

“GO FOR GROWTH: LAND FOR JOBS”

DELIVERING A PROSPEROUS FUTURE FOR COVENTRY AND WARWICKSHIRE: A “CALL TO ACTION” ON EMPLOYMENT LAND

Executive Summary

The Coventry and Warwickshire Chamber of Commerce has acted as the “voice of industry” and promoted the importance of the economy in our area for over 130 years.

We have been- and will continue to be- a proactive partner with all the other public and private sector bodies who have a key part to play in the sub-region’s future.

We recognise that creating and sustaining a positive economic future is a collective responsibility – and only by working together can we meet our aspirations and deliver what is needed.

Since 2012/13 the Chamber has been working with our Local Authorities as they have progressed through the step-by-step process of reviewing and up-dating their (and therefore our) strategic Local Plans for the 20 years to 2031.

Right from the start the Chamber questioned the (initial) consultant-led overall targets for new housing and employment land. As a result of ours- and others- arguments, the new housing target for the sub-region has been significantly increased to now reflect the reality and needs of our fast-growing population. Unfortunately our arguments about the targets for new employment land have not impacted-as yet- upon the Local Authorities 20 year Plans, and the employment land target has remained stubbornly too small!

The Chamber has consistently argued that using 2011(when we were still wrestling with the effects of the Banking Crisis and Recession) as a base to assess and estimate the needs of our economic future was always going to throw up problems....and we now have the evidence to prove this.

As the old adage says, whatever planning and economic model we might use “Rubbish In: Rubbish Out”. Now, with “the wisdom of hindsight” and real and growing evidence about the true needs of our ever-growing and diversified businesses, we can see that the basis upon which we have calculated our employment land needs is seriously flawed. **If we don’t rectify this situation this present and future shortage of employment land will severely and prejudicially impact upon our economic growth and employment opportunities for our growing and relatively-young population.**

The Sub-Region’s Local Authorities had collectively agreed to seek to deliver 714 ha. of new employment land in the 20 years to 2031. The Chamber believes that all the evidence points to a real need for in excess of 1,000 ha. in this period. Anything less than this will artificially constrain and prejudice the very positive economic growth and opportunities for our sub-region and the people and businesses that call C&W “home”. Our sub-region is demonstrating levels of growth (in

population, the number and size of companies, in GDP, the confidence of our businesses in opportunities for the future, etc.) that are significantly higher than comparative national and regional figures. More and more it is clear that Coventry and Warwickshire has a key and growing role to play in the future of UK PLC. So our responsibilities for economic growth extend well beyond our local boundaries.

What is now absolutely apparent- with 13 to 14 years of the Plan period to 2031 still to come and because of the scale of recent take-up and development of the “new” employment land that is built into our Plans- is that we have only 2 ½ years of supply of “strategic” (i.e. over 2 ha.) readily or shortly-available land now available and much of that is already “taken” even before the infrastructure to service it is built!

The Chamber is seeing how this severe shortage of employment land is already seriously impacting upon all different sectors and sizes of business. We don't just have the problem of not having enough employment land available or planned to enable us to make a credible offer to large inward investors. We are only meeting the immediate needs of some of our larger companies, but can't give them the assurances they need to plan their future here with any certainty. Chamber Members in the SME and “supply chain” to larger companies are also very anxious that their own ability to survive and prosper as they try to respond to the ever-growing needs of their clients is already at risk.

Dealing with the dilemma of a fast-growing economy is a challenge that many other parts of the UK would relish.....and it's a dilemma the Chamber believes we should – together-relish. **But Action is required now!**

Our Local Authorities have sought to work together and across boundaries to deliver-through their Local Plans-the aggregate targets for new housing and employment land. They have signed-up to 2 Memorandums of Understanding (MOU) relating to these 2 items that:

1) recognise that Coventry cannot meet its own housing and employment land needs within the constraints of its existing administrative boundaries and that the “urban footprint” of our existing city, towns and some villages will have to grow, and

2) that – in helping meet Coventry's needs- the relevant Warwickshire Local Authorities will seek to plan for new housing and employment land directly adjacent to or near Coventry's boundaries, thus delivering new homes and jobs that can best respond to Coventry's needs.

The Chamber believes that the sub-region is close to delivering in terms of item 1) above, but – of the relevant Local Authorities that share a boundary with Coventry- only Warwick District, at present, meets objective 2). In consequence the Chamber has made proposals for how both Rugby and N&B could better meet their MOU responsibilities, and these will be considered in the forthcoming Public Examination of these 2 Plans.

The 543 ha. of remaining employment land (from within the overall planned 714 ha.) built into existing plans is made up of 35 sites, but most of these are small.26 of these sites are less than 20ha. and only 1 (C&W Gateway South) is –at 50 ha.-big enough to support a major new inward investor or new manufacturing site, meaning we have no big sites to help us plan for the future. **From Market signals, we anticipate very strong and immediate take-up of this land once planning**

permission is in place, to the extent that it is likely to be seriously over-subscribed. So what was to be the sub-region's largest "new" Business Park is already "spoken for".

Where are the "new" Ansty's, Ryton's, MIRA's, Keresley's, and Tachbrook's? Where is the strategic planning of big, new Business Parks that has been the cornerstone of our Economic Strategies over the last 20 years?

Where is the land needed for our automotive, engineering and design industry and its huge supply chain to prepare for and begin to respond to the Government's recent policy announcement that no diesel or petrol cars can be sold after 2040 if all their existing land and premises are needed to maintain their present operations?

The C&W LEP – like the Chamber- has been raising their concerns about the inadequate supply of employment land, and this issue has now finally been acknowledged and recognised by our Political Leaders, but they are having difficulty delivering more employment land. So we all have to help!

The Chamber fully recognises the pressures upon our Local Authorities when it comes to strategic issues about our collective future that impact upon land and the use of that land at a local level. We are nearing the end of the (protracted) process of creating the 6 new Local Plans that (together) will chart out and determine the sub-region's future.

Unfortunately these Plans – notwithstanding the efforts put into them "do not" deliver what is needed in terms of employment land, and the Chamber is promoting a "Call to Action" whereby all relevant organisations- at a local, regional and national level-work together to bring a positive resolution to the dilemma that is of such critical importance to the future of our local, regional and national economy and the (growing) population we serve.

The Chamber recognises that anyone can criticize and challenge ideas and plans that they don't like. The Chamber's approach has always been to come forward with positive proposals to "put right what is wrong". We have done this in our responses to the Consultation Drafts of individual Plans as they have progressed, and have recently presented and discussed with the C&W Political Leaders Group a comprehensive Briefing Paper about this whole issue within which the Chamber made 6 recommendations that:

- encourage the relevant L.A.'s to amend their emerging Plans before they are finalised. This is particularly relevant for Rugby and N&B.

- reinstate earlier proposals for Walsgrave Hill Farm and Ansty as part of a major new cross-boundary strategic development on the North East of Coventry, adjacent to our sub-regional University Hospital and to the A46 and M6/M69,

- deliver an urgent sub-regional review of employment land requirements and supply (including consideration and a focus upon the significant enlargement of the existing successful and infrastructure-serviced Business Parks at Ansty, Ryton and Keresley, and maximising the opportunities and benefits of the Coventry and Warwickshire Gateway site), and

- ask Local Authorities to use their planning powers to promote and deliver "Affordable Employment Land" in similar terms to the approach to deliver Affordable Housing. We recognise this can't just be imposed upon an already inadequate employment land supply but must be part of the strategic thinking and actions that are the essential elements of successful Local Plans.

As a consequence of that discussion the Leaders Group has encouraged us to communicate the key information, messages and proposals within that Briefing Paper to a much wider audience of all those that have an interest or responsibility in resolving the dilemma we collectively face, and this is what we are doing.

The detailed Briefing Paper that supports this Executive Summary provides:

- evidence to back-up the Chamber's arguments about the inadequate supply of Employment Land and how this is and will artificially constrain and prejudice our economic future,
- data showing how our sub-regional economy (and business base) is growing faster and is more robust than regional and national figures,
- information and advice about how we can revisit our Employment Land targets without re-opening the whole Local Plan process,
- information about how different Local Authorities have not applied a consistent approach to the assessment and redesignation of existing Green Belt land,
- information and case studies about the real and tangible impact the shortage of Employment Land is already having on local businesses and the inability to promote our sub-region to both Inward Investors and indigenous companies that want/need to expand, and
- practical proposals and recommendations about how this shortage of Employment Land can be resolved quickly (particularly by the expansion of existing and successful Business Parks at Ansty, Ryton and Keresley).



