

CD-D40



Jon Turner Rebuttal  
Land NE J10 M42

Prepared for:

Hodgetts Estates /  
HPG Developments

Date: June 2024

Appeal Reference –

APP/R3705/W/24/3336295

LPA ref No: PAP/2021/0663

Author:

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## 1. Introduction

- 1.1. This document has been authored by me, Jonathan Turner MRICS. I have also provided a proof of evidence to this Appeal (**CD-D29/A**).
- 1.2. It responds where necessary in relation to employment need to the relevant parts of the following proof of evidence:
  - Ms Dorothy Barratt, North Warwickshire Borough Council (**CD-D24**); andit does so by addressing the points raised in the proofs that are considered to be:
  - Factually incorrect; or
  - Use out of date evidence; or
  - Misinterpret law, policy, or evidence.
- 1.3. References to paragraphs in this rebuttal are to Ms Barratt's proof of evidence (**CD-24**) unless otherwise stipulated.
- 1.4. At the outset, it is important to state clearly that the original application was supported by a letter dated 2<sup>nd</sup> December 2021 which stated that the development would be:
  - *“Up to 100,000 sqm (1,076,391sqft) of mixed Class B2, Class B8 and Class E(g)(iii) floorspace; and*
  - *“Up to a maximum of 10% Class B2 / Class E(g)(iii).”*
- 1.5. That letter was thereafter supported by numerous documents including the Planning Statement (**CD-B5**), Design & Access Statement (**CD-B34**), Design Guide (**CD-B35**) and indeed the Environmental Statement upon which the outline scheme was assessed (**CD-B1**), all of which clearly stated the proposed Use Classes sought and the split of floorspace between use classes.
- 1.6. Furthermore, the agreed draft planning condition in the Statement of Common Ground between the Appellant and NWBC (**CD-D13**) dated 26th March 2024, which is retained in the latest draft conditions schedule also made this clear, as follows:

*7. No more than 10% of the total development floorspace or 10,000 square metres (gross), whichever is greater, within the development hereby approved shall be used for a use or uses falling within Use Class E (g) (iii) or Use Class B2 of the Town and Country Planning (Use Classes) Order (as amended).*
- 1.7. Therefore, and given scale of the development, - if fully built out - at least 90% of the scheme would need to comprise of B8 use class (storage & distribution). The proposal has always been promoted as predominantly a large scale 'Big Box' logistics scheme, which befits its location.
- 1.8. It is in the context of that specific Big Box logistics sector that land supply, demand, and employment need must be considered.

## 2. Rebuttal to evidence from Ms Dorothy Barratt - NWBC (CD-D24)

Paragraph reference	Ms D Barratt's Comments	My Comments
<b>Under "The Development Plan" heading from page 8 onwards</b>		
4.7	<p><i>Policy LP5 deals with the amount of development, including employment land expected to be delivered during the plan period. It explains that between 2019 and 2033 a minimum of 100 ha of employment land will be provided and that the employment land will be directed towards settlements appropriate to their size and position in the hierarchy, as expressed in NWLP policy LP2, and will be appropriate to the scale and size of the settlement.</i></p>	<p>This paragraph neglects to inform the reader that Local Plan Policy LP5 on page 36 of <b>CD-F1</b> states that the "<b>minimum</b>" 100 hectares of employment land is "<b>subject to policy LP6</b>".</p>
4.10	<p><i>The Local Plan Inspector explained in relation to strategic employment sites that although the Core Strategy previously had tried to "grapple with similar issues...there remains no clear evidence as to what level of development should necessarily be delivered in the Borough as opposed to elsewhere." He went on to say in para 180, "Nonetheless by consequence, and for consistency with NPPF 2012 paragraph 17 and paragraph 82, the Plan needs to address this issue. That would be achieved via the incorporation of MM40 and MM120." (Main Modification 40 was the introduction of new policy LP6a whilst MM120 was a monitoring indicator. (CD F15)</i></p>	<p>The below is provided clarification.</p> <p>The LP6 monitoring indicator can be found in Table 9 of pages 105/106 of the Local Plan (<b>CF-F1</b>). The table states the LP6 'indicator/metric' as being:</p> <p><i>"Amount of employment <b>land provision</b> delivered by Use Class and by hectare and square metre relative to evidence of immediate unmet need <b>within Area A</b> as defined in the West Midlands Strategic Employment Sites Study (September 2015) or subsequent iteration or similar strategic study." [Our emphasis]</i></p> <p>This is further clear and unambiguous evidence that LP6 refers to specific Use Classes of employment land provision (not buildings) with Area A (Area 2) only.</p>
4.12	<p><i>LP6 was therefore introduced as a means to ensure that the Borough Council could consider employment opportunities that may be lost to the area through the lack of suitable sites. The policy refers to an identified immediate need or for a certain type of development. The Local Plan Inspector explained as seen in paragraph 4.11 above this was not to be at the expense of the Green Belt or the Strategic Gap policies.</i></p>	<p>I do not agree with this statement. Supporting text to LP6 at paragraph 7.46 on page 36 of the Local Plan specifically refers to Area A encompassing land covered:</p> <p><i>"...by the Strategic Gap, designated Green Belt, and land which is not in categories 1, 2, 3 or 4 of plan policy LP2."</i></p> <p>The supporting text goes on and:</p> <p><i>"recognises that there are particular locational requirements specific to certain employment uses and economic benefits to addressing needs in those locations."</i></p> <p>in reference to Area A (Area 2).</p>



