

**Nuneaton and Bedworth  
Borough Council  
Borough Plan Review (2021 -  
2039)**



Statement of Common Ground between  
Nuneaton and Bedworth Borough Council  
and Rugby Borough Council

January 2024

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## Organisations

- Nuneaton and Bedworth Borough Council (NBBC).
- Rugby Borough Council (RBC).

## Introduction

This Statement of Common Ground identifies areas of agreement and disagreement between NBBC and RBC in relation to the Borough Plan Review (2021-2039) and supporting evidence base. This Statement has been prepared to assist the Examination of the Plan and covers the administrative area of NBBC.

The Borough is located between Coventry and Hinckley and benefits from good road links. Nuneaton and Bedworth are both easily accessible from the M6 which gives good access to the M1, M5, M42 and M69. The A5 runs along the northern boundary of the Borough and the A444, A4254 and the B4114 are the major routes within the Borough. The Borough is home to 134,200 people according to the Census 2021. A plan has been provided at Appendix A which outlines the administrative boundary of NBBC alongside the location of sub-regional and adjoining Local Planning Authorities.

NBBC has fully engaged with RBC on the development of the Council's respective Local Plans from the outset. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, RBC has been formally consulted at every stage of consultation on the Borough Plan Review together with its accompanying Sustainability Appraisal and the Habitat Regulations Assessment. RBC made representations to the Preferred Options and Regulation 19 stages of consultation on the Borough Plan Review (representation number 3 in relation to the Regulation 19 consultation). The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes, together with the joint evidence base studies undertaken, during the Plan's preparation.

## Strategic matters

### Areas of Agreement

- **That NBBC has worked collaboratively with RBC to ensure that all cross-boundary strategic issues have been properly considered and where appropriate reflected in the Borough Plan Review and effective and on-going joint working has and will continue to be undertaken.**

### Housing requirements

It is understood that RBC has not yet assessed its future housing requirement or formally endorsed the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022). We understand that RBC reserves the right to ask NBBC to contribute to meeting any unmet housing need, in the future, if this situation was to occur. However, there have been no requests for NBBC to meet the housing needs of any neighbouring authorities so far.

NBBC's Towards a Housing Requirement evidence base document outlines that the additional housing provision over and above the borough's local housing need figure of 409 dwellings per annum, stated in the Coventry and Warwickshire HEDNA (2022) will provide 'headroom' to contribute to unmet needs arising from other areas. Accordingly, the annual housing need figure expressed in Strategic Policy DS3 is 33% greater than the figure proposed in the Coventry and Warwickshire HEDNA (2022).

Furthermore, the Borough Plan Review outlines the total housing supply for the plan period comprising of 12,127 units which is in excess of the minimum of 9,810. NBBC consider this to be a significant buffer (23%) providing flexibility, within the plan period, in the unforeseen event that some identified sites in the Borough Plan Review do not come forward, or potentially to contribute towards neighbouring authorities' unmet needs over the plan period.

### **Areas of Disagreement**

#### Strategic B8 – Employment land allocations

RBC consider that a greater proportion of the larger consented/allocated employment sites such as EMP1, SEA2, SEA4 and SEA6 might be able to contribute to meeting the wider sub-region's strategic B8 needs, rather than the Borough Plan Review only making provisions for 19.4ha of strategic B8 warehousing and distribution development in the Borough.

The allocation for employment land in the draft plan is 87.9ha. Of this, 2ha is for offices, 19.4ha for strategic warehousing need and the remaining 66.5ha for local industrial and warehousing need.

The plan's employment land requirement derives from the Nuneaton and Bedworth HEDNA (2022). This identifies a requirement for 73.5ha for warehousing and distribution and 7.1ha for industrial. In the submitted plan, to this is added 5.35ha of replacement provision.

