

## Alison Osborne-Newbold

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**From:** William Blincoe <[REDACTED]>  
**Sent:** 16 October 2023 16:15  
**To:** Planning Policy  
**Cc:** Sean Rose; John McGuigan  
**Subject:** C&W Chamber of Commerce -Borough Local Plan Review ,Oct 2023.Reg 19 Submission.  
**Attachments:** NBBC LPreview. Part A .pdf; NBBC -submit.pdf; NBBC LP Review-Continuation DS3..docx; NBBC LP Review-Continuation DS3.(6).docx

Dear Sir /Madam ,

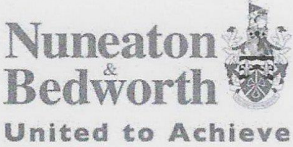
Please find the attached set of forms that make up a submission on behalf of the CW Chamber of Commerce.I have coordinated the preparation of the documents on behalf of the Chamber.There are two "continuation sheets" that form part of the Part B.

Please contact me if you require further information on the submission .

Many thanks ,

Bill Blincoe.

[REDACTED]

 <p><b>Nuneaton &amp; Bedworth</b> United to Achieve</p>	<p><b>Borough Plan Review</b> Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

Borough Plan Review Publication Stage
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Please return to Nuneaton and Bedworth Borough Council by 16<sup>th</sup> October 2023 via:

Email: [planning.policy@nuneatonandbedworth.gov.uk](mailto:planning.policy@nuneatonandbedworth.gov.uk)

Post: Planning Policy, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, NUNEATON, CV11 5AA

This form has two parts –

Part A – Personal details.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

	<p><b>1. Personal details*</b> * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</p>	<p><b>2. Agent's details (if applicable)</b></p>
Title	Mr	
First name	Sean	
Last name	Rose	
Job title (where relevant)	Head of Policy.	
Organisation (where relevant)	Coventry and Warwickshire Chamber of Commerce	
House no. and street	Chamber House, Cheetah Road,	
Town	COVENTRY	
Postcode	CV1 2TL	
Telephone number		
Email address (where relevant)		



**Part B – Please use a separate sheet for each representation**

Name or Organisation: *Coventry and Warwickshire Chamber of Commerce.*

3. To which part of the Borough Plan does this representation relate?

Paragraph(s)	<i>6.30 - 6.47 - Employment Land.</i>
Policy	<i>Strategic Policy DS3 Overall Development Needs</i>
Policies	
Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

<i>See separate sheet attached.</i>
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(Continue on a separate sheet / expand box if necessary)



6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See separate sheet attached.

(Continue on a separate sheet / expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	X

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The CW Chamber of Commerce has a wide range of business membership across the sub region. In recent years the Chamber membership has developed a growing concern about shortages of land and premises for employment growth + investment. The Chamber now actively participates in the plan process to advocate the case for the allocation of levels of employment land to facilitate and encourage growth. This is in line with Government policy. The Chamber wishes to have the opportunity to participate at the local Plan examination.



**Please note** the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

9.

Signature:

(Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)



Date:

15.10.2023.

## **Coventry and Warwickshire Chamber of Commerce**

### **Nuneaton and Bedworth Borough Plan Review**

#### **STRATEGIC POLICY DS3, paras 6.30-6.47.**

*Part B :Continuation Sheet*

*Part 5.Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate...*

Overall it is the central contention of the Coventry and Warwickshire Chamber of Commerce (hereafter referred to as “the Chamber”) that the proposed level of provision of employment land in the plan is inadequate to meet the needs of the Borough. This will mean that the stated economic objectives of the plan (notably objective 1 ref, page11.) and the overall Vision and Strategic Objectives set out in Chapter 4 to make the Borough a place of sustainable economic growth will fail .For this reason the Chamber argues that the draft Plan strategy relative to economic growth is unsound .It will frustrate the expansion of businesses currently located in the Borough and provide limited opportunity and choice to potential inward investors seeking to locate to the Borough.

The low level of overall employment growth proposed with no new major employment allocations proposed, means that at current completion and take up rates of land and premises the majority of the current land supply will be taken up well before the end of the designated plan period to 2039.

Fundamental to the Councils approach in setting employment levels is the work commissioned from Icenl Consultants .The Chamber notes and understands the methodology employed. However, it believes that too much emphasis has been placed on a this projection methodology and insufficient account is placed on examining the considerable body of evidence available from a range of market sources, market trends and likely future changes in the characteristics of a range of employment.

