

Anca Seaton

From: Nina Stanford <[REDACTED]>
Sent: 16 October 2023 09:37
To: Planning Policy
Subject: Reg 19 Consultation - L&Q Estates Submission
Attachments: R001v5_PL_BIR.5109_Reg19Reps_111023_FINAL_compressed (2).pdf

Importance: High

Categories: WIP

Dear Sir/Madam,

Please find attached representations made on behalf of L&Q Estates relating to the NBBB Regulation 19 consultation, and which are hereby formally submitted.

Please confirm receipt of this email.

Kind Regards,

Nina

Nina Stanford
Planner

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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		Miss
First name		Nina
Last name		Stanford
Job title (where relevant)		Planner
Organisation	L&Q Estates	Pegasus Group
House no. and street		5th Floor, 1 Newhall Street
Town		Birmingham
Postcode		B3 3NH
Telephone no.		
Email address		

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	Refer to attached Representations - Pegasus Ref: BIR.5109
Policy	
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 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.

Refer to attached Representations - Pegasus Ref: BIR.5109

(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.

Refer to attached Representations - Pegasus Ref: BIR.5109

(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:

Refer to attached Representations - Pegasus Ref: BIR.5109

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:	12/10/2023

BOROUGH PLAN REVIEW 2021-2039

**NUNEATON AND BEDWORTH BOROUGH
COUNCIL**

**PUBLICATION DRAFT PLAN – REGULATION 19
CONSULTATION (SEPTEMBER 2023)**

Representations on behalf of L&Q Estates

Land West of the A444 and South of M6 Junction 3

Date: September 2023 | Pegasus Ref: BIR.5109

Author: DO



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	27/09/2023	DO	DO	N/A
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1. INTRODUCTION

- 1.1. These representations are made by Pegasus Group on behalf of L&Q Estates, in response to Nuneaton and Bedworth Borough Council's Borough Plan Review Regulation 19 consultation.
- 1.2. L&Q Estates have an interest in Land West of the A444 and South of M6 Junction 3 (the "Site" – see Site Location Plan at **Appendix 1**) which is promoted for allocation for employment or residential development through the Borough Plan Review.
- 1.3. These representations respond to the emerging policies, having regard to the national and local policy context. The representations also provide comment in respect of the evidence base that underpins the Borough Plan Review including employment land requirements, as well as making reference to representations submitted on behalf of L&Q Estates at earlier stages in the Borough Plan Review process. The representations also refer to the approach being taken in sub region towards the preparation of Local Plans and especially in Coventry.
- 1.4. These representations are framed in the context of the requirements of local plans and spatial development strategies to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework ("NPPF", 2023), paragraph 35. For a development plan to be sound it must be:
 - **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective and joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.
- 1.5. These representations have regard to the NPPF's emphasis on the role of development plans in providing a framework for addressing housing needs and other economic, social and environmental priorities (paragraph 15) and in supporting the Government's objective of significantly boosting the supply of homes, through ensuring that a sufficient amount and variety of land can come forward where it is needed.
- 1.6. The representations also have regard to the statutory duty for local planning authorities to co-operate with other local planning authorities, county councils and prescribed bodies relating to strategic matters when preparing development plan documents.

2. BACKGROUND

- 2.1. The Borough Plan Review is intended to replace the adopted Nuneaton and Bedworth Borough Plan 2011-2031 ("**NBBP**") and extend the timeframe covered by the NBBP until 2039.
- 2.2. The NBBP was adopted in June 2019 and covers the period up to 2031. Nuneaton and Bedworth Borough Council ("**NBBC**") committed to undertaking an immediate review of the adopted NBBP following the publication of the updated NPPF.
- 2.3. The Council's decision to review the NBBP is fully supported by L&Q Estates to ensure:
 - planning policies and proposals are consistent with the updated NPPF;
 - the housing and economic development requirements are aligned to the most up-to-date information, including household and economic projections and cross-boundary needs; and
 - the local plan is up-to-date, reflecting Government guidance that plans should be regularly reviewed and the evidence base renewed to respond to changing needs.
- 2.4. A consultation was undertaken from June 2021 to August 2021 on the Regulation 18 Issues and Options stage of the Borough Plan Review. Representations were made to the Issues and Options consultation on behalf of L&Q Estates (the "**L&Q I+O Reps**").
- 2.5. The Council consulted on a Preferred Options version of the Plan (the "**BPR PO**") in July 2022. Representations were made to the Preferred Options on behalf of L&Q Estates.
- 2.6. The Council is now consulting of the Regulation 19 version of the Local Plan (the "**BPR Reg 19**"). This plan will be the version submitted to the Secretary of State and examined by an independent Inspector.