Paragraph reference	Ms D Barratt's Comments	My Comments
<b>Under the "Evidence of employment need" heading on page 15</b>		
4.28	<p><i>The evidence for employment need for the NWLP was various Employment Land Reviews as well as the 2015 West Midlands Strategic Employment Sites Study. The most recent evidence the Borough Council will use in the forthcoming EEDPD will be the Coventry and Warwickshire Housing and Employment Needs Assessment (CW HEDNA) and the awaited West Midlands Strategic Employment Sites Study. Both will be used along with any other evidence to determine a plan-led approach to the allocation of further employment sites.</i></p>	<p>I note that the Cushman &amp; Wakefield Employment Land Study May 2024 (CD-D29/C) section 3 pages 18-58 provides a comprehensive summary of the long-standing history of numerous studies, reports, and evidence being published at a national, regional, sub-regional, and local level. This evidence has thus far not been acted upon by North Warwickshire in any meaningful way. Indeed, paragraph LP6 was only introduced as a consequence of the failure of the submission version of the Local Plan to address the evidenced need. It would be my recommendation that when the next local plan is submitted (whenever that will be), it does not similarly sidestep this issue again.</p>
<b>Under the "CW HEDNA" heading from page 15 onwards</b>		
4.31	<p><i>There is a correction I would like to draw the Inspector's attention to in the reported HEDNA by the appellant. The correct table 10.19 is shown below. This indicates that across the Coventry and Warwickshire area there is a need up to 2041 of 551 ha and the need to 2050 is 735 ha of land for Strategic B8 uses.</i></p> <p>&amp; Table 10.19 as extracted in Ms Barratt's proof on page 16.</p>	<p>I note the comment but am unsure where the Appellant has incorrectly reported on the HEDNA previously, as it did not form part of the JLL Employment Land Statement September 2021 and Cushman &amp; Wakefield Employment Land Study May 2024 (CD-D24/C) was provided as an Appendix to my proof of evidence.</p> <p>Nevertheless, we note in response that at the previous paragraph of 10.44 on page 230 of the Coventry &amp; Warwickshire HEDNA 2022 (CD-i4) states:</p> <p><i>"As is standard practice, it is then appropriate to include a margin to support a choice of sites in a competitive market and ensure that there is some flexibility of supply to allow for some unforeseen delays in delivery without constraining the market. A 5 year margin based on the 5 year completions trend is considered appropriate."</i></p> <p>We also note paragraph 10.46 on page 231 of the same Coventry &amp; Warwickshire HEDNA 2022 (CD-i4) which states in relation to table 10.19:</p> <p><i>"The above analysis identifies the quantum of development which might be expected together with the appropriate supply-side margin to allow</i></p>

Paragraph reference	Ms D Barratt’s Comments	My Comments
		<p><i>for demand uncertainties, slippage and ensure a choice of sites.”</i></p> <p>These paragraphs are a clear indication that a choice of sites is required in a functioning market and acknowledgement of the complexity and long timescales normally associated with large scale strategic logistics sites.</p> <p>The importance of ‘over-supplying’ by the 5 year margin is therefore deemed necessary by the HEDNA to ensure the ‘base need’ land supply comes forward.</p> <p>We note that in Area A/Area 2 the land supply evidence we have presented demonstrates that B8 large scale logistics land is grossly undersupplied with the only supply being available at one site currently – Peddimore. See Cushman &amp; Wakefield Employment Land Study May 2024 (CD-D29/C) Figure 43 on page 89.</p>
<p><b>Under the “Other studies” heading from page 16 onwards</b></p>		
<p>4.32</p>	<p><i>There are two West Midlands Strategic Employment Sites Studies (WMSESS) prepared in 2015 and 2021 (CD I1) and (CDI2) which have considered the issue of strategic employment sites with a policy off approach. The first Study was intended to fill the gap of regional planning by determining the need for wider than local employment sites. These sites would have fell into the old RSS definition of over 25+ hectares and for companies who tended to be footloose and able to locate nationally and internationally. The 2015 Study did not provide any notion of the amount of land that North Warwickshire should deliver.</i></p>	<p>West Midlands Strategic Employment Sites Study 2015 (WMSESS 2015) (CD-i1)</p> <p>It was <b>not the purpose</b> of the Study to indicate an amount of land that North Warwickshire or any other local planning authority should deliver.</p> <p>Rather, the Study equated demand against supply in market terms, which demonstrated that Area A, which is referenced directly by Policy LP6, having the lowest level of immediate available supply measured by years’ supply – 3.7 years against an average of 8.2 years for all other sub-regions.</p> <p>The Study concluded that the planned land supply fell “<b>severely short</b>” in Area A.</p> <p>See paragraphs 3.52 to 3.58 of the Cushman &amp; Wakefield Employment Land Study May 2024 (CD-D29/C)</p>
<p>4.33</p>	<p><i>A further study was prepared and published in 2021, which is a “successor study” as mentioned in policy LP6.</i></p>	<p>West Midlands Strategic Employment Sites Study 2021 (WMSESS 2021) (CD-i2)</p> <p>As with the 2015 WMSESS, it was again <b>not within the remit of the 2021 “successor</b></p>

