

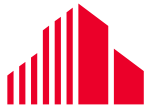
Para	Summary / Quotation	Notes
General	<p>The LSH report is prepared for a mixed use class application across B2 & B8.</p> <p>We set out in this document a review of the evidence submitted by Richborough as part of their recent outline planning application for 65,032 sqm of floorspace across Use Classes B2 (manufacturing)/B8 (logistics) and ancillary E(g). The distinction being that the Land NE Junction 10 M42 would be conditioned to deliver a minimum of 90% B8 (logistics) space greater than 9,290 sqm (Big Box Logistics).</p> <p>This LSH evidence supports our approach and critically adopts analysis of completions along with other evidence to assess need. This is in line with guidance. Whilst the council claimed that a completions approach created a skew in terms of need, they both instructed and signed off the HEDNA as their own evidence base to their plan process and therefore it seems unfathomable as to how they can run an Inquiry case in which their own advocate claimed that the figures were absurd. This is in our view an indefensible approach and one which was backed by no counter approach or evidence.</p> <p>In fact the councils case was simply based on – we allocated this land and they came and therefore, in the future the occupiers could go anywhere there is land allocated. This position totally ignores occupier demand dynamics and also ignores the fact that this would be exporting their needs to other local authorities who are already struggling to meet their own need in terms of supply of land. In overview, the Richborough evidence endorses both C&W’s evidence and that of the HEDNA and emphasises that there is an immediate and acute need for land for B8 use in the location.</p> <p>The C&W Employment Land Study was prepared on the basis of the Land NE Junction 10 application which is for a minimum of 90% B8 logisitics. The LSH report very much supports our evidence provided to the Inquiry to demonstrate an immediate need, and indeed goes further than we did in critising the HEDNA for undersupply to the end of the plan period. That approach is in line with the Chamber of Commerce’s response following publication of the HEDNA detailed in our Employment Land Study.</p>	
1.0.3	References the functional economic area (FEMA), as well as North Warwickshire generally	
1.0.3	References a “certain type” of land – strategic industrial and logistics premises, <u>and so considers separately</u> the supply of and demand for employment land to accommodate B2/B8 premises of more and less than 100,000 sq. ft. or its metric equivalent - 9,290 sq. m.	Reiterates our approach.
2.0	Planning Policy section	Reiterates our approach

Para	Summary / Quotation	Notes
2.4.4	The Addendum to the ELR (April 2016) indicated the Borough would need 538 hectares of employment land to the 2031 based on past completions	Confirms our analysis that NWBC have only planned for local need and that the strategic need was calculated but ignored. Also worth mentioning that the size of building used to disaggregate strategic and non strategic employment floorspace was an arbitrary assumption of 20,000 sqft and below for local need in the ELR 2013.
2.4.16	The document refers to Ms Barratt's proof at the Inquiry citing that Ms Barratt makes no mention the the WMSESS 2015 / 2021 findings of an 'urgent need' for new sites to be brought forward.	
2.4.17	<i>"Occupiers, for the most part, commit to a scheme once it has planning consent and often only once a building is under construction. Therefore, an absence of scheme specific requirements does not mean that there is no immediate need"</i>	Usefully highlights the importance of consented land in outline to accommodate objectively assessed need
3.5	<i>"For the purposes of this assessment LSH have considered the employment land needs in North Warwickshire taking account of the needs from both FEMAs. This considers the need in across the Coventry and Warwickshire FEMA as well as the unmet needs from neighbouring authorities in the Greater Birmingham FEMA. This reflects historic approaches to cross-boundary working, as set out above, and is considered a realistic approach for North Warwickshire Council to pursue"</i>	Usefully identifies need emerging from Greater Birmingham (mostly outside Area 2) overflowing into North Warwickshire. This is inline with our evidence (see para 4.89 of Employment Land Study (CD-D29/C))
4.4.3 & 4.5		Highlights, as we do, the approach of the C&W HEDNA re: primarily completions trend
5	CRITIQUE OF THE COVENTRY AND WARWICKSHIRE HEDNA APPROACH	<p>Technical and methodological critique suggesting under recording of B8 completions, including no factoring in of post covid changes in conditions of demand.</p> <p>Key overall criticism is at 5.2.20 & 5.2.21, relating to use of Replacement Demand and Traffic Growth scenario modelling for 2031-2041:</p> <p>5.2.20 <i>"However, the HEDNA then reverts to the Replacement Demand and Traffic Growth scenario from 2031 onwards. This means that the ^{needs} figures for the later [SIC] half of the forecasting period are below the trend of past completions for 2011-19. There is no</i></p>