The Nuneaton and Bedworth HEDNA (2022) doesn't identify what proportion of the warehousing and distribution need of 73.5ha would be for strategic scale sites of over 9000sq.m. Instead, it states at para 9.42: "...this will include development of some warehousing space (of over 9000sq.m.). Iceni consider that the Borough Council will need to work with others in the sub-region to confirm what proportion of the need for strategic warehousing it might accommodate, working with other authorities in the sub-region through the Duty to Cooperate. It may be appropriate to delineate elements of the supply to take account of this market."

In the submitted plan, the proportion of the warehousing and distribution land that would be for units of 9,000sq.m. and over in floor area and therefore, contribute to meeting strategic warehousing need (19.4ha), is calculated based on the level of strategic B8 as a proportion of overall industrial and warehouse completions 2016-21 in Nuneaton and Bedworth.

RBC think that Icen, and therefore Nuneaton and Bedworth in the submitted plan, have underestimated the proportion of the allocated employment land that would deliver strategic warehousing units for two reasons:

- First, as set out in RBC's Regulation 19 representations, the sites allocated in the plan are larger and more strategic than those developed in 2016-21. This suggests proportionately more big sheds will be built on these sites than were built on sites developed in 2016-21.
- Second, comparing the Coventry and Warwickshire HEDNA (2022) numbers for non-strategic industrial and distribution land in Nuneaton and Bedworth (45.5ha), with the requirement in the submitted plan, suggests at least 35ha could be developed as strategic warehousing land.

RBC is not calling for Nuneaton and Bedworth to allocate more employment land. Nor are RBC asking Nuneaton and Bedworth to meet unmet need. However, RBC consider that the submitted plan underestimates the proportion of the allocated employment land in the plan, that would be developed for strategic warehouses, and thereby contribute to the Coventry and Warwickshire HEDNA sub-regional strategic distribution need.

NBBC would like to highlight that the 19.4ha of strategic B8 warehousing and distribution proposed, is detailed to be a 'minimum' requirement, in the Borough Plan Review. This provides flexibility to potentially contribute towards neighbouring authorities' unmet needs over the plan period. However, NBBC has planned to meet its objectively assessed need for employment through its Plan policies, informed by working with the wider Coventry and Warwickshire Housing Market Area (HMA) (Coventry and Warwickshire HEDNA (2022)). There have also been no requests for NBBC to meet the employment needs of any neighbouring authorities so far. However, NBBC does agree that strategic employment sites can contribute towards a local need and regional need at the same time. The minimum requirement for 19.4ha of strategic B8 development is essentially being met through the Faultlands development. As noted in the Employment Land Review, site allocations and committed supply (Wilsons Lane, Prologis Extension, Coventry Road, Bowling Green Lane) have the potential to accommodate both either larger big box B8 units, which would contribute to the strategic B8 needs, and/or smaller units which contribute to meeting local needs or B2 manufacturing development.

NBBC has been leading on a draft Memorandum of Understanding with the other local authorities within the Coventry and Warwickshire HMA. This draft Memorandum of Understanding details matters of strategic importance relevant to all authorities, specifically relating to housing and employment needs, across the HMA. The draft Memorandum of Understanding is being prepared to reflect that all local authorities represented within the Coventry and Warwickshire HMA are at different stages of reviewing their Local Plans or are not reviewing them at all, at this time. This also provides the flexibility for future joint working and amendments to the draft Memorandum of Understanding once unmet needs are identified and Plans progress.

### **Further joint working**

This Statement of Common Ground will be kept up to date through continuous engagement and cooperation between NBBC and RBC. Joint working will continue to take place through the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) group and through the continued progression of the draft Memorandum of Understanding between the Coventry and Warwickshire HMA authorities.

### **Monitoring**

This Statement will be maintained by NBBC and updated as necessary with RBC.

NBBC will continue to work with RBC beyond the adoption of the Borough Plan Review for the monitoring and implementation of the Plan.