Paragraph reference	Ms D Barratt’s Comments	My Comments
	<p><i>The 2021 WMSESS again did not indicate the amount of land that the Borough Council should be seeking to deliver.</i></p> <p><i>It had a “semi call for sites” and this indicated well over 800 hectares of potential land in North Warwickshire.</i></p> <p><i>14 local planning authorities as well as the West Midlands Combined Authority have joined together to progress a further study to try and determine the amount of land that each local planning authority or sub-region should be seeking to deliver. This latest study is still awaited, although a final version is expected to become available sometime in July 2024.</i></p>	<p><b>study</b>” to indicate an amount of land that North Warwickshire or any other local planning authority should deliver.</p> <p>Notwithstanding this, the 2021 Study identified Area 2 (largely covering Area A from the 2015 Study) as the location with lowest immediate supply in the whole of the West Midlands.</p> <p>Further, the 2021 Study scored the Appeal Site as the joint best (using a basket of criteria) among the potential sites in terms its suitability to deliver strategic employment land in the whole of the West Midlands, with 2 other sites receiving the same joint score both located in the Green Belt.</p> <p>It follows that it would be wholly irrational if the Appeal Site was then not to be carried forward as either a site allocation though the EEDPD or approved against Policy LP6 when the need is demonstrated.</p> <p>Finally, undertaking a ‘CTRL F’ search of the document shows that the word “semi” does not appear once in the 84 page Study, nor its appendices, as is suggested by Ms Barratt’s paragraph 4.33 in relation to the “call for sites”, and so the Study is misquoted.</p>
<p><b>Under the “Immediate Need” heading from page 17 onwards</b></p>		
<p>5.8</p>	<p><i>While there may be a general need for additional land to meet development needs of the Borough over the plan period based upon the evidence base this is addressed through the development plan and emerging plans. Additional employment land would be assessed against the policies of the development plan as a whole with appropriate weight placed on the Strategic Gap policy and considerations of need and economic growth balanced against any harm to the Strategic Gap and other harm. Part of that consideration would be the availability of other alternative sites. To benefit from Policy LP6 an applicant would need to demonstrate no other sites are available or could be made available ahead of the appeal site and that economic growth and</i></p>	<p>It is important to point out that LP6 refers very clearly to evidenced need for a certain type of need or an immediate need in a specific geographical location of Area A as defined by the WMSESS 2015 (<b>CD-i1</b>). The reference to a successor study is reference to the WMSESS 2021 (<b>CD-i2</b>).</p> <p>Paragraph 5.8 is structured in such a way that it may be construed as to apply to the whole of North Warwickshire Borough Council’s (NWBC) administrative area. This is categorically not the case.</p> <p>Moreover, in terms of availability of supply within Area A or Area 2, policy LP6 does not state a requirement to demonstrate that <b>“no other sites are available or could be made available ahead of the Appeal Site and that economic growth and prosperity would be lost”</b> if the land did not come forward, as paragraph 5.8 suggests. This appears to be a</p>

Paragraph reference	Ms D Barratt's Comments	My Comments
	<p><i>productivity would be lost in the absence of such a site.</i></p>	<p>'gloss' on the policy invented by the author, but not promoted by the Inspector. Had the Inspector thought that such gloss was appropriate then he would have said so.</p> <p>LP6 is a need-based policy for the provision of additional employment land that is not being provided for within a specific geographical location. It is also worth reiterating that the majority of land within Area A or Area 2 is designated as Green Belt, meaning in reality land within a Strategic Gap is sequentially preferable in accordance with national policy, as explained by Mr Hann.</p>
<p><b>Under the "Certain Type" heading from page 26 onwards</b></p>		
<p>5.34</p>	<p><i>Based on the above [the 2021 Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change Study produced by GL Hearn and MDS Transmoda] criteria the appeal site is not considered to be unique in the sub region or Area 2. As such there is not the need to locate a site in the Strategic Gap.</i></p>	<p>Please see MDS Transmodal rebuttal in relation to the study referred to, which was co-authored by MDS Transmodal.</p> <p>From my perspective, this paragraph is misleading as it neglects to refer to the findings and observations of the 2021 WMSESS, which on 'policy off' scenario ranked the Appeal Site as the best performing site in terms of its ability to accommodate strategic employment of scale within the entire West Midlands.</p> <p>Applying a 'policy on' basis, of the 11 sites within Area 2 assessed as potential supply in WMSESS 2021, the only 1 outside of the Green Belt is the Appeal Site.</p> <p>On that basis, it is unique in that it is the only industry promoted strategic site within Area 2 outside of the Green Belt.</p> <p>The assessment made of the WMSESS 2021 within Ms Barratt's proof provides a very narrow snapshot of WMSESS 2015 and WMSESS 2021, with a selective interpretation.</p> <p>For example, it omits other key points from the 2021 WMSESS underpinning the unique facets of strategic sites, which as per paragraph 4.29 (page 39) (CD-i2) are summarised as being:</p> <ol style="list-style-type: none"> <li>1. <b>Their role in providing well located, serviced sites available for immediate development".</b> <ol style="list-style-type: none"> <li>I. <i>"Occupiers are increasingly influenced by the importance of efficiency, image, CSR and green credentials. In light of this, in addition</i></li> </ol> </li> </ol>

Paragraph reference	Ms D Barratt's Comments	My Comments
		<p><i>to expansion of the key logistics sectors which dominate the markets, a number of occupiers are looking to 'trade up' from secondary space to new accommodation. This is particularly relevant to the availability of new development both on a speculative and pre-let basis <b>where lead in times can be minimised by the provision of well located, serviced sites available for immediate development</b>". [Our emphasis]</i></p> <p>II. Furthermore, para 4.41 of 2021 WMSESS underlines</p> <p><i>"the vast majority of take-up was within estates or employment areas of a strategic scale, a significant number of which are clearly recognised as single entities (e.g. i54 or Hams Hall), consistent with the 25ha definition used for the purposes of this Study."</i></p> <p>2. The location of the Appeal Site in the Golden Triangle, the report noting in the West Midlands the greatest amount of total take-up has been on sites with motorway access, including sub-regions east and south of Birmingham and in Warwickshire at Birch Coppice.</p> <p>3. Para 4.64 states that</p> <p><i>"for the region to fulfil its clear potential, as advocated earlier in this Report, this level of good quality supply needs to be maintained and increased. It is recommended that a <b>proactive approach is taken to identify a deliverable portfolio of fit for purpose employment land and property capable of providing sufficient supply thus enabling it to provide a timely response to meet both known local needs and unknown (and at times unquantifiable) strategic employment requirements</b>". [Our emphasis]</i></p> <p>4. Crucially, Para 6.12 states</p>