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GO FOR GROWTH: LAND FOR JOBS

Background Briefing Paper from the C&W Chamber of Commerce

(Data and information correct as at end September, 2017)

C&W's STRATEGIC PLANS AND THE INADEQUATE SUPPLY OF EMPLOYMENT LAND TO MEET OUR NEEDS

This Briefing Paper was originally prepared for and discussed with the Coventry and Warwickshire Political Leaders Group on 20th July, 2017. As a result of these discussions and the growing importance of the issues about Employment Land that the Chamber of Commerce has continued to raise, the Political Leaders Group asked that the Briefing Paper –with any appropriate up-dating to reflect the discussions - should be much more widely circulated to all those that have a role and responsibility in terms of the economic future of the Sub-Region and its contribution to the larger West Midlands and national economy ...since this is an issue that all agree must be addressed!

By the very nature of the problem we are seeking to address, the views expressed in this paper may be challenging to different organisations and in different ways. The views expressed and the interpretations drawn from the information that the Chamber has been/continues to draw together are the views of the Chamber (on behalf of its Members and as “a voice for industry”). The Chamber, as a true partner in the sustainable growth and regeneration of this area, has a responsibility to be challenging – but positively challenging- in working with other key partners who are most closely involved in the strategic planning of our sub-region. This Briefing Paper has been constructed on that basis.

The Chamber believes that there is a growing awareness and recognition of the problem of the significant shortfall in the supply of Employment Land in our sub-region, and there is now a real momentum to address this, but this cannot happen unless all relevant organisations can work together to find a common sense way forward. Hence the need to communicate with and involve other key partners.

One of these challenges relates to how change can be made within the requirements and operation of the Government's National Planning Guidelines. The Chamber has sought the assistance of the Planning Minister and has also contacted the Chancellor of the Exchequer and Business Secretary because of the economic importance of the issue. We recognise that the issue is very much “on the

agenda” of the WMCA and our new “metro” Mayor, the WMCA Land Commission, and other regional bodies as well as Central Government and its relevant Agencies.

Fundamentally this Briefing Paper is “a call to action” and our Political Leaders’ Group and LEP have asked for reports back on the reality of “what’s happening on the ground”. This is a key requirement of the National Planning Guidelines in seeking to ensure that Local Plans understand and respond to the changing circumstances and needs of the local area.

This Briefing Paper is structured to cover:

- context and background: why are we concerned about the inadequate scale of employment land being proposed in our (collective) Local Plans to 2031?

- the key issues the Chamber has raised in terms of what our Local Plans must address,

- evidence about business growth, employment land availability and feedback from our Chamber Members,

- how the Chamber has sought to put forward practical and proactive proposals to resolve this ever-growing problem.

(We’ve also provided an Appendix giving evidence of how the shortage of employment land is impacting upon local companies across the sub-region to give a real feel to the problems they and we face “at the coal face”.)

A. CONTEXT AND BACKGROUND

- 1) Whilst the Chamber has responded directly to the different stages of the individual Local Plans being developed by our 6 Planning Authorities, our concern about the grossly inadequate level of employment land supply in the 20 year period to 2031 is now top of our list of concerns in terms of how our sub-region can develop and prosper. That is why we’ve prepared this Briefing Paper and why we need to speak direct to all our Political Leaders together.
- 2) The C&W Chamber of Commerce has sought to represent the interests of business in our area for over 130 years, but our involvement and input goes much further than just representing one sector. The Chamber is a strong and active partner in the long-term economic and regeneration planning of our sub-region, working with Local, Regional and National Government (and their relevant agencies) and we recognise that unless all sectors work together we won’t succeed.
- 3) We believe we are all committed to a growing, diversified, sustainable and ever-changing economy through which the needs and aspirations of our growing, and comparatively young, population can be met.
- 4) The Chamber is committed to strong economic growth and we strongly support the ambitious but essential growth plans for our sub-region. Notwithstanding any differences of political opinion, the Chambers of Commerce nationally believe that the UK can’t restructure

its public finances and debt and deal with the uncertainties of BREXIT simply by cutting back on public sector spending. We need to grow our economy and tax base, and economic growth is the primary means of doing this. So economic growth isn't just for the Private Sector- it is everyone's responsibility.

- 5) Back in 2012/13, when our sub-regional Local Authorities were beginning their collective research and thinking as a precursor to developing their new 20 year plans, the Chamber adopted a mantra of "Prosperity through Growth" and we've developed and sustained that focus through our "Go for Growth" programmes. So – like all our Local Authorities- we recognise how important economic growth is to our future and –working together- we must remove all/any obstacles to that growth.
- 6) **Our campaign of "Land for Jobs" is now a key element of our "Go for Growth" strategy and-more and more-we are seeing that the acute shortage of employment land is the biggest obstacle and impediment to our essential economic growth.**
- 7) As a proactive partner in the strategic planning of our sub-region, the Chamber has always sought to put forward ideas and proposals to respond to the issues we face. If we are critical of what's proposed, we want to be positively critical, and we've summarised below how we believe our Local Authorities- working together-can proactively and positively deal with this huge shortfall of employment land- not just in terms of large sites but also to respond to the different needs of all sectors and sizes of companies.
- 8) Right back at the beginning of the review of our (collective) 20 year Local Plans, when external consultants and advisers were commissioned to provide us with data and advice about the scale of need , the Chamber argued strongly that the (initial) proposals for housing and employment land growth were inadequate and derived from an unrealistic "starting point"
- 9) Thankfully, with the process of time, discussions and new nationally-derived population figures, the sub-regional targets for housing have been significantly increased to a much more realistic level.
- 10) Whilst- at this late stage of the Local Plan process- our Local Authorities are publically beginning to recognise the employment land problem, unfortunately – and notwithstanding the on-going arguments of the Chamber and other bodies- the target for new employment land has largely (and stubbornly) remained the same- and the reality of this inadequate target is now being felt!
- 11) The original new employment land target proposed by GL Hearn (the external consultants) was for 500 to 660 ha. across the sub-region. This was revised upwards to 714 ha. This % change in the target for Employment Land was and is significantly lower than the % uplift in the original housing projections, which all authorities have agreed to work to in their individual Plans.
- 12) **The Chamber believes our planning figure should be much higher and nearer to 1,000 ha. and the evidence supports this.**
- 13) The C&W Strategic Economic Plan (as revised in 2016) and WMCA "super" SEP (of September, 2016) both refer to and acknowledge the shortfall of employment land. The WMCA Plan sets out an extensive set of actions building upon the work and

recommendations of their Land Commission. **Collectively, we all have a responsibility to ensure “that actions speak louder than words”.**

- 14) In their (final) Modifications Consultative Draft of March/April, 2017, Coventry City Council finally and formally acknowledged the proverbial “elephant in the room” by stating (page 19) “there remains a significant shortfall against the overall requirements and an on-going need for deliverable employment land across the sub-region”. CBRE, who are retained as advisers to the C&W LEP also confirm this by emphasising that “Future economic growth in the sub-region will be constrained unless currently proposed sites are delivered and additional future sites identified.”**
- 15) The Chamber has always argued – that whatever model is used to try to forecast future employment land needs over a 20 year period- basing that model and its calculations on 2011, when the country was still “reeling” from the impact of the financial crisis and major economic recession, is fundamentally flawed. We believe that the situation that faces us today proves this to be the case. Over the last 3 years developments on the employment land identified in the initial Plans has significantly accelerated from the “artificial” base of the financial crisis/recession years and we see no reason why this accelerated rate of development won’t continue....but only if we have the new employment land to support it!
- 16) An example of this is given in Rugby BC’s draft Plan (as it was) that the Chamber responded to in 2016.This draft made provision for the release of significant new employment land at the existing and highly-successful Business Parks at Ansty and Ryton. In pressing Rugby for confirmation of this, we were then told that the “new” land related to the years 2011 to 2031 and that –in reality- nearly all of this “new” land had actually been developed over the last 2 or 3 years...and that no further employment land was now required from them since they had met their disaggregated target figures. As of now there are only 5 ha. (from the “planned” 41 ha.) at Ansty and 7 ha. (from the “planned” 57 ha.) at Ryton that remain available...such has been the pace of development of these 2 key sites. Unless something changes, the enormous potential of the 2 sites is to be artificially constrained –when there is a clear need for their easy expansion to be promoted. Later we’ll evidence how these sites as well as the Keresley Business Park could and should be enlarged to begin to meet the sub-region’s real needs rather than the discredited targets we seem “wedded-to”.
- 17) We now have the untenable situation where-some 6/7 years into our 20 year plan period to 2031, with 13/14 years of economic growth to come-on the basis of the development rate of the last 2 to 3 years- we have only 2 ½ years supply of strategic (i.e. over 5 acres/ 2 ha.) and easily deliverable employment land to meet the next 13/14 years. This is nonsense and clearly and simply shows our “starting point” was wrong.**
- 18) Where is the land to attract major Inward Investment? Or to enable our existing major companies to further expand? Or to ensure that our smaller companies that are crucial in the supply chain can grow to meet their order books? Where is the land to create purpose-built recycling and environmental Business Parks, whose importance is growing but where such industries are often seen as “Bad Neighbours” deep within our most deprived communities? Where is the land to allow our key industries to respond to the Government’s recent announcement that no new petrol or diesel cars can be sold after 2040? Where is the land for the “home of the motor industry” to maximise its international role in this

“revolution”? Where are our MIRA’s, Ryton’s, Ansty’s, Keresley’s, Tachbrook’s, Coventry and Warwickshire Gateway’s for the future? Why aren’t we planning for the large Business Parks that we did plan for 20 years ago?

