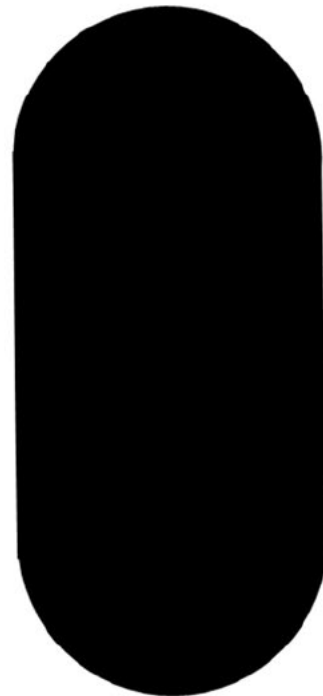


Draft Representations

Rugby Borough Local Plan Review – Regulation 18 Issues and Options Consultation

Warwickshire Property and Development Group

February 2024





1. The following representations are made in response to the Rugby Borough Local Plan Review (RBLPR) Regulation 18 Issues and Options Consultation document (October 2023) on behalf of Warwickshire Property and Development Group (who are acting in their capacity as Warwickshire County Councils delivery vehicle on the County Councils behalf), in respect of their land interests at three sites, Barnwells Barn Farm, south of Coventry Road; Blue Boar Farm site, off the A4071 and part of the Brierley's Farm site, north of the Coventry Road, Brinklow, Rugby.
2. These representations should be read alongside the accompanying supporting documents, namely:
 - a. An Employment Land Report published by the Coventry and Warwickshire Chamber of Commerce which considers the employment land supply situation in the County (June 2023);
 - b. Site Location Plans which identify the boundaries of the Barnwells Barn Farm site at land south of Coventry Road, land referred to as Blue Boar Farm site off the A4071 and land which is part of the Brierley's Farm site, north of the Coventry Road, Brinklow.
 - c. Completed Call for Sites forms for each respective site which provide the necessary information to consider the three sites as potential site allocations (February 2024);
 - d. A high level feasibility plan showing how the land south of Coventry Road, (Barnwells Barn Farm) could be developed, including proposed access point to the site; and
 - e. Background information on Warwickshire Property and Development Group, and example of an employment scheme they have delivered.

Chapter 3 – Land for Employment Uses

Question 1: How much employment land should we be planning for?

3. National planning policy requires that local authorities account for the local business needs and wider opportunities for development within their Local Plans.



4. The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022) identifies a need for 8.5ha of office space and 147.6ha of general industrial land. In addition, a further 551ha has been identified as needed across Coventry and Warwickshire to meet strategic B8 demand; an exercise to distribute this strategic logistics need across the various Coventry and Warwickshire authority areas has yet to be published.
5. Details are still awaited as to the West Midlands Employment Sites Study which will update the position on supply and identify potential future supply, however given that Coventry is unable to meet its own employment needs there will continue to be a need for Rugby to contribute to meeting some of the identified need for strategic warehousing for Coventry and the wider Warwickshire area.
6. There is an established history of Rugby Borough supporting the growth requirements of Coventry (and Warwickshire), including in the adopted Rugby Local Plan 2011-2031 (June 2019) which makes provision for 2,800 dwellings and 98 hectares of employment land to contribute towards Coventry's unmet needs. Delivery of Ansty Park and the former Peugeot site at Ryton (Prologis Park) employment developments are recognised in the adopted Rugby Local Plan as supply to contribute towards Coventry's employment needs.
7. The Employment Land Report prepared by the Coventry and Warwickshire Chamber of Commerce (June 2023) highlights the chronic shortfall in employment land in the County, including strategic sites, and recommends that Councils allocate 20 percent more land than recommended by the HEDNA due to the historic take up of sites and the demand for good quality sites within the area.
8. As highlighted in the Issues and Options document, WPDG are also aware from working within the area, of the shortage of "grow on space" and small to mid-size industrial units within the borough to allow existing businesses to expand and for incubator space for new start-ups. It is noted that the HEDNA advises that no additional supply is needed up to 2041, and 40.29ha is required up to 2050, however, from WPDG experience and knowledge there is a need for good quality smaller units below 9,000m² to be provided.