Paragraph reference	Ms D Barratt's Comments	My Comments
		<p><i>“there is a very limited supply of available, allocated and/or committed sites across the Study Area that meet the definition of ‘strategic employment sites’, and an urgent need for additional sites to be brought forward to provide a deliverable pipeline, noting the very substantial lead-in times for promoting and bringing forward such sites.” [Our emphasis]</i></p>
<p><b>5. Under the “Disaggregation” heading from page 27 onwards</b></p>		
<p>5.35</p>	<p><i>The same approach to need for development in the Strategic Gap based on the criteria in LP6 must be taken for each element of the scheme and the extent these can be disaggregated.</i></p> <p><i>In this respect there is no requirement for the lorry park to be combined with the employment use land. Standalone proposal for lorry parking come forward such as the proposal at land west of Hams Hall roundabout and south of Marsh Lane, Curdworth (CD K3).</i></p>	<p>There are no site allocations for HGV parking or other driver facilities in the adopted Local Plan. Notably the most recent “standalone” proposal that is referenced in paragraph 5.35 was refused by NWBC and subsequently dismissed at appeal (ref. APP/R3705/W/23/3327296) (CD-K3) on the basis of inappropriateness and the harm to landscape character and being within the Green Belt.</p> <p>As a relatively low value land use compared to residential and employment uses, lorry parking provision has few promoters and struggles to compete for prominent and relevant sites on the strategic road network where it is required. It is therefore entirely sensible to integrate HGV Parking within more commercially viable land uses such as large-scale logistics, allowing subsidisation, and based upon obvious synergy of land uses.</p> <p>Indeed, had that approach been followed by the Borough over the last 20 years at J10 M42 where over 7 million sq ft of floorspace has been developed over that period the current problems may not be so acute.</p> <p>The lorry park at the Appeal Site proposed would allow the Borough to correct the prior planning oversights. It also allows agglomeration benefits.</p> <p>This is evidenced by the Agenda Item 6 from the NWBC Planning and Development Board meeting of 8<sup>th</sup> April 2019 (attached to the Rebuttal Proof of Mr Hatfield) which refers to a meeting between the promoters for Peddimore in Birmingham and their planning consultants and councillors and planning officers from NWBC. Paragraph 5.7 of that report states:</p>

Paragraph reference	Ms D Barratt's Comments	My Comments
		<p><i>The second issue was to seek comfort on the provision of appropriate HGV parking on site with the relevant welfare infrastructure. Members were told that the service yards on the site would be substantially larger than those experienced at Birch Coppice for this reason and that on-site welfare facilities would be provided...Members were satisfied that their concerns had been recognised and addresses as far as they could be through the application process.</i></p> <p>Two conclusions can be drawn from this:</p> <ul style="list-style-type: none"> <li>• Firstly it is accepted by NWBC that existing HGV parking and welfare infrastructure at Birch Coppice does not meet modern operational requirements, therefore offsite provision is required nearby;</li> <li>• Secondly, it is also accepted by NWBC that strategic scale employment development should incorporate appropriate HGV parking and welfare infrastructure, which in the case of the Appeal Site would also deliver for identified deficiencies close by.</li> </ul> <p>Further, Paragraph 113 of the NPPF puts the onus on developers of new or expanded distribution centres to <b>“make provision for sufficient lorry parking to cater for their anticipated use.”</b>, implying a preference for “aggregation”, which the NWBC is clearly at odds with.</p> <p>Please also see the MDS Transmodal's Rebuttal.</p>
5.36	<p><i>Various masterplans submitted by the Appellant show a number of large units, which could be disaggregated to sites outside the Strategic Gap. No evidence has been presented as to why units need to be on a single site at the cost of harm to the Strategic Gap. The availability of other sites outside the Strategic Gap to meet general employment need will be considered through the development plan process.</i></p>	<p>Firstly, this paragraph misunderstands the Appeal Site's unique ability to deliver buildings of scale (up to 1 million sq ft) <u>and</u> of 'bespoke' layout.</p> <p>Please see the Design Guide (<b>CD-B35</b>) and Design and Access Statement (<b>CD-B34</b>) (Section 6 on pages 72-74) for large scale layouts able to be accommodated at the Appeal Site. Both of these documents were submitted with the original application. <b>Appendix 1 to 3 of this rebuttal</b> provide further examples of such buildings.</p>

