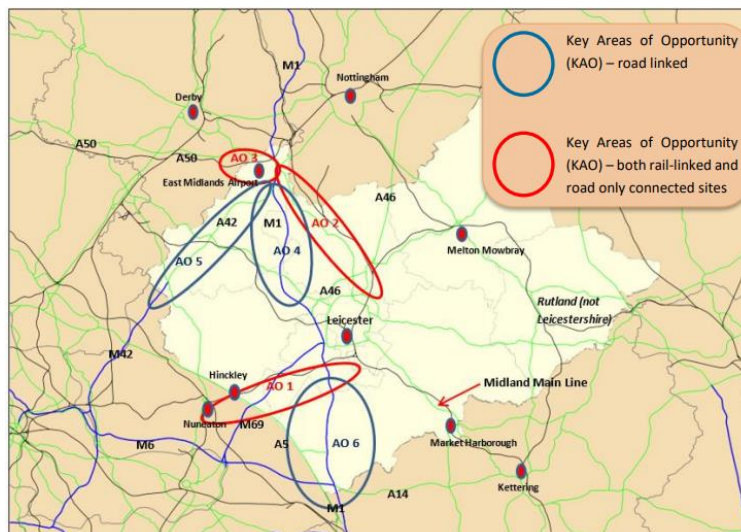
Figure 3: Wider 'Golden Triangle' Study Area (Source: Warehousing and Logistics in Leicester and Leicestershire 2021, updated 2022 (page 22))



The Council's evidence base also recognises the significance of the M1 corridor. The Warehousing and Logistics in Leicester and Leicestershire study (2021, updated 2022) designates the broad area to the north of Leicester along the M1 and A512 transport corridors as a Key Area of Opportunity (AO4) for the location of road-served strategic warehousing and logistics sites (Figure 4). The Warehousing report makes it clear that these Areas of Opportunity were chosen using the following criteria:

- Good connections with the strategic highway network;
  - Good connections with the railway network;
  - Appropriately located relative to the markets to be served; and
  - Is accessible to labour and located close to areas of employment need.
- (Warehousing and Logistics in Leicester and Leicestershire report, 2021 (updated 2022)).

Figure 4: Key Areas of Opportunity, Leicester and Leicestershire (Source: Warehousing and Logistics in Leicester and Leicestershire 2021, updated 2022 (page 139))



NB: Boundaries of key areas are not definitive and are shown for indicative purposes only

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We consider that that sites within AO4 (and specifically those with close proximity to the M1) should have been prioritised for development, particularly given the location of Charnwood's only motorway junction (J23) which is located equidistant to the key employment areas of Shepshed and Loughborough. Wilson Bowden Developments has detailed local market knowledge and is aware of a major existing employer that wishes to expand or relocate to premises with M1 access but the adopted and emerging draft local plan makes no suitable provision for this requirement.

Whilst WBD recognise that the Inspectors are only considering the plan that has been submitted, they contend that it could be made sound through a Main Modification which allocates land east of junction 23 for major employment use, in line with the ELR identified requirement. A concept plan showing how this land could be brought forward in line with the evidence base is appended to this matter statement and is supported by a range of technical work (available on request) including:

- Desk Based Heritage Assessment;
- Biodiversity Appraisal;
- Preliminary Landscape and Visual Assessment;
- Access Appraisal; and
- Flood Risk & Drainage Strategy Appraisal.

The technical work concludes that this site is deliverable.

Therefore, WBD conclude that as presented the Draft Charnwood Borough Plan is not positively prepared as the Borough-level requirement for a site of minimum 10ha with excellent access to the M1 (which was identified by the ELR and is further supported by the Warehousing and Logistics in Leicester and Leicestershire study) has not been included.

### ***Issue 3: The Development Strategy***

#### **2.11) Is the distribution of development in Policy DS1 justified by the evidence and were all options for the level and distribution of growth tested through the Sustainability Appraisal? What is the justification for a greater proportion of new dwellings being delivered in the Service Centres compared with the 'hybrid' option tested?**

No – CBC's evidence base highlights a requirement for an employment site of a minimum 10ha with excellent access to the M1 to meet a need for large-scale warehousing. As shown in Table 1 below, the proposed employment allocations do not include any single site comprising a minimum of 10ha with excellent access to the M1. Therefore this part of the evidence base has not been accounted for in the strategy. Very few of the employment allocations are located in close proximity to the M1, and those which are lack the size (minimum 10ha) or layout required to meet the large-scale requirement identified in the ELR. In addition, there are no large-scale employment allocations which fall within Opportunity Area 4 (AO4) which was recommended as a key area to locate development in the Warehousing and Logistics in Leicester and Leicestershire Study 2021 (updated 2022).

