1. COVENTRY AND WARWICKSHIRE CHAMBER OF COMMERCE :  RESPONSE TO THE HEDNA STUDY AND RELATED ISSUES

*The comments set out below are based on input from members of the Chamber Of Commerce’s Employment Land Group .The Group is made up of member and advisors of the Chamber with experience and expertise in the land, development and property sectors.*

PREAMBLE  
  
The C&W Chamber of Commerce welcomes this early opportunity to continue to engage and input to the hugely important strategic planning of the sub-region for the 30 years to 2050.  
 The Chamber, as the recognised “voice of business” across the whole sub-region, takes its responsibilities in terms of working with our Local Authorities and other Public Agencies (nationally, regionally and locally) very seriously. This is especially the case in planning forward a positive and proactive response to both the challenges and opportunities the sub-region faces.  
 Our particular thanks at this stage go to Chris Elliott, the CEO of Warwick District Council, and his senior colleagues for directing us towards and providing key documentation and for being willing to work with the Chamber as these important plans develop. As we have done in the past, the Chamber is keen to be an active partner as this work of strategic, geographic and economic planning proceeds.  
 The Chamber has had a long-standing and consistent concern about (what we believe) has been and remains a real shortage of Employment Land across the sub-region. As such the Chamber has an Employment Land Panel (made up of relevant Members, Officers and Advisers) who seek to lead on this matter on behalf on the Chamber and its Members, and this Panel has worked together to provide this Chamber response.  
 The Chamber recognises that the recently-published ICENI HEDNA Study is a hugely important “starting point” for real discussions about the strategic planning for the sub-region. Through Chris Elliott, we’d like this Chamber response to be made available to all our LA Leaders and their Chief Executives and senior Planning Officers, please?  
 The Chamber has long had involvement and engagement with our LA’s in the creation and review of Local Plans and for the coordinated, cross-boundary, cross-authority approach so essential to our sub-region. We’d like to continue that engagement and see this response as the construction of a dialogue between Chamber and LA’s as we move forward.  
 We are advised (by Philip Clarke of Warwick DC) that the HEDNA Study was commissioned jointly by all the LA’s in Coventry and Warwickshire. Philip advises that “In terms of employment projections, ICENI modelled employment land needs utilising a range of different forecasting techniques alongside local intelligence and an understanding of the merits of different approaches in drawing conclusions. This approach of triangulating different approaches and testing findings, which ICENI has adopted, is consistent with the PPG-though as we comment elsewhere we cannot see evidence that the methodology takes sufficient account of market signals data.

To give further clarity to the role the HEDNA Study will play in the development of plans for our sub-region, Philip also advises that “All the authorities agreed to sign-off and publish the HEDNA, but that does not mean that we endorse all its findings….”  
“In South Warwickshire, when signing off the SWLP Issues and Options paper….we said “Although the figures contained in the HEDNA are challenging for the SWLP, they do represent up-to-date evidence based, importantly, on the latest 2021 census.” “Whilst there will undoubtedly be questions that both Councils and many local stakeholders will want to ask about the figures in the HEDNA, they do provide a credible basis on which to explore the issues and options that the SWLP will need to consider” and “importantly, publishing the HEDNA alongside the Issues and Options paper will give an opportunity for all interested parties to comment upon the HEDNA.”  
 The Chamber is happy to follow that advice and our response looks first at the HEDNA at sub-regional level and then sets out comments on the SWLP Issues and Options paper.  
 As the LA’s have recognised, the HEDNA Study is “a means to an end” …not “an end in itself”. In this response .the Chamber seeks to identify key issues, questions, proposals and actions to help us-collectively- make best use of the HEDNA Study and ensure its proposals are built into the new/reviewed/refreshed Local Plans of all our LA’s. Unlike the current set of adopted local plans that generally run to 2031, it is highly regrettable that the Coventry and Warwickshire sub regions individual local plan reviews are being conducted in a relatively uncoordinated manner. In this way thereafter effective delivery relates to the whole of the sub-region in a coordinated way.

