

PS.M5.08 Mr Rouse, Savills on behalf of Prologis

Further to the EIP hearing session on Thursday 27th September, where I referred to the draft WMCA Spatial Delivery and Investment Plan, as included within public papers for the 17 July WMCA Housing and Land Delivery Board. Please find attached a copy of those meeting papers and the draft SIDP.

It is clear that as a party to the SIDP, NWDC does recognise the need for regional planning to provide for strategic employment sites necessary to meet the objectives of the Midlands Engine and WMCA SEP. There is acknowledgement that it is likely to be necessary to identify sites between 10ha and 50ha in the three locations of highest demand including the M42 corridor.

It would be helpful to draw the Inspector's attention to the report of Gareth Bradford / Deborah Cadman (Agenda Item 6) which provides some contextual explanation of the draft SIDP and its intended function. In particular that it is a key recommendation of the West Midlands Land Commission and subsequent Delivery Plan and Housing Deal agreed with Government.

The draft SIDP has been subject to input from officers from relevant Local Authorities. North Warwickshire is central to this as it qualifies for inclusion on 4 different bases: WMCA non-constituent membership, Coventry & Warwickshire LEP, Birmingham HMA and Coventry HMA. The draft SIDP attached reflects comments by the LPA officers. The purpose of the SIDP is non-statutory, but is aimed at highlighting strategic growth areas and corridors across the region.

With reference to the draft SIDP itself, (page 4) identifies the need for strategic planning region wide to identify a development pipeline and key locations for employment is a top priority of the WMCA. The stated intention is to integrate this with development plans.

The SIDP acknowledges (p5) that the Land Commission concluded that employment land delivery is being held back by a lack of co-ordinated effort across LPA boundaries.

Objectives of the SIDP include supporting the Midlands Engine Growth Strategy, and WMCA SEP and West Midlands Industrial Strategy.

The SIDP focuses delivery planning on the constituent and non-constituent members of the WMCA (including therefore NWDC) (p11)

Reference is made to the Hearn / Wood Strategic Growth Study and joint statement by the 14 HMA authorities. There is acknowledgment that planning for additional housing also requires planning for additional employment. (p13)

The approach to delivery of a competitive portfolio of employment sites is set out at Objective 5 (p15). The draft SIDP adopts the definition of Strategic Employment Sites used in previous regional study work: - providing accommodation that would not otherwise come forward through the local planning system. The SIDP references the conclusions of the 2015 Peter Brett / JLL report identifying the severely short supply in the three areas of highest demand. The M42 corridor to the east of Birmingham being within NWDC. The SIDP states that it is likely further work will be needed after the Strategic Sites Study (being commissioned by Staffs CC as reported by Ian Macleod of BCC) to look at sites from 10ha to 50ha.(p17).

The SIDP albeit in draft, evidences the acknowledgment of the WMCA authorities including NWDC, that there is a need to plan for strategic employment site provision across the WMCA (including non-constituent members) geography. The West Midlands Strategic Employment Sites Study 2015 (WMSES) as corroborated by the West Midlands Land Commission (WMLC) report of February 2017 evidences the location of greatest need as the M42 corridor at the point where the boundaries of Birmingham, Solihull, North Warwickshire and Tamworth converge (WMSES 4.71). There is therefore, an objectively assessed need, with clarity on the location of that need within NWDC's area. There is an undertaking in the adopted Core Strategy to review the Plan if (after 2014) there is evidence of need. There is now acknowledgement from the WMCA Authorities that there should be planning across local authority boundaries to meet the identified strategic employment site need and to meet Midlands Engine and

WMCA SEP objectives. There should be no need to await the outcome of any WMSES phase 2 study to take action in the NW Local Plan to meet the identified need. This is necessary for the Plan to be sound.

The WMSES notes that supply in the area of greatest need could be reasonable if Birmingham International Gateway being promoted by Prologis formed part of the supply (4.82), but the BIG scheme was not allocated in the North Warwickshire Local Plan Core Strategy despite the Inspector having evidence of need for strategic distribution sites, due to the absence of larger than local policy (4.66). The WMSES and the WMLC are clear that it is likely to be necessary to release land from the Green Belt to meet the need (WMSES 5.37 and WMLC recommendation page 86 & 11.44).

The Core Strategy Inspector found that the Employment Land Review demonstrated clear demand for regional and national distribution centres, but his report pre-dated the WMSES and he considered it would be premature to pre-judge the outcomes of the WMSES (IR 3.4 & 3.6). The Inspector notes that work at the LPA level across 24 authorities, had commenced in July 2013 to identify how to identify need and allocate wider than local employment sites (IR 3.9). The Inspector therefore recommended inclusion of a commitment to review the Plan should ongoing reviews of employment and need for Regional Logistics Sites identify a need to change the provision in the Plan (IR non tech summary). The WMSES is that review of employment need evidence. The WMSES identifies an objectively assessed need in a specific location on the M42 corridor. The location of the greatest need has been defined sufficiently precisely to know that there is a need for regional employment site provision in NWDC administrative area.

The draft SDIP is evidence that there is acknowledgement from the WMCA authorities including North Warwickshire District Council, that there is a need to make provision for regional employment sites. The SIDP refers to the WMSES, the findings of the West Midlands Land Commission, the WMCA SEP and Government strategy for the Midlands Engine which set a clear need to grow the economy and narrow the productivity gap of the West Midlands with the rest of the UK. These are all documents that have been referenced by Prologis in representations at Regulation 18 and Regulation 19 stages.

The process of considering if there is a regional need has been ongoing since at least July 2013. All the evidence says there is a need. The evidence of the WMSES and WMLC is clear that the greatest need is the M42 corridor at the confluence of Birmingham, Solihull, North Warwickshire and Tamworth. The SIDP evidences acknowledgement of the need to plan across local authority boundaries to meet the need. This need must be addressed by the North Warwickshire Local Plan 2011-2033 if the Plan is to be sound. In the absence of planning positively to meet an objectively assessed need, the Plan is not positively prepared, is not the most appropriate strategy nor even an appropriate strategy, is not effective working on cross-boundary strategic priorities, and is not consistent with national policy in NPPF 2012 and 2018.

These matters are explained in further detail in Prologis' Regulation 19 representations, particularly in relation to LP6, LP40 and 5.66 & 5.67, 7.44 & 7.46.

If I can be of any further assistance please do let me know.