3. REPRESENTATIONS ON THE EVIDENCE BASE SUPPORTING THE REGULATION 19 PLAN

3.1. The adopted NBBP was supported by a comprehensive suite of additional evidence, including a Green Belt Study (2015), an Employment Land Review (2014) and Employment Land Use Studies (2015 and 2016), for which no equivalents have been produced in relation to the Local Plan Review process. Ensuring the delivery of sufficient employment land is particularly important given the sub-regional context of record demand and constrained supply and the local context of a lack of growth and a recent fall in employment. As stated elsewhere in these representations and previously in the L&Q I+O Reps and L&Q BPR PO, L&Q Estates considers that Green Belt release at appropriate locations should be considered to deliver at the most sustainable pattern of new development. An updated Green Belt Study would be appropriate to ensure the most sustainable options are fully explored and the changes that have occurred since the 2015 Green Belt Study are taken into account in assessing potential sites.

3.2. The sections below provide L&Q Estates' commentary on elements of the evidence that has been produced in support of the BPR Reg 19.

Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (November 2022)

3.3. The sub regional HEDNA recognises the importance of national policy and this is reflected in the document, in particular it notes that PPG Para 2a-O31 specifically identifies how to assess need and allocate land for logistics. It recognises that the logistics/ distribution sector is an important component of the sub-regional economy and the sub region has a competitive advantage in this sector reflecting its location at the centre of the country and motorway network. It recognises that Para 2a-O31 of the PPG outlines that:

3.4. *"The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land). Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policymaking authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas."*

3.5. The sub region HEDNA report provides an assessment of development needs including for employment land across the sub-region. The sub-regional HEDNA considered data only to 2019 as this was the only timeframe for which consistent data was available for all of the HMA authorities.

3.6. Key themes in terms of the current industrial market sector includes a recognition that the northern part of the sub-region has a strong and dynamic industrial market (summary on page 57). With regard to the specifics of employment in Nuneaton and Bedworth it noted that the proportion employed in the Transport and Storage Sector exceeded both the national and sub-regional average (Table 2.9).

- 3.7. Section 6 of the sub-regional HEDNA considers economic growth potential. It utilises economic forecasts developed by Cambridge Econometrics (CE) for the Coventry and Warwickshire economy. It then moves on to consider the future growth potential of different local economies having regard to the baseline forecasts, using a focus on potential demand-side drivers (rather than land supply).
- 3.8. The HEDNA considers anticipated employment growth in each local authority area and concludes that relative to its existing employment, North Warwickshire is expected to post the strongest proportional growth. The weakest relative growth is expected in Nuneaton and Bedworth (9%).
- 3.9. The HEDNA concludes that completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace particularly for the short/medium-term. Comparing the completions data with other sources, and monitoring by authorities suggests far higher levels of development have been achieved and therefore may be required in the future.
- 3.10. Similarly to the June 2022 NBBC HEDNA, this sub-regional HEDNA takes the jobs growth from the forecasts for the relevant sectors and the gross completion trends for industrial and warehousing and converts this into floorspace requirements using the following employment densities:
- 14 sqm offices (12 sq.m NIA per FTE)
 - 44 sqm industrial (blend of former B1c and B2)
 - 80 sqm warehousing
- 3.11. The employment forecasts method leads to a floorspace requirement for office space in the Borough of 10,100 sq. m. or 2.0 ha over the period 2021-39. Industrial space has a negative requirement of -22,000 sq. m. (-4.4 ha) and warehousing space has a requirement of 23,300 sq. m. (5.8 ha).
- 3.12. Taking into account all the approaches identified the Sub-Regional HEDNA identifies an overall need for 47.7 ha of employment land to 2041 in Nuneaton and Bedworth.

Table 11.2 Employment Land Needs 2021-2041, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.7	621.9	659.6	551

Source: VOA / CE/lceni

- 3.13. The Sub Regional HEDNA uses a range of methods which includes the take up of employment land, but it concludes that the preferred approach is the use of completions data as the best

representation of market needs for the next phase of plan making for industrial / warehousing floorspace particularly for the short/medium-term (para 11.10). However, the HEDNA also recognises that there was a relatively constrained supply position for a number of years in Nuneaton and Bedworth prior to the adoption of the Local Plan in 2019, which released a number of sites from the Green Belt. This factor must influence the completion based methodology which were based on previous take up of sites. This is confirmed by the low anticipated trend based requirement for NBBC set out in tables 9.12 and 9.13. It can be seen that whilst the HEDNA recognised that the past delivery of employment land in NBBC was constrained due to a lack of supply, no allowance was made to reflect this issue. In addition whilst sites are now coming forward as a consequence of the 2019 Local Plan, these will not be factored into the need calculation, due to the data cut off in 2019.

