

**NORTH WARWICKSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION
STATEMENT ON BEHALF OF STOFORD DEVELOPMENTS – ID SLP335**

MATTER 5 – EMPLOYMENT NEEDS AND REQUIREMENTS

Barton Willmore are instructed by Stoford Developments Ltd in connection with their land interests at two sites south of Coleshill: (1) Land at Brickhill Farm and (2) Land at Stonebridge Road and their promotion for employment development through the North Warwickshire Local Plan.

Our Statement below addresses the need for the draft Plan to identify additional land or provide another suitable mechanism to meet wider than local employment needs.

Issues and questions:

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?

1. It appears that the additional 40 hectares is intended to meet the uplift in housing growth which relates to Birmingham’s unmet housing needs, although it would be useful for the Council to confirm this.

(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?

2. This is not made clear in the Local Plan or evidence base, including the Infrastructure Delivery Plan [CD0/4], so again the Council’s position should be clarified.

(b) If so, is that approach justified and consistent with national policy?

3. No. The NPPF states that the provision of infrastructure is part of sustainable development¹ and forms one of the core planning principles². It is also one of the strategic priorities for strategic policies and Local Plans generally to deliver³. Councils need to demonstrate a clear understanding of business needs, including the infrastructure required to meet changing needs and address barriers to investment⁴. Crucially, an understanding of the overall infrastructure requirements should inform district-wide development costs at the time Local Plans are drawn up, and so infrastructure and development policies should be planned at the same time⁵.
4. As the Council have not provided evidence to demonstrate compliance with these points, the approach cannot be considered to be consistent with national policy, nor can it be considered positively prepared or justified. Therefore the submitted Plan is unsound.

(c) For effectiveness, should employment requirements be expressed in terms of floorspace?

5. Yes, or at the very least it should identify clearly what proportion of the areas are proposed within specific Use Classes. It should also include agreed assumptions on employment densities and plot ratios.

5.2 Is the assessment of employment needs in support of the LP based on robust evidence [CD8/6, CD8/7, CD8/8 in particular]?

6. The Employment Land Review Further Update [CD8/8] suggests that for the growth scenario for 100 hectares of employment, the forecast net land requirement for B8 floorspace is 81 hectares. The Local Plan Submission Version includes four proposed employment allocations; only one of which is identified as being allocated for B8 purposes (E2 at 5.1 hectares). It is not clear what sites comprise the extant planning permissions and allocations, or what proportion of this 76.58 hectares is made up of B8 floorspace. Without this information, it is difficult to conclude that the proposed approach to employment is consistent with the evidence base.

¹ NPPF 2012 Paragraphs 7 and 21

² NPPF 2012 Paragraph 17

³ NPPF 2012 Paragraphs 156, 157 and 160

⁴ NPPF 2012 Paragraph 160

⁵ NPPF 2012 Paragraph 177

7. Further, the Plan should give positive consideration to the need for strategic (as well as local) employment needs. In the absence of such an assessment, the evidence base cannot be considered robust.

(a) What is the functional market area? How has that influenced the plan’s approach to assessing employment needs at a strategic level?

8. None of the supporting employment evidence [CD8/6, CD8/7 or CD8/8] makes reference to the functional economic market area (FEMA), nor does the Local Plan Submission Version. At paragraph 160, the NPPF requires that:

“Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:

- work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.”

9. As exemplified by the Inspector’s Report into the North West Leicestershire Local Plan (appended to our representations to the Regulation 19 Plan dated 31st January 2018), the FEMA is different to the housing market area. In NWL, the “FEMA also relates to a wider Midlands market area based around the motorway network, especially in regard to the logistics and distribution sectors” (paragraph 86). In North Warwickshire, the FEMA covers a similarly wider area given the proximity to the Birmingham and the strategic road network. We note the West Midlands Strategic Sites Study essentially identifies ‘Area A’ as a FEMA (paragraph 4.71).
10. The Council should have identified a FEMA and the market and industry requirements in it to assess the suitability of sites or broad locations for development, as required by the PPG (Paragraph: 019 Reference ID: 3-019-20140306). This would enable the Council to have a clearer understanding of what assistance they can and should provide to help deliver the LEP Strategy (see below).

