

Forward Planning Team
North Warwickshire Borough Council
The Council House
South Street
Atherstone
Warwickshire
CV9 1DE

Our Ref: let.CoC.NWBC.002
8th May 2024

Dear Sir/Madam,

Final Draft NWBC Economic Strategy and Action Plan Consultation - Representations on behalf of Coventry & Warwickshire Chamber of Commerce

1. Prologue

The Coventry and Warwickshire (C&W) Chamber of Commerce (hereafter referred to as 'the Chamber') would like to thank you, on behalf of the C&W business community, for the opportunity to respond to the consultation on the Final Draft Economic Strategy and Action Plan ('the Strategy') for North Warwickshire Borough Council ('NWBC').

The Coventry and Warwickshire (C&W) sub-region, particularly in the north of Warwickshire and around Coventry, lies at the heart of the 'Logistic Golden Triangle' and the national strategic road network. It is therefore imperative that sufficient land for freight (including supporting infrastructure such as lorry parking facilities), warehousing and logistics is identified and allocated within the sub-region to meet both the local needs of the sub-regional population but also the wider strategic needs of the nation.

The Chamber views are focused on the undersupply of sufficient employment land and commercial properties to meet the needs of North Warwickshire Borough and the sub-region. In the interests of the wider economy and the people of the sub-region, The Chamber's long-held argument has been that our Local Plans simply don't adequately reflect the real employment land needs of our sub-region.

Indeed, NWBC will understand that a key concern of the Chamber is the fact that during two rounds of plan making covering the period from 2009 when the Core Strategy was first published for consultation, the existing Local Plan and to the present day, on both occasions the issue of allocating sufficient land to address the strategic need for warehousing and logistics and to meet the needs of existing and future business and occupiers to drive growth into the sub-region has not been dealt with conclusively through the identification and allocation of sites in successive plans.

Businesses across North Warwickshire and indeed the C&W sub region are reliant on the overall supply of employment land and business premises. There are myriad issues that the Government and the private sector need to navigate in a quickly changing world, including climate change, public infrastructure, power and utilities, however the issue of under supply and reluctance to allocate appropriate employment land has been the primary obstacle to economic process in the region.

There is clear evidence demonstrated to us from our Members and observed from market signals/distortions we see for employment land which both reinforce to us that Employment Land targets need imminently revisiting. The Coventry & Warwickshire Housing & Economic

Development Needs Assessment (HEDNA) (November 2022) which the Chamber provided a detailed response to in March 2023 as part of the South Warwickshire Local Plan: Issues and Options Consultation (a copy of which is at **Appendix A**) and the (yet to be publicly released) West Midlands Strategic Employment Sites Study (Phase 3) reflects and reinforces this contention. It is crucial that land targets exceed demand to stimulate the delivery of sufficient new Employment land which is fundamental to our collective economic future. As a sub-region, and at each Local Authority (LA) level, we must recognise there are a number of changing global political and economic factors, including the Covid-19 pandemic, the War in Ukraine, the over-dependency on imports from China. Furthermore, the long-held "outsourcing abroad" approach of key elements of our manufacturing, food and energy "supply chains" are now likely to be significantly "reversed" as a necessary and essential response to ensure Britain has a "balanced economy". This will place further pressures on the existing inadequate supply of Employment Land.

Flexibility and capacity in our employment land is also imperative, particularly as we experience a shift to electrification of many manufacturing and vehicular processes which will render many plants and buildings unfit for purpose. If we want to successfully manage the Green transition for the benefit of the environment, we need to provide necessary space and infrastructure to do so. We must also place a greater emphasis on Energy generation and distribution, particularly in Local Plan Reviews. While the powers to spearhead this may lay heavier in Central Government, work can be done locally to respond to the Green Energy agenda. We would cite Coventry City Council's recent 15-25 year partnership with Eon to proactively respond to the move towards more sustainable energy sources, but also importantly to harvest the economic opportunities in the sub-region and play a leading role on the energy transition on a national and international level.

The Chamber has previously responded to our LAs' Local Plan Reviews and Evidence Consultations including for South Warwickshire (produced jointly by Stratford-upon-Avon District Council (SADC) and Warwick District Council (WDC)), Coventry City Council (CCC), Nuneaton & Bedworth Borough Council (N&BBC) and Rugby Borough Council (RBC)) as well as the HEDNA study and the West Midland Strategic Employment Sites Study. The Chamber has consistently affirmed that our Local Plans must recognise and proactively respond to the need for Affordable Employment Land. Support should be provided for commercial operations that throw up nuanced employment land needs, such as 'spin-offs' from our Science and R&D parks, 'start-up' or 'grown-on' companies that have varying space and infrastructure requirements. In the same vein we must recognise and support industries that are less dense in their physical property needs but still require land for their operations such as bus and HGV operators.

