

## NORTH WARWICKSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION

### Statement prepared by GL Hearn on behalf of Severn Trent Water Matter 5- Employment needs and requirements

#### Introduction

1. This position statement is prepared on behalf of Severn Trent Water by GL Hearn and considers specifically the land interests of Severn Trent (ST) located at Coleshill STW, which have previously been the subject of submissions relating to the review of the NWBC Local Plan (ref: **SLP442**). This statement should be considered in the context of the Document Ref: INSP5.

GLH put forward the following comments in relation to the Inspector's questions/points raised;

**5.1 How does the LP requirement of providing 60 hectares of employment space to 2033 set out in LP paragraph 7.44 relate to the intended provision of around 100 hectares in policy LP6? (a) Is the intended provision of around 100 hectares in policy LP6 an aspiration in the same manner as housing provision related to the GBHMA [INSP2], i.e. that the actual amount is reliant on the provision of infrastructure?  
(b) If so, is that approach justified and consistent with national policy?  
(c) For effectiveness, should employment requirements be expressed in terms of floorspace?**

2. Policy LP6 is clear that the Council intends that 100 hectares of additional employment land are to be provided in the period 2011 to 2033. The Policy is the only place in the LP where there is clarity on the provision and this must be taken as a minimum basis for any assessment of employment allocations. Indeed, it may be the case that evidence base (such as Greater Birmingham HMA Strategic Growth Study (CD8/23)) requires additional employment land in North Warwickshire to meet regional growth levels.
3. The challenge here is the aspiration of the Council as set out in paragraph 7.49 of the LP. In this paragraph the Council states that it does not need to consider wider strategic employment need and that *"It is considered more important for the Borough to focus its attention on widening the employment base and to build on the opportunities that the Horiba MIRA Technology Park can provide and seek the provision of aspirational job opportunities within the Borough"*.
4. We contend the way that the Council has approached the allocation of employment land and the fact that it does not meet the objectively assessed need, and does not meet the approach as set out in National Policy NPPF2012- Paragraph 20 sets out that: *"To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century,"* and: *"In drawing up Local Plans, local planning authorities should: ... set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period"*.

Paragraph 157 states that:

*"Crucially, Local Plans should:*

- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*
- *be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*
- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;”*

5. It is our view that the approach of the Council had not followed the requirements of the NPPF2012

6. In addition, the Council has not considered how the provision of additional employment land in sustainable location such as Coleshill, could assist in widening the employment base and the provision of aspirational job opportunities, as this is an example of a highly sustainable location which could provide for new as innovative new industries, including a potential for use of localised energy use. It is important for such uses to be fully considered in a wide, diverse, and flexible employment land portfolio for maximising sufficient land opportunities.

**5.4 With regard to the economic objectives in LP paragraphs 9.5 to 9.8 and CD8/8, which set out the inter-relationship between jobs and employment space figures, should a job number be set as an LP requirement?**

7. There are three different approaches to delivery of employment and the allocation of such land in a Local Plan. These are:

- Area based;
- Floorspace based; or
- Number of employees based.

8. The Council has decided to use an area based figure of 100ha. CD8/8 provides the background as to how this figure was arrived at using the population growth figure and converting this into jobs for each sector. This is then translated into a floorspace figure which is then translated into an area based figure using plot ratios. What is clear is that the majority of the job growth will be in the B8 sector and the LP should aim to deliver this. However, with the LP only setting out an overall figure without any separation to the different B Use Classes, this could lead to under-delivery of the requirement and / or the inappropriate allocation of land in the incorrect locations associated with the need. Moreover, B8 is a low density job generator and the Inspector will need to be convinced that this approach fits in with the vision and strategy of the Council and the diversification of the job base

9. As such, and to comply with the evidence, it might be more effective if the employment land figures are allocated to the various B Use Classes.

10. In addition, there is some merit in ensuring that sufficient land is delivering the quantum of jobs.

**5.6 Are the employment areas identified in policy LP12 ‘Employment Areas’ appropriately evidenced? Are policies LP12 and LP11 ‘Economic Regeneration’, which makes provision for release of employment allocations in certain circumstances, effective and consistent with national policy?**

11. We do not challenge the designation of the existing employment area, however, we do challenge the boundaries set out for these sites that exclude employment generating areas and brownfield land located adjacent to these areas as not being included within them. This approach does not meet the aspirations of NPPF2012 in maximising efficient and robust use of land nor bringing back brownfield sites into use (paragraphs 7 and 17). To our mind, the Council’s definition of employment does not consider wider opportunities for employment generating uses as well as more innovative enterprises that could be accommodated in, or immediately adjacent, to these areas. This is why we have been

promoting the STW site in Coleshill, as a site that is suitable to be allocated for employment use. It is of course, already being used for employment and is surrounded by similar development on three sides, therefore complementing the neighbouring employment uses. However, the site could provide additional opportunities for intensification of employment in a highly sustainable location. This matter appears to have been unfairly disregarded by the Council and the site not considered as an alternative for allocation as employment land.

12. In terms of Policies LP11 and LP12, these policies support the loss of employment land. However, they don't allow for any replacement employment land to be designated if the loss of employment is justified. Given the significant amount of employment land required, what the policies do not do is provide flexibility if the proposed employment land does not materialise. This could lead to a disparity with the housing and population growth anticipated during the plan period and could lead to additional out-commuting whilst not achieving the Council's proposed Local Plan objectives.

### **5.9 Have alternative levels or distributions of employment space provision been assessed, including any contribution from existing under-used sites or previously developed land?**

13. The Coventry & Warwickshire Green Belt Study (CD6/9) reviewed residential and employment parcels of land, including a number of previously developed/existing under-used sites, and land parcel CH8- Coleshill STW. This brownfield site extends to some 70ha, of which 6.8ha, are immediately available for redevelopment.
14. It is our contention that the Plan has not been positively prepared, nor is it effective or consistent with National Policy at this stage. Paragraph 17 of the NPPF sets out that the core planning principles "*encourage the effective use of land by reusing land that has been previously developed (brownfield land)*" and this is also set out in paragraph 111 "*Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land)*".
15. In addition, paragraph 30 sets out that "*In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport*".
16. The only consideration of employment in the Plan at this sustainable settlement is a commitment from Prologis and not further employment allocations in this Category 1 settlement. This despite the settlement having excellent public transport linkages and strategic infrastructure in place.
17. We see no logical reasoning behind not progressing the site at Coleshill for further consideration and assessment- both in terms of release from the Green Belt, but more fundamentally, its appropriateness as a brownfield employment site, which is surrounded by existing employment uses.

### **5.10 Are LP requirements employment and homes suitably correlated? If not, precisely why not?**

18. Draft Policy LP6 sets out that 100ha of employment land would be provided in the Local Plan. Policy LP40 sets out employment allocations. These are provided in two of the Category 1 Market Towns and Category 2 Adjacent Adjoining Settlements. However, no allocations are provided in Coleshill which is a Category 1 settlement. The effects of this are that one of the most sustainable locations in the Borough will not deliver any new employment growth, whilst some housing growth is identified in the Local Plan for the area. This would lead to unsustainable patterns of development.

GL Hearn 30 August 2018