Paragraph reference	Ms D Barratt's Comments	My Comments
		<p>None of those buildings could be disaggregated as paragraph 5.36 suggests.</p> <p>Paragraph 87 of the NPPF, references Storage and Distribution as a sector that benefits from the economics of agglomeration (with the attendant opportunities for clusters and networks), whilst also recognising that operations at a variety of scales in suitably accessible locations should be planned for.</p> <p>Moreover, the benefits of clustering are manifold and clearly apparent locally, considering Tamworth Logistics Park, Birch Coppice, and Core 42 at J10 M42 and indeed any other strategic B8 site.</p> <p>See also the Cushman &amp; Wakefield Employment Land Study 2024 (CD-D29/C) in which the word 'clustering' or 'cluster' is mentioned 7 times in section 3 which summarises the relevant national, regional, sub-regional, and local evidence base.</p> <p>Specially that Study at paragraph 3.116 on page 41 points out that the Coventry &amp; Warwickshire HEDNA 2022 states</p> <p><i>“Consultations undertaken suggest that, whilst B8 demand is strong, there is a need for separate allocations for B1(c)/B2 where land is delineated from sites going for B8 to support the manufacturing sector. The strong manufacturing sector in the sub-region needs to be supported.”</i></p> <p>The point being made is that because of the logistics sector's strength in the Coventry &amp; Warwickshire area, manufacturing users are not able to be competitive in taking land where B2 (manufacturing) or B8 logistics use classes are available. The B2 provision for North Warwickshire is at the E4 allocation, land south of MIRA, and in that respect the Appeal Site would provide the required corresponding B8 land supply for large scale logistics in the Borough.</p> <p>In terms of the proposed 5-10% of floorspace that would delivered as SME units, as identified in (CD-I5), there is a dearth of units in this scale coming forward in Coventry &amp; Warwickshire. Integrating these units as part of a larger scale</p>

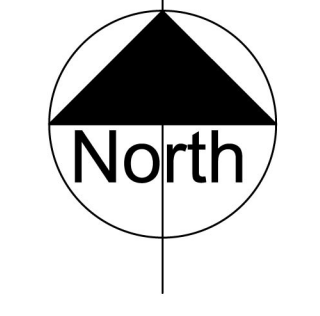
Paragraph reference	Ms D Barratt's Comments	My Comments
		<p>employment scheme allows for cross subsidisation.</p> <p>It follows that disaggregation of this element of the proposals could potentially result in less SME and follow on space ultimately being delivered, against the backdrop of an acute need for such. Moreover, those SME units often have a business link to the larger B8 users.</p> <p>Please see paragraph 3.113 from the Cushman &amp; Wakefield Employment Land Study May 2024 (CD-D29/C) which summarises this matter considered in the Coventry &amp; Warwickshire Market Signals Study 2019 and states:</p> <p>3.113 <i>“In addition, a significant element of the Study considered the feasibility and viability of providing for all employment property sectors. It concluded that the development of much smaller industrial premises (i.e., below 25,000 sq. ft) has not proved to be viable and, therefore, has not been developed on a speculative basis. One of the suggested recommendations is that larger developments, particularly for the more feasible uses such as large B8, enable the development of smaller units.”</i></p>
<b>Annual Monitoring Table from page 33</b>		
<p>Table 3 - Land Supply as at 31<sup>st</sup> March 2024 (page 33)</p>	<p>See Appendix 6</p>	<p>This table includes quantitative errors and applies no qualitative analysis whatsoever. It is misleading and I have included a corrected and clarified table providing clarity for the Inquiry in <b>Appendix 4 of this rebuttal.</b></p> <p>In relation to that Appendix 6 of this rebuttal, I make the following key point:</p> <ul style="list-style-type: none"> <li>- Market facing large scale B8 logistics land reached '0' (zero) years supply in 2021/2022 as evidenced by the large take up in 2020/21 and 2021/2022 totalling over 67 hectares in that 2-year monitoring period alone.</li> </ul>

## Appendix 1





NOTES:  
 Please note Title Plans have been scaled using Ordnance Survey features which may have altered over time. Complete accuracy cannot be guaranteed without further on-site survey.  
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 Building areas are liable to adjustment over the course of the design process due to the ongoing construction detailing developments.  
 Please note the information contained within this drawing is solely for the benefit of the employer and should not be relied upon by third parties.  
 The CDM hazard management procedures for the Chetwoods aspects of the design of this project are to be found on the "Chetwoods - Hazard Analysis and Design Risk Assessment" and/or drawings. The full project design teams comprehensive set of hazard management procedures are available from the Principle Designer appointed for the project.  
 Please note Title Plans have been scaled using Ordnance Survey features which may have altered over time. Complete accuracy cannot be guaranteed without further on-site survey.



Rev	Revision Description	Date	Author	Reviewer
	<b>MARKETING</b>			

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Project  
**LAND NORTH EAST OF J10 M42, DORDON**

Client  


Drawing Title  
**INDICATIVE MASTERPLAN  
 TWO UNIT OPTION**

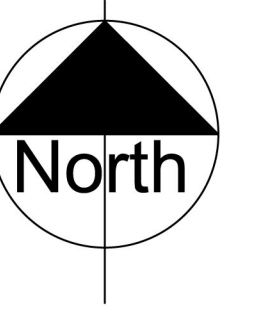
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Project	Originator	Zone	Level	Type	Rate	Number	Rev
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## Appendix 2



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- NB.**
- SUBJECT TO SURVEYS, CONSTRAINTS & PLANNING.
  - LAYOUT TO BE TRACKED.
  - RED LINE INDICATIVE ONLY.