9. Rugby Borough has a key role to play in the economic prosperity of the region as it controls prime strategic employment sites along the M6 corridor around Coventry and falls within the “golden triangle” for strategic investment. As a result, WPDG consider that the Council should be mindful of the above factors in setting their employment requirement in the RBLPR, to ensure employment land needs of the Borough and unmet needs arising from Coventry (and elsewhere within the West Midlands) are being met in full, to support economic growth and prosperity of the region.

Question 2: What type of employment land should we be planning for?

10. WPDG consider that the RBLPR should plan for a range of employment land uses. This is to ensure that new businesses have the opportunity to start up within the borough, those wishing to expand, have the opportunity to do so, without having to leave the area and to plan for larger strategic sites, maximising and building upon the success the borough has seen to date, taking advantage of its location and close proximity of the strategic highway network.

Question 3. Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).

11. WPDG fully support the identification of A45/A4071 as a potential strategic employment location to be allocated in the RBLPR, however, consider that the area of broad location should also be expanded to include the two sites WPDG are promoting for employment development in the RBLPR. The two sites are identified in the attached Site Location Plans, and completed Call for Sites forms have been submitted with these representations.
12. In relation to the land south of Coventry Road, the attached illustrative layout shows how the site could accommodate a range of different unit sizes to address the demand within the area. Given the sites location on the A45, in close proximity to the strategic network this would accord with the Council’s desire to allocate larger-scale manufacturing and distribution uses with good access to A-roads and motorways, avoiding inappropriate routing of HGVs through residential areas and country lanes.
13. Furthermore, the site benefits from being in close proximity to the existing settlement of Thurlaston, and the SW Rugby allocation, which is currently being developed out.



The opportunity exists to create new sustainable modes of transport, e.g. walking and cycling for employees to assist the Council in addressing climate change.

14. WPDG would be willing to engage with the Council, the County Council and Active Travel England to discuss how the development of this site could secure active travel measures and provide the opportunity for people to access jobs without the need for a car.
15. An Illustrative Masterplan is provided for the site to the south of Coventry Road, this shows how the development could be brought forward on the site, taking into account the settlement of Thurlaston. Residential amenity will be protected given the green buffer that will be provided. Furthermore, the provision of the extensive green buffer, will create a physical separation from the development enabling a landscaping buffer which will screen the development.
16. The Site's location on the edge of Thurlaston and to the south of the SW Rugby allocation will enable employers to benefit from a sizeable skilled workforce within easy reach of the site.
17. The second site being promoted by WPDG is part of land known as the Blue Boar site. The site is part of a larger area which is designated mineral safeguarding site, however, this particular parcel of land is not required for mineral extraction. The site is also within Green Belt designation. It is acknowledged that Green Belt boundaries should only be altered in exceptional circumstances and should only be done at the Local Plan review stage. Given the need to ensure that there is sufficient employment land to meet the economic objectives of the area and the need to ensure that sites for employment uses are allocated with good access to the strategic highway network and have access to a skilled workforce, it is considered that there are exceptional circumstances to allow the release of this site from the Green Belt. The south of the site is bounded by existing industrial development, a new Green Belt defensible boundary would be in the form of the A4071.
18. WPDG are also aware that land to the north of the Blue Boar site is also being promoted for employment use as part of this consultation. The opportunity therefore exists to have a much larger area of land that could be released from the Green Belt



to allocate land for employment use and provide certainty for a supply of employment in the longer term.

19. WPDG consider that Land at Blue Boar site should be removed from the Green Belt and allocated for employment use in the RBLPR.

Question 4. How can we provide more space to allow existing businesses to expand?

20. WPDG can support the Council in the delivery of a range of business units including those which are small scale, c.280m² – 929m² (3,000 – 10,000sq.ft) and small / medium sized units of up to 6,500m² (70,000sq.ft). Different configurations of units could be constructed to accommodate the needs of occupiers and these upper and lower size parameters can be further refined subject to future planning applications to meet market demand. . The model of WPDG is to provide both serviced plots (for mid and large size units 9000m² (c.100,000 sq.ft) and above) and to rent out units, offering through the County Council additional business support initiatives to freehold and leasehold occupiers. By supporting the sites that WPDG are promoting the Council can ensure that more space is provided for existing businesses to expand. The concern of WPDG is that if insufficient land is allocated existing businesses will be forced to move out of the County, which will have a detrimental impact on the resilience of the economic prosperity of the area.

Question 5. We are minded to allocate sites specifically for industrial (B2) and light industrial (E (g)(iii)) uses. Do you support this and if so, where?

