



# **BPF RESPONSE TO MHCLG'S CONSULTATION ON AREAS FOR PRODUCING SPATIAL DEVELOPMENT STRATEGIES**

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**PREPARED AND SUBMITTED BY**

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## British Property Federation

### Question 1: Which SDS area(s) are you interested in?

The British Property Federation (BPF) represents owners, investors, developers and managers of property across the UK and therefore has an interest in the effective implementation of Spatial Development Strategies (SDSs) across all proposed SDS areas. The BPF represents the real estate sector, which contributed more than £116 billion to the UK economy in 2020 and supported over 2.4 million jobs. We promote the interests of those with a stake in the built environment, and our membership comprises a broad range of property owners, managers and developers, as well as the professional services that support them.

Our members invest across the full range of proposed geographies, including mayoral combined authorities, emerging devolution areas and areas where new strategic planning boards may be established. We therefore respond from a national perspective, focusing on the principles that should guide the establishment of SDS geographies and the operation of the strategic planning system.

The Industrial and Logistics (I&L) property sector, in particular, has a strong interest in the successful implementation of SDSs. As highlighted in the BPF's Logistics Manifesto *Building the UK's Critical Infrastructure* (May 2024), I&L businesses build, own and manage the warehousing and distribution infrastructure that underpins the UK's supply chains. They enable goods to be manufactured, stored and distributed to businesses, households and public services across the country. I&L facilities, therefore, form a critical part of the national infrastructure that supports economic activity and the functioning of the modern economy.

I&L occupiers typically have expansive supply chains: linking themselves with their suppliers and end customers of between 1 to 4 hours travel time. Even the distance covered over this shorter 1-hour timeframe, more akin to smaller occupiers, is far larger than most local authority boundaries. This means I&L developments typically span multiple local authority areas and rely upon access to strategic transport infrastructure and labour markets that extend beyond individual local plan boundaries. Strategic planning at the SDS level will, therefore, have an important role to play in ensuring that I&L uses are planned for coherently across wider Functional Economic Market Areas (FEMAs) as required by the national Planning Practice Guidance (PPG).

This response also draws on evidence from the BPF's recently published report *Industrial and Logistics: The Infrastructure of Everything* (March 2026), which highlights the critical role that I&L infrastructure plays in underpinning supply chains, economic productivity and investment across the UK. As highlighted in the BPF's [response](#) to the draft National Planning Policy Framework (NPPF), planning policy plays an important role in enabling development across a wide range of sectors, including I&L space, offices, retail and town centre uses, life sciences and innovation space, and a range of housing products.

Strategic planning at the SDS level provides an opportunity to ensure that these different forms of development are planned coherently across the corresponding FEMA(s).

**Question 2: Do you agree with the proposed SDS area (where one is provided)? If so, please explain the strengths of the proposal as you see them.**

The BPF is broadly supportive of the principle of defining SDS geographies as this will allow needs to be calculated across a wider geography compared to being confined to individual local authority boundaries that only capture part of the wider supply chain. Importantly, this also enables alignment between the strategic planning of jobs, homes and infrastructure.

Planning for housing, employment land and infrastructure extends across multiple local authority areas and needs to be planned for at a strategic 'larger than local' level. Aligning SDS areas with existing mayoral combined authority and combined county authority geographies where these exist is therefore a sensible starting point. These authorities already operate at a strategic scale and are responsible for a range of economic development, transport and infrastructure functions, which can support more coordinated planning and investment decisions.

Strategic planning across wider geographies also offers the potential to improve coordination between housing delivery, employment land provision and strategic infrastructure investment. If implemented effectively, SDSs could provide a clear long-term spatial framework for growth and investment across functional economic areas.

Planning across wider strategic geographies is particularly important for sectors that depend on strategic infrastructure networks and distributed supply chains. I&L development, for example, is closely linked to transport infrastructure, labour markets and supply chains that extend well beyond individual local authority boundaries.