- 3.14. As a consequence the NBBC figures for employment land set in the sub-regional HEDNA of 2.2Ha for offices and 45.5HA of general industrial employment land to 2041 have not been adequately justified in evidence nor has the approach taken been positive to respond to the issues in play including that the Borough has had the lowest level of growth in the sub region.

Strategic B8 Need

- 3.15. The land-use forecast methodology used for strategic B8 land use is derived from the following key factors relating to new logistics facilities:

- The continual need to build new large-scale warehousing as a replacement for existing capacity which, over time, becomes life-expired (replacement build); and
- Long-term growth in the demand for goods in the wider economy and the subsequent need for additional floor space in order to handle that growth (growth build).

The sub regional HEDNA identifies the following as key requirements for strategic B8 sites:

- Road Accessibility
- Power supply
- Proximity to rail terminals
- Labour availability
- Neighbouring activities

- 3.16. The HEDNA goes on to identify 4 key corridors in the sub region for strategic B8 development. One of these is M6 corridor which is described as:

- M6 Corridor – this corridor includes Junctions 2 and 3 on the northern side of Coventry, as well as Junction 1 at Rugby. Coventry is a large population centre which includes areas of deprivation.

- 3.17. The HEDNA recognises that existing concentrations of development indicates that the above are attractive locations for strategic B8 development and relate well to the Golden Triangle. Whilst identifying that over concentration in these key areas could cause issues, these remain the preferred location for strategic B8 development. The HEDNA recommends that

there should continue to be a focus of strategic B8 growth in the north and west of the sub-region,

Conclusion on Sub Regional HEDNA

- 3.18. The approach taken in calculating employment land requirements has been underpinned by past completion rates and the situation in NBBC has been constrained until very recently by a lack of employment sites coming forward. This must influence the calculation of employment land. No allowance is made to take account of this factor nor the low levels of growth in Nuneaton and Bedworth.
- 3.19. There is a large requirement for strategic B8 development which is defined as 551Ha up to 2041. The M6 corridor including J3 and J4 remain key locations to meet this need. The distribution of this requirement across the sub region has yet to occur.

Housing and Economic Development Needs Assessment (June 2022)

- 3.20. The BPR PO was supported by a Housing and Economic Development Needs Assessment ("HEDNA") prepared by Icen Projects and issued in June 2022. This report was published before the sub-regional HEDNA study above. It was prepared for NBBC only and focused on the Borough rather than the sub region. It is referred hereon as the NBBC HEDNA.
- 3.21. The key difference in the approach of the NBBC HEDNA and the sub regional version in regard to calculating employment land need is:
- a) The NBBC HEDNA took account of more recent completions looking at data to 2020/21, whereas the sub-regional HEDNA considered data only to 2019 as this was the only timeframe for which consistent data was available for all of the HMA authorities. Its preferred approach in drawing conclusions for Nuneaton and Bedworth was to project forward a 5 year completions trend (2016-21) whereas the sub-regional evidence considered a 7 year period (2011-19);
 - b) The NBBC HEDNA considered all industrial and warehousing development, whereas the completions trend in the sub-regional HEDNA sought to remove completions related to strategic B8 development which was treated separately. The effect of this was to reduce the completions projection in NBBC by 19%.
- 3.22. L and Q Estates support the general approach in the NBBC HEDNA set out above, however if it is to address the specific issues associated with the low level of historic growth in the Borough, it will need to make a step change in the provision of employment development, rather than still, at least in part, be based on past employment completions.
- 3.23. In addition, as the sub regional HEDNA identifies, the increasing need for B8 development is often predicated on the need to replace existing buildings to address changes in technology/ user requirements etc, as well as long term growth in the supply of goods. As has been set out there has been limited development within Nuneaton and Bedworth in the employment sector generally due to constraints on employment sites. As a result it follows that much of the existing supply in NBBC must be of older stock which is more likely to require renewal than elsewhere in the sub region. This provides further support for an increase in the requirement.

Conclusions with regard to the NBBC HEDNA

- 3.24. Based on the above analysis, it is L&Q Estates' position that the employment need set out in the NBBC HEDNA and planned for, which includes the a reduction in the amount of employment land proposed at Bowling Green Lane (EMP7 in the NBBP) is insufficient to help the Borough increase its long-term employment growth rate. If the aspirations of the Reg 19 Local Plan and in particular the Council's Draft Local Economic Strategy are to be realised, and in particular in terms of enterprise and prosperity to deliver a step change from historic circumstances, it will be essential that new employment opportunities are brought forward which exceed the largely trend based derived employment need.
- 3.25. With regard to housing need, the use of a housing need figure higher than the minimum derived from the standard method is supported. However, consideration needs to be given to what this uplift could mean for job numbers because housing and the labour market are closely linked.
- 3.26. For the reasons set out above it is anticipated that additional employment allocations are likely to be required as a result of further evidence arising, and, as set out in Section 5 of these representations, the Land West of the A444 and south of M6 Junction 3 is considered an appropriate location for removal from the Green Belt and allocation for employment development.