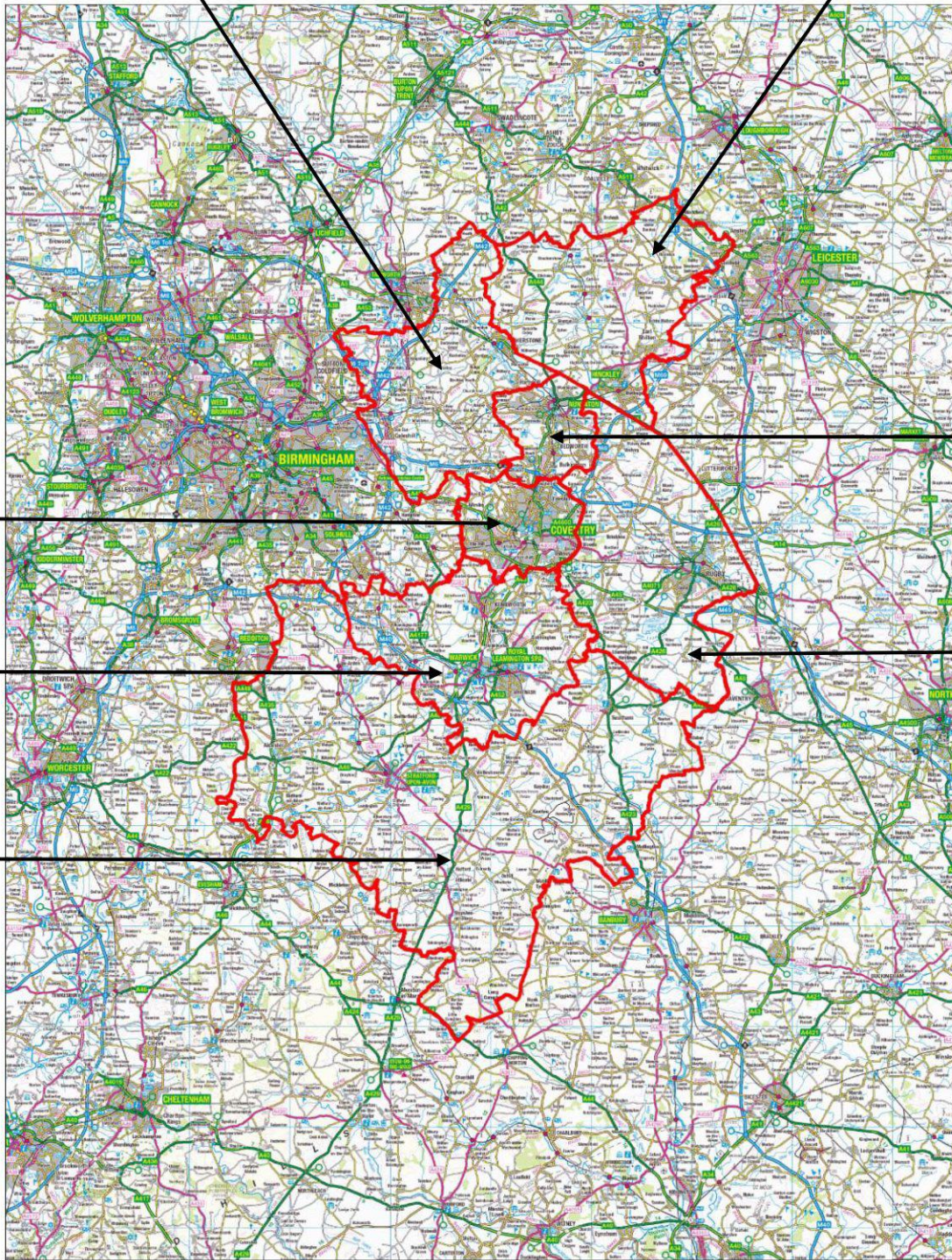
### **Signatories**

Signature: 	Signature: 
Maria Bailey, Assistant Director for Planning, NBBC	Nicola Smith, Chief Officer - Growth and Investment, Rugby Borough Council
Date: 11/01/24	Date: 07/02/2024

## Appendix A

North  
Warwickshire  
Borough

Hinckley and  
Bosworth Borough



Coventry  
City

Nuneaton  
and  
Bedworth  
Borough

Warwick  
District

Rugby  
Borough

Stratford-  
on-Avon  
District

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