The BPF's recently published report *Industrial and Logistics: The Infrastructure of Everything* highlights the scale and importance of this sector to the UK economy. I&L uses support around 4.5 million jobs across the UK and generate approximately £287 billion in economic activity each year while contributing around £84 billion in annual public revenues. Employment in logistics has grown by approximately 29% between 2010 and 2025 compared with around 17% growth across the wider economy, and jobs in the sector are estimated to be around 10% more productive than the UK average. Ensuring that sufficient land is planned for these uses across FEMAs will therefore be an important aspect of SDSs.

Strategic planning at the SDS level also provides an opportunity to better align infrastructure investment with development needs. Infrastructure provision is a key determinant of where development can be delivered successfully. BPF research highlights that infrastructure constraints, including electricity grid capacity and connection delays, can act as barriers to development and investment in sectors such as I&L. Strategic planning across wider geographies can therefore help ensure that infrastructure provision is aligned with long-term development needs.

**Question 3: If you do not agree with the proposed SDS area, please explain the issues or challenges that it would present.**

In principle, the BPF does not object to the proposed SDS geographies set out in the consultation.

However, it will be important that planning for employment need is assessed based on the appropriate best-fit FEMA, as described in the PPG (see 026 Reference ID: 2a-026-20190220 & 031 Reference ID: 2a-031-20190722). These should be determined through discussions with businesses and operators and will not align seamlessly with the administrative and devolution boundaries that are the subject of this consultation.

We recognise there are many other important contributory factors underpinning SDS geographies (e.g. existing political structures and local authority/unitary boundaries). However, where SDS administrative geographies are not aligned with the relevant FEMA for a specific area, there should be firm mechanisms in place to mandate effective cross-boundary working to ensure objectively assessed needs are met in full.

We are unconvinced that the current guidance in the NPPF around 'maintaining effective co-operation' (Paras 24-28) has enough 'teeth' to achieve this. This view is borne out of the ineffectiveness of the previous Duty to Co-operate to deliver requisite strategic employment need and resulted in chronic shortages in prime I&L areas (e.g. within the Golden Triangle of Logistics). Indeed, *Industrial and Logistics: The Infrastructure of Everything* confirms that £9.7 billion in GVA has been lost to suppressed demand equating to 140,000 jobs over the period 2010-2024. This is largely down to underestimating employment need across FEMAs and by not having regard to key market signals that are not always captured through traditional 'labour-based' forecasting approaches.

Within the BPF's *'Freight, Logistics and the Planning System: Call for Evidence Response'* (October 2023), and in line with the PPG (Paragraph: 010 Reference ID: 61-010-20190315), we suggested that this could be achieved through a Statement of Common Ground and/or Memorandum of Understanding agreed between all constituent LPAs in a FEMA (see in appendix extract containing some commentary and best practice case studies in Coventry & Warwickshire and Bassetlaw).

I&L is also geographically distributed across towns and cities throughout the country, supporting economic activity across a wide range of locations rather than being concentrated in a small number of urban centres. Strategic planning across wider economic areas can therefore play an important role in supporting economic growth and employment opportunities across a broader range of places.

**Question 4: If you do not agree with the proposed SDS area, please suggest and explain one or more alternatives that you believe would work better.**

Rather than proposing specific alternative geographies, the BPF emphasises the importance of ensuring that SDS areas are informed by the underlying economic geography of the areas concerned. There may also be value in complementary mechanisms, such as a national Freight Strategy, to help identify industrial and logistics needs and ensure these are fully planned for within SDS.

In particular, the identification of SDS geographies should consider labour market and commuting patterns, transport and logistics networks, supply chain relationships and established economic clusters and investment markets.

Strategic planning will be most effective where SDS areas reflect the scale at which housing markets, employment demand and infrastructure networks operate 'on the ground'. Where this is not fully achievable through administrative boundaries alone, effective mechanisms for cross-boundary coordination between SDS areas will be essential as referenced above.

**Question 5: If there is no proposed SDS area for your area of interest, please suggest your preferred SDS area.**

For areas where no proposed SDS geography has been identified, the BPF encourages the Government to prioritise geographies that reflect FEMAs and infrastructure networks.

