

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

Our Ref: let.CoC.NWBC.001

8TH MAY 2024

Dear Sir/Madam,

Draft NWBC Employment DPD Consultation - Representations on behalf of Coventry & Warwickshire Chamber of Commerce

This submission contains both specific comments on the text of the consultation document and general comments and issues the Chamber of Commerce wishes to highlight. As requested where the consultation questions are addressed they are referenced with the appropriate number and by indicating the relevant Chapter and section of the document.

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 Draft Employment Development Plan Document ('Employment DPD') 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 Midlands 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 restricted thinking that are implied by NWBC’s Final Draft Economic Development Strategy and Draft Employment DPD give the Chamber real cause for concern.

As the Chamber set out in the aforementioned response to the HEDNA study and related issues (**Appendix A**), there is a challenge in determining how and where the significantly higher Employment Land targets within the HEDNA study will be distributed and delivered. Key to this is the new and much higher disaggregated targets for B8 (storage and distribution). 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 draft Employment DPD

The remainder of these representations respond to relevant questions contained in the consultation document in a question and answer format. In some cases, the response given addressed numerous questions at once and so such responses are given beneath the relevant group of questions.

As an overarching point, before proceeding into the detailed responses, a key question is whether a DPD is the right vehicle for providing a long term strategic plan to address employment needs or whether such important strategic planning matters should form part of a more comprehensive review of the NWBC Local Plan in order to fit in with some future Memorandum of Understanding (MOU) to replace the 2015/16 MOU that covers all the adopted strategies in our sub-region.

The DPD is arguably not the correct vehicle for addressing the multifaceted issue of allocating sufficient land that the sub-region needs in the correct locations, especially as all local authorities within the sub-region are working on preparing new local plans. Furthermore, in the event that any Green Belt review is considered necessary then this would require a range of interrelated issues to be balanced against the exceptional circumstances required to justify Green Belt release and, in our view, would have to be carried out as part of a comprehensive review of the Local Plan. Such an exercise would, as a matter of course, need to be underpinned by an up to date assessment of the Green Belt throughout the Coventry and Warwickshire sub-region as a whole.

However, irrespective of whether NWBC continues to pursue with the DPD or opts to undertake a comprehensive review of the Local Plan (which considering the above may be more appropriate) the Chamber's responses below would equally apply.

Question 1:

- **1a) Is there anything from the Economic Development Strategy which needs to be reflected in the Employment DPD? Yes / No / Don't know?**
- **1b) If yes, please indicate what you consider needs to be reflected in the Employment DPD**

Yes. As set out in our separate representations to the Strategy, 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 strength of this and other sectors needs to therefore be recognised within the DPD (or in the event that a Local Plan review is undertaken instead) by allocating and supporting employment sites of this nature in the right places to sustain the success of these sectors. 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 Employment DPD (or in the event of a Local Plan review) therefore presents 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, the Employment DPD (or in the event of a Local Plan review) should therefore similarly highlight the 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.

In summary, for the reasons demonstrated in these representations, it is critical that the Employment DPD (or in the event of a Local Plan review) addresses the following:

- The need to identify need for and allocate rail served sites;
- The need for strategic scale inward investment sites to attract national and international occupiers that are long term drivers of growth;
- Provision of SME units, delivered both through overarching strategic employment sites and as standalone development;
- Addresses the fact that past undersupply is suppressing demand/need;
- The need to identify sites for industrial outdoor storage (IOS); and
- The need to allocate sites for dedicated truck stops close to known drivers of need (e.g., strategic rail freight interchanges/rail freight interchanges and the Strategic Road Network).

Question 2: 2a) Are there other policies from the adopted Local Plan that the Employment DPD should seek to review and/or amend? Such as LP5 Amount of Development or transport policies such as LP23 Transport Assessments or renewable energy and ‘Information and Communication Technologies’ policy (in so far as the impact/affect employment proposals), as

**well as the employment related policies in Chapter 9 of the Local Plan? Yes / No / Don't know?
If yes, please indicate which policies?**

Yes. The Chamber maintain that the proposed level of provision of employment land in the plan is inadequate to meet the needs of the Borough. This undermines the strategic vision of the Local Plan to develop and grow the local economy for the benefits of local residents, and contradicts the vision to support business growth and innovation in the draft Strategy.