21. Yes, WPDG recognise that Rugby is a key employment area, and there needs to be sites specifically allocated for these uses, however, there does also need to be some flexibility, particularly, given the need to ensure there are sites to facilitate the expansion of existing businesses within the area. The sites being promoted by WPDG would be able to accommodate the uses set out above. WPDG are aware that the scale of units that businesses need are not currently being provided to meet current latent demand. It is important that provision is not only made for strategic allocations but to also meet the requirements of specific manufacturing processes as well. The supply chain for the businesses operating in the area is essential to the borough's success, with the "Just in Time" principle necessitating the need for



business clusters to be facilitated in order for businesses to have the competitive advantage they need.

Question 6: Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

22. Yes, as set out in response to Question 1 above, there is a significant need for employment land including to meet the needs of Coventry which cannot be met within the City.
23. Paragraph 85 of the NPPF advises that significant weight should be placed on the need to support economic growth and productivity and advises Councils to build on their strengths and address the challenges of the future. Paragraph 87 of the NPPF further advises that planning policies should recognise and address specific locational requirements of different sectors, including making provision for clusters and for storage and distribution operations in suitably accessible locations.
24. As set out in response to Question 3 above, Land at Blue Boar is situated in a strategically significant location for employment development given its proximity to the strategic highway network. Furthermore, development of this site can deliver significant economic, environmental, and social benefits, notably through significant job creation and local investment and also positively impact the local environment by adopting a nature positive approach that integrates development with biodiversity and amenity.
25. As such, WDPG consider that exceptional circumstances do exist to justify releasing Land at Blue Boar from the Green Belt and subsequently allocating the Site for employment development.

Chapter 7 – Climate Change Policies

Question 18: Should we show areas of the borough in which wind and/solar energy will be supported? If so, where?



26. No. WPDG are committed to progressing schemes with green credentials and optimising opportunities where possible to address alternative energy provision, however, to specifically allocate sites for this purpose is not supported.

Question 20: We are minded to introduce a policy that supports other zero carbon energy infrastructure including battery energy storage and hydrogen energy infrastructure. Do you agree?

27. No, this could have an impact on the viability of schemes, particularly so in relation to smaller unit development given these schemes are more challenging to deliver whilst remaining viable. WPDG are committed to working in partnership with the Council to support wherever possible the provision of zero carbon energy, however, there needs to be flexibility.

Question 21: Should we adopt a minimum tree canopy policy for new development?

28. No. Design and landscaping considerations need to take into account the existing features of a site, and in some cases it may not be appropriate for significant tree planting in a landscape where this would be incongruous within the landscape setting. Furthermore, requirement for tree canopy coverage is considered to be unduly onerous and may negatively impact the ability of a development to achieve 10% Biodiversity Net Gain, where other biodiversity measures may be more valuable.

29. As such, WPDG consider that a policy which encourages development proposals to incorporate the provision of new trees, where appropriate, would be more suitable.

Question 24: Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

30. Given that national legislation covers this point, WPDG consider that a policy relating to this is not required.

Question 25: We are considering requiring all new residential development to be net zero. Do you agree?



31. No, anything above building regulations could have an impact on viability and deliverability. Instead, the policy should reference building regulations as a minimum with a drive to exceed these minimums where prevailing viability allows.

Question 26: We are considering requiring all new non-residential development to be net zero. Do you agree?

32. No, there may be instances where non-residential development (particularly commercial or industrial operations) by virtue of its operational requirements and energy needs are not able to achieve net zero, and economic development should not be stifled in such circumstances. The policy should reference building regulation minimum with a drive to exceed these minimums where prevailing viability allows.

Question 28: Should we require non-residential development to meet higher water efficiency standards to reduce water usage?

33. No, there may be instances where non-residential development, through its operational requirements, are not able to achieve higher water efficiency requirements, and economic development should not be stifled in such circumstances. In addition, there could be an impact on development viability, particularly on brownfield sites.

Chapter 7 – Land for Housebuilding.

Question 31. How many homes should we be planning for?

- (a) Minimum local housing need
- b) The HEDNA 2022 need
- (c) Other (please specify)

34. WPDG consider that given Rugby has an ambitious growth agenda the Council as a minimum should plan for the HEDNA 2022 need.



Question 33. Please provide comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?

35. WPDG consider that the village of Brinklow is capable of accommodating small scale growth to accommodate the identified housing need within the area. As set out on the Call for sites form the site proposed is capable of accommodating approximately 100 homes.