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1) It would be helpful to be reminded about when all our existing Local Plans were approved, what period they cover (usually to 2031) and the timetable for each of them to be formally reviewed. This issue of timing is very important in terms of ensuring a coordinated approach to the key issues and proposals from the HEDNA Study. A “new” Local Plan for South Warwickshire (bringing together the Plans of Stratford-on-Avon and Warwick) is now being developed and the HEDNA Study is recognised as an important contributor to this “new” Plan…. but where are we with the rest of the sub-region…and what cross-boundary coordination is in place to ensure we have an effective sub-regional approach?

2) The HEDNA Study emphasises how (among other things) the National Planning Policy Framework (NPPF) and the accompanying Guidelines (NPPG) require all Local Authorities to have regard to the (changing) economic needs of their (and adjacent) areas). Specifically, PPG para. 2a-031 makes it clear that for a Local Plan to be considered “sound” when it comes to Public Inspection regard has to be made for the (hugely expanding and developing) Logistics and Distribution sector.

3) The HEDNA Study very much reflects and supports the arguments promoted consistently by the Chamber over (at least) the last 8 years that the (existing) agreed targets for new Employment Land across the sub-region are inadequate and are restraining the economic growth of the area. ICENI’s evidence of relatively recent completions of industrial property (from 2011-2018) shows the strength of demand. The HEDNA proposals ( for the 20 years 2021-2041) show new employment land targets  nearly double that of the agreed targets for the 20 year period ( 2011-2031) in existing plans ( 1,265 ha compared to 714 ha). The proposal for a new, “separate” allocation of 606 ha for B8 uses is the thing that “leaps off the page” … but B8 had been embraced in the 714 ha target of the existing Local Plans. In evidencing real demand, the HENDA Study says that a significant amount (1 m sq.metres) of new employment space has been created over the last 10 years. We think this figure is significantly lower than the reality…thus further evidencing the need for a real increase in new employment land that responds to “real” need rather than conjecture.

4) The recently published and well-regarded Bromwich Hardy 2022 Barometer (covered and communicated by the media and local development agencies in February 2023) looks at the reality of commercial and industrial property transactions across the sub-region (and wider) over the last 12-18 months. It has some key conclusions based upon the very broad scale of transactions the company is involved in:  
- “the demise of the office has been overplayed by commentators”,  
- “The office market has…continued to outperform expectations in the past year, with demand for large, high-quality and sustainable space often outstripping supply.”  
-“Elsewhere, the market in warehousing has been robust, but we are again running into the problem of supply.”  
-“There is an urgent need for more employment land to be brought to market which both regional and national administrations will have to tackle if the country is to achieve the economic growth we hear so much about.”  
-“It is simply impossible for industry to flourish if there is no physical capacity for growth in the system or if it takes years of negotiation to develop the infrastructure that business needs to realise its expansion ambitions.”

5) In terms of the impact of COVID restrictions, Russia invading Ukraine, the over-dependency we have on Chinese imports and the raw materials we need from countries very much locked into long-term contracts with China, all of the comments above will be much “amplified” as -particularly in this region- our big manufacturers and their suppliers urgently need to reverse what they have been doing over the last 30 years…and thereby “re-homing” much of what we have grown to import from abroad.

6) Whilst the Chamber is pleased to see the higher targets for employment land in the HEDNA study (compared with existing local plans) it cannot yet determine whether the new HEDNA figures will indeed respond to the real needs of the sub-region until the key questions/issues ( in the paragraphs below) are fully resolved. In addition, experience tells us that this much more helpful approach will only “bear fruit” if there is regular monitoring and management of the delivery of (whatever) employment land targets we ultimately set ( see below).