Currently, Local Plan Policy LP5 'Amount of Development' states that NWBC will make provision for a minimum 100 hectares of employment land over the plan period for 2011-2033. This figure needs to be refreshed to meet the needs of the future needs of existing and incoming businesses up to 2050 and based on current, post-pandemic data.

The Chamber recognises that the HEDNA is an important starting point for real discussions about the strategic planning for the sub-region. However, the Chamber has concerns relating to the data within the HEDNA produced by Iceni for determining future employment land requirements (which we will go into more detail below, drawing on our previous and comprehensive response to the HEDNA Study, see **Appendix A**) and indeed NWBC's application of that data in the draft Employment DPD consultation document.

Taking a step back, the existing sub-regional Local Plans (for the 20 years 2011-2031) had a new employment land target of 714 ha. In the 'Final Agreed' redistribution of this target only North Warwickshire and Stratford-upon-Avon had a "Final Agreed Redistribution" that was exactly the same as their initial employment land allocation (i.e. both LPA's made no contribution to the new employment land needed but not able to be accommodated in Coventry). Rugby and Warwick were prepared to see significantly higher Final Agreed allocations (200% for Rugby and nearly 300% for Warwick) and N&BBC accepted a target 30% higher than their initial employment land allocation.

North Warwickshire Borough, at 284 sq kilometres, is 2.2 times the size of Coventry's area (of 128 sq kilometre), yet NWBC ultimately accepted only 45% of the employment land allocated to Coventry. Stratford-upon-Avon (in the proposed new South Warwickshire Local Plan) are now taking a dramatically different approach to that they took in the recent past.

The HEDNA new employment land proposals for the 20 years 2021-2041 amount to 1,266 ha. This is 177% higher than the existing 20 year sub-regional plans. NWBC only "accepted" 8% of the overall sub-regional employment land targets in the existing Local Plans. Regardless of their geographic location and position within the national infrastructure network, if NWBC seek to adopt the same stance then it will still be required to accept and deliver over 100 ha of new employment land (as currently required by Policy LP5).

As with other Local Plan Reviews for LPA's in the sub-region, NWBC (in paragraph 6.1 Table 1 of the Draft Employment DPD consultation document) is trying to paint a picture that "all is well here", which is incorrect and an invalid position to take. The consultation document then seeks to "avoid questions" by considering how in the HEDNA, Iceni have used different methodologies to come to the proposed new targets they've put forward, but other than a brief summary at paragraph 7.3 of the consultation document, NWBC does not respond (or even engage in discussions) about what the Planning Inspector said at examination, which ultimately led to the inclusion of Policy LP6 within the adopted Local Plan (through Main Modification MM40). Furthermore, the wording of Question 8 (a to d), which is responded to elsewhere in these representations, makes no attempt to "open up the issue".

In addition, other LPAs in our sub-region are adopting an approach of "plan our needs first, then consider the green belt implications". NWBC is adopting a different approach and paragraph 6.5 goes out of its way to emphasise that – even using past completion rates – would throw up real concerns

about natural and Green Belt issues, the Strategic Gap and other transport related constraints. Elsewhere in the consultation document NWBC is “encouraging” and “inviting” employers to “go elsewhere” to where employment land is being more positively planned by other LPAs (in other parts of the wider Midlands). This is plainly not an approach that will be supported by businesses in one of the most important economic and productive areas of the UK.

In order to meet the visions of the Plan and the Final Draft Economic Development Strategy, NWBC should move away from the statistical balance based on employment completion rates that forms the basis of the HEDNA data. Instead, as set out in the Chamber’s Employment Land Report¹ (2023), the Chamber believes that NWBC should adopt an employment land strategy aimed at providing a surplus or 20% ‘buffer’ of employment land supply above the calculated level of requirements (using the approach recommended by the HEDNA) through additional employment allocations. Furthermore, NWBC should allocate additional employment sites to cover its proportion of the 735 ha of strategic B8 need across the sub-region for the period 2021-2050 (as identified in the HEDNA).

Question 3: Should this DPD be limited to strategic employment land? If not, what are the other issues the DPD should consider?

As indicated at the outset, the Chamber is firmly of the view that 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 for North Warwickshire.