NWBC must be a key and active partner in the delivery of the much enhanced targets for new Employment Land, and the avoidance or reluctance to do so will prejudicially impact upon the economic future of the sub-region and its people. Unfortunately, and unlike some other LA's in our sub-region, the tone and restrictions in thinking that are implied by NWBC's Final Draft Economic Development Strategy and Action Plan and Draft Employment DPD give the Chamber real cause for concern.

The main weakness (and there are many) of the Strategy is that the Action Plan follow up does not really address resources, organisation or address how NWBC is going to implement some of the many Actions listed. The Chamber needs to see that NWBC is approaching this

challenge in a positive and proactive way and would like to be actively involved with the LA to discuss how this can be approached and implemented.

2.0 Specific comments on the Final Draft Economic Development Strategy and Action Plan

These representations respond (in sequence) to the topics and relevant questions (Q5 to Q12) contained in the online consultation form to ensure consistency with the online form. Alongside this response, the Chamber has responded separately to the consultation for the Draft Employment Development Plan Document ('DPD').

Purpose and ambition

"The Economic Strategy outlines our vision as to where we want the Borough to be by 2030, underpinned by four strategic themes:

- ***Supporting business growth and innovation***
- ***Securing a pipeline of talent***
- ***Enabling investment in infrastructure to support a low-carbon, modern and forward-looking economy***
- ***Supporting vibrant town and service centres through quality place-making."***

Q5. Do you think these strategic themes are adequate?

The Chamber broadly supports the four strategic themes of the Borough's vision, especially the theme of 'supporting business growth and innovation'.

The Chamber would, however, suggest that this vision is clearer on achieving business growth by making a more explicit reference to creating a policy framework that seeks to support the continued maintenance, development and growth of the local and sub-regional economy and more clearly aligned with the NPPF:

- NPPF paragraph 85 is clear that planning policies should help 'create the conditions in which businesses can invest, expand and adapt...allowing each area to build on its strengths [which is] particularly important...in areas with high levels of productivity, which should be able to capitalise on their performance and potential'.
- Furthermore, in addition to the requirement for planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth (paragraph 86(a)), paragraph 86 also states that planning policies should: b) set out criteria for or identify strategic sites to match the strategy and to meet anticipated needs over the plan period; and d) be flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in economic circumstances.

The Strategy identifies that the main contributors to the North Warwickshire economy in 2020 after wholesale and retail were the transport & storage (£446 million); manufacture of metals, electrical products & machinery (£404 million); and warehousing, transport support, postal & courier services (£342 million). The transport and logistics sector is rightly recognised as 'a key part of the Borough's economy and is likely to continue to be so, given its nationally strategic location'.

The Warwickshire Strategic Economic Plan (SEP) (2024-2034), which came into effect from 1 May 2024, provides a clear purpose and direction for economic development, helping stakeholders align their efforts towards objectives for the whole of the county, and those which are more locally focused. Ambitious growth is one of the strategic pillars identified in the SEP which also identifies a number of key sectors including logistics. The SEP states that

a key deliverable will be to 'Develop Sector Growth Plans for each of our identified priority sectors, setting out a coherent approach to support the continued development and success of these planks to our economy'.

The strength of this and other sectors being recognised in the Strategy, which also aligns with the Warwickshire SEP, is supported and as set out in our representations to the Employment DPD, to sustain the success of these sectors, the DPD (or in the event that a Local Plan Review is undertaken instead) needs to allocate and provide support for employment sites of this nature in the right places. Specific policy reference should be made to supporting and encouraging the key sectors in North Warwickshire included the sectors listed above.

NWBC elected not to allocate sites for 'Strategic Employment Land' through the Local Plan, instead opting to only allocate sites to meet its identified 'local need' based on its projected housing need. A total 57.35 ha of employment land was allocated including 6.8 ha of expansion land for Aldi at Atherstone (site E1), a 3.45 ha site "for uses, appropriate to the location reflecting the proximity with existing leisure and residential development" (site E3) and 42 ha of land south of MIRA Technology Park "for E(g)(ii) (research & development) and B2 use classes, with B8 (warehousing & distribution) uses permissible only where ancillary or clearly secondary to the primary use" (site E4). As such, only 5.1 ha of land, site E2 'Land to the west of Birch Coppice, Dordon' can be said to genuinely have potential to deliver new logistics floorspace. This is less than 9% of the total employment land allocated in the plan. As indicated above, the Strategy and separate Employment DPD (or in the event of a Local Plan review) therefore present a critical opportunity to address these issues and secure long-term growth for the sub-region.