7) Attached to this Chamber response are 2 important Appendices (A&B) relating to:  
(i) Appendix A is a comparison of Employment Land targets in the existing Local Plans and the HEDNA Study , together with other “headline” comparative data, and;  
(ii) Appendix B, represents an assessment of “real” employment land availability ( agreed to meet the targets in the existing Local Plans and comprising the main local plan allocations drawn from each C&W plan area ). The Chamber believes the myth of “plenty of employment land available” must be challenged and finally repudiated if the sub-region’s economic future is not to be put into further jeopardy. We’ll cover the key issues arising from these two Appendices below.

a) In terms of Appendix A, there are many aspects that warrant consideration by our LA’s. The table shows (comparative) Need/Provision for Employment Land at the time of the Coventry and Warwickshire Employment Land MOU 2017, agreed by all local authorities. It shows the Final Agreed Distribution of such land across the sub-region based upon the ability or inability of LA areas (notably Coventry) to be able to allocate and accommodate the employment land agreed. The proposed HEDNA-based allocations (for the “new” Plans) is shown…. but this specifically excludes the “new” distinct allocation for B8 Logistics and Distribution. How the 606ha rising to 709 ha. of B8 land in the HENDA Study is actually distributed and located is -as we understand it- yet to be determined and we comment upon this below.

The table also has helpful data from WCC about the comparative size of our LA areas ( in Ha.), unemployment levels and in/out travelling for people to go to work. The Chamber believes these are important items when it comes to longer-term strategic planning (as we cover below), particularly in terms of the “North/South Divide” within our sub-region.

b) Excluding the (as yet unallocated) B8 ,606 ha, and looking at the first column of need (expressed as Final Agreed Provision) comparing the two 20 year periods (2011-31 and 2021-41) shows there is a significant change being proposed in terms of where new employment land should be focussed.  
 N.Warks BC- roughly the same,  
 N&Bedworth BC- nearly 50% reduction,  
 Rugby BC-over 50% increase,  
 Stratford DC- nearly 500% increase,  
 Warwick DC-roughly the same,  
 Coventry CC nearly 60% reduction.

The column of Final Agreed Distribution presents a “different reality” (for predominantly where Coventry’s employment land needs would have to be met beyond Coventry’s boundaries) with significant increases being “taken up” in the adjoining administrative areas of Rugby and Warwick. The relatively poorer areas of North Warwickshire and Nuneaton and Bedworth benefitted little from this “redistribution”. Of course we have to have regard to the fact that employment land can’t simply be “magic-upped” and location and infrastructure is important. **However, any strategic plan must try to put employment where it’s most needed**. The information about Unemployment and commuting in or out of our sub-regional towns and city to go to work must also be an important issue to be addressed in the new sub-regional plans.

10) There are a number of unanswered questions prompted by this analysis.

How should the “new” B8 target (of 606 rising to 709 ha for Logistics/Distribution) be distributed across the sub-region? What should be the criteria and rationale used? What regard should be given to a distribution that proactively seeks to drive up economic activity where it’s presently weakest, puts new jobs closest to centres of population and seeks to minimise travel and transport costs?  How is existing Green Belt designation going to influence/impact upon the geographic distribution of the B8 targets? How and where should Coventry’s Employment Land needs (that can’t be physically accommodated within Coventry’s administrative boundaries) be focussed?

13) In terms of the HEDNA initial distribution of Employment Land (excl. B8) are Rugby, Stratford and Warwick local authorities agreed with these figures and do recognised sites already exist to meet those target figures? Any movement from Rugby to support the further expansion of the Ansty R&D area (that was originally much bigger when first proposed nearly 20 years ago) or the adjacent land proposed for development by the Fraser Group?

14) There is a very significant uplift in the new Employment Land growth for Stratford? Is this accepted and supported within the (developing) new South Warwickshire Local Plan?

15) Is all the land covered by “the Masterplan of Masterplans” area (of cross-boundary south Coventry, reaching down into Warwick District and the M40) embraced within the ICENI HEDNA figures? The Chamber is unclear about this .Similarly are the already-Planning-approved proposals for and around the proposed Gigafactory site excluded from these “new” targets?

16) The more deprived northern Warwickshire Districts are allocated with some of the lowest levels of new Employment Land- hence exacerbating/consolidating their existing problems. This can’t be a credible proposition for our economic future?