Strategic planning mechanisms, such as SDSs, have the potential to address long-standing challenges in planning for employment land across FEMAs. Under previous arrangements, including the Duty to Cooperate, some areas struggled to plan effectively for cross-boundary employment land needs. SDSs therefore provide an important opportunity to establish clearer strategic frameworks for addressing housing, employment and infrastructure needs across wider economic areas.

I&L development in particular is highly dependent on strategic spatial planning across these wider geographies rather than being constrained by individual local authority boundaries. Evidence indicates that historic constraints on industrial and logistics land supply have had measurable economic impacts as referenced above.

Strategic planning mechanisms therefore have an important role to play in ensuring that sufficient land is identified across FEMAs to support future economic growth.

When assessing employment land requirements at the SDS level, authorities should ensure that evidence reflects real market demand. As highlighted in the BPF's response to the draft NPPF, employment land planning should consider a broader range of evidence, including market signals such as rental growth, vacancy rates, take-up trends and development pipelines. These indicators can help identify where markets are supply constrained and where unmet demand exists.

### **Appendix 1 – Extract from the BPF's *Freight, Logistics and the Planning System: Call for Evidence Response (October 2023)***

St Modwen are promoting 47 hectares of land for industrial and logistics uses to the east of the Burnt Mills Employment Area in Basildon. It is a Green Belt site, however Policy E6 of the emerging Local Plan proposed the removal of the site from the Green Belt and its allocation for 48 hectares of B-Class employment development, including the provision of smaller starter industrial units and a storage facility for travelling showpeople.

During the Local Plan Examination, new evidence was prepared by the Council relating to the town centre strategy and housing needs. Subsequently the Council resolved to adjourn the debate on the Local Plan modifications to a meeting on the 10<sup>th</sup> February 2022 to allow for additional time to consider potential options. Immediately ahead of the Full Council meeting on the 10<sup>th</sup> February 2022, an emergency motion was raised and Members resolved to withdraw the Local Plan. The reasons given for the withdrawal included reference to placing a greater emphasis on protecting the Green Belt for current and future generations. It is also worth noting that these decisions were taken in the run up to local elections that were held in Basildon District in May 2022.

At a meeting held on Thursday 3<sup>rd</sup> March 2022, the Council resolved to withdraw the Basildon Borough Local Plan from Examination. Eight years after starting the review of their Local Plan, the Council withdrew their Plan for reasons completely unrelated to employment development and, as a consequence, the adopted development plan still comprises policies that were saved in 2007 from the 1998 Basildon District Local Plan. No land has been allocated for employment development in Basildon District since the 1998 Local Plan. As a Green Belt authority, no new sites of any significance have come forward for employment since this was adopted in 1998. This is a local authority with areas of deprivation that would benefit from such development coming forward.

### **The Geographical Scale of Economic Needs Assessment**

- 2.1 The National Planning Practice Guidance (PPG) provides clear guidance on the assessment of economic need as part of the plan-making process; including the appropriate

geographical scale at which this should be undertaken<sup>1</sup>. It calls for plan-making authorities to identify a 'best fit Functional Economic Market Area' (FEMA), as an essential prerequisite for the calculation of such need<sup>2</sup>, and 'to identify need across the relevant market areas'<sup>3</sup>. Calculation of need, therefore, requires cross boundary co-operation/collaboration in order to be effective, robust and comprehensive.

2.2 The calculation of need for the storage and distribution sector is particularly sensitive to scale as it spans across wider geographies encompassing several administrative areas. We consider that strategic employment sites need to be planned for at a strategic level: a view substantiated by the scale at which numerous strategic employment studies<sup>4</sup> from around the UK have been undertaken. Despite this, there is no consistent approach that local planning authorities adopt to frame their respective employment land evidence base assessments. There are many examples of how this has been ignored, leading to acute land supply issues across strategically important geographies upon adoption of the corresponding Local Plan(s).

