



FAO Mr D Wildsmith (c/o Mr K Brown)  
Planning Inspectorate  
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5 July 2024

PUBLIC

Dear Sir,

**Re: Planning Application (NWBC ref: PAP/2024/0297) by Richborough Estates – Evidence in respect of economic needs and benefits.**

I act on behalf of the Appellant, Hodgetts Estates, in respect of the ongoing planning appeal relating to land north-east of Junction 10 M42, North Warwickshire – appeal ref: APP/R3705/W/24/3336295; NWBC ref: PAP/2021/0663).

I write in response to the recently submitted planning application (NWBC ref: PAP/2024/0297) by Richborough Estates pertaining to land at Junction 9 M42, North Warwickshire and have reviewed the Wisher Consulting Economic Needs & Benefits Report and the associated Skills and Employment Plan.

Both documents relate to economic need, benefits, training and skills provision. As such, I make the following observations and comments which I consider to be pertinent in consideration of the ongoing planning appeal in respect of land north-east of Junction 10 M42, North Warwickshire (appeal ref: APP/R3705/W/24/3336295):

- Similar to the Appellant's position regarding the Junction 10 M42 proposals, the Wisher Consulting report points to ongoing unemployment and inactivity in North Warwickshire and surrounding areas as a basis of need for new employment. There is little mention, however, of the overall growth of the logistics sector nationally (as referenced in our reporting), which is also relevant as a driver of need.
- Also, in keeping with the Appellant's evidence, this report points out the high degree of inter-relationship with other surrounding areas in terms of the actual functional economic geography and the interlinkages with surrounding labour markets, demonstrated for example by significant in- and out-commuting flows daily. This reinforces the point that North Warwickshire is not a self-contained economy in its own right and 'job density' figures should therefore be treated with a degree of caution.
- The Wisher Consulting report also points to ongoing population growth, common across the whole of North Warwickshire (and wider areas) and therefore the need for new jobs to support a growing population.

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- This report additionally states that provision of new jobs in the logistics sector will suit the skills and experiences of the existing labour force, given the existing degree of specialisation locally in this sector.
- Similar to the Appellant's evidence, this report identifies severe pockets of deprivation in the surrounding area and the role of new employment creation in addressing deprivation.
- According to the Wisher Consulting report, the proposed Richborough Estates development will support around 600 jobs in the construction phase – on and off site – a similar level to the Appellant's Junction 10 M42 scheme.
- In terms of jobs forecast – the Richborough Estates scheme is estimated by Wisher Consulting to create 845 FTE jobs directly across a range of roles and skill areas, including a good share of higher skill jobs. The report also points out (in keeping with our own work) that median salary levels for jobs in the logistics sector are above the all-sector median level.
- Jobs estimates in the Wisher Consulting report are derived using a process that applies standard HCA density figures. Our own analysis of job creation related to the Appellant's case adopts a similar industry-standard process, modified on the basis of recent research undertaken by ProLogis and by Icenis (for the LEP). Our mid-range estimate is 1,200 jobs for the Junction 10 M42 proposals which is larger overall in area terms compared to the Richborough Estates proposal, so proportionally, both proposals are reasonably consistent in job creation terms.

Regarding the Skills and Employment Plan related to the Richborough Estates proposals – overall this is far less detailed than the Junction 10 M42 proposals (which I would consider to be closer to industry best practice). The Richborough Junction 9 proposals include some standard local employment access and apprenticeship support, but this should be seen really as a minimum requirement. In respect of skills and employment proposals, the Junction 10 M42 proposals are more detailed overall (**CD-B45**), and development of the Hub Office in particular provides a very substantial addition to local upskilling and business development capacity. The Junction 9 proposals focus solely on employment access and there is no facilitation of local supply chain development and new business opportunities for local communities – something that is clearly set out on the Junction 10 scheme proposals.

In summary, I conclude that the economic need and benefit related findings of the analysis relating to the Richborough Estates proposals align closely to our own assessment of the Junction 10 M42 proposals and are therefore relevant for, and pertinent to, the Appellant's case. I therefore encourage the Inspector to read the aforementioned documents.

I would be happy to provide any further comment, as necessary.

Yours sincerely,



**Prof Jim Coleman**  
Director & Head – Economic Advisory