The Strategy also highlights the importance of the strategic rail freight interchanges at Birch Coppice and Hams Hall as a means of reducing road traffic, which is also acknowledged in Local Plan Policy LP12 in which the two interchanges are described as being of 'strategic significance' and whereby businesses and developments on these two estates are encouraged to use the interchanges. For consistency, we have set out in our representations to the Employment DPD that it should similarly highlight the aforementioned strategic significance of the Birch Coppice and Hams Hall strategic rail freight interchanges given their strategic location and sustainability credentials for supporting employment development within their proximity and indeed the allocation of additional employment sites should be prioritised in these areas. Development in such locations would help stimulate further investment and growth into the sub-region by locating linked business in clusters around key and important transport hubs, which we note is a key requirement of NPPF paragraph 87.

Economic & Policy Context

"Inclusive economic growth is essential if we are to Level-Up the Borough to tackle inequalities and low wages, pockets of deprivation and poor housing provision that affect our communities. Work to support economic growth, particularly to attract and secure investment to unlock major development opportunities, will need to be a core feature of our future economic development programme.

In addition to the fiscal stimulus measures to get the country back on its feet and the Government's 'Building Back Better' agenda, there is a renewed focus on climate change, sustainability and working towards net zero. We need to ensure

that we focus on our commitments to climate change actions that deliver a better result both for the local economy and for the environment.”

Q6. Are these the correct focuses for economic growth in North Warwickshire?

The Chamber is supportive of NWBC’s proposed focus on attracting and securing investment to unlock major development opportunities.

However, investment throughout North Warwickshire and the wider C&W sub-region is dependent the availability of employment land and commercial properties. It is therefore crucial for the Chamber to highlight that the current North Warwickshire Local Plan falls short in addressing the demand for new employment land and commercial spaces (and indeed successive plans have failed to adequately address the matter), as identified at the outset of these representations. This shortfall poses a significant challenge in meeting the requirements of both current and future businesses and occupants, hindering the potential growth of the sub-region.

As such, whilst the focus is valid, it should be recognised that to ‘unlock major development opportunities’, releasing an appropriate amount of development land with a buffer for flexibility is imperative to attract inward development from a range of businesses and potential occupiers. The emerging Employment DPD (or in the event of a Local Plan review) provides a critical opportunity to achieve this but it must be underpinned by a corresponding Strategy.

Indeed, the idea of inclusive economic growth is important, and the creation of local jobs and training opportunities can be incited by employment development supported by clear employment and skills strategy. We note that this is also reflected in the SEP which establishes aims of reducing inequalities and increasing social mobility. One of the key priorities from the Council with the SEP that the Chamber supports is to review the employment and careers support offer for all residents with a focus on priority groups, ensuring there are consistently strong academic, technical training and engagement pathways in high quality settings across the county that meet the needs of local employers (including T-levels and apprenticeships).

The Chamber would agree that new development opportunities should and can benefit all sectors of the society through upskilling, training and employment opportunities, including in sustainability and transformational roles which ensure the growth has a green-focus.

Policy Context

“Following the unsuccessful Levelling Up Round 2 bid, North Warwickshire Borough Council will submit a bid for Levelling Up Funds (Round 3) to create a new ‘Health and Wellbeing activity hub’ in Atherstone town centre. Subject to feedback, it is likely to include a new wet and dry leisure facility, new library and relocated NHS clinic. Its allocation of £3.5 million UKSPF will be used to:

- ***Enhance community facilities, amenities and activities that support community health and well-being including by reducing social isolation and loneliness; and***
- ***Improve the vitality and viability of the Borough’s market towns, enhancing their contribution to community health and well-being and the development of the Borough’s visitor economy.***

At sub national level West Midlands Local Industrial Strategy (2019) guides policy on transport infrastructure, housing, skills and innovation. It identifies key market opportunities as the future of mobility; data driven health and life

sciences; creative, content, techniques and technologies; and modern services. Warwickshire County Council is currently refreshing its economic strategy. Seven emerging themes have been identified:

- **Maximising the county's economic strengths;**
- **Supporting business growth;**
- **A well and appropriately skilled population;**
- **Inclusive Growth;**
- **A network of diverse and vibrant place;**
- **A connected county; and**
- **A green and sustainable economy."**

Q7. Do you think this would be beneficial for the community?

The Chamber is fully supportive of any bids for Levelling Up Funds to help level up the sub-region and improve social sustainability and mobility in the area.

The proposed bid for a 'Health and Wellbeing Activity Hub' is important initiative that could improve the wellbeing of the Borough's residents. The improved health and wellbeing in the Borough could potentially have positive 'knock-on' effects in the long term on productivity and economic growth.

Q8. What other facilities should be introduced?

The Chamber would be supportive of education and training facilities for young adults across a range of sectors, particularly focussed on computer literacy and computer science. We note that this would align with the key priorities within the SEP which identifies skills and education provision as a key deliverable for the borough to support inclusive growth. This can ensure that the upcoming generation are suitably upskilled for technological advances such as artificial intelligence and data science that are transforming many industries. Such facilities could, for example, be delivered as part of employment allocations and other strategic employment development in the Borough.