17) How do we ensure the Chamber’s push for “Affordable Employment Land” that responds to the whole breadth and diversity of employment needs is actually delivered? What sub-regional Planning Policies are needed to deliver this effectively? How are these best fitted into Local Plans? We can see (from examples elsewhere) that there are local examples of criteria-based planning policies which address demand and/or need for employment land that is out-with Local Plan site allocations e.g. Policy LP6 Additional Employment Land in the North Warwickshire Local Plan (September 2021) and Policy Ec2 .New Employment sites in the North West Leicestershire Local Plan (November 2017). The policies) could be worded to address particular uses, sectors ( including growth and niche sectors) or market segments ( i.e. affordable or smaller units,and “grow-ons”, ) to ensure that all needs are capable of being addressed.

18) Do the HEDNA proposals (for a 38% reduction in Coventry’s existing housing target numbers (from 3,188 to 1,964 pa)) “disturb” the existing (and likely new) MOU across the sub-region? When will the Government’s ONS release their updated population projections for Coventry (and other cities and the rest of the sub-region) and how will the HEDNA respond to this? The HEDNA already recognises important increases needed in Employment Land in the sub-region…. but this could be much higher if we “revert” to ONS projection as NPPG/NPPF requires.

19) Both to respond to Climate Change and effectively support our communities and community facilities and the revitalisation of our existing urban centres, it is of critical importance that new employment and housing is provided as close as possible to existing (and any new) urban centres.

Whilst we fully appreciate that we can’t simply “magic-up” new employment land within or directly adjacent to our existing city and towns, in strategic planning terms (for the next 30 years) real priority and commitment must be given to focussing employment and employment land where it is most needed, and where the population and skills exist to support this new economic activity. The sub-region has its own North/South divide- and “Levelling-Up” isn’t just a new, national “flavour of the month”! A fundamental objective for (any) new LA and sub-regional plan for the next 30 years must be to demonstrate how this “new” plan will drive and secure the real, positive and self-fulfilling changes that we all recognise our sub-region has to deliver.

20) In looking forwards for the next 30 years, the Chamber is surprised that- in this area- little or no regard is given to bringing rail transportation (and more localised rail depots) into the equation. One of the much-vaunted “promises” of HS2 was that it would “release” much more usage of the capacity presently constrained on the West Coast main line, other existing rail routes and other rail infrastructure across the sub-region. With an increased acknowledgement of B8 requirements, the Chamber would look to our LA’s to be much more positive and proactive about planning for much greater/more effective use of our rail infrastructure across the sub-region…and this could and should have an impact upon where new employment land is sited and serviced. In looking at possible B8 sites, the Chamber would encourage the HEDNA Study to differentiate between “rail-served sites” and “non-rail-served sites” (as is evidenced elsewhere in the country e.g. Leicestershire).

21) Whilst we recognise the role of big B8 and manufacturing sites, we also know that we must be encouraging a growth in employment and employment opportunities directly within our existing urban centres. Big new employment sites- such as some of those proposed in South Warwickshire- will do little or nothing to help revitalise Stratford town centre or to reduce/ minimise the journeys-to-work, which - of necessity- are car-focussed.

22) The Chamber welcomes the acknowledgement and attention to B8 logistics and distribution. If the 606-709 ha. (Within the proposed aggregate targets of 1,265 -1,660 ha. to 2050) is for B8, then the rest of the aggregate targets must not be used for B8 and we should be more specific about how we protect, satisfy and manage the other B group classifications and diverse economic/ employment needs. The C&W Market Signals report produced for the CWLEP and the local authorities makes this point very strongly

23) Having a list of allocated Employment Land sites is simply not enough. Collectively, we need simple criteria to test whether the land allocated for employment can and will deliver what we need, whether there are obstacles that need to be removed, or if there are practical issues, which are blocking real progress. Like the HEDNA itself (see Preamble paragraph 10 above) Local Plans are a “means to an end” not “an end in them” and this focus upon delivery must always be our -collective- primary concern.