Government Guidance on establishing appropriate levels of employment land requires a “balanced approach “using a combination of projection techniques but also looking at the wide range of market signals and market intelligence ’. The NPPF at para 81 states that significant weight should be placed on the need to support economic growth and productivity. While the Council’s own Vision (Chapter4) endorses this the resulting employment provision based on the HEDNA and related work do not match the current market characteristics and demand evidence.

The Borough Council along with the other local authorities in the sub region commissioned and published a report “*Coventry and Warwickshire Sub-Regional Market Signals Study*” (*BBP Regeneration 2018*). This represents relatively up to date and comprehensive evidence relating to the operation ,and characteristics of sub regional commercial and industrial markets. There is no evidence that this

work has been used to inform any of the approach used to derive or inform the employment land supply or related proposals in this draft document.

The Borough Council's approach to land supply results in reliance largely on existing commitments (para 6.43 table). It concludes, somewhat remarkably, that the Borough has a significant surplus of employment supply (19.2 ha) when set alongside Icenis' assessment of likely future requirements. The Chamber is concerned that the analysis set out in the draft Plan in this respect does not reflect the views, experiences and feedback of members –this includes a number of local agents and commercial property experts.

The recent performance associated with those sites that were released from the Green Belt and allocated in the current adopted Local Plan (2019) illustrates current market conditions and the relatively rapid take up of high quality employment sites fuelled by the underlying market demand. A good example is the strategic site at Faultlands Farm. The Chamber understands that planning applications are also being progressed on other large allocated key sites brought forward in the adopted plan. These trends relative to the existing allocations provide evidence of the strength of market demand across the Borough. It suggests that if further new employment land was allocated then take up would be underpinned by increased market activity.

The draft Local Plans proposals do not consider gaps or current supply deficiencies in employment provision in the Borough. As noted in the sub regional Market Signals report there are both affordability issues and sectoral shortages for particular types of accommodation and commercial premises. These are not addressed in the draft plan, which relies on the largely statistical forecasting in the HEDNA studies. Once again therefore the Chamber believes that market evidence has been set aside in favour of avoiding the allocation of new employment land to meet current and likely future deficiencies in land supply.

The Chamber notes that the current West Midlands Strategic Sites Study is an ongoing regional assessment of the likely need and allocation of "strategic" employment land provision. It is not clear when the results of this work will be available and precisely how it will impact on the Council's overall approach. It notes that the Council has attempted to identify an "interim figure" that might emerge from the study. However, it is difficult to judge how realistic this figure is likely to prove. The study will have an obvious impact across the C&W sub region and the use of the interim figure could have a distorting impact on the final distribution across the C&W sub region. It seems appropriate to rely on the future liaison and joint working embodied in the Duty to Cooperate activities with the other local authorities in the region.

In conclusion, the Chamber believes the proposals in the draft Local Plan will have a range of negative impacts on local business and frustrate opportunities to attract new investors into the Borough. Specifically these proposals will result in

- a more limited range of employment premises, reducing market choice and market activity in all business sectors,
- fail to address existing gaps and deficiencies in provision,
- limit the ability to attract new inward investment and divert pressure to other sub regional areas.



**Coventry and Warwickshire Chamber of Commerce.**

**Nuneaton and Bedworth Borough Plan Review.**

STRATEGIC POLICY DS3, paras 6.30-6.47.

*Part B: Continuation Sheet (ii)*

*6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in Part 5 above, where this relates to soundness..*

In the context of employment land supply the central modification required is for a range of new further employment land allocations to be made. These allocations will need to provide for a broad spectrum of land types and sizes in order to meet the range of requirements evidenced by current market demand and activity. They will need to address strategic and local needs.

It is important that the additional sites are spread across the whole plan period .In this context, phasing of the release of employment land allocations may be appropriate. This general action will ensure that the plans stated, “key objectives “are met.

The Chamber does not consider that at the moment it is able to put forward an appropriate figure for the quantum of new employment land required to meet the identified shortfall in the current provision. In part ,the figure will be impacted by sub –regional considerations and will depend on the outcome of the West Midlands Strategic Sites Study. From this work there should be an agreed level and distribution of the new employment sites required to meet this critical element of employment land supply.