Whilst facilitating the delivery of strategic employment sites through the DPD (or in the event of a Local Plan review) is a clear necessity, the DPD / Local Plan review should not be limited solely to dealing with strategic employment land. As also indicated at the outset, the following needs need to also be addressed:

- The need to identify need for and allocate rail served sites;
- The need for strategic scale inward investment sites to attract national and international occupiers that are long term drivers of growth;
- Provision of SME units, delivered both through overarching strategic employment sites and as standalone development;
- The need to identify sites for industrial outdoor storage (IOS); and
- The need to allocate sites for dedicated truck stops close to known drivers of need (e.g., strategic rail freight interchanges/rail freight interchanges and the Strategic Road Network).

These needs are discussed in further detail elsewhere in these representations.

Question 4: What should the plan period be for the DPD? (See options below)

- **4.1) 15 years from adoption of the DPD (assuming adoption during 2025 this would be 2040)**
- **4.2) A 20-year period to accommodate growth (this would likely be around 2045)**
- **4.3) 2041 (to mirror data from HEDNA)**
- **4.4) 2050 (to mirror data from HEDNA)**

Whether it be through a DPD or a more comprehensive review of the Local Plan, it is essential that NWBC adopts strategic and long-term thinking when making provision for employment land, being ambitious in its long-term goals and anticipating future demand and growth in doing so.

The HEDNA data, in line with recommended practice guidance, examines a variety of methods to forecast North Warwickshires' employment growth to 2041 and 2050. As set out above, the Chamber believes a 20% buffer should be added to allow for market flexibility and choice however a long-term view like this allows an appropriate amount of land to be considered so that there is plenty of land supply, in accordance with NPPF paragraph 85. This will ensure that demand, should it remain high or even accelerate can be comfortably accommodated within the supply provided by the long-term plan period and growth is encouraged.

Alongside this, the Chamber believes that, as the Council is currently doing so, it is important to consistently review demand and supply so that there is an opportunity to review the figures. The plan period should be long-term but not prescriptive in that if market signals change the land supply can be adjusted accordingly to encourage inwards investment and allow businesses to grow and adapt in line with NWBC's and the Government's vision.

Question 5: Can employment land continue to fit in with the current development strategy of the adopted Local Plan? Yes / No / Don't know? If not, what other options should be considered?

Policy LP6 provides a policy mechanism in the Local Plan for additional employment sites to come forward subject to meeting a number of criteria and as stated elsewhere in these representations was conceived at Local Plan examination stage as the plan does not sufficiently address the strategic need for warehousing and logistics.

However, noting that the intention is for Policy LP6 to be removed from the Local Plan in the event the Employment DPD is adopted and given the recommendations from the Chamber's Employment Land Report (2023) set out above, it is imperative that additional employment allocations are included in the Employment DPD (or in the event of a Local Plan review) to address North Warwickshire's identified requirement in the HEDNA (plus the 20% buffer recommended by the Chamber's Employment Land Report) and to address NWBC's proportion the strategic B8 requirement across the sub-region between 2021-2050 (as indicated in the HEDNA).

This is an essential step to providing greater certainty from a strategic planning policy perspective to ensure that the current development strategy in the Local Plan can be delivered. Failure to provide employment site allocations that address the identified need in the HEDNA could conversely mean a criterion based policy (e.g., Policy LP6) would need to be retained in the development plan.

Question 6: Should sites in the Green Belt sites be allocated for employment use? If so, will this require a wider review of the Local Plan?

The Chamber would support a review of current Green Belt boundaries for potential employment allocations noting that NPPF (paragraph 146) is clear in its requirement for strategic policy-making authorities to demonstrate that they have examined fully all other reasonable options for meeting their respective identified need for development prior to concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. In this regard, 'all other reasonable options' includes assessing the suitability of alternative sites outside the Green Belt to meet the identified need. Nevertheless, the locational benefits of potential allocations is clearly of paramount importance and indeed we support Green Belt reviews and allocations where appropriate to deliver additional employment sites. Notwithstanding, sequentially preferable non-Green Belt sites should be prioritised where they meet the necessary locational and sustainability requirements for employment development.