24) Regardless of the “dithering” of Central Government, the Chamber strongly believes that we need a robust and secure minimum 5-year land supply for BOTH Housing and Employment Land, Through our own, local, well-managed planning, development and delivery processes, employment land to support the growth of local industry and commerce (in all its different facets) can be ensured. All the organisations and agencies involved in the development and management of Employment Land can work together in a coherent and coordinated way to ensure that what our Plans set out to deliver are actually delivered…and delivered quickly, effectively and in the most environmentally and sustainable way that underpins and supports essential economic and employment growth- particularly in areas of our sub-region that need this most.

25) The SWLP Consultation paper recognises that the scale of population growth, housing and employment land needs, etc. that South Warwickshire has to respond to cannot be addressed without regard to the (existing) Green Belt designations. This is a helpful step forward, but it applies to strategic land and economic planning across the sub-region as a whole, not just South Warwickshire.

26) How do we make it attractive for employers to move to our planned new employment sites? If we want a “green” economy that moves us towards Zero Carbon and Climate Change priorities, LA’s must get more actively involved in making sure this new employment land is brought forward in a way that encourages, supports and “underpins” the “green technologies” and Climate Change agenda especially for our “grow-on” and SME industries to be able to develop on these sites.

27) There is a long-standing acknowledgement and agreement across the sub-region that the housing and employment needs of Coventry cannot be met within its (relatively confined) administrative boundaries. But to respond to Coventry’s unmet needs, new employment and housing must be as close as possible to Coventry- otherwise travel-to-work, transport movements and congestion, negative Climate Change consequences, etc will continue to grow. Are the LA’s whose own boundaries meet those of Coventry committed to seeking to focus an appropriate amount of new housing and employment land in locations that best address our sub-regional city’s needs?

28) Appendix B is an important “base” document in terms of the HEDNA Study and Employment Land. On the basis of the existing Employment Land allocations in the existing round of Local Plans,(generally 2011-2031, the table lists all the sites of “strategic” importance i.e. over 5 ha. and categorises them in terms of being “oven ready”, “imminent”, “advanced” and “constrained”. It includes a number of sites that have come forward outside the local plan allocation process ,notably the planning consent at Coventry airport.

If we are using the HEDNA proposals to determine the scale and location of “new” Employment Land we need to be clear about where already-allotted Employment Land fits into the overall equation. Whilst the HEDNA Study reinforces the scale of demand and development over the last 8-10 years, we have a number of sites (such as Atherstone Airfield, the Warwick Sewage Treatment works, the allocated Kenilworth employment growth land, the 100 ha. “Reserved” for JLR growth at Gaydon) that don’t seem to have progressed in 10 years.

This analysis raises key questions. Are these allocations still credible and deliverable sites? Is the Special Employment status currently held by the (old) Stoneleigh National Agricultural Exhibition Centre still appropriate…. when we have a large, hugely important and strategically-located site not “delivering” and being used for the sub-region in the way it should and must? Does the inclusion of these sites in our allocated employment land figures distort the reality of what employment land really is available?

29) The Chamber believes that there continues to be a deep-rooted belief in our Local Authority Members and Planners that the sub-region has sufficient employment land already allocated. This is simply wrong. It has been challenged by the Chamber over (at least) the last 10 years and is now proven by both the HEDNA Study and the evidence of demand, latent demand and the scale of recent …but artificially-constrained. development in recent years. It’s therefore hugely important that we build today’s and tomorrow’s plans on the reality we know is with us and refer to the evidence of such analysis.

30) The Chamber believes that the next (and urgent) stage in the HEDNA approach is to “forensically” assess all the Employment Land sites in the existing Local Plans (as shown in Appendix 2) to clearly determine:

- What’s the real scale of readily-available land for employment, now and for the next 2 years,  
- What allocated land hasn’t moved forwards in the last 10 years and be very clear about why?  
- What needs to happen for this allocated-but-undeveloped employment land to be brought forward quickly? Is this a problem of planning, land ownership, infrastructure, economic viability …or what…to then determine whether, how and when this land will actually be developed and deliver the sub-region’s urgent needs?