2.3 Consequently, the NIC labelled freight as 'the forgotten element of spatial planning' and noted that '*Current planning policy encourages neighbouring local planning authorities to agree and cooperate on 'strategic policies' and cross border issues, which can include housing, transport infrastructure and water supply, but there is limited precedent for freight being considered as a strategic issue in this context, and therefore limited evidence of locally led efforts to work together and join up their respective planning geographies in response to freight issues and opportunities*<sup>5</sup>. Moreover, the geographical scale at which employment need is assessed and/or the methodology used can be open to political manipulation with the aim of arriving at the lowest need figure, thereby resulting in less land being allocated.

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<sup>1</sup> See Housing and Economic Needs Assessment Section - Paragraphs 25-32.

<sup>2</sup> Paragraph: 026 Reference ID: 2a-026-20190220

<sup>3</sup> Paragraph: 031 Reference ID: 2a-031-20190722

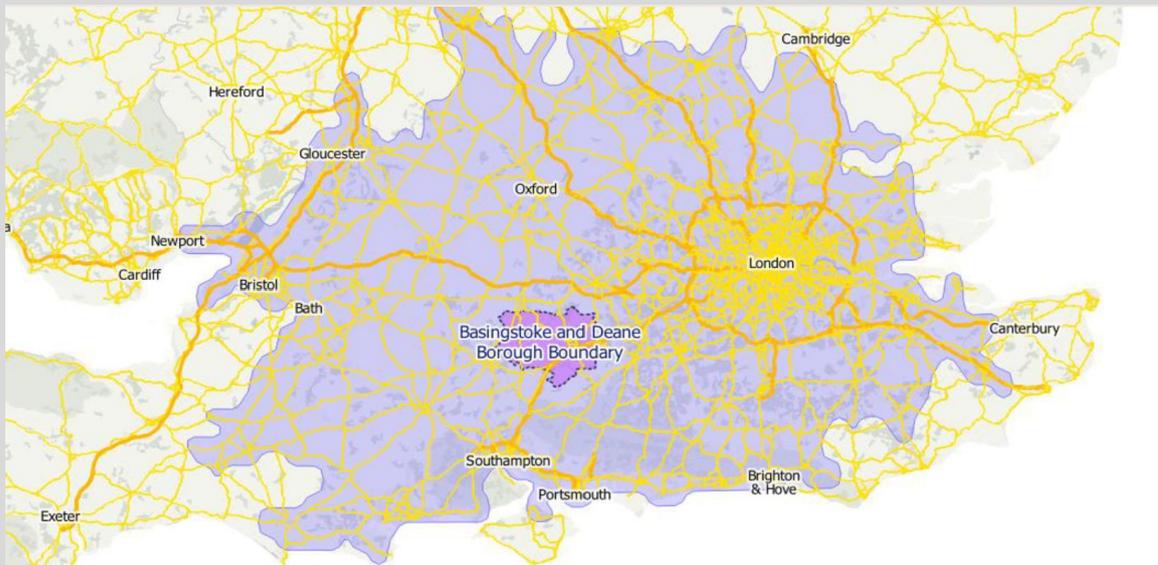
<sup>4</sup> See MDS Transmodal (November 2006) 'East Midlands Strategic Distribution Study', MDS Transmodal (November 2014) 'Leicester and Leicestershire Strategic Distribution Study', Atkins (October 2014) Coventry and Warwickshire Strategic Employment Land Study, West Midlands Local Authority Chief Executives (2015) West Midlands Strategic Employment Sites Study, GL Hearn (April 2021) 'Warehousing and Logistics in Leicester and Leicestershire: Managing Growth & Change', Icení (July 2022) 'Nottingham Core & Outer HMA Logistics Study' & Icení (September 2022) 'Warehousing and Logistics in the South East Midlands'.

<sup>5</sup> National Infrastructure Commission (December 2018) Future of Freight Interim Report, Pages 22-23.

### CASE STUDY 3: BASINGSTOKE & DEANE COUNCIL ECONOMIC NEEDS ASSESSMENT

Basingstoke and Deane Council defined its administrative area as its own market area, not as part of a wider sub-region or FEMA. The Basingstoke and Deane Economic Needs Assessment (ENA) notes this as not being realistic, but it doesn't attempt to address its own limitations.