Schedule of Accommodation GIA

Unit 1	sq. m	sq. ft.
Warehouse	: 59,240	637,654
Main Office (2 levels)	: 1,858	20,000
Hub Office	: 465	5,000
Gatehouse	: 20	215
<b>TOTAL (GIA)</b>	<b>: 61,583</b>	<b>662,869</b>

HGV Parking	: 397 (Inc. 10 Loading)
Car Parking	: 250 (Inc. 13 Accessible)

Haunch Height	: 18m
Dock Wall Height	: 1.2m
Dock Levellers	: Allowance for future provision - T.B.C.
Level Access	: 10

(18m wide canopies above at each end of unit)

	Ha	Acres
Site Area	: 13.825	34.163
Site Density	: 44.54%	

P3	Removed plot B site boundary	09/08/21	SA/NH
P2	Updated layout and schedule	04/08/21	SA/NH
P1	First Issue	28/01/21	TC

Rev	Revision Description	Date	Author/Reviewer
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**PRELIMINARY**

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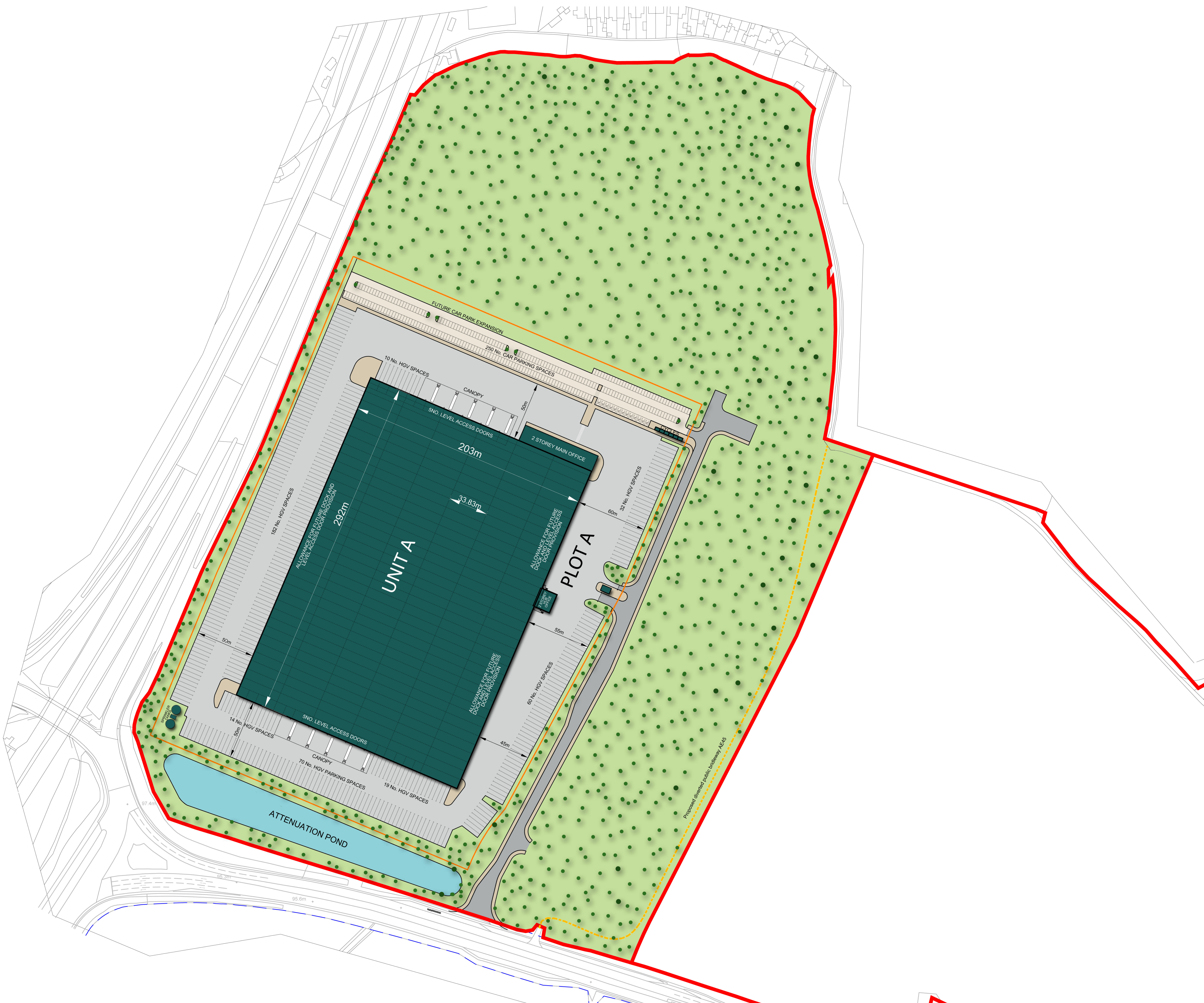
Project  
**LAND EAST OF J10, M42**

Client  
**HODGETTS ESTATES**

Drawing Title  
**PROPOSED SITE LAYOUT  
 SINGLE UNIT SCHEME**

Scale	Size	Drawn	Checked	Date
1:1500	A1	TC	NH	28/01/2021

Project	Originator	Zone	Level	Type	Role	Number	Rev.
4263	CA	00	00	DR	A	00079	P3



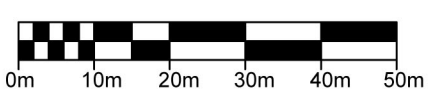
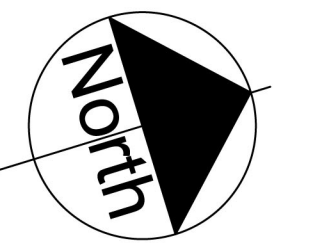


