

16 January 2023
Delivered by email

Inspectors Sarah Housden and Hayden Baugh-Jones

Ref: IM Q3039

Dear Inspectors

CHARNWOOD LOCAL PLAN EXAMINATION HEARING SESSIONS 2023

We write on behalf of our client, IM Land (“IML”) and IM Properties (“IMP”), in response to the Matters, Issues & Questions (“MIQs”) that were not dealt with in the hearing sessions in June and/or October 2022 and the supplementary questions in relation to the findings on the unmet need for housing and employment in Leicestershire.

This letter responds specifically to Matter 5: Employment Development and Town Centres.

ISSUE 3 – WAREHOUSING AND LOGISTICS FLOORSPACE

5.14 How will the Areas of Opportunity identified in the Study be taken forward? Does this represent an unmet need across the Leicester and Leicestershire authorities or is it a cross boundary issue to apportion the distribution of logistics space?

There is an unmet need across the Leicester and Leicestershire authorities for strategic warehousing and logistics floorspace and it is a cross boundary issue to apportion the distribution of logistics space across the county.

The ‘Leicester & Leicestershire Authorities – Statement of Common Ground relating to Strategic Warehousing & Logistics Need’ (September 2022) (“the SoCG”) has been reported to and approved by a number of Cabinets across Leicestershire. However, it is unclear whether it has been reported to and approved by Cabinet in Charnwood borough.

Nevertheless, the SoCG sets out the following in relation to strategic warehousing and logistics floorspace in Leicestershire:

- (i) The authorities agree the ‘Warehousing and Logistics in L&L: Managing Growth and Change’ study (April 2021) is the most up-to-date evidence on strategic B8 need.

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- (ii) As at 1st April 2021 the supply position suggests there is a shortfall of 718,875m² at rail served sites and 334,986m² at non-rail served sites up to 2041. The supply includes land with planning permission, allocations and vacant units.
- (iii) The authorities agree that the current supply of strategic B8 is “strong”.
- (iv) The authorities agree the Areas of Opportunity specified in the study “represent the most likely general broad areas” for new strategic B8.

Paragraph 3.12 of the SoCG is clear on how the Areas of Opportunity will be taken forward, which includes reliance on the Strategic Growth Options & Constraints Study to “inform an approach to meeting the L&L need which maintains an appropriate supply across the AoO, in terms of geography and trajectory, as recommended by the study.”

There are two Areas of Opportunity identified within the Charnwood borough boundary and which also extend into other authority areas including Hinckley & Bosworth borough along the A50. It is Charnwood’s duty to cooperate with its neighbouring authorities to ensure the unmet need is distributed in the right places across Leicestershire – either as part of this Local Plan or it’s on-going engagement with the SoCG. This may include the preparation and publication of a second Employment Land Distribution Paper for strategic B8 only.

5.15 Should the Plan be more explicit about addressing the need for logistics and warehousing floorspace to 2041 identified in the Study? Is there a need for a specific reference to logistics and warehousing within Policy E1 (Meeting Employment Needs) or within other policies as well, for example Policy DS1?

Yes, the plan should be more explicit about addressing the known need for strategic logistics and warehousing floorspace to 2041 identified in the study. There should be specific reference to strategic logistics and warehousing within Policy DS1 and Policy E1 in addition to the existing explanatory text at paragraphs 5.30 to 5.35 of the Local Plan.

If Charnwood Borough Council (“CBC”) is unable to address all or part of the known unmet need now within its own boundary it must work with its neighbouring authorities, such as Hinckley & Bosworth Borough Council (“HBBC”), to determine a suitable suite of specific locational criteria for the Strategic Growth Options & Constraints Study and/or a second Employment Land Distribution Paper for strategic B8 only. This should be used to guide the direction of strategic employment land across Leicestershire to inform future plan-making.

The criteria can inform discussions and agreements in future iterations of the SoCG to deliver the unmet need where demand is highest in the county including in Hinckley & Bosworth. It is recommended the criteria is as follow for site consideration:

- (i) It is located within or adjoining an Area of Opportunity.
- (ii) It can accommodate multiple buildings each above 9,000m² in floorspace.
- (iii) It is within an appropriate drive-time to rail freight terminals / interchanges, airport(s), the motorway and/or trunk road network.
- (iv) It is within close proximity to a strong labour market / supply.
- (v) It is not subject to any international and/or national environmental designations.

- (vi) It is capable of being adequately served by power.
- (vii) It will limit detrimental impacts to the health and living conditions of neighbouring residents.

Alternatively, and if the above approach is not endorsed by CBC, it can commit to either of the following:

- (a) A Local Plan review should the Strategic Growth Options & Constraints Study and/or second Employment Land Distribution Paper for strategic B8 only find a deliverable or developable strategic employment site in its boundary, or
- (b) Provide support for strategic employment planning applications that lie within or adjoin the Areas of Opportunities identified in the study, or
- (c) Provide policy guidance in the Local Plan to determine how planning applications for strategic employment will be supported subject to specific locational criteria.

The latter approach has been taken in adopted Local Plans for neighbouring authorities including HBBC and North-West Leicestershire District Council (“NWLDC”) and further afield by North Warwickshire Borough Council (“NWBC”). NWBC is now preparing a separate Employment Development DPD to deal with strategic employment land need and distribution and to reduce the prospect of speculative planning applications – this could have been avoided if strategic employment land was dealt with as part of its recently adopted Local Plan, a position CBC could soon find itself in.

5.16 Overall, does the Plan allocate a sufficient amount, mix and choice of employment sites to meet future needs and has the Plan’s economic strategy been positively prepared? Are the Plan’s economic and housing strategies aligned?

No, the plan does not allocate a sufficient amount, mix and choice of employment sites to meet future needs as it is currently silent on the known identified unmet need for strategic warehousing and logistics floorspace.

We trust the information provided in this letter will be considered by the Inspectors and should there be any questions on the letter, please don’t hesitate to contact me.

Yours sincerely

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