

## **Comments on the reports submitted by Richborough to support their planning application**

**Mrs D Barratt**

### General Comments:

- The Richborough planning application is located within the Green Belt
- Would expect evidence for an employment site submitted by an applicant will be very similar in its overall emphasis as it is trying to convince the LPA that its site should be developed.
- There is no end occupier being suggested at the present time.
- The information appears to focus on the Borough of North Warwickshire. It does not provide information on the specific areas of A or 2 or the wider provision.
- It talks about neighbours needing employment land in North Warwickshire – no LPA has approached the Borough Council to deliver their needs. Even if they had this would be a matter for a plan led approach and would be considered through the Employment DPD or through a review of the Local Plan as a whole.

**Note prepared by Mr David Binks, Cushman & Wakefield (Appellant's employment need (market) witness) providing comments on the CBRE Market Report and Occupier Overview.**

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**Comment**

I would draw the Inspector to Appendix G of my proof detailing all of the sites available within the Golden Triangle and beyond.

**Note prepared by Mr Jon Turner, Cushman & Wakefield (Appellant's employment need (policy) witness) providing comments on the LSH Employment Land Assessment.**

General (first section of the paper)

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.

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.

**Comment:**

The Cushman and Wakeman report tries to give further evidence and the following points should be disregarded or removed:

In response to the above comments I would draw the Inspector's attention paragraphs 11.26 and 11.27 in CD I4:

“11.26 We would therefore envisage a continuing focus of strategic B8 growth in the north and west of the sub-region, but with a greater potential role for South Warwickshire than seen historically. Given the need for Green Belt development if the needs identified are to be met, it would be advisable to 239 coordinate assessment of suitable sites at a sub-regional level to integrate relevant consideration including landscape harm, power capacity, and seek to limit harm to Green Belt purposes. It would not be appropriate in our view to simply replicate past development patterns in respect of the spatial distribution of development by local authority.

11.27 Planning for strategic B8 development is inevitably an area where it will be important that the local authorities in the sub-region continue to collaborate.”

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.
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**Comment:**

Again, the following is not a critic of this report but of Mrs Barratt's evidence.

**Needs from other LPA's**

**Comment:**

The Richborough Report talks about North Warwickshire having to deal with a need arising in other areas. To be clear and as stated in evidence no LPA has approached NWBC to deliver any part of their employment requirement. In fact at 7.1.9 it states that there is oversupply in Tamworth.

**Site ratio.**

**Comment:**

We disagree again in relation to the gross to net site ratio. If there are known constraints as there are on the Richborough site (electric pylons) then that is clearly a reason to alter the plot ratio.

**Section 10**

**Comment:**

This section is factually incorrect as the A5 is part of the Strategic Road Network so site E4 sits on and is directly accessed from the SRN.

**10.5.2**

- 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.**

**Comment:**

I would draw the Inspector's attention to the fact that the appellant owns 3.5 hectares of E2 and has an interest in delivering E3 (land for the reprovision of the sports facilities to the north of the A5). E4 is an allocation with a minded to support from the Borough

Council. In addition, the applicant for E4 is actively marketing the site nationally and internationally. In addition CD ID20 indicates the applications that have been considered and approved since 2017.

**Section 11**

**Comment:**

Reiterate again that no local authority has approached NWBC to deliver any employment land.

14.7.7 Mr Turner quotes in the last sentence that “insufficient land is allocated to enable a strong and responsive economy.”

**Comment:**

The quote used by the appellant helpfully focuses on the requirement of LP6 and it is not an allocations policy but an enabling policy. The applicant, Richborough, has submitted the site through the call for sites to accompany the emerging Employment DPD production the plan-led approach of delivering allocated sites.

**Letter prepared by Professor Jim Coleman, WSP (Appellant's economic need/benefits witness) providing comments on the Wisser Consulting Economic Needs & Benefits Report and the Outline Skills and Employment Plan.**

**Comment:**

Professor Coleman focuses on the unemployment and inactivity in North Warwickshire, but the inquiry has heard as evidence that unemployment in North Warwickshire is around 2 to 3 % depending on the time of the year. This is below the national and West Midlands average.

**Comment:**

Professor Coleman seeks to reiterate the appellant's view that North Warwickshire has shied away from dealing with growth. As stated in evidence the Borough Council has never shied away from its location or its commitment to deal with needs when they are clear.

- The Wisser 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.

**Comment:**

The population of North Warwickshire will grow as it has been very proactive in dealing with and allocating land for the Greater Birmingham and Coventry and Warwickshire HMA's. An additional amount of employment land was added to the requirement to cater for this growth as identified in CD I36 (second document) "*North Warwickshire – Update to the Employment Land Review for the Period 2011-33*". As evidenced in the AMR (CD F4 and F5) completions have far exceeded the minimum 100 hectares required by policy LP5 in the NWLP (CD F1).