Q9. Do you agree with these themes?

Maximising's the county's economic strengths and supporting businesses growth aligns closely with the Chamber's objectives and indeed the SEP's focus on ensuring Warwickshire's economy is vibrant and supported by the right jobs, training, skills and infrastructure. However, as identified elsewhere in these representations, the vision and themes are currently undermined by the lack of appropriate employment land provision in the Local Plan (and indeed in successive plans).

As we set out in detail in our representations to the Employment DPD consultation, the provision of a minimum of 100 hectares of employment land over the plan period for 2011-2033 needs to be refreshed to meet the needs of the future needs of existing and incoming business up to 2050, and based on current, post-pandemic data and with additional employment allocations to ensure the refreshed need is clearly support by policy. Subsequently, the themes should be more clearly defined in terms of unlocking development land for existing and new businesses.

North Warwickshire Profile

"Overall, North Warwickshire performs poorly in terms of social mobility, based on its deprivation profile, however. This is particularly the case for School Social Mobility indicators (SMI 2022): It is within the 'weak education; strong adulthood' quadrant of the Social Mobility Commission's Social Mobility Index report.

The Borough is strengthening its visitor offer, building on the Belfry Hotel, Spa and Golf Course and ensuring it benefits from the other cultural and natural attractions offered in the wider Coventry and Warwickshire sub-region. Emerge Surf Birmingham, located on a 15 acre (6.1 hectares) site in Coleshill is expected to attract 250,000 visitors per year, whilst there are also plans for a 51.5 metre Eternal Wall to become a major tourist attraction. Both developments will enhance the visitor product offer and it will be important for the Borough and industry to look at ways on encouraging visitors to stay longer and spend more within the locality."

Q10. Why do you think that social mobility is scored poorly?

The Chamber has no comments to make in response to this question, although reserves its position to comment on the matter in future submissions.

Q11. Will these attractions help to encourage more visitors?

The Chamber has no specific comments to make in response to this question, although reserves its position to comment on the matter in future submissions, however at a high-level, the Chamber fully supports the further growth and expansion of the visitor economy and tourism. The development plan framework must positively support these developments to help encourage more visitors to the Borough.

Vision and Priority Themes

"The Economic Strategy outlines our vision as to where we want the Borough to be by 2030 and beyond, underpinned by four Priority Themes:

- ***Supporting business growth and innovation***
- ***Securing a pipeline of talent***
- ***Enabling investment in infrastructure to support a low-carbon, modern and forward-looking economy.***
- ***Supporting vibrant town and service centres through quality place-making."***

Q12. Do you think these themes are correct?

The Chamber reiterates its response to Q5 which addresses the vision and priority themes.

Governance, Delivery & Monitoring

"This is a strategy for the Borough. Its future success depends on the public, private and voluntary sectors working together towards common goals that support the strategy's vision. The action plan focuses on where North Warwickshire Borough Council can have the greatest impacts.

We will coordinate our economic development resources effectively so there are clear points of contact for economic development matters and that the actions within the strategy are delivered and communicated internally and externally to business, public and private sector partners."

Q13. Do you think this will be effective and Q14. Why?

The Chamber is supportive of an open and transparent approach where economic strategies are clear and communicated externally to all parties. Consultations such as these are imperative to draw upon the expertise of various stakeholders to ensure that the outcomes are the best for all facets of the sub-region.

3.0 Next Steps

The Chamber has been pleased to engage with this important consultation related to the Final Draft Economic Development Strategy and Action Plan for North Warwickshire. It would welcome an opportunity to further engage, elaborate and develop some of the detail set out above that underpins the views set out.

Yours sincerely,



Mr Corin Crane
Chief Executive

HEDNA:

re Document 1

A. COVENTRY AND WARWICKSHIRE CHAMBER OF COMMERCE :
RESPONSE TO THE HEDNA STUDY AND RELATED ISSUES

The comments set out below are based on input from members of the Chamber Of Commerce's Employment Land Group .The Group is made up of member and advisors of the Chamber with experience and expertise in the land, development and property sectors.

PREAMBLE

The C&W Chamber of Commerce welcomes this early opportunity to continue to engage and input to the hugely important strategic planning of the sub-region for the 30 years to 2050.

The Chamber, as the recognised “voice of business” across the whole sub-region, takes its responsibilities in terms of working with our Local Authorities and other Public Agencies (nationally, regionally and locally) very seriously. This is especially the case in planning forward a positive and proactive response to both the challenges and opportunities the sub-region faces.