Question 34. Do you support a requirement for all new dwellings to meeting the additional Building Regulations standard for accessible and adaptable dwellings and for a least ten percent of dwellings to be suitable for wheelchair uses?

38. WPDG are willing to develop properties at Brinklow which incorporate additionally to Building Regulation standards where viable to do so. Proposed houses would also include solar PV, EV charging, Air Source Heat Pumps and primarily a fabric first approach to building efficiency. In order to meet the identified housing need at Brinklow a range of house types and tenure could proceed but where market 'sale' houses will need to help cross subsidise any specialist affordable or age restricted or adapted housing, or self-build / custom-build plots for sale.



Warwickshire Property & Development Group

Company Overview



Warwickshire
Property & Development

Who we are...

Warwickshire Property & Development Group (WPDG)

- We are the arms length delivery vehicle of Warwickshire County Council
- Separate legal entity with our own Non Exec Board
- Our sole shareholder is WCC

- We comprise a team of
 - Development specialists and Surveyors
 - Estates Surveyors
 - Finance and administrative support



Our Vision

"Warwickshire Property and Development Group will deliver sustainable, high quality new homes and new commercial space in the County of Warwickshire. All profits made will be re-invested within Warwickshire for the benefit of its residents and neighbourhoods across the County."

Our Purpose

Launched by Warwickshire County Council in August 2021 WPDG's main purpose is to positively contribute to the delivery of the Councils Commercial and Medium Term Financial Strategies notably:

- WCC Council Plan 2020 - 2025
- WCC Covid 19 Recovery Plan
- WCC Commercial Strategy 2019



WPDG

Warwickshire Property Development Ltd

Direct Development – Buy land, de-risk, fund development, dispose/retain
Joint Venture – Develop Warwickshire
Development Management – DM function and support to WCC
Strategic Land and Promotion
Consultancy Support / Critical Friend – Development Advisory

Warwickshire Property Management Ltd

Property inspections – *rolling inspection cycle*
Rent collection – *monthly invoicing*
Rent reviews – *periodic negotiations*
New leases – *renewals to existing tenants & re-letting to new tenants*
Landlord consents – assignments, sub-lettings, building work, variations
Ad hoc transactions & Professional advice – *terminal dilaps, legal disputes, etc*



What we've achieved so far

Joint Venture with Countryside Partnerships

- Established Dec 2022
- 30 year relationship
- Initial pipeline of 2000 dwellings
- Operates on a 50 / 50 basis
 - Land matched by development value
 - Priority returns and remainder split 50 / 50 between parties



DEVELOP
WARWICKSHIRE



Warwickshire
Property & Development



COUNTRYSIDE
Places People Love

Develop Warwickshire Sites

Top Farm Nuneaton

Outline planning secured on 1700+ dwelling SUE

- First Phase reserved matters application submission May 2023
- Link Road Construction start Spring 2024
- First phase housing start autumn 2024 (500+ dwellings)
- 10 year build programme



Develop Warwickshire Sites

Brookmill Meadow

Warton - Reserved Matters Consent secured on 71 dwelling scheme

- Started on site Autumn 2023
- Mix of 2, 3 & 4 bed houses
- Show home/marketing suite open Feb 2024



Develop Warwickshire Sites

Water Orton School

- Proposed redevelopment of an allocated site for 50 / 60 dwellings
- Currently working up planning application for 55 dwellings – with associated survey work underway
- Consultation event Dec 22 showed broad support
- Start on site early 2025



Southam Park

42,200 sq.ft industrial scheme

- Secured Full Planning Consent January 2023
- Appointed contractor (MCS) January 2023
- Started on site Feb 2023
- PC Dec 2023
- Currently pre-let 50% of the scheme



SUCHAM PARK

9 NEW BUILD BUSINESS UNITS

Completed December 2023

- Available to let on flexible terms
- Available Units 1 to 6 sizes range from 3,100 sq ft (288 Sq m) to 4,900 Sq Ft (455 Sq M)

Sucham Park
Northfield Road
Southam
CV47 0FS

Due to high demand Unit 9 is let and Units 7 & 8 are Under Offer

Warwickshire
Property & Development



Former Manor Park School

Nuneaton

- Secured outline planning consent for development comprising up to 58 dwellings and a 65 unit Extra Care facility
- Procurement process for delivery partner appointment underway – complete Spring 2024
- Reserved Matters submission Autumn 2023 with a start on site Summer 2024
- WPDG will look to progress an enabling package to de-risk the site