Table 1: Savills review of emerging employment allocations against the recommendations of the Employment Land Review 2018

| Site Ref | Criterion 1: Minimum 10ha in size  | Criterion 2: Proximity to the M1  |
|----------|--|---|
| LSEP     | 73ha - this site has been allocated for a specialist employment use (science park) which is controlled and proposed to be delivered by Loughborough University. It is therefore not available for general industrial (class B2) or storage and distribution (class B8) employment requirements arising from market demand. | 0.5 miles   |
| ES1      | 2.3ha  | 8.4 miles   |
| ES2      | 15ha, however site is oddly shaped suggesting smaller units  | 9.7 miles   |
| ES3      | 3.95ha   | 12.9 miles  |
| ES4      | 16ha, but this site is fragmented into 3 irregular shaped parcels.   | 2.5 miles – however HGV traffic will either have to travel through the new housing development, or via backroads through Shepshed/ Hathern. |
| ES5      | 9ha  | 11 miles  |
| ES6      | 3.35ha   | 8.4 miles   |
| ES7      | 2.2ha  | 8.4 miles   |
| ES8      | 5ha (does not meet the minimum 10 Ha requirement and is for smaller scale / local employment uses)   | 0.8 miles to Junction 23, however this would be via an access onto Fairway Road which is a residential street.                              |
| ES9      | 12ha, but this is split into 3 parcels   | 10.6 miles  |
| ES10     | 13ha, but access is via a narrow country lane to the north or a housing estate to the south  | 9.5 miles   |

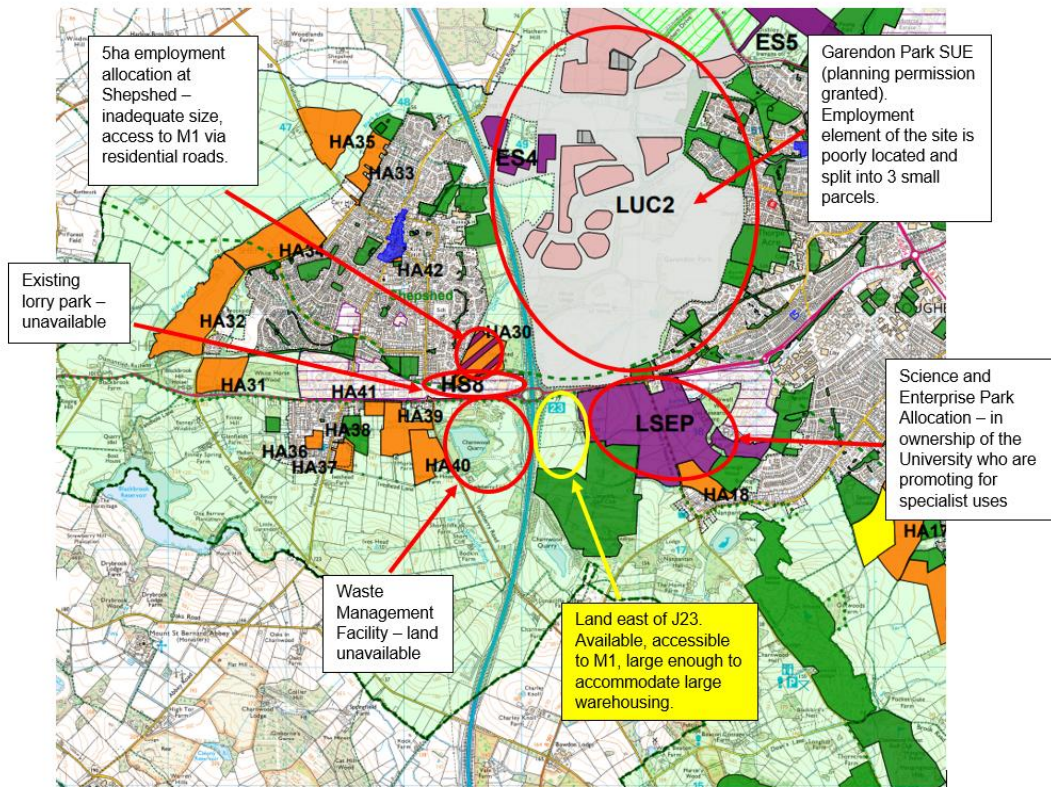
The Pre-submission Sustainability Appraisal (SD/5) states that the Council considered employment alternatives against their compliance with the ELR 2018 and the HEDNA 2017 (para 5.1.1). The Sustainability Appraisal states that, despite the recommendation of the ELR 2018 (which was to allocate a site close to the M1 of at least 10ha), a 5ha site was allocated at Shepshed, and goes on to state that *“the rationale for release is to support flexibility and spatial strategy (rather than to attract large scale warehouses)”* (para 5.2.5). The SA does not contain a site-by-site assessment of the sustainability of each employment site (unlike other Local Plans currently at Examination stage such as Shropshire). It appears from this evidence that the Council does not wish to support large-scale warehousing and WBD consider that this approach is putting local business expansion at risk because not all large-scale employment relates simply to warehousing.

