

Anca Seaton

From: Peter Leaver <[REDACTED]>
Sent: 11 October 2023 17:52
To: Planning Policy
Cc: Peter Leaver
Subject: Pre-Submission Draft to Borough Plan Review
Attachments: Representation_Form_A__Nurton Developments Ltd.pdf;
Representation_Form_B__Nurton Developments Ltd - Policy DS3 FINAL.pdf

Dear sir/madam

Please find attached representations in respect of Policy DS3.

If you have any questions, please do not hesitate to call me.

Regards

Peter

Peter Leaver
Planning Director




 [@nurtondev](#)
 [Nurton Developments](#)



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 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Review 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

Please return to Nuneaton and Bedworth Borough Council by 16th October 2023 via:

Email: 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

	1. Personal details* * 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.	2. Agent's details (if applicable)
Title	Mr	
First name	Peter	
Last name	Leaver	
Job title (where relevant)	Planning Director	
Organisation (where relevant)	Nurton Developments Ltd	
House no. and street	11 Waterloo Street	
Town	Birmingham	
Postcode	B2 5TB	
Telephone number		
Email address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph	6.30 to 6.44
Policy	DS3 – Overall Development Needs
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

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

The identified employment need, as set out in Policy DS3 and Table 4, has been significantly underestimated. It is inadequate, both quantitatively and qualitatively. Specifically, it fails to: -

- *Make any provision for the unmet needs of Coventry.*
- *Make sufficient provision in contributing to the wider identified need for the sub-region for strategic distribution.*

With regards to the former, the Review of Nuneaton & Bedworth Employment Land Portfolio (Iceni, June 2023) makes it clear that the identified need of 87.85 hectares meets only Nuneaton & Bedworth's needs. Paragraph 6.14 states: -

"The Council will need to engage through the Duty to Cooperate with Coventry City Council, and as appropriate other local planning authorities in the sub-region, on issues of unmet needs arising".

Paragraph 6.13 refers to the previous Borough Plan making provision of 26 hectares as a contribution to meeting the employment land shortfall in Coventry (as set out in the adopted Coventry Development Plan). A similar scenario presents itself with the review of the Coventry Development Plan.

The Coventry Development Plan review has just commenced. Issues and Options were consulted upon in August and September this year. It shares the same principal evidence based on employment land need as Nuneaton & Bedworth – i.e. the sub regional Coventry & Warwickshire HEDNA (November 2022).

The Coventry & Warwickshire HEDNA identifies an employment land need of 147.6 hectares for general industrial land (i.e., excluding strategic warehousing) for Coventry. This is likely to be a minimum figure as it was based on a projection of land completions from 2011 – 2019. The more recent appraisals undertaken by Iceni of the employment land need for Nuneaton & Bedworth indicates that the 2011 – 2019 projections may be an underestimation. Iceni has reassessed projections based on completions from 2016 to 2021, which have led to an increased local need for general industrial land in Nuneaton & Bedworth.

The Coventry Development Plan Issues and Options identifies a potential existing supply of just 53.02 hectares. This is likely to be a maximum figure as a number of consented and allocated sites are constrained and will not yield their notional hectareage.

As such, there is a **current minimum shortfall of 94.58 hectares** (i.e. 147.6 hectares minus 53.02 hectares). Because of its very tight boundaries, and the absence of any obvious development or redevelopment opportunities within the City Council's jurisdiction, this unmet need will have to be met in Coventry's neighbouring planning authorities.

Nuneaton & Bedworth has an obvious geographical and economical relationship with Coventry and is very well placed to absorb much of this unmet need. In addition, development to the north of Coventry would rebalance current planned growth of Coventry to the south (Segro Park and the Gigafactory at Coventry Airport) and the east (Ansty Park), focus development in areas of relative deprivation, and help to level up the local economy.

The Coventry shortfall of 94.58 hectares relates to just general industrial and non-strategic warehousing. It does not include strategic warehousing, which is treated separately by the Coventry & Warwickshire HEDNA, and identifies a need for strategic warehousing land in Coventry & Warwickshire of 551 hectares for the period to 2041 and 735 hectares to 2050. This is **over and above** the need for general industrial land identified for each local planning authority.

Policy DS3 and Table 4 identify a provision of only 19.4 hectares of strategic warehousing land for Nuneaton & Bedworth. **This represents just 3.5% of the identified need of 551 hectares for the sub-region.** Given its strong communications and available labour force, this is an insignificant contribution by Nuneaton & Bedworth to meet the wider needs for strategic warehousing.