The Chamber consider that a Green Belt review could only be undertaken through the preparation of a comprehensive new local plan, not the single issue Employment DPD as proposed. It is only through the preparation of a comprehensive new local plan that all of the interrelated issues which

would need to be balanced against the exceptional circumstances required to justify Green Belt release could be taken into consideration. Such an exercise would, as a matter of course, need to be underpinned by an up to date assessment of the Green Belt throughout the Coventry and Warwickshire sub-region as a whole.

Question 7:

- **7a) Should the HEDNA be the basis of an employment land requirement for the Employment DPD? Yes / No / Don't know?**
- **7b) If so, should past trends be the sole determinant for future employment? Or what other information should the DPD take account of?**

The Chamber responded comprehensively to the HEDNA study and has previously acknowledged that the study was an important catalyst for discussions about strategic planning for the sub-region. A copy of this response is appended to these representations (**Appendix A**).

The HEDNA substantiates the central contention of the Chamber held for at least the last 8 years that the targets for new employment land across the sub-region are inadequate and are restraining the economic growth of the area.

It is recognised that IcenI modelled employment land needs utilising a range of different techniques however there are some concerns:

1. We are concerned that we cannot see evidence that the methodology takes sufficient account of market signals. The approach of establishing future need for employment land is based on projects of suppressed past take up rates, which will always underestimate the true requirement for employment land.
2. We have previously questioned how the 735 ha of strategic B8 space be distributed across the sub-region and would call on NWBC to consult on their methodology for allocating this.
3. North Warwickshire's Local Plan allocates some of the lowest levels of employment land in the sub-region and we would discourage this as it can consolidate existing problems in lower performing areas elsewhere.

As set out previously, subject to the above, the Chamber consider that the HEDNA data should be used as a broad basis for the allocation of employment land and it should be augmented with a 20% additional buffer to provide more scope in the quality and quantity of land.

Prior to this however, our Employment Land Report recommended that the urgent next steps are to forensically assess all the employment sites in the existing Local Plans to determine:

- **What is the real scale of readily-available land for employment now and the next five years?**
- **What allocated land hasn't moved forward in the last ten years and be clear about why?**
- **What needs to happen for this allocated but undeveloped land to be brought forward quickly? Is this a problem with planning, land ownership, infrastructure, economic viability? Then determine how and when this land will actually be developed to contribute towards the sub-region's urgent needs.**

Undertaking the above assessment data can ensure that any land that is allocated is deliverable and can identify those sites where additional work is needed to rectify any issues to allow it to come forward for development. The employment land needs identified in the HEDNA + 20% buffer can then be allocated with the constrained sites in mind to ensure there is a range of quality sites to give new and existing businesses the flexibility to grow, adapt and invest in the sub-region.

Question 8:

- **8a) What does “immediate” need mean in LP6?**
- **8b) How can it be demonstrated?**
- **8c) Should there be a time limit for its expected delivery if it has been identified as an immediate need? Yes / No / Don’t know?**
- **8d) What happens (or should happen) to the site if this need does not materialise?**

The Chamber considers that our answer to question 7 is relevant here. Once a forensic investigation of the existing allocated sites in the Local Plan has been undertaken, it will be clear where there is readily available land which is deliverable, achievable and implementable.

An ‘immediate need’ should be forward thinking in that it should represent an immediate need to address future demand and should react to market signals. Should NWBC wish to achieve its vision of allowing businesses the opportunity to grow and invest, it needs to ensure that the allocating of sites and determination of employment planning applications does not react to demand but prepares for demand, because this will encourage inwards investment.

An immediate need should robustly demonstrate the take up rates and market signals suggest that the need is present or is forecast, to ensure that the sub-region is ready for growth.

Time limits for delivery should not be enforced as this can prevent developers from creatively adapting to meet the needs of different potential tenants. If a need is identified and NWBC agrees, then the site should be treated as necessary employment land until an there is a demonstrated need for an alternative use.

Question 9: Should the site threshold be the same as the West Midlands Strategic Employment Sites Study i.e. over 25 hectares? Yes / No / Don’t know? If not, what should the site threshold be for a ‘strategic site’ considered as a site falling under the currently adopted Local Plan Policy LP6?

Yes - +25 hectares (gross) for strategic sites.