19) The Chamber recognises the very many pressures upon Local Authority Leaders and the “challenges” they and their Planning colleagues face in both creating and then gaining support and agreement to the new 20 year Plans which- of necessity- must challenge the “status quo” at a local level.

20) Therefore the Chamber has tried to help by putting forward positive and proactive proposals.

21) WHAT IS CLEAR IS THAT SOMETHING HAS TO HAPPEN TO RESOLVE THIS SITUATION. DOING NOTHING IS LIKE SAYING TO THE WORLD

“IN COVENTRY AND WARWICKSHIRE WE ARE “OPEN FOR BUSINESS” BUT PLEASE DON’T EXPECT TO BE ABLE TO BRING YOUR COMPANIES TO THE AREA OR FOR EXISTING COMPANIES TO GROW, SINCE WE DON’T HAVE THE EMPLOYMENT LAND TO SUSTAIN OUR AMBITIONS”.

The real message behind what we seem to be presently proposing is that rather than “Going for Growth” we are actually simply planning to stabilise and control our present economy rather than trying to grow it....as we all say we are committed to do!

22) What the Chamber’s work over the last 4 years has also shown us is that we cannot just assume that getting the right overall target for employment land will resolve all the problems. It’s clear to us that we need our Planning Authorities to use the full extent of their planning powers not just to deliver the right scale of employment land but also seek to ensure that the use of that land meets all the different- and sometimes competing-needs of a diverse economy.

B. THE KEY ISSUES THE CHAMBER HAS RAISED IN RESPONDING TO THE EMERGING LOCAL PLANS

1) To different degrees the Chamber has sought to involve itself and input into the evolving Plans of our 6 Planning Authorities who are responsible for creating the Local Plans that cover our sub-region.

2) The Chamber has consistently argued that the people and businesses of our sub-region don’t live their lives “constrained” by the administrative boundaries within which they live. It’s therefore important that –across all our Planning Authorities, with Warwickshire County Council, and all other relevant public and private sector bodies who deliver key services-we plan and act in a co-ordinated way across the sub-region...and where necessary beyond. Since the Chamber can’t just look at 1 of the 6 Local Plans in isolation from the other 5 and doesn’t have – in one place- that overall sub-regional view, **we asked that the Local Authority Leaders Group and the C&W LEP should carry out this important “oversight” role.**

3) The Chamber strongly supports what our Local Authorities have done to seek to deliver this sub-region- wide co-ordinated approach through the Memorandum of Understanding approach, but clearly this isn’t robust enough to do what is actually necessary, and – with

many other organisations- the Chamber would promote and support a Single Spatial Strategy approach to our strategic planning, but done in a way that makes sense for Coventry and Warwickshire.

- 4) We understand that- at a local level-there is some speculation-that because of resource constraints-the WMCA and the West Midlands Mayor should take over the leadership of Single Spatial Planning- but if we have to start with creating (what was once) the Regional Spatial Strategies, that were then abandoned by the Coalition Government, then there will not be an early resolution of the employment land problem that faces us now....not sometime/never in the future!
- 5) In terms of progress with their individual Plans, as of the end of September, 2017, our understanding of the position of the individual LA's is summarised in the next few paragraphs.
- 6) Stratford-upon-Avon's new Local Plan was adopted in July, 2016, and is therefore complete and in operation.
- 7) The Chamber appreciates that North Warwickshire's draft Plan also has to "look" westwards towards the needs of Birmingham and Staffordshire as well as east and south towards Coventry and the rest of Warwickshire. The Draft Plan was consulted upon from November, 2016 to March, 2017. It had been anticipated that the Planning Inspector's Public Examination would originally have started in April, 2017 with adoption of a new Local Plan by autumn, 2017 but this time schedule has slipped.
- 8) Warwick DC recently received a positive feedback from their Planning Inspector that their Local Plan (consideration of which was effectively suspended in October, 2015 pending them dealing with the key issues arising from the MOU's) as now modified is considered "sound". As a result on 20th September, 2017 their new Local Plan to 2029 was formally approved and adopted at a meeting of the full Council.
- 9) We understand Coventry are awaiting a similar final "sign-off" of their Local Plan by their respective Planning Inspector shortly and that formal approval by their Council -originally anticipated for September, 2017-may slip slightly to a date later in Autumn.
- 10) Rugby and N&B's Plans are at an earlier stage, though well advanced...especially in the case of Rugby. They submitted their post-Modifications Plan to their Inspector on 14th July, 2017. We understand the Public Examination is being "pencilled in" for 3 weeks commencing 22 November, 2017.
- 11) The first stage of consideration of N&B's Local Plan commenced with a 3-day session starting 30 August, 2017 within which the Planning Inspector considered whether the Plan meets legal requirements and the "duty to cooperate". Very recently the Planning Inspector has decided to proceed to the next stage of the Public Examination process, subject to N&B preparing and publishing a stringent assessment of their (very recently up-dated) housing numbers , why specific sites were included or not, etc.by early November, 2017. This assessment must satisfy the Inspector and then will be subject to the normal processes of public consultation. Originally the detailed review of the Plan in Public Examination was programmed for October, 2017 but it now seems likely that the Public Examination will not happen until early 2017. As a response to N&B's First Consultation Draft of their new Local Plan (published in January, 2017) the other LA's in the sub-region collectively registered

their concern about N&B's stance in not presenting a Plan that meet its MOU targets, since this would be likely to have implications upon them and the progress of their own Local Plans. As a result of N&B "up-dating" their housing numbers, the other C&W LA's have withdrawn their original objections, thus allowing the Planning Inspector to decide that the "Duty to Cooperate" requirement has been met (subject to him being satisfied by what he receives in November, 2017) but The Chamber understands that whilst N&B is seeking to up-date its assessment of new housing that is already "in the pipeline" it still feels that it is unlikely that they can bring forward proposals to meet its employment land targets.

- 12) The recent feedback from Warwick DC's Planning Inspector (as summarised above) is very interesting and may influence consideration of the Rugby and N&B Plans, since it similarly has had to consider if and how Warwick has responded to its "Duty to Cooperate" and the 2 sub-regional MOU's. Since-until the very recent "up-dating" of housing numbers-N&B's Plan had stated that the Council believes it can only plan for 13,374 new homes (against the "target" of 14,060) and also doesn't meet its targets for new employment land, the Warwick Inspector concludes that (for N&B) "the outcome of the examination into the Borough Plan is uncertain" (paragraph 77, page 15).
- 13) At the centre of our sub-region the co-ordination of the Plans of Coventry, Warwick, Rugby and Nuneaton and Bedworth is of particular importance and this is where the Chamber has concentrated most of its focus. Nevertheless, right across the sub-region through our Local Branch meetings we have had the progress of all the (relevant) Plans as a regular item on our agendas, and the Chamber has sought to raise important issues with our individual Local Authorities and their MP's on behalf of our Members. Some of these are referred to in section C below and the Appendix. We have seen that the shortage of employment land is a key concern to businesses in all of our 6 Statutory Planning Authority areas.
- 14) As we move towards formal and final adoption of the different Plans, the Chamber unfortunately finds that only Warwick District, of the 3 Warwickshire Districts directly adjacent to Coventry, has "delivered" on its MOU commitment to both help Coventry meet its unable-to-be-met housing and employment land targets AND to site the necessary housing and employment adjacent to or near to Coventry. In Warwick's Plan major redesignation of land in the C&W Gateway site and at Kingshill and Westwood Heath help deliver on our (collective) MOU ambitions.
- 15) **ANSTY R&D Business Park.** Until a very late stage of the development of Rugby's Local Plan, the very important proposals for Walsgrave Hill Farm, Ansty, connections to the University Hospital and wider Coombe Country Park area were a key element of Rugby "delivering" on its MOU commitments. These proposals have now been dropped –for reasons that the Chamber cannot understand or support- and the Chamber has made detailed responses to Rugby's emerging and changing proposals and has asked to present its arguments to the forthcoming Public Examination of Rugby's Plan, in the same way as the Chamber did in terms of the Public Examination of Coventry's Plan.
- 16) What had been proposed and consulted upon (through successive drafts) was a new "Model Village" where housing, employment, public services and infrastructure and a quality environment could all be sympathetically planned together in a way that perhaps only this area of our sub-region offers. This new village would offer 2,400 new homes on both sides

of the A46, the potential to enlarge the enormously-successful Ansty R&D Business Park (as it had always been envisaged from its inception, with all the road infrastructure to service a much bigger site already in place), (finally) the long-sought-for secure “blue-light” access to our University Hospital, the opportunity to embrace and incorporate the redevelopment of the existing Rolls Royce site within our overall thinking and all of this planned and delivered via a Masterplan that took maximum benefit from the areas high quality environment and the ability to open up and extend the Coombe Countryside Park to afford even better access to our wider communities.

