

## CWLEP-Representations re Consultation Draft Development Brief relating to land East of Kenilworth .November 2018.

### Introduction.

Coventry and Warwickshire Local Enterprise Partnership (CWLEP) is a partnership between the private and public sectors, set up by Government. The LEP was established to help determine local economic priorities, lead financial growth and create jobs in the sub region. One related and a key objective of the CWLEP is to promote and support the development and growth of the local and sub regional economies. As such it takes a keen interest in the long term land use planning of the sub region .This includes seeking an active role in the consultation and engagement processes, such as this draft Brief.

These representations focus on the employment content of the draft Brief .

### Sub Regional Context

Recent market evidence and information<sup>1</sup> has highlighted an increasing shortfall in the amount of land available for future employment growth across Coventry and Warwickshire .It has been suggested that the overall supply of readily implementable sites is currently at critically low levels and failure to address this will further harm the economic growth of the sub region<sup>2</sup>. The CWLEP is increasingly concerned to ensure that all relevant development plan documents address the provision of suitable and sufficient allocations for business and commercial space to meet current and future needs .

The shortfall also has a qualitative element and there is evidence of shortages of suitable employment and commercial space in a number of key economic sectors to meet particular market and sub market sectors. This includes small workshop space, and smaller employment premises between 500-20,000 sq. ft which are suitable for small and medium enterprise (SME)types of business.

### Local Economic Context

In view of the shortages in readily available employment land we have identified above then bringing forward the employment content of the East of Kenilworth is crucial to maintain current economic growth across the District .The land has excellent location and accessibility credentials and as the draft Brief identifies is suitable for a range of high quality employment uses .

The current supplies of allocated employment land in Warwick District are now reducing and it is acknowledged that it is vital to maintain a flow of employment land capable of the provision and occupation of business units .In the District, the stock of allocated land that is currently available to the market has reduced significantly in the last five years and this site( alongside other nearby

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<sup>1</sup> CBRE: "Employment Land Use Study –Coventry and Warwickshire ",August 2015 and for example Appeal Ref APP/R3705/W/15/3136495, re M42 Junction 10.

<sup>2</sup> "The lack of suitable space in the quantity identified is likely to be having a detrimental effect on the economic prospects of the LEP area. CBRE (above )Conclusions para 1.

allocations at Leamington /Warwick and the edge of Coventry) must be implemented at the earliest opportunity to maintain the buoyancy of the local economy and avoid growth going outside the sub region .

Our central concern is that the draft Brief takes a “passive “ position on the implementation of the employment land .The overriding implication is that the Council is prepared to leave matters to market forces to bring forward this important strategic employment release .This creates uncertainty in terms of meeting the joint economic growth objectives of both the Council and in a wider context the CWLEP.

#### Specific Comments and Observations

- (i) The level of detail relating to the employment content of the development area is throughout the draft low and is general. The employment land is hardly dealt with in the “Design Principles” and it is unclear what the Councils “vision “ for the type and character of the employment land. Consequently it’s difficult to see how this strategic employment site is likely to meet various types of need that exist across the District .We request more detailed consideration of the proposed employment area and its role in meeting current requirements .
- (ii) The CWLEP is particularly concerned by the absence of any information related to the timing and implementation of the strategic employment area at Kenilworth .While a housing trajectory is set out at Table 5 in the Delivery Section of the guidance( and this already appears to be slipping?), the draft gives no clues to the likely timing of release of the employment area .This is a concern for the CWLEP because the site has strategic significance as part of the wider sub regional picture .Moreover, this makes monitoring of economic performance difficult .The latter is important in terms of the agreed Employment MOU agreed by all C&W local authorities .<sup>3</sup>
- (iii) The draft Brief has no information about the likely content of the employment area in terms of the mix of uses or size range of units envisaged at this important site .We consider that instead of an implied position that this will be left to prevailing market forces an indication of the aspirations and market types that the District wishes to achieve would help guide developers .In saying this we appreciate that the District Council has no direct land control but nevertheless we consider the draft Brief represents an opportunity for the local authority to look at what type of employment land will have the most beneficial impact .
- (iv) In relation to the “targeting” of the site the Brief represents an opportunity to examine the requirements of local businesses and whether the site can provide for any of these needs .In particular recent research has highlighted the absence of provision of expansion space for many SME businesses .The draft Brief provides an opportunity to whether alongside larger units there is scope for the provision of a range of smaller units

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<sup>3</sup> C&W Employment MOU 2016 .

.The recent Market Signals<sup>4</sup> work provides good evidence base for this .A clear policy framework in the Brief setting out the ambitions of the Council to achieve the provision of a tranche of small units would help reinforce the local planning authority position in future negotiations around planning obligations.

- (v) The land East of Kenilworth represents a very large area and in order to produce a generally sustainable and mixed community the Local Authority should look to provide a range of small business units that can sit comfortably within and perhaps mixed into predominantly residential uses This would provide both design variety and local employment opportunities .In particular land in or adjacent to the proposed local centre seems to hold potential for the provision of small business units .(references).
- (vi) Overall the implementation of this urban extension requires major infrastructure investment and a carefully managed programme of implementation .In spite of an extensive draft Brief the external reader is left with little detail about how the implementation will be managed and crucially when key infrastructure and facilities will be developed .While the draft brief contains various information about major infrastructure costs we are not clear if the delivery of the employment land can be carried out in isolation or ahead of the surrounding residential areas ? This may impact significantly on the timing of release .

## Conclusions

- As noted above the CWLEP has concerns about the lack of detail and absence of key timing information regarding the bringing forward of the employment content of the scheme .This comment is made mindful that the District is approaching a position where all its supply of new employment land is being exhausted .The CWLEPs central concern is that because of the open-ended timescales economic growth may be adversely impacted by an absence of a range of suitable employment opportunities.
- As a secondary concern, we consider that the draft Brief could go further in establishing the Vision of the District Council for the employment content of the site .This could then represent a position statement to assist in the determination of subsequent planning applications.
- Related to the above recent research has highlighted shortages of employment opportunities because of an absence of suitable premises for small and medium enterprises (SME's).The draft Brief might creatively explore this matter in order to allow the new development to meet the widest possible employment needs.
- The CWLEP would welcome the opportunity to discuss the above issues in more detail with the Council.

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