Question 10:

- **10a) Should land be allocated for specific employment types? Yes / No / Don’t know? Please explain.**
- **10b) Should employment allocations be subdivided by type and/or use (including percentage of uses per site)? Yes / No. Please explain and provide any information on a potential split.**

The HEDNA data appears to advocate for a more disaggregated approach to meeting future employment needs. Therefore the suggested levels of employment land provision to both 2041 and 2050 indicate a separate allocation for B8 (warehousing and distribution) allocations, with Offices and General Industry having their own allocations. The Chamber welcomes this approach, though it would question if this goes far enough in disaggregating proposed supply.

A drawback of the current adopted plan allocations across the sub-regions is that they simply allocate land for general employment across all Use Classes. Consequently, particularly on the larger allocations, land tends to come forward for the highest value uses, that generally being Class B8 (warehouse and distribution) where values can approach residential values.

Shortages of general industrial land and in particular smaller scale units has therefore emerged.

These trends, drawbacks and issues are well documented in the report *Coventry and Warwickshire Market Signals Study 2019* produced by BBP Regeneration Ltd. This was produced by the CW LEP, WCC and the local authorities across Coventry and Warwickshire and represents a key piece of relatively up to date market evidence and recommendations.

Indeed, the Chamber would welcome separate policies for R&D and Storage and Distribution for the reasons given that the markets and their characteristics are very different. This has been suggested by Stratford and Warwick in their new joint plan where they have allocated separate designations for warehousing and distribution.

Question 11:

- **11a. What other uses should the Borough Council plan for?**
- **11b. What size of site(s) are required?**
- **11c. Should a criteria-based policy be developed? Yes / No / Don't know?**
- **11d. If so, what criteria should this include?**

As indicated elsewhere in these representations, NWBC also needs to sufficiently plan for the following needs:

- The need to identify need for and allocate rail served sites;
- The need for strategic scale inward investment sites to attract national and international occupiers that are long term drivers of growth;
- Provision of SME units, delivered both through overarching strategic employment sites and as standalone development;
- The need to identify sites for industrial outdoor storage (IOS); and
- The need to allocate sites for dedicated truck stops close to known drivers of need (e.g., strategic rail freight interchanges/rail freight interchanges and the Strategic Road Network).

Specifically with regards to rail-served sites, with an increased acknowledgement of B8 requirements, the Chamber would look to its LPAs to be much more positive and proactive about planning for much greater/more effective use of our rail infrastructure across the sub-region, particularly existing rail infrastructure in close proximity to key growth corridors such as the A5. This could and should have an impact upon where new employment land is sited and serviced. The Chamber has previously encouraged the HEDNA, in looking at possible B8 sites, to differentiate between “rail-served sites” and “non-rail-served sites” (as is evidenced elsewhere in the country e.g. Leicestershire).

Furthermore, the Chamber has been of the firm belief that new plans in the sub-region should adopt a more sectoral disaggregated policy approach to town / district centre uses, that moves away from a reliance on a Use Classes Order that is not able to discriminate between sectors and simply favours the change of use of land to that with the highest use value. There are good examples of these weaknesses that have unintentional consequences.

The shortages of open storage land and spaces has serious consequences for the operation of communities. Over the past seven years these shortages have created steep rises in land values. It is important for land use planning to seek to protect remaining stocks of storage land and premises so that built up areas can function efficiently. This will have an additional benefit that travel (and freight) movements are minimized. However brownfield land policy and general allocations for employment land mean that storage space continues to be lost to higher values. It is rarely protected as the asset that it represents. A more sectoral plan framework is required.

Similar problems arise with low density commercial land uses such as R&D space and indeed some types of new office space. Often these specialist low density uses cannot compete with pressures from other high value uses notably housing and distribution land. The operation of general Use Classes based policies does not protect some key sector employment needs and in particular land required by small scale “start ups” and “niche” specialist scientific businesses.

Question 12: Should all employment sites include an element of lorry parking? Yes / No?

Question 13: If yes, should the DPD only require lorry parking sites or areas within future employment sites over a certain size threshold. Please indicate what that employment site threshold should be, 10, 20, 25 ha's or strategic sites of 50 or more only? Please explain your reasons for the threshold chosen.

Question 14: Should there be standalone lorry parking provision

It is accepted that not all employment sites, for instance very small employment sites, will be of an appropriate size or generate sufficient HGV movements to be required to deliver an element of lorry parking.