- 17) This ambitious and widely-supported plan would also ensure that new market and affordable housing would be created directly adjacent to University Hospital and would undoubtedly help our NHS colleagues to attract and retain very important but not-always-highly-paid staff.
- 18) Rugby are now saying that the primary reason for this very late change is that Walsgrave Hill is in the Greenbelt and therefore subject to Greenbelt protections whereby such land can only be redesignated for other use if it meets the stringent national criteria of “Exceptional Circumstances”.
- 19) Across the sub-region all our Local Authorities have agreed to “face up to this challenge” in terms of recognising that we simply don’t have anywhere near the Brownfield land to meet the basic requirements of our growing population. Many of our Local Authorities have had to promote and justify the redesignation of existing Greenbelt land –as indeed did Rugby in terms of Walsgrave Hill/Ansty all the way through the Consultative stages of their Local Plan preparation until it was “dropped” in their final Modifications draft.
- 20) Page 24 of Rugby’s Preferred Options Consultation 2015 states:
 - In consideration of the significant contribution other areas of the Borough will be making to meeting Rugby’s housing need and that the additional need is coming from Coventry, delivery on the edge of Coventry is a logical approach”
 - and page 35 reinforces this saying:
 - “ the Council considers that the promotion of sustainable patterns of development that meet identified housing need is an exceptional circumstance that can justify Green Belt release. In this specific location (Walsgrave), the advantages of locating development that meet the unmet housing needs of Coventry and Warwickshire housing market area, Coventry City specifically, are a further sufficiently exceptional circumstance to justify Green Belt release within Rugby Borough”.
- 21) Not all Green Field land that exists across our sub-region is designated Green Belt land, and is not therefore covered by Green Belt regulations and safeguards. Our most up-to-date information indicates that –of necessity and to help contribute to meeting the collective housing and employment land needs of our growing population and vibrant economy-at least 1,376 ha. of Green Belt land has/is being redesignated for development across the sub-region. Warwick’s recently approved Plan sought to redesignate 310 ha. of Green Belt land (for both housing and employment) and this was tested and endorsed by their Planning Inspector. Coventry’s (shortly to be endorsed?) Plan has had to redesignate 700 ha. of Green Belt land within its boundaries for housing and mixed-use. N&B’s draft Plan seeks to redesignate 329 ha. of Green Belt land. But -for whatever reason- all of what was proposed

for Walsgrave Hill Farm has now been dropped by Rugby BC and the 1,500 new homes planned for the east of the A46 (in Rugby BC's area) have now been "transferred" some 15 miles south, distant from both Coventry and even Rugby town, and all the opportunities for new employment and a quick solution to the Hospital access issue have been lost. There therefore seems to be a glaring inconsistency in how our different Local Authorities have responded to the challenge of the growth in the urban footprints of our city, towns and villages and the Chamber –for all the obvious reasons summarised above-is asking that Rugby's original proposals should be re-instated and that a Masterplanning approach to the whole area should be adopted on a cross-boundary basis. Not all Green Field land that exists across our sub-region (both within and surrounding our city, towns and villages) is designated Green Belt.

- 22) In seeking to clarify what could be achieved for the sub-region by the unique opportunities at Walsgrave Hill Farm/Ansty and the wider Walsgrave and Coombe area (and indeed what would be lost), the Chamber has seen the overall infrastructure and land use proposals for the whole area. Highways England has included new 2-level junctions on the A46 trunk road to replace the existing roundabouts at Binley Road and at the Coombe/Clifford Bridge Road. These would continue the work started at Toll Bar. Highways England are very supportive of developers creating the essential Off-A46 new roundabouts (that would open up and service the proposed housing and mixed-use sites east and west of the A46) in advance of HE carrying out their own major upgrading of this important trunk road since these Off-A46 roundabouts would significantly help to alleviate the major congestion and disruption to traffic that their major up-grading works will undoubtedly create....witness what we have seen over the last 3 to 4 years at Toll Bar. Highways England have offered "matched funding" for the new roundabouts off the A46. Highways England recognise-that unless they can secure funding contributions from the overall housing and mixed-use developments (originally) proposed in Rugby's draft Local Plan- then all these essential new roundabout costs would fall upon them.
- 23) The Chamber has also been advised that –because Rugby BC have now "dropped" the strategic Walsgrave Hill Farm proposals from their most recent version of their Plan- that Highways England have revisited the programming of their planned major 2-level upgrade to the A46 (at the existing Coombe roundabout) and this will now be carried out later in their programmed period. This means that the long-awaited "blue light" access from the A46 to our University Hospital might now not happen for 10 years....when such an access could be created within 18 months of planning permission being granted for the (originally proposed and promoted) Walsgrave Hill Farm strategic scheme.
- 24) In terms of Ansty/Walsgrave Hill Farm and the wider Walsgrave/Coombe area, it would be inappropriate for the Chamber to seek to promote any specific developer's proposals...but what we have seen demonstrates the enormous potential and opportunity that this location and site offers. At this strategic and already successful location and "hub", we have an opportunity- unique in the sub-region- to develop a "new model village" providing high-quality and diverse housing, new employment, public services, a long-sought-for access to our sub-regional and regional hospital, the opportunity to extend and further open up a nationally-recognised countryside park...and all planned together to take maximum benefit

from the topography and quality environment in which it sits. The proposals have all been developed to directly respond to the agreed needs of Coventry, Rugby and the sub-region and the Chamber is struggling to understand why Rugby BC has so fundamentally changed its mind so late in the Local Plan process.

- 25) The Chamber is therefore strongly arguing that Rugby's original and widely consulted-upon proposals should be reinstated in their final new Local Plan, and that a cross-boundary Masterplan for the overall area should be developed by Rugby, Coventry and Warwickshire Councils as a matter of urgency.
- 26) It is in that context that the Chamber has argued that Ansty Business Park could easily be at least doubled in size, since a much bigger new employment base was always envisaged if the first phase was successful...and that success is evident for all to see. A significant "new" addition to our employment land supply of c. 250 acres/100ha. could be easily and quickly delivered.
- 27) **RYTON Business Park.** In the Chamber's response to Rugby BC's Consultation draft Plan of September, 2016 we also argued strongly for further employment land growth to be promoted at Ryton.
- 28) The Chamber proposed that the well-located and infrastructure-serviced Ryton site could be extended (in similar terms to Ansty by in excess of 250 acres/100ha.) by developing for employment the land owned by Warwickshire CC and currently let for short-term agricultural tenancy, on the west side of the A423 which is the main access road for the existing site. This land was "offered" to Peugeot as a major expansion of their factory site to respond to their demand to be able to create what they said would be an essential-supplier/supplies park – over 12 years ago when WCC and CCC were doing all they could to seek to secure the future of the Peugeot manufacturing plant at Ryton. In similar terms to our discussions with Peugeot back in 2005, we have at Ryton the opportunity to ensure we can deliver more employment land that helps protect and secure more jobs in our local economy.
- 29) The Chamber considers that Nuneaton and Bedworth's Local Plan is less advanced than that of other Authorities. The Chamber has submitted a detailed response to N&B's first consultation draft Plan. Of particular importance-among several issues of concern-is that N&B have failed to propose a cross-boundary approach to create more housing and employment on the north side of Coventry south of the M6, around Keresley and Exhall, which seems a simple and logical way for N&B both to meet its attributed housing and employment land targets AND for them to meet the objectives of the MOU approach.
- 30) **KERESLEY Business Park.** In responding to N&B's first Consultation draft Plan (of January, 2017) among many other issues the Chamber raised were the enormous opportunities for cross-boundary mixed-use development on the north of Coventry but south of the M6.
- 31) Specifically in terms of employment, the Chamber summarised the regeneration plans for this overall area set some 20 years ago, of which only "Phase 1" has currently been completed.
- 32) Nearly 20 years ago N&B, Coventry and Warwickshire Councils collectively commissioned external consultants to bring forward major proposals in (what later was approved as) the North Coventry Regeneration Zone. The large and redundant ex-industrial sites of the

Coventry Colliery and Foleshill Gasworks blighted the whole area and dominated people's and possible investor's perceptions of the North Coventry/N&B area. Over many years different ideas and proposals had emerged to try to redevelop these 2 key sites, but none of the proposals had the scale and "muscle" to redevelop and regenerate these large and hugely contaminated sites. The LA s realised that something of strategic scale and difference was needed if these sites were ever to be brought back into beneficial use and the long-standing eyesores that they were, removed. Creation of the cross-boundary North Coventry Regeneration Zone (and the approved planning objectives and priorities that quickly followed) led the way in terms of the major regeneration we have seen in this North Coventry/Keresley area.