Therefore, we consider that the Plan is not positively prepared, not justified, and has not taken into account reasonable alternatives, particularly alternative sites close to Junction 23 of the M1. As discussed, the only employment site mentioned by name in the Sustainability Appraisal is allocation ES8 to the north-west of J23 near Shepshed. The NPPF (paragraph 35) is absolutely clear that reasonable alternatives should also be taken into account, therefore we consider that a more justified approach would have been to assess land parcels in a defined radius to J23, as this is the only motorway junction within Charnwood’s administrative boundary.

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We illustrate in Figure 5 below the land surrounding Junction 23, M1 which could have been considered as alternative locations for a site of minimum 10ha with excellent access to the M1 motorway. After taking into account permissions already granted and current uses and constraints of different parcels, it is clear that there is a site of 22ha located south-east of the junction which is available and accessible via the recently upgraded A512. A review of the 2020 SHELAA has also identified that aside from the Science Park land, no other employment sites (either included or omissions) are contained which can provide this scale of development. Therefore, we consider that land south-east of J23 (SHELAA site ref PSE285) represents an appropriate site at which to situate the site of minimum 10 ha with excellent access to the M1 as recommended in the ELR.

Figure 5: Suitability of land parcels surrounding Junction 23, M1 for large-scale warehousing development (Source: Charnwood Local Plan Policies Map, Savills annotations)



**2.12) Does Policy DS1 set out a clear approach to the distribution of future housing and employment development across the different settlements in the hierarchy?**

With regards to employment, Policy DS1 fails to recognise the opportunity to locate development around the M1 motorway as part of a significant Area of Opportunity for the Borough, as evidenced by the Warehousing and Logistics in Leicester and Leicestershire Study 2021 (updated 2022). Further to this, the 2018 ELR recommended that a site of minimum 10ha be allocated with excellent access to the M1. Policy DS1 fails to be positively prepared, as the development strategy it sets out is not consistent with these evidenced requirements.

We welcome the policy wording of Policy DS1 which recognises Loughborough as the “main social, economic and cultural focus within the Borough”. A clear settlement hierarchy is also



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defined in Table 4 of the Plan, and we consider that the employment allocations accord with this hierarchy overall. However, we consider that the distribution of future employment development should also be informed by the proximity of sites to the M1 motorway in order to provide a site of minimum 10ha to provide large-scale warehousing development. Currently, the Plan does not allocate a large-scale site for this purpose near to Junction 23, Charnwood's only motorway junction. We consider that the settlement hierarchy and Policy DS1 should set out preferred locations for different types of employment (industrial, small-scale B8, large-scale B8, and offices), as this would represent a more justified approach to the development strategy.

It should also be noted that land east of J23 is situated between Loughborough and Shepshed which are listed as the first and second tier settlements in the settlement hierarchy respectively. Therefore, land east of J23 is considered to be a highly sustainable and appropriate location for large-scale warehousing development.