In reality, Industrial & Logistics occupiers typically have distribution networks linking their customers and suppliers of between 1 to 4 hours travel time, sometimes longer, depending on their size. The map below shows how a 2-hour drive-time catchment is much larger than the Basingstoke & Deane local authority boundary. By not considering a wider sub-regional profile, the ENA grossly underestimates need over 20 years. This level of need can easily be met through one to two applications for Industrial & Logistics (I&L) given the District's prominent position on the M3, linking London to the ports of Southampton and Portsmouth.



Source: Savills (October 2022)

2.4 Whilst there are a number of good examples of assessing 'strategic' need (see West Midlands<sup>6</sup>, Leicestershire and Leicester<sup>7</sup>, Greater Nottingham<sup>8</sup> and South East Midlands<sup>9</sup>), in the absence of a regional tier of governance (following the abolition of Regional Spatial Strategies (RSSs)), a recurring challenge has been how this assessed 'larger-than-local' need percolates down to the constituent local authorities' local plans. The current system places the onus on local authorities to dictate whether they wish to accommodate 'larger than local' need (often in the face of objections for local residents). There is a tendency for them to be reluctant to do so querying 'why here?' as they tend to be sizeable sites capable of accommodating the largest requirements. This is demonstrated by the North Warwickshire, Bedford and Leicestershire examples below.

#### **CASE STUDY 4: NORTH WARWICKSHIRE LOCAL PLAN EXAMINATION**

Policy LP6 of North Warwickshire's draft Local Plan was proposing the allocation of 100 hectares of employment land to meet locally assessed needs. However, the Council failed to acknowledge the role that North Warwickshire should play in accommodating a recognised sub-regional need for additional employment land (as reported in the West Midlands' Strategic Employment Sites Study (WMSESS) (September 2015)) and respond positively through the identification of Regional Logistics Sites (RLSs).

The Council's dismissal of the issue followed advice from the Inspector examining the previous version of the Plan that the issue of regional need should be considered when the evidence becomes available:

*"I am requested by some representors to increase the allocation of employment land to accommodate the demand for RLS. The Council is right to seek to encourage a diverse economy in the Borough but I see no reason why taking a more positive approach to RLS in addition to the aims*

<sup>6</sup> See Peter Brett Associates & JLL (September 2015) 'West Midlands Strategic Employments Sites Study' and Avison Young & Arcadis (May 2021) 'West Midlands Strategic Employment Sites Study – Final Report'.

<sup>7</sup> MDS Transmodal Ltd & Savills (November 2014) 'Leicester and Leicestershire Strategic Distribution Study' & MDS Transmodal Ltd & GL Hearn (April 2021) 'Warehousing and Logistics in Leicester and Leicestershire: Managing Growth & Change'.

<sup>8</sup> Icen (July 2022) 'Nottingham Core & Outer HMA Logistics Study'.

<sup>9</sup> Icen (September 2022) 'Warehousing and Logistics in the South East Midlands'.

*of Policy NW7 would conflict with this. However, a regional perspective is required and I do not consider there to be sufficient evidence before me to set a requirement for North Warwickshire".<sup>10</sup>*

Given the failure to allocate sufficient land through the local plan, St Modwen made a speculative planning application in respect of their Tamworth site at M42 Junction 10. This was refused and successfully appealed in 2016<sup>11</sup>.

### **CASE STUDY 5: BEDFORD BOROUGH LOCAL PLAN 2040 EXAMINATION**

As part of the Bedford Borough Local Plan 2040 Examination, the Council responded to the Inspector's queries around how it had arrived at the quantum of land proposed for strategic B8 warehousing. It is clear from the below response that the Council and the consultants responsible for producing its economic evidence (AECOM) reject the conclusions of Icenis 'Warehousing and Logistics in the South East Midlands' ('the SEMLEP Logistics Study') that was undertaken at the strategic level:

*"As explained in the response to query 1, the intention in assessing what demand identified in the SEMLEP Logistics Study (Document C8) could be apportioned to Bedford was based on the study's not doing this and it being relevant to attempt this to provide evidence to inform the Council's Economic Prosperity Plan. This assessment does not relate to the 51 ha of B8 land that AECOM recommended should be allocated in its conclusion to Document ED13. As summarised in paragraph 2.2.48, AECOM states that it is not in agreement with the findings of the Study or aspects of its methodology in calculating needs. It is not an Economic Needs Assessment and therefore any findings taken from it should in a local context be treated with appropriate caution. The AECOM recommendation that 51 ha of B8 land should be allocated is justified on the basis of the PPG compliant methodology applied to assess economic needs as set out in Document ED13".<sup>12</sup>*

### **CASE STUDY 6: LEICESTER & LEICESTERSHIRE**

<sup>10</sup> The Planning Inspectorate (24<sup>th</sup> September 2014) 'Report to North Warwickshire Council', para. 47.

<sup>11</sup> APP/R3705/W/15/3136495

<sup>12</sup> [OpenDocument.aspx \(bedford.gov.uk\)](#)

The major issue in Leicester and Leicestershire is a disconnect between local and strategic employment studies. GL Hearn's 'Warehousing and Logistics in Leicester and Leicestershire: Managing Growth & Change' Report focusses on strategic B8 demand (units above 100,000 sq ft) using a methodology not commonly used. Its overall future needs estimate for the region is not distributed to the constituent local authorities meaning its recommendations, for the most part, are not being taken forward across the various local plans.

Each local authority in the region has commissioned its own employment study looking at smaller, more localised demand. These studies do not correspond with the wider regional study, use different demand methodologies, cover different time periods and different segments of the I&L markets (e.g. for B8, some only estimate demand for small-scale, some for all B8 need and take different approaches to B2) – see table below.

Area	Period	Segment	Method Used
Leicester + Leicestershire	2020-2041	Large B8 (>9,000 sqm)	Replacement + Traffic Growth
Blaby	2011-2031	B1c, B2, small B8 (<9,000 sqm)	Past completions (excluding B8 >9,000 sqm)
Charnwood	2011-2036	B1c, B2, B8	Past completions (non-strategic only)
Harborough	2011-2031	B1c, B2, small B8 (<9,000 sqm)	Past completions (excluding B8 >9,000 sqm)
Hinckley & Bosworth	2019-2036	B1c, B2, B8	Past completions
Leicester	2019-2036	B1c, B2, B8	Past completions
Melton	2011-2036	B1c, B2, B8	Past completions
North West Leicestershire	2017-2039	B1c, B2, small B8 (<9,000 sqm)	GVA outputs
Oadby & Wigston	2011-2031	B1c, B2, B8	Past completions

**Source: Savills (October 2022)**

So, taken in combination, these various studies result in a patch work of various need estimations that underestimate market demand, for what is the growth engine of the I&L sector in England.

- 2.5 To remedy this issue we would call for more 'teeth' in national planning policy guidance, such that it obligates local authorities within the same FEMA/Market Area (as defined through the proposed NSCIF – see Key Ask 1 and Question 10), to work collaboratively to ensure identified needs are met in full. Mechanisms exist, such as a Memorandum of Understanding (MoU) and/or Statement of Common Ground (SoCG), to achieve this in a co-ordinated and transparent manner. Below are good examples of how strategic or larger-

than-local needs have been dealt with at the local level in Coventry & Warwickshire and Bassetlaw.

**CASE STUDY 7: COVENTRY & WARWICKSHIRE EMPLOYMENT LAND MEMORANDUM OF UNDERSTANDING (MoU)**

Following involvement of the six constituent authorities, an Employment Land MoU was produced to ensure that the needs of Coventry and Warwickshire were met in full, including addressing an identified shortfall of employment land arising in Coventry. The below figures were informed by updated evidence of economic growth forecasts and land requirements at a range of geographies across the sub region. The MoU contains points of agreement that relate to the quantum of employment land that should be distributed across the sub-region. This distribution supports both demographic and workforce growth, market signals and demand, as well as considering commuting flows between the six authorities and opportunities to combat deprivation.