- 33) In promoting the overall Regeneration Zone proposals there was obviously a need for significant up-grading of the strategic highway network as well as the obvious reclamation, decontamination and redevelopment of the 2 individual sites. The Highways Agency (then responsible for the M6 and the A444 major trunk road) required a comprehensive and costly up-grade to M6 junction 3, and significant road widening of the A444 north and south of the M6 Junction 3. It was agreed that the old Colliery and Gas Works projects should equally contribute to these "off-site" major highways works, and that to help fund this – and the reclamation of the sites- the Councils would apply for a large EC ERDF grant, which was subsequently awarded.
- 34) In approving the final plans for the old Colliery site, N&B were keen to only support- at that stage-the necessary scale of redevelopment of the colliery and wider site that was needed to ensure the economics of contamination, contribution to off-site major highways work, new to-site and on-site infrastructure and new country park costs plus meeting the "contribution" requirements of the EC grant could all be satisfied. It was agreed that-if necessary- further consideration would be given to an "enlargement" of the ex-colliery site if it proved necessary to assist with the overall (complex) funding of the regeneration proposals.
- 35) It was therefore acknowledged "from day 1" that (what is now) the Prologis Keresley site could be much bigger.
- 36) The redevelopments of the old Colliery and Gas Works sites have been hugely successful and have met all the aspirations and objectives set for them. There is now an opportunity-in this time of clear and apparent need for more employment land-to continue the regeneration and economic/employment growth objectives of N&B's draft Plan by enlarging the Prologis Business Park –or creating a new one-as part of a strategically-important cross-boundary mixed development and creating much needed new jobs in an area most in need of them.
- 37) In feedback to the Chamber's proposals N&B feel that the Chamber hasn't understood the complexities of redesignation of Green Belt, the efforts they have made to meet their MOU "obligations" and how they plan and operate on a cross-boundary basis in a (relatively) small but already densely-populated district.
- 38) N&B have indicated that redesignating Green Belt land for housing or employment uses is particularly difficult but they have been prepared to do this in circumstances that allow them to "smooth out" the current urban edges of the Borough and can be contained within "defensible boundaries". (Please see the comparative information re. Green Belt release in

paragraph B. 21 above). The Chamber believes this approach could be applied to the area between the northern edge of Coventry and the M6 (which is a clear, understandable and “defensible” boundary) in ways that everyone would understand, and this would assist N&B to meet its MOU housing and employment land targets and would also further strengthen the benefits of the Sustainable Urban Extension (SUE) planned by Coventry in their Local Plan for the directly-adjacent areas near Keresley that are within Coventry’s boundaries. In all instances, redesignation of Green Belt land has had to pass the test of “Exceptional Circumstances” set out in National Planning Guidance. Paragraph B.21 above and other sections of this Briefing Paper demonstrate how individual Local Authorities have justified these “Exceptional Circumstances” and how their arguments have been tested and agreed. The Chamber believes the same approach could and should be applied to the proposals summarised above in this paragraph.

39) In terms of N&B’s size and population density relative (say) to Coventry, N&B has an area of 30.48 square miles and a population of 122,000. Coventry is only 25% bigger in area (at 38.09 square miles) but its population at 352,000 is some 2.88 times that of N&B.

40) The fairly-immediate contribution that Rugby, Warwick and N&B can make to resolving the employment land problem has been summarised above and forms an important part of our recommendations in section D below.

41) OTHER OVERALL ISSUES. In responding to an earlier draft of Coventry’s Plan, in October, 2014 the Chamber highlighted 8 key issues – it believed-had to be addressed in any final Plan, and these issues are also pertinent to all the other Warwickshire Plans to a greater or lesser extent:

- the final Development Plan must be based upon comprehensive, coherent and integrated development –not just housing,

- the 20 year Plan cannot and must not dodge the important decisions that need to be made about strategic infrastructure essential to deliver the Plan,

- “Greenbelt” isn’t “Greenspace”. Quality and sympathetic development on presently-designated Greenbelt land adjacent to our existing urban conurbations can deliver real Greenspace to the wider community,

- recognising the value and opportunities of growth as a key part of a sustainable economic future,

- recognising the scale of investment, economic growth and employment that a large 20 year house building programme alone could generate,

- the Chamber believes the city (and sub-region) is fast running out of high-quality employment land, (and this we believe is now proven and well recognised but must be acted upon),

-the Chamber has serious and on-going concerns about the credibility and deliverability of 16,500 new homes on Brownfield and existing Greenspace sites in Coventry, and

-“aspirational” housing isn’t just large, higher-cost housing. It’s about providing for a broad span of housing that best needs the different needs and aspirations of our citizens and communities at different stages of their lives.

- 42) The Chamber’s detailed responses to Rugby and Nuneaton and Bedworth’s emerging Plans have also considered –inter alia-the above issues where relevant.
- 43) The Chamber’s responses to Coventry, Rugby and N&B’s draft Plans have been copied to all LA Leaders and their Chief Executives, our local MP’s and other “key players” as they have been submitted so that we could best keep you informed and advised of the Chamber’s concerns and proposals. Whilst we would be happy to provide you with further copies, the key “messages” and proposals we wanted to give with regard to employment land is summarised in C. and D. below. These are the key things we want to focus upon as a means of resolving the employment land problems we believe everyone now accepts.

C. EVIDENCE ABOUT BUSINESS GROWTH, EMPLOYMENT LAND AVAILABILITY AND FEEDBACK FROM OUR CHAMBER MEMBERS

- 1) “WHAT’S HAPPENING ON THE GROUND?” As a result of the Chamber’s growing concern about employment land and the feedback we were getting from many of our Members, the Chamber carried out its own survey among its SME members in mid-2016 to try to assess actual and latent demand for new office, business and manufacturing space in the area. Using the feedback we received, extrapolating it to the whole SME sector and then applying industry norms (in terms of split between offices and industrial/warehouse, average square footage per employee, etc.) the survey indicated that SME employment in our area could grow by just under 20,000 jobs in the short-to-medium term. This level of employment growth reflects the picture of growth we are receiving from national Government statistics relating to our area (see some “headline” data below).
- 2) Using this data from our Members (again on the basis of industry norms and split between the different space requirements of different sectors/usage) shows that we would require some 458 acres/185 hectares of new employment land. This would represent over 50% of the total target of 369 ha. proposed to meet Coventry’s needs (as expressed in the MOU for Employment Land) and 26% of the 714 ha. presently planned for the whole sub-region, and takes no account of the accepted larger land use requirements of larger manufacturers and the distribution sector. This assessment of employment land needs in 2016 allied with some “headline” data from Government about economic growth in our area over recent years (see below) has reinforced our concern that planning for future employment land needs on the basis of 2011 is dangerous and inappropriate.

- 3) A snapshot of some “headline” data to show the growth of business in the C&W area- and therefore the need for more employment land.

A) Growth in businesses registered in the sub-region:

2010 -29845

2011 -29065

2012 -29845

2013 -30015

2014 -31590

2015 -34195

2016 -36,090 i.e. 24% increase since 2011 and 14% in last 3 years.