Justice Walk / Vicarage St – Nuneaton

- Acting as DM on behalf of WCC.
- Outline planning application submission for a new Library and Business Centre and up to 65 residential dwellings
- Anticipated outline consent granted April 2023



Mabels Farm – Ilmington

- Neighbourhood Plan allocated site for 20 dwellings
- Lifetime Farm tenancy – relocation
- Planning application submitted for farmstead relocation
- Working up a scheme on the development site, soon to embark on delivery partner procurement



The Future

Build the Pipeline

- Currently 10 – 15 sites going through initial due diligence, scoping and pre-app discussion
- Purchase land within the market / Assemble sites
- Work with District Councils
- Partner with the private sector – funding / JV / Development Agreements

Strategic Land Promotion

- Large scale housing, mixed use and industrial development opportunities
- Align asset base with local plan reviews and opportunities – South Warwickshire Local Plan, Nuneaton & Bedworth, Rugby, North Warwickshire local plan updates

Add sites to the Develop Warwickshire JV

- Opportunity to add more land into the JV both strategic and large scale individual and packages of land

Continue to effectively manage the WCC Asset base

Build Awareness & Relationships



Contact



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**INDUSTRIAL /
WAREHOUSE UNITS**

**TO
LET**

Coventry & Warwickshire

**Employment Land
Report**



Coventry & Warwickshire
Chamber of
Commerce
The Ultimate Business Network

Coventry and Warwickshire Chamber of Commerce has enjoyed excellent working relationships with our Local Authority partners for 120 years. Together we have laid the foundations for businesses to grow, to create jobs and to export products and services across the world.



Coventry and Warwickshire Chamber of Commerce has been monitoring and measuring the total employment land supply across the sub-region for the last seven years.



As a Chamber of Commerce, we have been consulting with our members and partners on the Local Plans of our Local Authorities, District and Borough Councils.

It is vital we resolve the critical matter of employment land supply and the provision of commercial premises for all sectors of our economy. This needs to be done through a co-ordinated, cross-boundary, cross-authority approach.

This is now reaching a crucial phase because it is stifling the opportunities of businesses to expand and boost our local economy as well as attract inward investors who are choosing to locate in neighbouring counties where there is a greater supply of infrastructure-ready employment land of all types.

We have summarised our initial findings in this new report which includes proposals on a unified approach to tackling these urgent issues and suggesting ways of resolving some of the time-sensitive employment land problems that the area is currently facing.

Much more detailed information and considerations have been presented in our separate and larger response to the Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) study to your officers.

This study strongly supports the Chamber's long-promoted position that the existing Plans' targets (2011-2031) are, and have been, inadequate in responding to real need and demand by significantly increasing the employment land targets for the 20-30 years to 2051. The Chamber welcomes this positive response.

This document has been produced with the help of the Chamber's Employment Land Panel which is drawn from members along with our advisers and consultants.

We would welcome an opportunity to continue to engage and input to the hugely important strategic planning of the sub-region for the 30 years to 2050. We are aware that all the C&W local authorities are now addressing development plan reviews.

As we have done in the past, the Chamber is keen to be an active partner as this work of strategic, geographical and economic planning proceeds, and we recognise that the recently published HEDNA study – which was commissioned jointly by all the Local Authority partners in Coventry and Warwickshire and carried out by consultants Icen Projects – is a hugely important "starting point" for these discussions.

The Chamber views the HEDNA as an important document which needs to be explored further.

Once you have read this document, we would be very keen to meet to discuss a joined-up approach during the early stages as the new Local Plans are formulated throughout our sub-region to grasp the challenges and opportunities.

To arrange a meeting, please contact me at corinc@cw-chamber.co.uk and through a co-ordinated-approach, we will all aim to identify land availability and infrastructure for employment use for effective delivery throughout Coventry and Warwickshire.



This wide-ranging review of infrastructure-ready employment land is vital for Coventry and Warwickshire's future prosperity.

The results – as this report reveal – are a major concern and reinforce feedback received from commercial property agents throughout Coventry and Warwickshire. Local Plans are now being prepared until 2050 which will have a massive importance and impact on the sub-region.