Para	Summary / Quotation	Notes												
		<p><i>justification in the HEDNA for why this is expected to be the case. This approach is contrary to the commercial market analysis and conclusions within HEDNA which identifies transformational growth within the sector”.</i></p> <p>5.2.21 <i>“This means the HEDNA does not adequately address the commercial market dynamics and demand within the strategic B8 sector, despite identifying this sector as one of considerable growth. This is a critical failing of the HEDNA”.</i></p>												
5.5.36	<p>Presentation of an alternative method.</p> <p>5.3.6 LSH has undertaken an assessment of strategic employment land needs in accordance with this approach which is PPG compliant. This is set out in the next section of this report. When robust data is used, the LSH assessment identifies strategic B8 requirements for Coventry and Warwickshire of 678ha (2021-41) and 983ha (2021-50) – notably higher than the HEDNA figures, as shown in the table below.</p> <p>Table 7. Comparison of Strategic B8 Land Requirement, Coventry and Warwickshire (ha)</p> <table border="1"> <thead> <tr> <th></th> <th>Forecast 2021-41</th> <th>Forecast 2021-50</th> </tr> </thead> <tbody> <tr> <td>HEDNA Strategic B8 Requirement</td> <td>551</td> <td>735</td> </tr> <tr> <td>2011-23 Completions Trend</td> <td>678</td> <td>983</td> </tr> <tr> <td>Difference</td> <td>127</td> <td>248</td> </tr> </tbody> </table>		Forecast 2021-41	Forecast 2021-50	HEDNA Strategic B8 Requirement	551	735	2011-23 Completions Trend	678	983	Difference	127	248	<p>Approach identifies a requirement for a further 127ha in the 2021-41 period over an above what we stated at in our evidence as being an ‘immediate need’.</p>
	Forecast 2021-41	Forecast 2021-50												
HEDNA Strategic B8 Requirement	551	735												
2011-23 Completions Trend	678	983												
Difference	127	248												
6	New “Completions Trend Scenario”	<p>Helpful, and picks up on demand in North Warwickshire being constrained by lack of supply (6.1.14). Whilst this approach is justifiable and demonstrates a much greater need, which may well present, the HEDNA method (which we presented at the Inquiry) shows a degree of prudence by contrast and one which we believe is both technically compliant with guidance and utilises other metrics to arrive at the weighted longer term figures.</p>												
7	<p>Reviews the demand/supply situation in neighbouring LPA areas. Flags same conclusion as us and the “Tetris” analogy (7.2.3): <i>“This suggests that there may be need for some of North Warwickshire’s neighbouring authorities within the Greater Birmingham FEMA to look to North Warwickshire – to meet their unmet needs. Conversely, there is very limited capacity, based on the Councils’ own evidence, for these authorities to accommodate unmet needs coming from Coventry and Warwickshire”</i></p>													

Para	Summary / Quotation	Notes
7.1.9	Tamworth HEDNA	Makes comments there is oversupply in Tamworth but no analysis of HEDNA (which was heavily criticised by various parties and also lack of strategic need being addressed). HEDNA is dated 2019 so needs updating to be reliable.
8	National (Trends) Sub regional Market Review	This is helpful and supports our evidence.
8.2.1 & Table 22	Notes available premises in Coventry & Warwickshire FEMA	Outside of Area 2, but in North Warwickshire, we understand and Ms Barratt confirmed in her evidence that, the 3M manufacturing site has been purchased by the adjacent logistics occupier Davies Turner (storage & freight forwarding) and so should actually be in take up rather than supply. We also note that this supply relates to both B2 manufacturing and B8 logistics premises.
9	Quantitative Assessment of Available Large Employment sites	Helpful – similar to our analysis in Section 3 of ELS in parts
9.06	Confirms that site density ratio should be applied to the net developable area, i.e. 9,290 sqm for every 2.3 hectares	This corroborates our analysis and conflicts with evidence supplied by Ms Barratt in her evidence that the 40% site density ratio applies to gross developable area. The LSH report very much focuses on net developable area, which is the relevant measurement in terms of employment land delivery and completions, as it excludes land used for non-developable purposes such as landscaping, drainage features, highways etc.
9.3.1	Summary equates land supply to 1 years in NWBC	That figure is across all use classes and does not focus solely on large scale logistics land.
10	<p>QUALITATIVE ASSESSMENT OF AVAILABLE LARGE EMPLOYMENT SITES</p> <ul style="list-style-type: none"> • Para 10.0.1 - 678ha for the period 2021 to 2041 but a supply of only 336ha; and whilst it is important to understand the quantitative case, the qualitative nature of the supply is also important • Para - 10.4.1 LSH analysis of take-up in other local authority areas has established that it is not unusual to find 80% of take-up, and in some case more, occurring within 2km of a motorway or dual carriageway junction. Demonstrates C&W evidence that sites close to the SRN are preferred • Para - 10.4.3 Our analysis of the take-up of large sites identifies that in North Warwickshire 74% of sites taken-up have been within two kilometres of the strategic highway network and a further 15% within two kilometres of the major road network. Further corroboration of the unique nature of the appeal site • Para 10.4.4 - The three available sites within North Warwickshire all front the A5, two are less than 2km from junction 10 of the M42. These two sites account for 20% of the available land within the district. The other 80% of land is at MIRA South which is further from the strategic highway network and on which B8 development is not permitted. <p>Readily Available / Constrained</p> <ul style="list-style-type: none"> • 10.5.1 - Where land requires extensive remediation, major infrastructure provision or land assembly before it can be brought forward, this can add costs, delays and uncertainty to the development, impacting on viability and reducing profit. Developers and occupiers will typically avoid sites where 	