## Appendix 3

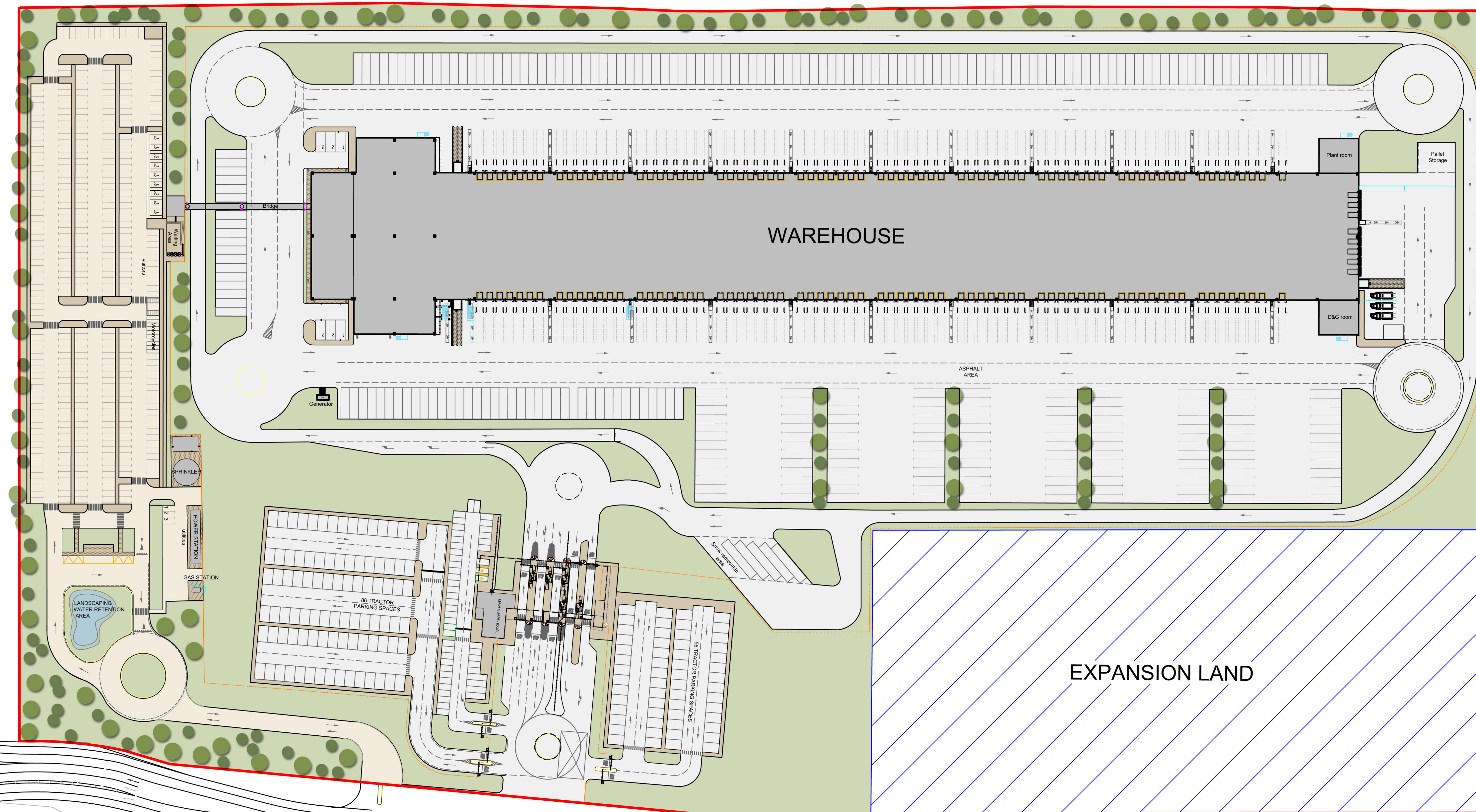


NOTE:  
 Chetwoods Concept Tender Pack has been derived from the client supplied proposed site plan design.  
 HH-Tenite-V0.1-4857-CA-00-00-DR-A-00051-PROPOSED SITE LAYOUT-P1.

NOTES:  
 Copyright Chetwoods (Birmingham) Limited. No implied licence exists.  
 Contractors must verify all dimensions on site before commencing any work or shop drawings. This drawing is not to be scaled. Use figured dimensions only.  
 Subject to statutory approvals and survey.  
 Building areas are liable to adjustment over the course of the design process due to the ongoing construction detailing developments.  
 Please note the information contained within this drawing is solely for the benefit of the employer and should not be relied upon by third parties.  
 The CDM hazard management procedures for the Chetwoods aspects of the design of this project are to be found on the "Chetwoods - Hazard Analysis and Design Risk Assessment" and/or drawings. The full project design teams comprehensive set of hazard management procedures are available from the Principle Designer appointed for the project.



Site Boundary



SK1	First Issue	04.04.24	SM/SM
Rev	Revision Description	Date	Author/ Reviewer

**CONCEPT TENDER**

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Project  
**BTS LAND N/E J10 M42**

Client  
**HPG DEVELOPMENTS**

Drawing Title  
**PROPOSED SITE LAYOUT PLAN**

Scale	Size	Drawn	Checked	Date
1:1000	A1	SM	SM	04.04.2024

Project	Originator	Zone	Level	Type	Role	Number	Rev.
5744	CA	00	00	DR	A	00050	T1



## Appendix 4

Appendix 4 – Response to Table 3 in Ms Barratt’s proof of evidence on Employment Need

Table 3 from page 33 of Ms Barratt’s proof extracted below.