However, the lack of secured and formal HGV parking provision in North Warwickshire Borough is a chronic issue and as such NWBC should identify and allocate sites to address any identified need for overnight HGV parking and driver facilities, on or close to the motorway / strategic road network. Indeed, the rise in demand for lorry parking has been identified in Warwickshire's Local Transport Plan 4 (LTP4) (2023)² which states that the *"demand for safe, secure lorry parking facilities is very high in Warwickshire"*. LTP4 also recognises the fact that Warwickshire is *'criss-crossed by a Strategic Road Network of motorways and trunk roads [including] some routes recognised for their wider importance, such as the...A5 Midlands Logistics Corridor'* which passes through North Warwickshire.

The Route Strategy Initial Overview Report: South Midlands (2023)³ further recognises the important east-west link the A5 provides between the M1, M6 and M54 and also the strategic link north-south provided by the M42 to the A42 and M1 and notes that the A5 *'around Rugby, Tamworth and Lichfield'* as a particular section of the SRN in need of improved freight parking facilities.

As such, the Chamber's position is that it would be overly prescriptive to arbitrarily determine a pre-determined size threshold over which employment sites should provide an element of dedicated HGV parking. It would, too, be contrary to NPPF paragraph 113, which requires all 'proposals for new or expanded distribution centres' to 'make provision for sufficient lorry parking to cater for their anticipated use'.

Objective need could be established through the nationwide rollout of the national survey of lorry parking process, with existing iterations of the 'National Survey of Lorry Parking' reports having been published in 2017, March 2022 (Part 1) and May 2023 (Part 2). At a local level, this could be supplemented through parking beat surveys, in accordance with that contained within 2017 study.

Question 15: Should this Employment DPD have policies relating to farm diversification and loss of agricultural buildings, modern or traditional? If so, what should the policy cover?

The Chamber wholeheartedly supports the continued development and diversification of the rural economy.

The Chamber is unsure of what additional measures can be captured in land use planning policies (to those already contained in the existing Local Plan) and which do not run a risk of stifling innovation and entrepreneurial activity.

Indeed, development management policies and the current Use Classes framework allow considerable flexibility in repurposing spaces for new uses. Resources are an important consideration in developing the rural economy and a multi agency approach by the public sector is essential. If land uses policies that encourage cooperation between agencies can be developed that would seem a major benefit.

Overall, while there is no harm in general policy that encourage and support more small-scale rural businesses, given that such policy is already contained in the existing Local Plan, the Chamber cannot see the benefit or added value in more specific policies without a linkage to resources and particularly financial support.

Question 16: Should this Employment DPD have policies for the retention and prevention of loss through redevelopment of major rural businesses and farm/agricultural complexes, similar to Policy LP12 on existing employment areas/estates? Yes / No / Don't know?

As above, the Chamber wholeheartedly supports the continued development and diversification of the rural economy.

Policies that look to retain and prevent the redevelopment of agricultural complexes / rural businesses could unduly run a risk of stifling innovation and entrepreneurial activity. In any case, it is considered that the existing Local Plan contains sufficient land use policies to control the loss of major rural businesses and farm/agricultural complexes.

Question 17: Should this Employment DPD have policies relating to solar farms, battery storage and wind turbines? If so, what criteria should they include? E.g. relating to design, location, visual impact and/or land quality.

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

Question 18: Should this DPD have specific policies relating to, or seeking avoidance of loss of Grade 1 or 2 agricultural land and directing such sustainable energy uses/sites towards Grade 3 or less? Yes / No or Don't know. Please explain your answer.

No.

It is noted that the existing Local Plan does not include a policy relating to agricultural land, nor did the Inspector and Local Plan examination stage require any such policy to be included in order for the plan to be found sound.

The issue of the loss of the best and most versatile (BMV) land is monitored by Natural England who are the statutory authority responsible for ensuring that BMV is considered through the planning process.

The inclusion of an agricultural land policy in the DPD (or in the event of a Local Plan review) could unnecessarily place a bar on development and could prevent an otherwise ready and available site from being brought forward and ultimately stifle development. Such a policy would, in any case, conflict with the NPPF which is clear that the loss of BMV should be a consideration in the overall planning balance rather than a policy restriction.

Question 19: Should new (major or strategic?) employment site allocation policies/proposals include an area/element specifically for small to medium units? Yes / No

Yes.