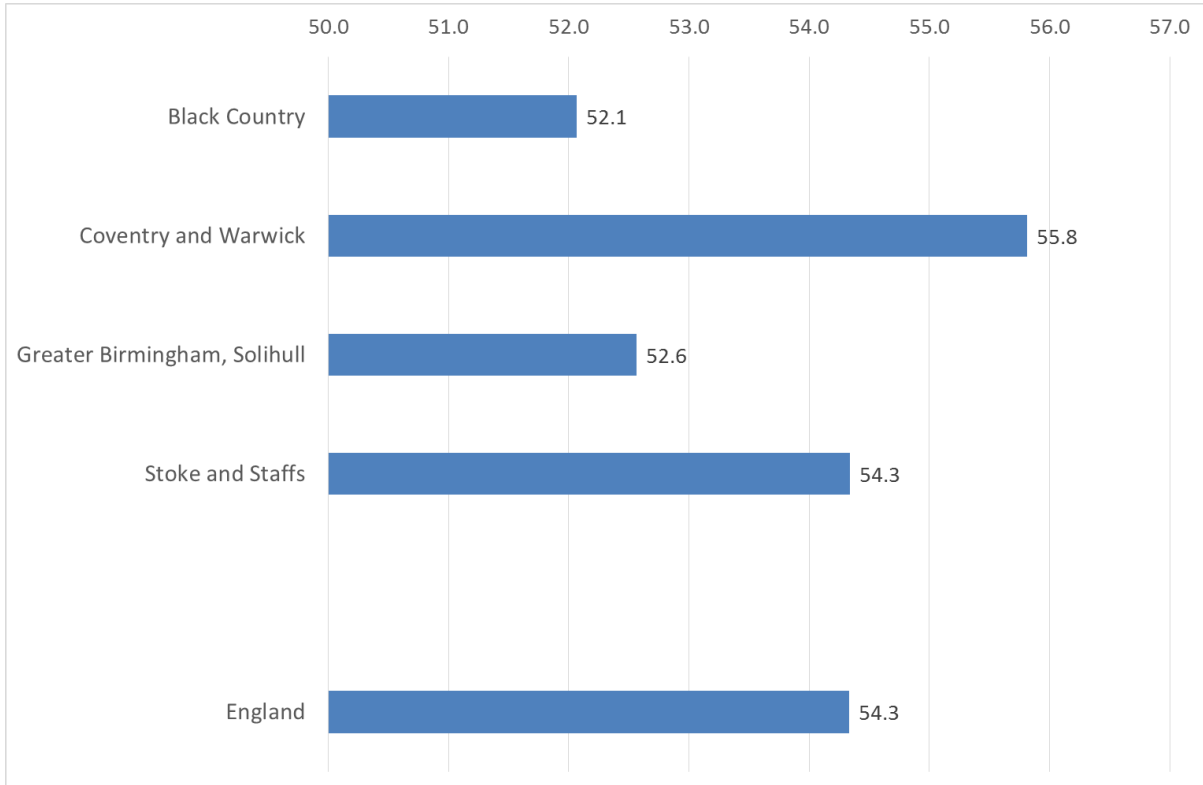
B) Growth in the number of businesses by size:

	2014	2015	2016
0 to 9 employees	28005	30455	32320
10 to 40	2940	3060	3085
50 to 246	490	515	530
250 plus	155	165	155
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	31590	34195	36090

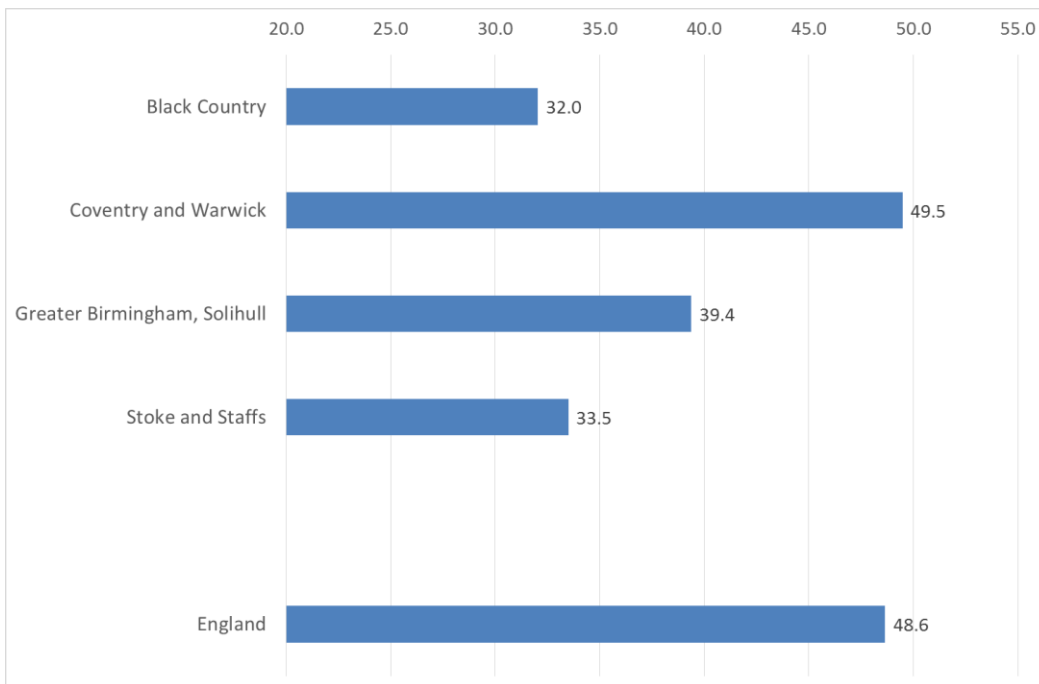
C) Summary:

Business “births” in C&W have outgrown regional and national averages,
 Business “deaths” in C&W have declined over the last 5 years,
 Business growth has been strong. C&W has outgrown England and the West Midlands,
 Business growth in LEP priority sectors, which are identified as high-growth and high-value, has also been impressive relative to the West Midlands.

D) Survival Rate of UK Owned Firms 2012-2015



E) Number of UK-owned firm births per 10,000 population 2015



4) EMPLOYMENT LAND AVAILABILITY. The C&W LEP Planning and Business Group maintains an oversight of employment land across the sub-region, and receives regular reports on this important issue, based upon data and advice from its retained external consultants and other sources. The information summarised below is drawn from a report presented and discussed at the recent Group meeting in June, 2017.

5)

A) Of the 10 “oven-ready” sites totalling 90 ha. across the sub-region, the largest site is only 17 ha. which is all that’s still left available from the “new” Browns Lane Lyons Park.

B) Of the 16 sites that together make up the next 283 ha. of employment land, classified as “imminent” (i.e. likely to be available to market in the next 12 months) and “Advanced” (i.e. sites allocated in the different Local Plans whose timing availability is very dependent upon major new infrastructure and is therefore seen to be 2 to 3 years away), only 1 site (the C&W Gateway South) at 50 ha. could respond to a major new manufacturing plant or inward investor...but we are advised all of this 235 ha. site is “already gone”, “spoken for” or hugely over-subscribed. These 16 sites range from 5 to 30 ha. but 11 of the 16 sites are less than 20 ha. and therefore nowhere near the scale of land that could be opened up quickly by the enlargement of the existing Ansty, Ryton and Keresley Business Parks.

C) Indeed within the list of 35 sites (that make up the whole of what’s now left of our employment land supply target figure already identified in the Local Plans of 543 ha.) the preponderance is towards smaller sites.

Size of sites	Number
10 ha. or lower	15
11 to 20 ha.	11
21 to 30 ha.	6
31 to 49 ha.	2
50 ha.	1

	35

D) A further list of 5 “possible” strategic sites-whose delivery might be “sometime/never”- adds 67 ha. to the “planned” 543 ha. (making 621 ha. in total) but only 1 of these sites is larger than 20 ha. (the now last remaining 25 ha. of the Hams’ Hall site).