Our particular thanks at this stage go to Chris Elliott, the CEO of Warwick District Council, and his senior colleagues for directing us towards and providing key documentation and for being willing to work with the Chamber as these important plans develop. As we have done in the past, the Chamber is keen to be an active partner as this work of strategic, geographic and economic planning proceeds.

The Chamber has had a long-standing and consistent concern about (what we believe) has been and remains a real shortage of Employment Land across the sub-region. As such the Chamber has an Employment Land Panel (made up of relevant Members, Officers and Advisers) who seek to lead on this matter on behalf on the Chamber and its Members, and this Panel has worked together to provide this Chamber response.

The Chamber recognises that the recently-published ICENI HEDNA Study is a hugely important “starting point” for real discussions about the strategic planning for the sub-region. Through Chris Elliott, we'd like this Chamber response to be made available to all our LA Leaders and their Chief Executives and senior Planning Officers, please?

The Chamber has long had involvement and engagement with our LA's in the creation and review of Local Plans and for the coordinated, cross-boundary, cross-authority approach so essential to our sub-region. We'd like to continue that engagement and see this response as the construction of a dialogue between Chamber and LA's as we move forward.

We are advised (by Philip Clarke of Warwick DC) that the HEDNA Study was commissioned jointly by all the LA's in Coventry and Warwickshire. Philip advises that “In terms of employment projections, ICENI modelled employment land needs utilising a range of different forecasting techniques alongside local intelligence and an understanding of the merits of different approaches in drawing conclusions. This approach of triangulating

different approaches and testing findings, which ICENI has adopted, is consistent with the PPG-though as we comment elsewhere we cannot see evidence that the methodology takes sufficient account of market signals data.

To give further clarity to the role the HEDNA Study will play in the development of plans for our sub-region, Philip also advises that “All the authorities agreed to sign-off and publish the HEDNA, but that does not mean that we endorse all its findings....”

“In South Warwickshire, when signing off the SWLP Issues and Options paper....we said “Although the figures contained in the HEDNA are challenging for the SWLP, they do represent up-to-date evidence based, importantly, on the latest 2021 census.” “Whilst there will undoubtedly be questions that both Councils and many local stakeholders will want to ask about the figures in the HEDNA, they do provide a credible basis on which to explore the issues and options that the SWLP will need to consider” and “importantly, publishing the HEDNA alongside the Issues and Options paper will give an opportunity for all interested parties to comment upon the HEDNA.”

The Chamber is happy to follow that advice and our response looks first at the HEDNA at sub-regional level and then sets out comments on the SWLP Issues and Options paper. As the LA’s have recognised, the HEDNA Study is “a means to an end” ...not “an end in itself”. In this response .the Chamber seeks to identify key issues, questions, proposals and actions to help us-collectively- make best use of the HEDNA Study and ensure its proposals are built into the new/reviewed/refreshed Local Plans of all our LA’s. Unlike the current set of adopted local plans that generally run to 2031, it is highly regrettable that the Coventry and Warwickshire sub regions individual local plan reviews are being conducted in a relatively uncoordinated manner. In this way thereafter effective delivery relates to the whole of the sub-region in a coordinated way.

.....

1) It would be helpful to be reminded about when all our existing Local Plans were approved, what period they cover (usually to 2031) and the timetable for each of them to be formally reviewed. This issue of timing is very important in terms of ensuring a coordinated approach to the key issues and proposals from the HEDNA Study. A “new” Local Plan for South Warwickshire (bringing together the Plans of Stratford-on-Avon and Warwick) is now being developed and the HEDNA Study is recognised as an important contributor to this “new” Plan.... but where are we with the rest of the sub-region...and what cross-boundary coordination is in place to ensure we have an effective sub-regional approach?

2) The HEDNA Study emphasises how (among other things) the National Planning Policy Framework (NPPF) and the accompanying Guidelines (NPPG) require all Local Authorities to have regard to the (changing) economic needs of their (and adjacent) areas). Specifically, PPG para. 2a-031 makes it clear that for a Local Plan to be

considered “sound” when it comes to Public Inspection regard has to be made for the (highly expanding and developing) Logistics and Distribution sector.

3) The HEDNA Study very much reflects and supports the arguments promoted consistently by the Chamber over (at least) the last 8 years that the (existing) agreed targets for new Employment Land across the sub-region are inadequate and are restraining the economic growth of the area. ICENI’s evidence of relatively recent completions of industrial property (from 2011-2018) shows the strength of demand. The HEDNA proposals (for the 20 years 2021-2041) show new employment land targets nearly double that of the agreed targets for the 20 year period (2011-2031) in existing plans (1,265 ha compared to 714 ha). The proposal for a new, “separate” allocation of 606 ha for B8 uses is the thing that “leaps off the page” ... but B8 had been embraced in the 714 ha target of the existing Local Plans. In evidencing real demand, the HENDNA Study says that a significant amount (1 m sq.metres) of new employment space has been created over the last 10 years. We think this figure is significantly lower than the reality...thus further evidencing the need for a real increase in new employment land that responds to “real” need rather than conjecture.