	<b>Employment Land Requirement (gross hectares)</b>	<b>Redistribution from Coventry (gross hectares)</b>	<b>Minimum Local Plan Employment Provision (gross hectares)</b>
Coventry	369	-	128
North Warwickshire	58	0	58
Nuneaton & Bedworth	87	26	113
Rugby	99	98	197
Stratford-on-Avon	35	0	35
Warwick	66	117	183
<b>Total</b>	<b>714</b>	<b>241</b>	<b>714</b>

Source: Coventry & Warwickshire Employment Land Memorandum of Understanding (2016)

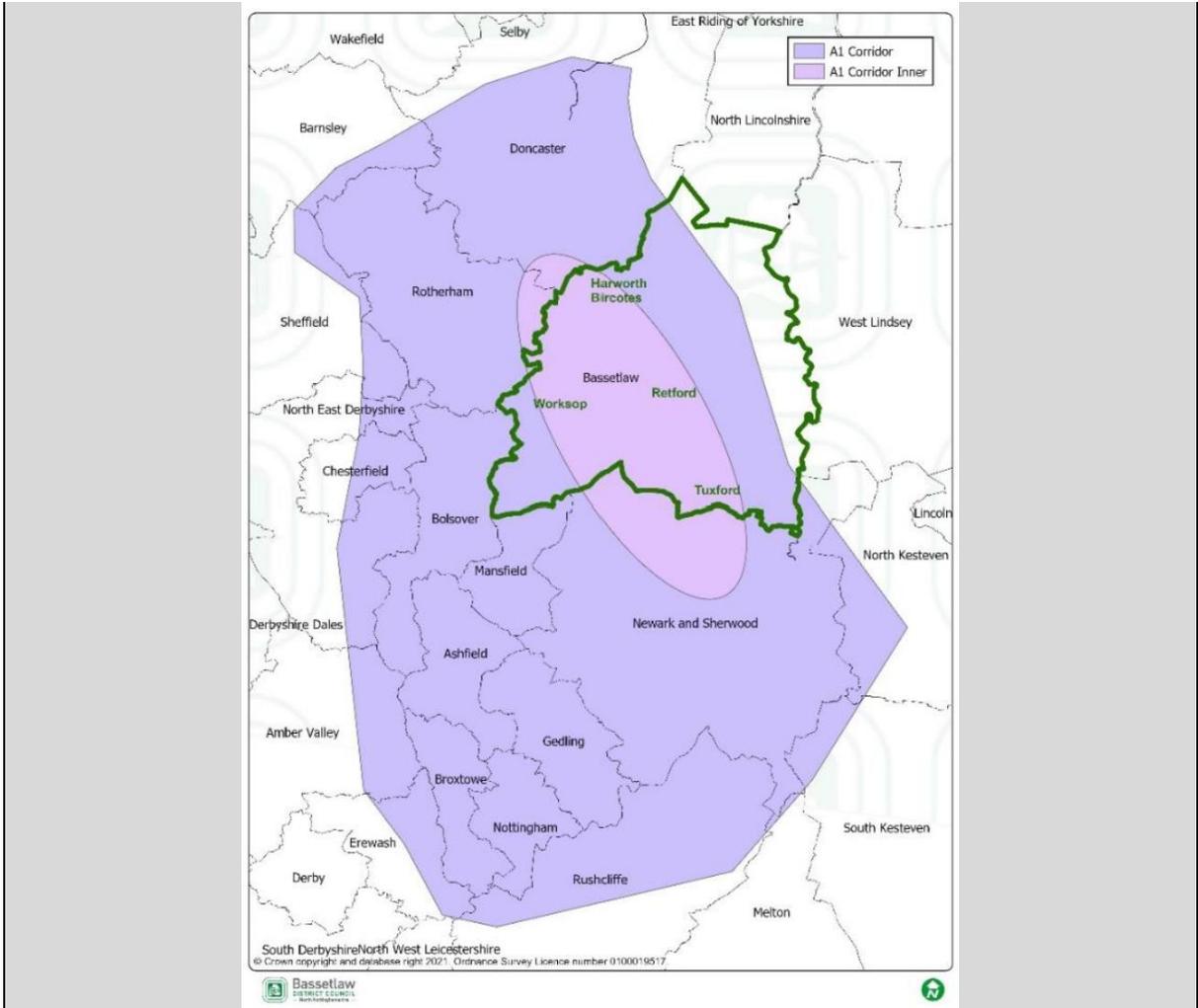
**CASE STUDY 8: BASSETLAW DISTRICT COUNCIL**

Bassetlaw District Council, during the formulation of their Local Plan evidence base and recognising their strategic location, instructed an independent consultancy to lead the collation of employment information to support the "A1 Corridor Logistics Assessment" ('A1LA').