David Penn, Partner, Bromwich Hardy, said: "It's been clear that we've had a chronic shortage of land for jobs for many years.

"There has been insufficient construction of factories and warehouses of all sizes and insufficient land for storage uses such as haulage, wood yards, coach companies, waste and recycling, builders' merchants, timber merchants and many others.

This is at the same time as strong demand for such uses, particularly since Covid because of higher levels of online shopping and direct delivery.

"Those sites that have been allocated through Local Authority Local Plans have inevitably been taken up in bulk for large scale logistics, leaving very little for the development of buildings for small to medium sized companies.

"Lack of construction of new units means less churn in the marketplace and less second-hand units becoming available to rent or to buy. High demand against low supply means we at Bromwich Hardy have seen rampant inflation in rents and prices which sees no sign of abating, despite current economic turmoil.

"Units become available and get snapped up very quickly. Offices are a particular problem as restricted land supply means very high land values which are unviable for the development of offices where construction costs are exceptionally high due to inflationary pressures.

"I am delighted that the Chamber of Commerce as the leading voice of business is taking up the challenge to get policymakers to release more land as it is absolutely vital for our sub-regional economy and for jobs."

"Continuous monitoring of availability and take-up is required so that we have a true picture, and local authorities need to allocate sufficient land supply, not just for "big sheds", but also for companies of all sizes and sectors.

"Our local economy is exceptionally resilient, but a short-sighted approach to this urgent matter is a real threat to a promising future."

Shortage of land highlighted in Coventry & Warwickshire

This table, based on a much more detailed assessment, illustrates the current pool of employment land presently available in Coventry and Warwickshire.

"OVEN READY" EMPLOYMENT SITES - Immediately available	Currently available land (Ha) est at allocation	Status	Progress (est)
Radio Station Site (Houlton) (RBC)	12	Allocated. Not started (N/S)	
"Prospero" Rolls Royce Campus, Ansty (RBC)	5	Under construction (U/C)	50%
SW Rugby SUE Employment Area (Symmetry Park) (RBC)	45	U/C. Committed	N/S
Tournament Fields (WDC)	1	Largely complete	85% plus complete.
Abbey Park, Business Park (WDC)	3	Allocated. Part complete. U/C	60% complete
Friargate, Coventry (CCC)	6	Allocated. Phase 1 complete	60% complete
Warwickshire Gateway (north -ext to Whitley South BP) (WDC?CCC)	4	Allocated adopted Plan	U/C
Whitmore Park, Holbrook (CCC)	Update 4	Allocated submitted Plan	U/C
Birch Coppice (Core 42) (NWBC)	0.3	Near complete	Near complete
Hams Hall (NWBC)	2	Allocated. Part complete. U/C	60% complete
Arden Rd, Alcester (SDC)	4	Allocated adopted Plan	U/C. Near complete
Winyates Trl, Mappleborough Green (nr Redditch) (SDC)	0	Committed	U/C
Faultlands Employment area (N&BBC)	16	Allocated. N/S	Pre-let and housing
Sub Total	98.3		
"Imminent Sites" likely to be available to market in next 12 months			
Warwickshire Gateway (South) (WDC/CCC)	35	Allocated. U/C	
Alcester Road, Stratford (SDC)	12	U/C	
Sub total (rounded)	47		
"Advanced" allocated Local Plan Sites-timing dependant on ownership, infrastructure and demand.			
South of Horiba Tech Park (EZ) (NWBC)	42	Allocated. N/S	
West of Birch Coppice (NWBC)	5	Allocated. N/S	
E Polesworth and Dordon (NWBC)	7	Allocated. N/S	
Eastern Green, Coventry (CCC)	15	Allocated. N/S	
Land east of Kenilworth -Thickthorn (WDC)	8	Allocated. N/S	
Stratford Road, Warwick (WDC)	12	Allocated. N/S	
Stoneteigh Park, Warwick (WDC)	tbc	Allocated. N/S	
Atherston Airfield (SDC)	10	Allocated. N/S	
Canal Quarter, Stratford (part) (SDC)	2	Allocated adopted plan	
Long Marston "Eco town" new settlement (SDC)	13	Allocated. N/S	
Coton Park Eas (RBC)	8	Allocated. N/S	
Phoenix Way/Wilsons Lane, Nuneaton (N&BBC)	18	Allocated	
Bowling Green Lane, Nuneaton (N&BBC)	26	Allocated. N/S	
Coventry Rd, Nuneaton (N&BBC)	9	Allocated. N/S	
Sub total	177		
Other strategic sites. May contribute to C&W supply but constraints or dedicated users so not formal part of open market.			
Coventry Airport (CCC)	124	Consent for Gigafactory	
Wellesbourne Campus - University of Warwick (WDC)	20		
JLR Works at Gaydon (SDC)	100		
Aston Martin at Gaydon (SDC)	5		
Sub Total (Ha)	249		