As indicated elsewhere in these representations, a drawback of the current adopted plan allocations across the sub-regions is that they simply allocate land for general employment across all Use Classes. Consequently, particularly on the larger allocations, land tends to come forward for the highest value uses, that generally being Class B8 (warehouse and distribution) where values can approach residential values.

Shortages of general industrial land and in particular smaller scale units has therefore emerged. These trends, drawbacks and issues are well documented in the report *Coventry and Warwickshire Market Signals Study 2019* produced by BBP Regeneration Ltd. This was produced by the CW LEP, WCC and the local authorities across Coventry and Warwickshire and represents a key piece of relatively up to date market evidence and recommendations.

We would therefore reiterate our recommendation in the Chamber Employment Land Report (2023) to encourage more smaller business units to be built alongside large warehouses. This approach has been pioneered in neighbouring local authorities such as Hinckley and Bosworth.

Question 20:

- **20a. Should the Borough seek to provide and identify sites for start-up incubator units available at an affordable rent level (similar to the approach for affordable housing provision)? Yes / No?**
- **20b. If so, should such provision be across the Borough or focussed on rural areas and settlements or other approach? Please provide an explanation.**
- **20c. Should sites specifically for small start-up incubator units be supported by policies for their retention and prevention of loss through redevelopment? Yes / No / Don't know?**
- **20d. Would you support this approach if it required either application of Article IV designations (involving removal of specific permitted development rights) or pressure to Compulsory Purchase sites to ensure control over future development and any GPDO 'Permitted Development' rights changes? Yes / No / Don't know? Please explain your answer.**

The Chamber actively promotes and pushes for the provision of "Affordable Employment Land". As for sub-regional Planning Policies that are needed to deliver this effectively and how these are 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. NWBC Local Plan Policy LP6 Additional Employment Land and North West Leicestershire Local Plan Policy Ec2 New Employment Sites.

The Employment DPD (or in the event of a Local Plan review) could include policy/policies 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.

Question 21:

- **21a) Should we use the policies from the adopted Local Plan, LP35 Renewable Energy and Energy Efficiency, to try and progress to net zero? Yes / No / Don't know?**
- **21b) Does the policy go far enough? Yes / No / Don't know?**
- **21c) Or are building regulations the better way to secure net zero buildings / sites? Yes / No / Don't know?**

Question 22:

- **22a) Should there be specific policies referring to net zero buildings included within the DPD or should this be dealt with through Supplementary Planning Documents? Specific policies / Supplementary Planning Documents?**
- **22b) What should these policies and/or SPD's include?**

The Chamber acknowledges that Development Plans have a role to play in tackling the climate change. However, it must be emphasized that the introduction of measures and policies must always be fully costed and their impacts on business and commerce be properly understood before measures are adopted. Small businesses that are the lifeblood of the economy of the new plan area, are not always well equipped to bear the impact and consequences of new policy initiatives. The Chamber is concerned that if policies to move to net zero are not replicated in surrounding areas then they may create the unintended consequence of encouraging business to relocate to nearby areas where new initiatives have not been introduced.

It is considered that the existing Local Plan policies should be used to try to progress to net zero given there is not presently a firm policy requirement to achieve net zero, which for the reasons set out above could lead to unintended consequences for the local economy.

However, the Chamber would also point out that new and existing commercial properties are governed by the energy-efficiency standards regulations, which will progressively set more and more ambitious energy efficiency requirements over time. It is a basic principle of the planning system that it should not, unnecessarily duplicate policy and regulations stated elsewhere. As such, any policy would need to be carefully considered.

Question 23:

- **23a) Should there be greater flexibility and encouragement for changes of use and redevelopment of existing sites, to help address demands? Yes / No / Don't know?**
- **23b) If so, how would this be applied?**

Yes.

For example, consideration should be given to further encouragement by appropriate policies to the “repurposing” of town and village centre retail buildings for other employment uses and policies that seek to selectively resist change from retail to residential which is facilitated under the new Use Classes Order (2021).

Already in some of the larger towns in other sub-regional authorities (including Warwick and Stratford Districts) there is evidence that market forces have allowed, under Use Class E, some former shopping units to be converted to small business premises such as offices and workshops.