4) The recently published and well-regarded Bromwich Hardy 2022 Barometer (covered and communicated by the media and local development agencies in February 2023) looks at the reality of commercial and industrial property transactions across the sub-region (and wider) over the last 12-18 months. It has some key conclusions based upon the very broad scale of transactions the company is involved in:

- “the demise of the office has been overplayed by commentators”,
- “The office market has...continued to outperform expectations in the past year, with demand for large, high-quality and sustainable space often outstripping supply.”
- “Elsewhere, the market in warehousing has been robust, but we are again running into the problem of supply.”
- “There is an urgent need for more employment land to be brought to market which both regional and national administrations will have to tackle if the country is to achieve the economic growth we hear so much about.”
- “It is simply impossible for industry to flourish if there is no physical capacity for growth in the system or if it takes years of negotiation to develop the infrastructure that business needs to realise its expansion ambitions.”

5) In terms of the impact of COVID restrictions, Russia invading Ukraine, the over-dependency we have on Chinese imports and the raw materials we need from countries very much locked into long-term contracts with China, all of the

comments above will be much “amplified” as -particularly in this region- our big manufacturers and their suppliers urgently need to reverse what they have been doing over the last 30 years...and thereby “re-homing” much of what we have grown to import from abroad.

6) Whilst the Chamber is pleased to see the higher targets for employment land in the HEDNA study (compared with existing local plans) it cannot yet determine whether the new HEDNA figures will indeed respond to the real needs of the sub-region until the key questions/issues (in the paragraphs below) are fully resolved. In addition, experience tells us that this much more helpful approach will only “bear fruit” if there is regular monitoring and management of the delivery of (whatever) employment land targets we ultimately set (see below).

7) Attached to this Chamber response are 2 important Appendices (A&B) relating to:

(i) Appendix A is a comparison of Employment Land targets in the existing Local Plans and the HEDNA Study , together with other “headline” comparative data, and;
(ii) Appendix B, represents an assessment of “real” employment land availability (agreed to meet the targets in the existing Local Plans and comprising the main local plan allocations drawn from each C&W plan area). The Chamber believes the myth of “plenty of employment land available” must be challenged and finally repudiated if the sub-region’s economic future is not to be put into further jeopardy. We’ll cover the key issues arising from these two Appendices below.

a) In terms of Appendix A, there are many aspects that warrant consideration by our LA’s. The table shows (comparative) Need/Provision for Employment Land at the time of the Coventry and Warwickshire Employment Land MOU 2017, agreed by all local authorities. It shows the Final Agreed Distribution of such land across the sub-region based upon the ability or inability of LA areas (notably Coventry) to be able to allocate and accommodate the employment land agreed. The proposed HEDNA-based allocations (for the “new” Plans) is shown.... but this specifically excludes the “new” distinct allocation for B8 Logistics and Distribution. How the 606ha rising to 709 ha. of B8 land in the HENDA Study is actually distributed and located is -as we understand it- yet to be determined and we comment upon this below. The table also has helpful data from WCC about the comparative size of our LA areas (in Ha.), unemployment levels and in/out travelling for people to go to work. The Chamber believes these are important items when it comes to longer-term strategic planning (as we cover below), particularly in terms of the “North/South Divide” within our sub-region.

b) Excluding the (as yet unallocated) B8 ,606 ha, and looking at the first column of

need (expressed as Final Agreed Provision) comparing the two 20 year periods (2011-31 and 2021-41) shows there is a significant change being proposed in terms of where new employment land should be focussed.

N.Warks BC- roughly the same,
N&Bedworth BC- nearly 50% reduction,
Rugby BC-over 50% increase,
Stratford DC- nearly 500% increase,
Warwick DC-roughly the same,
Coventry CC nearly 60% reduction.

The column of Final Agreed Distribution presents a “different reality” (for predominantly where Coventry’s employment land needs would have to be met beyond Coventry’s boundaries) with significant increases being “taken up” in the adjoining administrative areas of Rugby and Warwick. The relatively poorer areas of North Warwickshire and Nuneaton and Bedworth benefitted little from this “redistribution”. Of course we have to have regard to the fact that employment land can’t simply be “magic-upped” and location and infrastructure is important.

However, any strategic plan must try to put employment where it’s most needed. The information about Unemployment and commuting in or out of our sub-regional towns and city to go to work must also be an important issue to be addressed in the new sub-regional plans.