There is only 96 hectares of "oven-ready" employment land available across the whole sub-region and only one site of strategic scale

The table highlights that there is only a further 47 hectares likely to be available in the next 12 months, with 177 hectares at the advanced stage along with 105 hectares at Coventry Airport and Wellesbourne which are allocated but unlikely to proceed at this stage.

Coventry and Warwickshire is sorely lacking sufficient serviced land, both qualitatively and quantitatively, to encourage inward investment into the sub-region.

This means bringing forward the right land in the right location (e.g., future manufacturing near to renewable energy sources and logistics close to road and rail infrastructure).

Consequences of the land supply problem

There are many knock-on effects if Coventry and Warwickshire does not resolve the current situation by planning a positive and pro-active response to the lack of suitable employment land for this and future generations of businesses.

We acknowledge all the work the Local Authorities have done to bring forward reviews of their Local Plans looking ahead towards 2050 but given the nature of this problem, urgent action is required in areas where there are no good sites available for inward investors or expansion of local businesses.

Here is a summary of the Chamber's main points of concern:

1. Affecting the local labour market. Companies already based in Coventry and Warwickshire will look elsewhere to grow, which will have a detriment on their employees and the local economy which, in some cases, will mean highly-skilled jobs moving to other parts of the country.
2. Discouraging inward investment. UK-wide and internationally-based businesses will be attracted to neighbouring counties and sub-regional areas because of the disincentive to move here despite our world-renowned automotive expertise and globally-recognised universities.
3. Small and medium sized enterprises (SMEs). If there is no new land for employment uses the market doesn't function correctly. This affects SMEs since they are squeezed out of an opportunity to expand since they often can't afford high-quality land which is bought by larger businesses.
4. The sub-region is currently at a disadvantage. Apart from the major logistics and distribution site at South West Rugby called Symmetry Park there is no large-scale employment land available over 20 hectares throughout the entire sub-region. The absence of such large employment sites is putting Coventry and Warwickshire at a competitive disadvantage.
5. The number of sites which remain unavailable because of major infrastructure requirements and investment. There's a huge amount of construction currently underway at the Coventry & Warwickshire Gateway, with very strong take-up, lettings having been

agreed with DHL and Syncreon, but other employment land in Kenilworth, Stratford Road in Warwick and Eastern Green in Coventry show little signs of moving forward a number of years after allocation.

6. Pressures on new housing land across urban and built areas. Due to value differentials, there is a significant loss of employment land and premises to higher value uses, particularly housing. This removes important commercial opportunities from the marketplace which impacts on local businesses seeking premises at lower rental or being able to buy units on cost-affordable employment land.
7. Targeting particular types of employment. The broad-brush allocation of a wide range of possible employment uses leads to a shortage of industrial land as the limited space is snapped up by the warehouse and distribution sector.
8. Annual Monitoring Reports. Coventry City Council, Warwickshire County Council and the District and Borough Councils need to agree to standardise the collection of monitoring information to make it easier to compare the land that is available or could be made available across wider employment areas. A co-ordinated partnership approach could track the progress of all the major site allocations in the Local Plans for Coventry and Warwickshire.



Proposals to improve the provision of the right amount and types of employment land

Land has been taken up more quickly than anticipated because Coventry and Warwickshire's economy has been more successful and buoyant than was predicted since the last Local Plans were drawn up.

This is also partly due to a rise in warehouse distribution businesses which has benefited Coventry and Warwickshire more than other areas because of the 'Golden Triangle' and the sub-region's proximity to the M6, M1, M42 and A5 which is particularly attractive to this sector.

This has also spilled over into areas such as Ansty and Coventry Airport because these types of warehousing, distribution and logistics businesses are land hungry. They require access for lorries, lighting, parking, infrastructure and landscaping over a larger area compared to conventional factories. This has led to distribution hubs squeezing the value of the land since it can be sold for a similar amount to those for housing.