If these market trends could be treated more “sectorally” and aligned with more financial support measures this could improve the stock of employment land being better aligned to changing needs.

Question 24:

- **24a) Should there be simple policy support and encouragement for re-use of demolition and waste material ? Yes / No / Don't know?**
- **24b) or should there be a policy ‘requirement’ for programmes/schedules indicating re-use of demolition and waste materials from redevelopment sites/proposals, applying a “sequential test” criteria approach to site redevelopment? Yes / No / Don't know?**
- **24c) Is this policy approach within the remit of an Employment DPD? Yes / No / Don't know?**

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

Question 25:

- **25a) Should building design be addressed in the short term through a criteria-based policy in the employment DPD or left to a Design Code or SPD for the Borough? criteria-based policy / a Design Code or SPD / Don't know?**
- **25b) If a criteria-based policy, should the policy also address Climate change and Zero Carbon design issues as well? Yes / No / Don't know?**

The Chamber supports the ambition to improve and develop the overall quality of design and acknowledges that Development Plans have a role to play in tackling the climate change.

The Chamber wants to emphasise that the impacts of changes to the policy framework need to be understood and carefully evaluated in terms of their likely cost and impact on commercial businesses. This is especially true in relation to small businesses. Design represents policy area where often costs can be hidden in detail for example in changes relating to materials and specification.

In introducing new initiatives related to design, the Chamber would emphasise that costs impacts of new measures need to be understood and properly evaluated. The Chamber would also not support prescriptive policies in relation to density of development as some commercial development and land

use types require low density layouts-for example the biomedical and scientific sectors as well as many logistic and distribution schemes. Setting blanket density policies could cut across the proper provision for some commercial land uses. Storage land and space (e.g., industrial outdoor storage) represents another commercial land use type where pressures from brownfield land policy and density increase could seriously impact the overall provision of the use.

With regards climate change and net zero, as identified elsewhere in these representations, the Chamber is concerned that if policies to move to net zero are not replicated in surrounding areas then they may create the unintended consequence of encouraging business to relocate to nearby areas where new initiatives have not been introduced. It is considered that the existing Local Plan policies should be used to try to progress to net zero given there is not presently a firm policy requirement to achieve net zero, which for the reasons set out above could lead to unintended consequences for the local economy.

Question 26: Is it sufficient to rely on the adopted policies in the Local Plan 2021, as they refer to lighting, and updating the Lighting Supplementary Planning Document (SPD) sufficient to control lighting on employment sites? Yes / No / Don't know?

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

Question 27: In light of recent changes to GPDO permitting changes of use to employment and commercial development (Class B1, B2, B8 and Class E) without requiring planning consent (or subject only to 'Prior Notices') is there benefit in applying employment designations to areas/estates that have no or limited control, and subsequently applying Article IV designations to those designated areas.? Yes / No / Don't know?

Question 28:

- **28a) Should we apply employment change of use restriction designations for smaller rural employment estates in light of the GPDO changes? Yes / No / Don't know?**
- **28b) If yes, what size of sites and what distances/location from settlements should be considered appropriate before application of such restrictions?**
- **28c) Please explain your reasons.**

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

Question 29: Are there any local issues that should be considered in addition to those outlined in the HELAA methodology at this initial stage?

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

Question 30: What other evidence is required to move forward with an Employment DPD?

The Chamber has set out elsewhere in these representations the other evidence / additional work required to move forward an Employment DPD for North Warwickshire.

Question 31: Are there any other comments that you would wish the Borough Council to take account of when preparing planning policies in relation to employment?

In addition to the comprehensive comments made in these representations, the Chamber wishes to recognise a key material consideration insofar that freight services are currently undergoing major changes due to electrification / decarbonisation and the rapid expansion and changes of the whole warehousing and distribution sectors. It is considered that these major changes will require new and up to date policies.

A sub-regional cross-boundary approach would seem appropriate to tackle this strategic issue however the Chamber is not aware of any initiatives for cooperation between the local authorities on this matter. Neighbouring authorities have proposed consolidation centres to reduce mileage so we would encourage the authorities to collaborate on this matter.

1. **Next Steps**

The Chamber has been pleased to engage with this important consultation related to the emerging Employment DPD. 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 HENDA 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



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

C&W CC Mar 23.