10) There are a number of unanswered questions prompted by this analysis. How should the “new” B8 target (of 606 rising to 709 ha for Logistics/Distribution) be distributed across the sub-region? What should be the criteria and rationale used? What regard should be given to a distribution that proactively seeks to drive up economic activity where it’s presently weakest, puts new jobs closest to centres of population and seeks to minimise travel and transport costs? How is existing Green Belt designation going to influence/impact upon the geographic distribution of the B8 targets? How and where should Coventry’s Employment Land needs (that can’t be physically accommodated within Coventry’s administrative boundaries) be focussed?

13) In terms of the HEDNA initial distribution of Employment Land (excl. B8) are Rugby, Stratford and Warwick local authorities agreed with these figures and do recognised sites already exist to meet those target figures? Any movement from Rugby to support the further expansion of the Ansty R&D area (that was originally much bigger when first proposed nearly 20 years ago) or the adjacent land proposed for development by the Fraser Group?

14) There is a very significant uplift in the new Employment Land growth for

Stratford? Is this accepted and supported within the (developing) new South Warwickshire Local Plan?

15) Is all the land covered by “the Masterplan of Masterplans” area (of cross-boundary south Coventry, reaching down into Warwick District and the M40) embraced within the ICENI HEDNA figures? The Chamber is unclear about this. Similarly are the already-Planning-approved proposals for and around the proposed Gigafactory site excluded from these “new” targets?

16) The more deprived northern Warwickshire Districts are allocated with some of the lowest levels of new Employment Land- hence exacerbating/consolidating their existing problems. This can't be a credible proposition for our economic future?

17) How do we ensure the Chamber's push for “Affordable Employment Land” that responds to the whole breadth and diversity of employment needs is actually delivered? What sub-regional Planning Policies are needed to deliver this effectively? How are these best fitted into Local Plans? We can see (from examples elsewhere) that there are local examples of criteria-based planning policies which address demand and/or need for employment land that is out-with Local Plan site allocations e.g. Policy LP6 Additional Employment Land in the North Warwickshire Local Plan (September 2021) and Policy Ec2 .New Employment sites in the North West Leicestershire Local Plan (November 2017). The policies) could be worded to address particular uses, sectors (including growth and niche sectors) or market segments (i.e. affordable or smaller units, and “grow-ons”,) to ensure that all needs are capable of being addressed.

18) Do the HEDNA proposals (for a 38% reduction in Coventry's existing housing target numbers (from 3,188 to 1,964 pa)) “disturb” the existing (and likely new) MOU across the sub-region? When will the Government's ONS release their updated population projections for Coventry (and other cities and the rest of the sub-region) and how will the HEDNA respond to this? The HEDNA already recognises important increases needed in Employment Land in the sub-region.... but this could be much higher if we “revert” to ONS projection as NPPG/NPPF requires.

19) Both to respond to Climate Change and effectively support our communities and community facilities and the revitalisation of our existing urban centres, it is of critical importance that new employment and housing is provided as close as possible to existing (and any new) urban centres.

Whilst we fully appreciate that we can't simply “magic-up” new employment land within or directly adjacent to our existing city and towns, in strategic planning terms (for the next 30 years) real priority and commitment must be given to focussing

employment and employment land where it is most needed, and where the population and skills exist to support this new economic activity. The sub-region has its own North/South divide- and “Levelling-Up” isn’t just a new, national “flavour of the month”! A fundamental objective for (any) new LA and sub-regional plan for the next 30 years must be to demonstrate how this “new” plan will drive and secure the real, positive and self-fulfilling changes that we all recognise our sub-region has to deliver.

20) In looking forwards for the next 30 years, the Chamber is surprised that- in this area- little or no regard is given to bringing rail transportation (and more localised rail depots) into the equation. One of the much-vaunted “promises” of HS2 was that it would “release” much more usage of the capacity presently constrained on the West Coast main line, other existing rail routes and other rail infrastructure across the sub-region. With an increased acknowledgement of B8 requirements, the Chamber would look to our LA’s to be much more positive and proactive about planning for much greater/more effective use of our rail infrastructure across the sub-region...and this could and should have an impact upon where new employment land is sited and serviced. In looking at possible B8 sites, the Chamber would encourage the HEDNA Study to differentiate between “rail-served sites” and “non-rail-served sites” (as is evidenced elsewhere in the country e.g. Leicestershire).

21) Whilst we recognise the role of big B8 and manufacturing sites, we also know that we must be encouraging a growth in employment and employment opportunities directly within our existing urban centres. Big new employment sites- such as some of those proposed in South Warwickshire- will do little or nothing to help revitalise Stratford town centre or to reduce/ minimise the journeys-to-work, which - of necessity- are car-focussed.