Para	Summary / Quotation	Notes												
	<p>there are high levels of upfront costs and opt for land that is serviced and available for immediate development or sites that can be made readily available.</p> <ul style="list-style-type: none"> 10.5.2 - within North Warwickshire there are no large, allocated or consented sites that are immediately available for development. Moreover, the four sites being promoted by developers and/or landowners which do not yet have planning consent also require preparation. The constraints to bring forward allocated sites E2, E3 & E4 are described earlier in this report. The very fact that they have not been taken-up at a time of intense market activity is evidence that the market recognizes barriers to delivery. 													
11	Need ie. Supply / Demand Balance imbalance for strategic B8	Very supportive of the case we have made.												
11.2.2	<p>This suggests that there may be need for some of North Warwickshire’s neighbouring authorities within the GB FEMA to look to North Warwickshire – to meet their unmet needs”</p> <p>(For GB FEMA, the latest evidence of neighbouring authorities to North Warwickshire is set out in Section 7 of this report. This shows that there is a shortfall of 48.8ha. Historically these authorities have looked to North Warwickshire to accommodate unmet employment land need and this will be required again.)</p> <p><small>Table 41. Identified Supply / Demand Balance in Neighbouring Authorities in GB FEMA</small></p> <table border="1" data-bbox="259 1082 875 1241"> <thead> <tr> <th>Neighbouring Local Authority</th> <th>Supply / Demand Balance</th> </tr> </thead> <tbody> <tr> <td>Birmingham</td> <td>-52.8 ha</td> </tr> <tr> <td>Solihull</td> <td>-6.5 ha</td> </tr> <tr> <td>Lichfield</td> <td>8.4 ha</td> </tr> <tr> <td>Tamworth</td> <td>2.0 ha</td> </tr> <tr> <td>TOTAL SHORTFALL</td> <td>-48.8ha</td> </tr> </tbody> </table>	Neighbouring Local Authority	Supply / Demand Balance	Birmingham	-52.8 ha	Solihull	-6.5 ha	Lichfield	8.4 ha	Tamworth	2.0 ha	TOTAL SHORTFALL	-48.8ha	Usefully identifies need emerging from Greater Birmingham (mostly outside Area 2) overspilling into North Warwickshire in line with our evidence.
Neighbouring Local Authority	Supply / Demand Balance													
Birmingham	-52.8 ha													
Solihull	-6.5 ha													
Lichfield	8.4 ha													
Tamworth	2.0 ha													
TOTAL SHORTFALL	-48.8ha													
12	Overall critique and conclusions on need	Table 42 on page 80 (Available Employment Land across both B2 and B8 use classes in North Warwickshire) is accurate as and <u>further demonstrates the poor quality for current allocations in North Warwickshire</u> which will do not meet the strategic B8 need.												



Para	Summary / Quotation	Notes
14.7.7	<p>Includes LP6 Case.</p> <p><i>There is an immediate and urgent need to identify and deliver more land for both strategic B8 and general industrial needs in North Warwickshire. Policy LP6 provides a mechanism to bring forward sufficient land, at a sufficient rate to address this immediate need, but the Council's strategy (apparent from their proof of evidence on employment land to the public inquiry into Land North East of Junction 10 M42) seems to be to deny the extent and urgency of this need. Insufficient land is allocated to enable a strong and responsive economy.</i></p>	Useful. Adopts our interpretation of "immediate need" with regard to LP6