6) The Chamber is informally advised that the Local Authority Planning Policy Officers believe that the plan system is working and –that given take-up levels- the supply is feeding known requirements and that any further review of employment land requirements is not considered urgent. A fundamental requirement of the National Guidelines for the preparation of Local Plans is that due and on-going regard must be given to key data that impacts upon what policies and objectives the Plans propose and promote, and that the views, information and needs of Key Stakeholders (including commerce, industry, etc.) must be listened to. The Chamber believes that – with the wisdom of hindsight-we simply have

started with the wrong target figure for employment land needs in the 20 years to 2031...**and all the evidence tells us we have to do something about this now!**

- 7) The C&W Political Leaders Group have accepted that “there is a problem” and they have asked their officers to report back to them. (We now understand that arrangements are currently being put in place to better monitor employment land supply data and to up-date the needs analysis of employment).
- 8) Our ability to market to inward investors – with any credibility-the benefits and attractions of investing and locating in our sub-region OR to create new big Business Parks as we have successfully done in the past is hugely constrained. (Just as a speculative question, where might a 300,000 sq.ft. battery plant go...and the many subsequent manufacturing plants that will deliver what is currently being invented in the C&W area?) The Chamber is advised that the West Midlands generally, and not just C&W, has a paucity of larger sites, and this is a real problem in making the region attractive to inward investors.
- 9) The Chamber believes that the summarised information (C. 1 to 8 above and the practical examples in the Appendix) provides real and compelling evidence for WHY we need more employment land AND why urgent delivery of this land is essential.
- 10) IS IT TOO LATE TO CHANGE OUR TARGETS FOR EMPLOYMENT LAND? As a result of direct feedback from some of our MPs that our Planning Authorities were reticent about “re-opening” the question of employment land targets because – they had been advised- they may be challenged to re-open the arguments about the rest of their Local Plans- especially housing numbers and greenbelt- the Chamber wrote directly to the Government’s Planning Minister (and copied in the Chancellor of the Exchequer and Business Secretary because of the economic significance of the issue) to ask for his support in finding a common sense answer to our dilemma.
- 11) We copied this letter – and the Planning Minister’s response- to all our “key players” across the sub-region so they were aware we were trying to help find a positive way forward.
- 12) Extracts from the Planning Minister’s response might help Local Authority Leaders in being able to resolve the best way forward.
- 13) The Minister said (inter alia):
 - “I’m pleased to hear that the Chamber of Commerce is actively engaged and influencing the preparation of the Local Plan in the sub-region, supporting planning that can bring sustainable growth to the area.”
 - “Local Plans are key to ensuring that land is available to meet the objectively assessed needs of a local area...”
 - “Local Plans are required to be supported by robust evidence that can justify plan proposals. The policies and proposals set out within a Plan, including scale of growth, will be tested at examination.
 - ”I can, therefore, reassure you that any representations made by the Chamber to a published Local Plan will be considered by the Inspector as part of the examination process.”
- 14) The Chamber was pleased to receive this supportive “guidance” and “direction” giving – as it does- “a green light to Local Authorities in the area to set aside more employment land as it will stand up to scrutiny from the Inspector” (our words not his).

- 15) Separate professional advice to the Chamber indicated that the National Planning Guidelines required an “on-going review and alignment” of housing and employment land needs, and that did not mean that housing target numbers would have to be revisited if employment land targets were changed. What was required was evidence to make it clear that whilst the supply of planned employment land was now considered inadequate to meet real need, that the housing targets remained valid since they relate directly to the agreed growth in the local population. It is the on-going alignment of targets for housing and employment land that is important. The Chamber believes that it has presented strong evidence to show that the Employment Land targets accepted at the beginning of the (collective) new Local Plan process across the sub-region are now seriously out-of-date and understated but that the (upwardly-revised) housing targets are still valid.
- 16) Recommendation D. 1. Below refers specifically to this issue.
- 17) “AFFORDABLE EMPLOYMENT LAND”. In terms of Employment Land, what has also strongly emerged from the detailed discussions the Chamber has been having with many companies in the area (both through our regular Branch meetings and the day-to-day engagement of Chamber staff seeking to help Member companies to expand) is that –over and above the overall scarcity and inadequacy of the supply of employment land- there is a need for our Planning Authorities to recognise that – like housing-there is a need to plan for and manage “Affordable Employment Land”.
- 18) What is clear, with a grossly inadequate supply of employment land, is that what land that is available is quickly taken up by those companies and sectors that can afford to pay the highest land price. In the last 10 years there has been a “revolution” in retail patterns and on-line shopping, and on-going change is the only thing we can assume for the future. The Internet “revolution” is also impacting upon how goods are “warehoused” and delivered. This new approach is being used right across-the-board and doesn’t just apply in retail sales. In terms of the large B8 “sheds”, sites for these requirements are themselves in danger of chronic under-supply. This only exacerbates the problem for smaller companies, who cannot compete with the “larger footprint” companies for the very limited land that is available.
- 19) The Chamber would propose that our Planning Authorities positively and proactively use their planning powers to require that in any mixed-use Strategic Growth Site, in the enlargement of existing Business Parks and the provision of smaller employment sites, due regard should be given to securing and safeguarding appropriate land for SME use and/or low density use that, through the planning process, acknowledgement should be given to differential land values/rental values that respond to the needs of our SME businesses. This approach is recommended in D.6. below. Clearly this more direct involvement in the “market” for land use can’t just be imposed on a land supply that is already inadequate- since it will have the contra effect of driving up land values even further- but it can and should be one of the policies and “tools” that our Planning Authorities use to ensure best use is made of the land we’ve got, and the different needs of the different –but all contributing-sectors of our business operations are recognised and appropriately supported.

D. PROPOSALS TO RESOLVE THE EMPLOYMENT LAND PROBLEM

The C&W Chamber of Commerce has sought to come forward with practical proposals to deal with the inadequacy of our present employment land targets in the 20 year Plans to 2031 (and these have been included in responses to Consultation Drafts of relevant LA Plans):

- 1) Align our employment land and housing targets to more correctly address the real needs of our area and work with the Planning Minister to allow our Local Authorities to revisit their collective and disaggregated Employment Land targets without re-opening housing numbers and the rest of their Local Plans. See C. 11 to 16 above. The Planning Minister, within the “officialese” wording of his response, encourages us to “bring forward your arguments as part of the Public Examination process”. Rugby have demonstrated that –at a very late stage in their Plan process- they can make strategic and material alterations to the Plan they’ve widely consulted upon, so why can’t we do this to deliver the real level of employment land we need across the sub-region?
- 2) Ensure that we maximise the benefits of the –to be formally approved- plans for the Coventry and Warwickshire Gateway site on both sides of the A45 around Coventry Airport and Whitley; enlarge the key, already-successful and infrastructure-ready Business Parks at Ansty, Ryton and Keresley; and ensure that a truly mixed-use approach is given to the masterplanning of the Sustainable Urban Extensions planned for Coventry (at Eastern Green and Keresley) and in any similar strategic-sized developments across the sub-region.
- 3) Restore the previous proposals in Rugby’s Plan re. Walsgrave Hill Farm, Ansty, University Hospital and wider Coombe area.
- 4) Subject to D.1 to 3 above, if LA’s are convinced that they cannot revisit the overall (and disaggregated) employment land targets in their Local Plans- because this would create a major delay in the approval of these Plans- then the Chamber has proposed that the LA’s should specifically “set aside” and “safeguard” the real scale of employment land needed in their (new) Local Plans, but don’t formally approve or “release” this safeguarded land at this stage. This would give us medium-term certainty upon which to plan. (This “safeguarding” approach has been used, examined and approved in Warwick’s Plan re. the phased release of greenbelt land for housing on the south of Coventry). Once the Plans have been adopted the release of this land could be immediately reviewed independently from any wider review. The “safeguarded” land would be focussed around the existing Ansty, Ryton and Keresley Business Parks as a starting point.
- 5) On a sub-regional basis, once the Plans for Coventry, Warwick and Rugby are adopted (with Stratford already approved and North Warwickshire at a late stage) our Local Authorities (in a joined up way) carry out a specific review limited to sub-regional employment land needs as a precursor to (any) later Sub-Regional Spatial Strategy. This review could be carried out within the “alignment” process recognised by National Planning Guidance. In this review regard should also be had to the necessary creation of Eco/Environmental/Recycling Business Parks and the needs of “bad neighbour” and low-intensity-of-use sites (for such as transport depots, etc.), all of which are essential both to respond to the needs of key elements of our economy and to help provide for the relocation of businesses and operations that need to be supported but sometimes “blight” some of our more deprived communities. The Chamber believes we can’t afford to wait until N&B’s Plan has reached

this same level of approval because there are likely to be more fundamental concerns about the ambitions and current state of proposals in N&B's current draft Plan, which may be of concern to the Government's Planning Inspector and may therefore delay its progress.

- 6) Adopt a planning-led approach to "Affordable Employment Land" or "low density employment land" in a similar way to "Affordable Housing" to ensure we can truly respond to the different needs of different sectors of our economy (as explained in C.17 to 19 above).

Case Studies from real Companies

The shortage of employment land and the implications this is having on companies in our area.

This Appendix is a compilation of some of the things our Members have said to us about the shortage of employment land and the impact it is having upon them, their businesses and their future in our area. The list is a small example of what we have been told. A lot more was told to us on a strictly confidential basis since the companies were having to think and plan for moving out of the area and they needed to be able to deal with this before being able to inform their employees and customers to try to minimise any implications of the move. We've therefore only been able to list here a small extract from a bigger and even more disturbing "picture" of what we are hearing from all LA areas across the sub-region.