**Table 3:** Total Land Supply as at 31<sup>st</sup> March 2024

	<i>over 0.4 hectares</i>	<i>under 0.4 hectares</i>	<i>Total</i>
<i>Total Completions Since 2019/20 – 2023/24</i>			
<i>2019/20</i>	0	0.39	0.39
<i>2020/21</i>	24.25	0.47	24.72
<i>2021/22</i>	42.79	0.25	43.04
<i>2022/23</i>	0	0.25	0.25
<i>2023/24</i>	3.49	0	3.45
<i>Sub-total</i>	<i>70.53</i>	<i>1.68</i>	<i>72.21</i>
<i>Allocations In Local Plan</i>	57.2	0	57.2
<i>Outstanding sites with Planning Permission as at 31/3/24</i>	23.14	0.32	23.46
<i>Sub-total</i>	<i>150.87</i>	<i>1.68</i>	<i>152.81</i>
<i>Loss of employment land</i>	0	-0.04	0
<i>Additional land at MIRA</i>	18.0	0.00	18.0
<b>Total considering losses + additional land at MIRA</b>	<b>168.87</b>	<b>1.64</b>	<b>170.51</b>

*Note: All employment sites are counted in gross site area*

Corrected Table (having applied quantitative and qualitative analysis)

	over 0.4 hectares	C&W Comments	under 0.4 hectares	Total
<i>Total Completions Since 2019/20 – 2023/24</i>				
2019/20	0		0.39	0.39
2020/21	24.25		0.47	24.72
2021/22	42.79		0.25	43.04
2022/23	0		0.25	0.25
2023/24	3.49		0	3.45
<b>Sub-total</b>	<b>70.53</b>	<b>70.53</b>	<b>1.68</b>	<b>72.21</b>
<i>Allocations in Local Plan</i>	57.2	<p>On a quantitative basis this figure is revised to <b>51.05</b> ha</p> <p>On a qualitative basis (relevant to LP6 and the Appeal proposals for large scale B8) this figure is revised to '0' (zero) ha.</p> <p>E1 – B8 for Aldi only so not market facing, or reserved in allocation for R&amp;D. Therefore 6.8 ha assumed on QUANT basis but '0' (zero) on QUAL basis.</p> <p>E2 – Estimated to generate net developable area of 3-3.5 hectares and requires allotments to be moved and operational prior to commencement of construction. Therefore 3.25 ha on QUANT basis but '0' (zero) on QUAL basis.</p> <p>E3 – Next to houses and requires drainage, landscaping, estate roads etc, so 2 ha on QUANT basis. Not suitable for B8 of scale so '0' (zero) ha on QUAL basis.</p> <p>E4 – Land to the south of MIRA E4 has resolution to grant but has been approved with a developable area of 39 hectares and not the full 42 hectares allocated by the Local Plan. In any case, this land is for B2 (manufacturing) and research and development use class, with only ancillary B8. It is not within Area A or Area 2. On QUANT basis 39 ha, on QUAL basis '0' (zero).</p>	0	57.2
<i>Outstanding sites with Planning Permission as at 31/3/24</i>	23.14	<p>This is made up of only 2 sites:</p> <p>Coteshill Hall Hospital of 16.38 ha and Hockley Park Dosthill 4 ha = <b>20.38 ha</b></p> <p>Coteshill Hall is an office development affected by HS2. The following was detailed in the AD52 Savills Submission to Local Plan by parties including agents for the landowner</p>	0.32	23.46

		<p>IM Properties (See <b>(CD-29/C)</b> Cushman &amp; Wakefield Employment Land Study 2024 and specifically it's Appendix 2 on page 111. QUANT basis 16.38. QUAL BASIS '0' (zero)</p> <p><i>"The site is affected by HS2. Permission was granted to redevelop the former hospital in 1996 for up to 10,627 sq m of B1 office floorspace and refurbish the hall. Following IM's acquisition of the site in 2002, an HQ office was built, implementing the consent. IM will relocate to Solihull in 2019 as HS2 commences pre- construction which will involve demolishing IM House and providing an alternative access to the hall. All of the consented floorspace is affected by HS2. The remainder of the site lies within the Green Belt and does not benefit from any allocation or permission."</i></p> <p>Dosthill is referred to in the Cushman &amp; Wakefield Employment Land Study 2024, (CD-29/C) in Figure 21 on page 56 and in paragraph 5.43 on page 92. It is an abnormally shaped site and can only accommodate a max. 150,000 sqft single building. It is discounted as a potentially site for large scale B8, being accessed via narrow roads with residential on either sides of those roads. The recent planning application PAP/2023/0188 (not yet approved) has also meant revised heights no suitable for large scale logistics. QUANT 4 ha and QUAL '0' (zero).</p>		
<b>Sub-total</b>	<b>150.87</b>		<b>1.68</b>	<b>152.81</b>
<i>Loss of Employment Land</i>	0		-0.04	0
<i>Additional Land at MIRA</i>	18	This additional land for diversion of A444 highways only. i.e. not for developable area so no contribution to employment land provision. Revised to '0' (zero) on QUAL basis.	0	18
<b>Total considering losses + additional land at MIRA on gross area basis) as detailed by Ms Barratt</b>	<b>168.87</b>		<b>1.64</b>	<b>170.51</b>
<b>Corrected Total considering Quantitative Analysis by C&amp;W</b>		<b>70.53 + 51.05 ha + 20.38 ha = 141.96 ha</b> <b>(quantitative supply across ALL employment use classes)</b>		
<b>Corrected Total considering Qualitative Analysis by C&amp;W showing land relevant to LP6 and large scale B8 logistics</b>		<b>0 (zero) ha</b> <b>(relevant to LP6)</b>		

Author:

Jonarhan D Turner MRICS

Partner

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