11. In the absence of this evidence, it is not clear how the Council have calculated the need for employment land or floorspace for economic development, as required by NPPF paragraph 161.

(b) Is the approach to establishing employment needs in the LP consistent with the Local Enterprise Partnership Strategy?

12. No. As noted elsewhere, the WMCA SEP and the LEPs' individual strategies set out ambitions to deliver economic and job growth within the region and North Warwickshire. A contributor to this growth includes logistics⁶, which is particularly pertinent for this Local Plan given North Warwickshire's location.

(c) Have employment needs been informed by the future influences of HS2 (including the Birmingham Interchange), Birmingham International Airport, and the Horiba MIRA Enterprise Zone?

13. Whilst there has been consideration of Horiba MIRA, the growth – and resulting employment needs – around Birmingham Airport and the future HS2 Interchange do not appear to have been considered positively, as has been the case in neighbouring Solihull where an Urban Growth Company has been established and a Growth Strategy published which seeks to exploit the opportunities presented by HS2. There is some assessment of an option (IN4) within the Sustainability Appraisal [CD1/2] that looks at development around public transport hubs, including the expected provision at the HS2 Interchange. However this is included with relatively dispersed development, which intentionally undermines IN4, which could otherwise have a more positive assessment for the employment growth around this area, including the M42 corridor. The 'reasonable alternatives' to the proposed employment allocations at 5.150 of CD1/2 do not explore the appropriateness of other sites which could benefit from colocation with the HS2, the Airport, and the M42 corridor.

5.3 My attention has been drawn to various studies related to economic trends and prospective employment needs in the wider area. What account has, or should, be taken of such studies in establishing employment needs and requirements in North Warwickshire?

⁶ The SEP Sectoral Analysis Appendix identifies 'logistics and transport technologies' as a 'transformational sector'; economic benefits of logistics sector are identified from paragraph 2.21 of the West Midlands Freight Strategy (Dec 2016).

14. As noted elsewhere in our Matter Statements, the Council have not considered in a transparent or effective way wider than local employment need as part of their proposed employment allocations⁷. There is a large body of evidence regarding the substantial demand for large scale industrial in this area (i.e. along the M42 corridor) to meet acknowledged strategic needs and how this is considerably outstripping the constrained supply⁸.

15. The Council's Employment Land Review Further Update [CD8/8] acknowledges issues with supply whilst referencing the aforementioned evidence, and subsequently recommends the allocation of 81 hectares of B8 floorspace. As noted in our response to question 5.2, it is not clear that the Council's approach to employment needs and requirements reflect this or the wider evidence.

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?

16. Given the aspirations at WMCA SEP and LEP levels for growth and the job figures that they set out, we consider that the Local Plan should quantify the number of jobs which the proposed allocations could contribute to these wider growth targets.

5.5 Has the overall employment requirement in LP6 been established with appropriate regard to the Duty to Cooperate?

17. No. Please see our response to Matter 1.

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?

18. We have no comments to make in response to this question.

⁷ Paragraph 7.49 of the Local Plan Submission Version.

⁸ Including paragraph 4.90 of West Midlands Strategic Employment Sites Study; and paragraph 5.20 of the West Midlands Land Commission Final Report.

5.7 Are policies LP11 and LP13 ‘Rural Employment’ justified and consistent with national policy which seeks to support a prosperous rural economy?

19. We have no comments to make in response to this question.

5.8 Is the approach in the LP to the provision of retail and other main town centre uses based on appropriate evidence, effective and consistent with the NPPF 2012?

20. We have no comments to make in response to this question.

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?

21. No. We consider that based on the issues raised above, that the Local Plan should have tested development options which would have exploited the geographical benefits of the M42 corridor.

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

22. We have no comments to make in response to this question.