Examples of case studies of business concerns regarding employment land and property availability:

Case Study 1

"I read with interest that your Chief Executive has written to Gavin Barwell, Minister of State for Housing and Planning, saying it backs ambitious plans for 88,000 new homes but that the plans for more employment sites fall way short of meeting the needs of the growing population's ability to be self-sustained when it comes to jobs. We have been following with interest the Warwick Local Plan Examination In Public and are also of the opinion that there is a shortage of high quality strategic employment land identified in the Leamington Spa/Warwick area to provide opportunities and choice for inward investment by companies seeking sites for advanced engineering, research & development, manufacturing and assembly. This is reinforced by our understanding that the sites identified in the Local Plan are already oversubscribed by potential occupiers. Neither do we believe there is sufficient employment land to provide jobs for the residents of the extensive new housing allocations to the south of Leamington Spa. ".....

Case Study 2

"With reference to our discussion on Friday, I can confirm we at Subcon Laser are becoming increasingly frustrated at the lack of building land and or suitable premises to expand our business.

We are literally bursting at the seams on our current site on Bermuda Road, Nuneaton and it is a huge concern that we may end up with no other option but to move out of the region.

As you can imagine that would be a nightmare scenario for us as it is not a simple task to move all the state of the art high tech equipment we operate, not to mention retaining the skilled workforce we employ.

I am currently waiting on exact information to what size site we are looking for, but as a minimum it would have to be around 70,000 sq ft with land to expand.

I have heard that there may be land coming up around Gypsy Lane but that has yet to be confirmed and planning permission would have to be granted.”

Case Study 3

“There has been such a momentous drive to convert brown land to residential use that there is now a significant shortage of land for employment and business purposes.

The Planners may advise that they have allocated large tracts of land on the outskirts of the Town or in open countryside, but these are not well located for smaller industries and particularly those who serve the local area or community. What is so often overlooked is that the cost of providing infrastructure onto the smaller Plots of half acre or an acre; the utility services for those units is also hugely expensive. What may look like cheap open land soon becomes very expensive to pass on to developers and owner / occupiers who only require a few thousand feet for their needs or even less for some.”

Case Study 4

“I’ve just had a chat with a customer in Rugby (a manufactured steel distributor). They were desperate to find additional warehouse space as they had to move stock out of their previous offsite space. They couldn’t find anything that fitted their special requirements so the stock that was held in Rugby has now gone back to parent company in Netherlands and is despatched from there. This may have 2 implications for jobs:

- Their client wanted them to maintain UK stock for their contract - so this may jeopardise the contract and hence jobs
- Stock despatched from NL means fewer staff needed in Rugby.

This is yet another example of how lack of land for development is affecting the local economy.”

Case Study 5

“Despite a desire to stay within the Stratford region, we found the situation regarding the availability of commercial land / property to be untenable. The lack of a strategic development plan was clearly a hindrance. I think at the time the plan was out for review by the Inspector? I believe there is an area earmarked for commercial development to the North of Stratford? But this is years away from having the appropriate infrastructure. Early on we did work with the Growth Hub, who I must say

were very helpful. Through them we were introduced to the Alscot Estate. The Estate is looking to develop a small commercial estate just south of Stratford but at the time (I think I'm right in saying?) it too wasn't part of the strategic plan. We also felt that the Estate's scheme was in its infancy and lacked the appropriate infrastructure for a modern commercial operation. In conclusion, none of the sites were considered feasible.

As a result, we widened our search area. Fortunately, we found a very nice plot at Vale Park, Evesham, and we are now only a few months away from completing the build and moving in. Our experience in Worcestershire, and in particular with Wychavon District Council, couldn't be more different to our struggles in Warwickshire. When I look back, three factors made our decision to relocate an easy one. 1) Wychavon District Council had a clear plan to develop local employment opportunities and couldn't be more helpful and welcoming as a result; 2) land was available to purchase from the District Council's land bank and 3) the District Council had already committed to the necessary infrastructure spending for the site to be a viable proposition for prospective occupiers; leaving us to concentrate on running our business. As well as designing and building a property appropriate to our future strategic needs."

Case Study 6

"Having looked for alternative office options I am staggered by the shortage of office space within Rugby. Any available space is either in an old converted town centre house and simply not appropriate for running the office I do, or the minimum letting space is at least double if not more than I need. I thought that there would be some options at the Central Park development, but that is full to bursting now. If there is any space available, no-one is willing to let less than 2000 sq. ft.

I really don't have any options to move within Rugby as we stand and as such I need to start making some decisions on the direction I take from here. Unfortunately, unless I can find a suitable premises in or on the outskirts of Rugby, I will have no choice but to restructure my business which will result in some local residents who enjoy a well-paying job in a fairly unique, challenging and enjoyable environment having to be made redundant."

Case Study 7

Below are comments taken from our snap poll conducted during w/c 3rd July 2017.

48% responded that they were looking to expand or move into new property with 78% stating they have not found anywhere suitable.

Banbury, Hinckley, Northampton are the preferred choices if suitable space were not available in Coventry and Warwickshire.

Respondents were also asked to leave comments regarding their experience:

- “The lack of general interest in the area has left us no option but to take up options outside of the region. The only space of the size we wanted was in the centre of Coventry which was exactly where we did not want to be due to communication links and travel.”
- “Very few industrial units 3000 sq ft. Have had to move out of Coventry”
- “If you are not in the logistics sector there is very little out there”
- “NO SMALL BUSINESS UNITS TO BUY”
- “It was very difficult to find space when we looked last year as not many places would accept a training company which was bizarre. We will need new space in two years time looking at our business and would like to remain in Nuneaton for a number of reasons which may prove challenging.”
- “Units are only available to rent, we want to buy.”
- “There is very little space available to buy or to let in the whole Coventry and Warwickshire area, we do keep our eyes open on everything.”
- “We moved here in October 2016 having found it extremely difficult to find office space in or around Coventry which had reasonable parking and was a reasonable size (12 employees and some storage space and a meeting room was our requirement). There seems to be lots of smallish office spaces and then complete office blocks but finding something in between proved extremely difficult for us. Over 50% of our employees are regular car users as part of their daily work so public transport is not an option for them and as almost everyone else is 10 miles+ away it is not even an easy option for those who are office based. Perhaps new build offices should be built on stilts to give under the building parking spaces.”
- “We want a high quality freehold factory of 6,000 to 10,000 sq ft”
- “This is a very frustrating process!”

Case Study 8

LLOYDS COMMERCIAL BANKING

With regard to lack of employment land, Cases I am immediately aware of;

- Carpentry business in Leamington moved to Redditch 45 employees due to availability of premises to buy and labour
- DCS Europe move to Banbury – I think this is well documented

· Automotive sector in Nuneaton looking to move out of C&W as unable to find suitable premises and deal feel through North Coventry M6 junction due to being out bid. This is symptomatic of lack of available land forcing prices up.

The key requirement SME clients are looking for property to buy rather than rent.

Case Study 9

“As a leading regional commercial property company who owns, develops, and constructs a range of use purpose buildings across the Midlands, we find the Coventry and Warwickshire market very difficult. We own over 1,000,000 ft.² of small industrial properties (from 0 ft.² to 50,000 ft.²) across the Midlands and we currently stand at an occupation rate of over 90%. There is a clear lack of commercial property and a clear lack of employment land across the region. We as a business, are trying to accommodate both our existing tenant base and new customer profile by building out speculative units in Coventry. We have currently completed our Henley Road Industrial Estate units and are about to commence on 65,000 ft.² of industrial development up on the A444 in Edgwick. Feedback from our tenants are that a number are looking to grow their businesses but do not have the quality of property available to plan the growth and I feel confident that we will accommodate some of our expanding tenant businesses into the new space that we are building. It seems to me, that although larger properties (over 100,000 ft.²) are being built we are not addressing the growth of the smaller businesses that are trying to get into the medium-sized business range. This will in turn release some of the smaller second-hand properties to the up-and-coming small business range. Emphasis is on residential development and housing numbers; but of course without employment land being released and developed, people moving into the new housing may not have the employment needed to justify the housing stock. We are an anomaly as a region and are continuing to drive forward even though we are in political uncertainty and subsequent economic instability. We have the support of some large PLC businesses in the region who are feeding our SME businesses. For our aspiring small to medium businesses to continue to grow we must address the employment land issue otherwise we could see this opportunity pass us by”

If you have any questions or comments regarding this paper, please contact Martyne Manning, Policy Manager: martynem@cw-chamber.co.uk

Yours Sincerely



Louise Bennett OBE DL, on behalf of the C&W Chamber of Commerce