Instead of focussing solely on the needs within the LPA, which logistics does not do, the A1LA looked at the Property Market Area ('PMA') which allowed a more robust assessment of the needs of the market; seeking to allocate a proportionate amount of the PMA need to Bassetlaw. The draft Policy, at Appendix 3, states:

*"Bassetlaw's general functional economic market area is broadly self-contained, with the District having strong links to Sheffield City Region and further links to Nottinghamshire authorities to the south. The Sheffield City Region Strategic Employment Land Appraisal 20208 recognised the potential of the A1 corridor in Bassetlaw, and that further assessment should follow to enable a better understanding of the logistics needs in the City Region area.*

*But the Bassetlaw A1 Logistics Assessment Update 2022 recognises that occupiers considering large scale units cover wider areas of search than typical travel to work areas or general or potentially strategic functional economic market area boundaries. National planning practice guidance supports this; recognising that the logistics industry has distinct locational requirements that need to be considered separately from those relating to general employment land. In this case, the evidence states that the property market area for large scale logistics is considered a more appropriate area of search (identified by Figure 12A below). The A1 (Doncaster to Newark with Bassetlaw at the core) is identified within a larger demand area."*



The above highlights the vast difference between the local authority's administrative boundary (outlined in green) and the A1 Corridor (purple) that formed the basis of Bassetlaw's assessment. Clearly, the findings of any assessment will be very different depending on what geographical scale is used.

**OUR KEY ASK 2: STATUTORY REQUIREMENT FOR (1) PLAN-MAKING AUTHORITIES TO ASSESS ECONOMIC NEED AT THE APPROPRIATE MARKET GEOGRAPHY IDENTIFIED WITHIN THE NATIONAL SUPPLY CHAIN INFRASTRUCTURE PLAN (NSCIF); AND (2) CONSTITUENT AUTHORITIES WITHIN THAT GEOGRAPHY TO MEET THE IDENTIFIED NEED IN FULL THROUGH A STATEMENT OF COMMON GROUND AND/OR MEMORANDUM OF UNDERSTANDING.**

### **No Consistent Approach to assessing Economic Development Needs**

- 2.6 LPAs are under increasing pressure to allocate land for housing, which is unfortunately having unintended consequences on the delivery of other important infrastructure that underpins our economy – including industrial and logistics floorspace. This is demonstrated by the Spelthorne example described below.
- 2.7 There is also the BPF research 'What Warehousing Where?' on the relationship between housing and warehousing floorspace – which found a need for 69 sq ft of warehouse floorspace for every new home . SBC are proposing 9,720 new homes across the plan period, which would generate a requirement of c. 670,000 sq ft of warehousing floorspace

#### **CASE STUDY 9: SPELTHORNE BOROUGH COUNCIL**

Spelthorne Borough Council (SBC) is currently in the middle of a (paused) Local Plan Examination. SBC have allocated no employment sites in their submitted Local Plan, principally due to a "policy off" approach, which provides a forecast need of 12,005 sq m (or 129,000 sq ft) of industrial space, despite SBC's proximity to London, Heathrow and the M25. The SBC Employment Land Needs Assessment ('ELNA') methodology is based on past trends, known as a 'policy off' approach. It acknowledges it does "*not take account of specific factors at the local level that might influence job growth, for example the Local Plan or any future changes at Heathrow.*"<sup>13</sup>. This means SBC is constraining their economic growth potential.

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<sup>13</sup> Spelthorne Borough Council (2022) 'Spelthorne Employment Land Needs Assessment', Para 2.5.