The Chamber's Employment Land Panel has a number of recommendations to deliver new sites:

1. Encourage more smaller business units to be built alongside large warehouses. This approach has been pioneered in neighbouring local authorities such as Hinckley and Bosworth.
2. All sub-regional Local Authorities have or are starting their Local Plan reviews but the slowness of the plan making process means more urgent action is needed. The Chamber is calling on our Local Authorities to take special measures to fast-track employment site allocation development plans and support planning application proposals wherever possible to provide more land for immediate use.
3. Improving monitoring so that there is clear and easily accessible evidence about how much land is or isn't available throughout Coventry and Warwickshire. Individual Local Authorities produce an Annual Monitoring Report which

details the granting and taking up of employment land on a local basis but there is no overview and much inconsistency in the way data is collected, hampering an opportunity to look at overall trends and performance.

4. Allocate 20 per cent more land than recommended by HEDNA calculations to provide scope for more variety in the quality and quantity of land. This will enable the market to function more efficiently and allow a vacancy rate that will assist market mechanisms in all employment sectors as well as give greater choice for businesses.
5. Develop a more disaggregated approach to the allocation of employment sites. This would include some allocations dedicated to a single-use class, or in the case of warehousing and distribution (class B8) uses the identification of both rail served and non-rail served sites. This has been suggested by Stratford and Warwick in their new joint plan where they have allocated separate designations for warehousing and distribution.
6. Introduce policies that give high levels of 'protection' to current employment land from change of use applications including a set of robust tests before changes can be introduced that might lead to the loss of employment allocations.
7. To address the problem of areas which have been allocated but have not come forward for development due to infrastructure, funding or other constraints, the Chamber is calling upon the Local Authorities to establish a public sector fund or funds and become more pro-active in bringing forward employment opportunities. This will increase the pool of serviced available sites and benefit the sub-region.

A way forward

Employment land should be given equal priority to housing land which currently isn't a requirement. The Chamber strongly believes this needs to be introduced to support the continued growth of the local economy.

Such an approach could be delivered quickly and developed in a co-ordinated way across all local authorities to support essential economic growth in an environmentally friendly and sustainable fashion – particularly in the areas of the sub-region which need it most. The Chamber recognises that it is important to make planned new employment sites supporting the Climate Change agenda to encourage and support green technologies, and we would like to work with local industry and Local Authorities to explore this further.

Analysis of the HEDNA study indicates that insufficient employment land has been allocated in the Local Plans in Coventry and Warwickshire historically, which backs-up the research of our Employment Land Panel, and the land which has been allocated has been used up far faster than ever anticipated. Furthermore, establishing future need for employment land based on projections of suppressed past take up rates will always underestimate the true requirement for employment land.

The Chamber believes the next – and urgent – steps are to forensically assess all the employment sites in the existing Local Plans to determine:

- What's the real scale of readily-available land for employment now and the next five years?
- What allocated land hasn't moved forward in the last ten years and be clear about why?
- What needs to happen for this allocated but undeveloped land to be brought forward quickly? Is this a problem with planning, land ownership, infrastructure, economic viability? Then determine how and when this land will actually be developed to contribute towards the sub-region's urgent needs.

There is a "once in a decade" opportunity to put these measures in place **now** since the Local Plans in Coventry and Warwickshire are being reviewed

up to 2050. This long-term view is welcome but in the short-term, urgent measures are needed alongside the reviews of the Local Plans.

The Chamber welcomes the South Warwickshire Local Plan because it has taken really positive steps to address some of the issues and we look forward to a specific discussion on the issues that have been raised.

The Chamber would like other Local Authorities, District and Borough Councils in the sub-region to talk to each other during the review of their Local Plans because a partnership-approach will help to tackle the issues the area is facing.

Some of the issues are cross-boundary including a West Midlands Gigafactory at Coventry Airport which has had its outline planning application approved by Warwick District Council and Coventry City Council because there will be a wider impact in the area.

The Chamber believes it is important for a strategic land perspective right across the region and the continued cooperation created by the Memorandum of Understanding.

During and following Covid-19, the business community has demonstrated great resilience with their ways of working and the economy has shown encouraging signs but it is vital these roots of growth are not stifled.

This is an opportunity which the Local Authorities can grasp on behalf of businesses in Coventry and Warwickshire – and, therefore, their residents – by working together to produce a strong range of new employment land opportunities that meet long-term requirements and create economic growth.



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