22) The Chamber welcomes the acknowledgement and attention to B8 logistics and distribution. If the 606-709 ha. (Within the proposed aggregate targets of 1,265 - 1,660 ha. to 2050) is for B8, then the rest of the aggregate targets must not be used for B8 and we should be more specific about how we protect, satisfy and manage the other B group classifications and diverse economic/ employment needs. The C&W Market Signals report produced for the CWLEP and the local authorities makes this point very strongly

23) Having a list of allocated Employment Land sites is simply not enough. Collectively, we need simple criteria to test whether the land allocated for employment can and will deliver what we need, whether there are obstacles that need to be removed, or if there are practical issues, which are blocking real

progress. Like the HEDNA itself (see Preamble paragraph 10 above) Local Plans are a “means to an end” not “an end in them” and this focus upon delivery must always be our -collective- primary concern.

24) Regardless of the “dithering” of Central Government, the Chamber strongly believes that we need a robust and secure minimum 5-year land supply for BOTH Housing and Employment Land, Through our own, local, well-managed planning, development and delivery processes, employment land to support the growth of local industry and commerce (in all its different facets) can be ensured. All the organisations and agencies involved in the development and management of Employment Land can work together in a coherent and coordinated way to ensure that what our Plans set out to deliver are actually delivered...and delivered quickly, effectively and in the most environmentally and sustainable way that underpins and supports essential economic and employment growth- particularly in areas of our sub-region that need this most.

25) The SWLP Consultation paper recognises that the scale of population growth, housing and employment land needs, etc. that South Warwickshire has to respond to cannot be addressed without regard to the (existing) Green Belt designations. This is a helpful step forward, but it applies to strategic land and economic planning across the sub-region as a whole, not just South Warwickshire.

26) How do we make it attractive for employers to move to our planned new employment sites? If we want a “green” economy that moves us towards Zero Carbon and Climate Change priorities, LA’s must get more actively involved in making sure this new employment land is brought forward in a way that encourages, supports and “underpins” the “green technologies” and Climate Change agenda especially for our “grow-on” and SME industries to be able to develop on these sites.

27) There is a long-standing acknowledgement and agreement across the sub-region that the housing and employment needs of Coventry cannot be met within its (relatively confined) administrative boundaries. But to respond to Coventry’s unmet needs, new employment and housing must be as close as possible to Coventry- otherwise travel-to-work, transport movements and congestion, negative Climate Change consequences, etc will continue to grow. Are the LA’s whose own boundaries meet those of Coventry committed to seeking to focus an appropriate amount of new housing and employment land in locations that best address our sub-regional city’s needs?

28) Appendix B is an important “base” document in terms of the HEDNA Study and

Employment Land. On the basis of the existing Employment Land allocations in the existing round of Local Plans,(generally 2011-2031, the table lists all the sites of “strategic” importance i.e. over 5 ha. and categorises them in terms of being “oven ready”, “imminent”, “advanced” and “constrained”. It includes a number of sites that have come forward outside the local plan allocation process ,notably the planning consent at Coventry airport.

If we are using the HEDNA proposals to determine the scale and location of “new” Employment Land we need to be clear about where already-allotted Employment Land fits into the overall equation. Whilst the HEDNA Study reinforces the scale of demand and development over the last 8-10 years, we have a number of sites (such as Atherstone Airfield, the Warwick Sewage Treatment works, the allocated Kenilworth employment growth land, the 100 ha. “Reserved” for JLR growth at Gaydon) that don’t seem to have progressed in 10 years.

This analysis raises key questions. Are these allocations still credible and deliverable sites? Is the Special Employment status currently held by the (old) Stoneleigh National Agricultural Exhibition Centre still appropriate.... when we have a large, hugely important and strategically-located site not “delivering” and being used for the sub-region in the way it should and must? Does the inclusion of these sites in our allocated employment land figures distort the reality of what employment land really is available?

29) The Chamber believes that there continues to be a deep-rooted belief in our Local Authority Members and Planners that the sub-region has sufficient employment land already allocated. This is simply wrong. It has been challenged by the Chamber over (at least) the last 10 years and is now proven by both the HEDNA Study and the evidence of demand, latent demand and the scale of recent ...but artificially-constrained. development in recent years. It’s therefore hugely important that we build today’s and tomorrow’s plans on the reality we know is with us and refer to the evidence of such analysis.

30) The Chamber believes that the next (and urgent) stage in the HEDNA approach is to “forensically” assess all the Employment Land sites in the existing Local Plans (as shown in Appendix 2) to clearly determine:

- What’s the real scale of readily-available land for employment, now and for the next 2 years,
- What allocated land hasn’t moved forwards in the last 10 years and be very clear about why?
- What needs to happen for this allocated-but-undeveloped employment land to be brought forward quickly? Is this a problem of planning, land ownership, infrastructure, economic viability ...or what...to then determine whether, how and



t 02476 654321
f 02476 450242
e info@cw-chamber.co.uk
w www.cw-chamber.co.uk

when this land will actually be developed and deliver the sub-region's urgent needs?

C&W CC Mar 23.