Paragraph 6.38 of the Review of the Nuneaton & Bedworth Employment Land Portfolio considers that the provision of 19.4 hectares of strategic warehousing is likely to be met through the development of the Faultlands site. This site has now been built out and is occupied by Rhenus Logistics. As such, there is no realistic provision for strategic warehousing for the remaining 16 years of the plan period (i.e. 2023 – 2039).

(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.

There is a clear shortfall of employment land in the sub-region of Coventry & Warwickshire. The draft Nuneaton & Bedworth Borough Plan does nothing to contribute to resolving this issue. This is a manifest failure of soundness and co-operation with neighbouring local planning authorities, particularly the latter.

To resolve this issue, Nuneaton & Bedworth Borough Council needs to engage with neighbouring planning authorities, particularly Coventry City Council. In the first instance, the local planning authorities of Coventry & Warwickshire need to work together to assess and determine: -

- How unmet employment land need from Coventry is distributed between its neighbouring authorities.*
- How the need for strategic warehousing is distributed between the authorities.*

Because of the scale of the employment land requirements, and the potential for significant overspill housing need from Coventry, consideration also needs to be given to what investment in transport and other infrastructure will be required. The Options Appraisals Report for the Coventry North Transport Package (April 2022), which was commissioned by the City Council, confirms that currently funded interventions (Keresley Link Road, Junction 3 M6, and Hawkesbury Level Crossing) only deal with the current and planned growth laid out in the adopted plans of Coventry and Nuneaton & Bedworth.

The report concludes further that significant new strategic interventions will be required to enable and deliver further growth beyond current known local plan allocations. It recommends that longer term major schemes should be investigated; specifically, a new link road west of Coventry connecting the A45 (at Eastern Green) and the M6 is recommended for further study. This link road could intersect with the M6 at Corley Services and provide a further connection to the A444 to the north of Bedworth.

As well as providing significant benefits in transport terms, the Options Appraisal Report considers that a new link road and junction on the M6 at Corley Services would unlock new employment and housing development opportunities to the west and north-west of Coventry. In our estimation, it could potentially accommodate up to 10,000 houses and a minimum of 100 ha of employment land. This ambitious approach, combining infrastructure and development planning, would enable the sustainable growth of Coventry and Nuneaton & Bedworth.

Nurton Developments Ltd is promoting a large site to the North-West of Coventry. It is located partly within Nuneaton & Bedworth Borough and partly within North Warwickshire Borough. It could be accessed off a new junction on the M6 at Corley Services. It has the potential to become a strategic employment site that can meet both the needs of Coventry for general industrial land and of the sub-region for strategic warehousing in the medium to long term.

This site is in the order of 100 ha and could potentially deliver up to 4 million sq ft of industrial and warehouse premises. The sub-regional HEDNA refers to the constrained industrial land supply of Coventry (paragraph 9.40 2nd bullet point). This site would improve Coventry's and Nuneaton & Bedworth's offer to the market and attract inward investment and jobs, particularly in high value or growth sectors such as automotive, high-tech manufacturing, renewable and green energy, and logistics.

Previously, a Memorandum of Understanding was agreed by all local planning authorities in the sub-region to redistribute unmet need from Coventry to its neighbouring authorities. This resulted in 241 hectares out of an identified need of 369 hectares of employment land for Coventry being distributed to Nuneaton & Bedworth, Rugby, and Warwick. A similar approach was taken with housing.

To date, this collegiate approach does not appear to have been taken by Nuneaton & Bedworth Borough Council with this review of the Borough Plan. To attract and stimulate economic activity, including the creation and safeguarding of jobs, we would encourage the Borough Council engages with Coventry City Council and planning and highways authorities in the sub-region. This would be the best way to ensure and plan for the growth of Coventry and its economic hinterland.

Before the draft Borough Plan is submitted for examination, we consider it is vitally important that Nuneaton & Bedworth Borough Council engages meaningfully with Coventry City Council, the other local planning authorities in the sub-region, and the principal transportation bodies (National Highways and Warwickshire County Council) to address these concerns.

(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:

These representations raise some serious and complex matters and our participation at the relevant hearing sessions should help the appointed inspector to gain a full appreciation of the issues involved.

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:	11 October 2023