Towards a Housing Requirement for Nuneaton & Bedworth (TAHR) (November 2022)

- 3.27. This report was published alongside the sub-regional HEDNA to provide a more specific consideration of both housing and employment needs in the Borough, taking account of local considerations, with a view to informing the level of provision of each within the Borough Plan Review.
- 3.28. The TAHR recognised that the NBBC area already has the lowest volume of jobs of the local authorities within Coventry & Warwickshire and has a relatively low jobs density with 64 jobs per 100 people of working age compared to an average of 80 across the West Midlands and 84 per 100 nationally. It also recognised that weaker growth in the Borough relative to the other HMA authorities is also manifest in issues associated with the quality of jobs, and the skills profile of the Borough's population.
- 3.29. In this context the TAHR concluded that the Nuneaton and Bedworth HEDNA should be preferred over the Sub Regional HEDNA as:
- In addition to the local needs identified in the sub-regional HEDNA (c. 48 ha to 2041) the Borough will need to contribute to strategic B8 warehousing and distribution needs. The 80.5 ha calculation in the NBBC specific report included provision for strategic B8 in line with past development trends in the Borough.
 - It was able to consider more up-to-date data on employment land completions in drawing conclusions on the industrial and warehouse demand. L&Q Estates support using an alternative approach to past completions to inform employment land need. This seems appropriate in the Borough context given the evidence of supply constraints as reflected in the Borough's previous employment land evidence and identified in the draft NBBC HEDNA at Para 9.40, which identified constraints on land availability and power capacity.

- 3.30. L&Q Estates also support including Strategic B8 completions in the employment need calculation bearing in mind the limited amount of completions that have come forward.
- 3.31. However the evidence to support the scale of the contribution towards strategic Class B8 needs is scant, again being based on past trends for this sector, which the same report has discounted as the basis for calculating general employment land requirements, due to the limited availability of sites in the Borough. In particular this does not take account of the scale of the requirement (606HA in the TAHR). The allowance made for the contribution of 19.4ha of employment land for strategic B8 warehousing and distribution development is entirely inadequate representing only 3% of the requirement, and the report recognises that it may be appropriate to plan above this level to provide supply-side flexibility and/or if there was potential to provide a higher contribution to the strategic B8 warehousing/distribution needs.
- 3.32. In addition it appears that the 'past trends' justifying this approach is based solely on the Faultlands site coming forward for B8 development. The fact that this single site is consented is inadequate to provide a meaningful contribution and ignores that other sites capable of largescale B8 use such as Wilsons Lane are also consented.
- 3.33. In addition it must be recognised that the Borough contains one the 4 key locations for strategic B8 development (the M6 corridor). It is location which has already been successful in attracting storage and distribution uses. This locational advantage should feed into identifying a suitable level of contribution.
- 3.34. In order to take account of the above a substantially larger contribution towards the significant need for Strategic B8 need and which looks to identify sites in strategically important locations such as J3 of the M6, should form part of the conclusion of the TAHR.

Review of Nuneaton & Bedworth Employment Land Portfolio (June 2023)

- 3.35. This report drills further into the supply position in the Borough, including issues around current vacant/available land and premises in the Borough; and any replacement provision which might be incorporated to take account of expected losses of employment floorspace to other uses. This will allow NBBC to consider the appropriate level of employment land provision to make in the Borough Plan Review. The report concludes that a locally-generated need for 68.5 ha is identified, made up of the office need and local industrial and warehousing needs, together with provision for replacement of losses and sites to be removed from the portfolio.
- 3.36. At para 6.23 the report states that if strategic B8 development is provided for in line with past trends, a total employment land needed of 87.9 hectares to 2039 is identified. However this is contingent on the ability of the Council to identify and allocate sites which are suitable and commercially attractive for strategic B8 development. The strategic B8 need shown (19.4 ha) should also be treated as a minimum figure.

Sustainability Appraisal Report, July 2023

- 3.37. As part of the evidence base for the Reg 19 LP, the Council has further updated the Sustainability Appraisal ("SA"). The SA considers the Reg 19 LP against a framework of 20 sustainability appraisal objectives and includes an assessment of a variety of sites across the Borough, to establish their desirability for housing and employment development.

Growth Strategy

- 3.38. The SA reflects on the SA undertaken at both Issues and Options and Preferred Options stage. In considering the Preferred Option LP the SA noted that there were five broad strategies for housing delivery:
- **Option 1:** urban dispersal, with strategic sites HSG4 and HSG7 de-allocated and additional sites allocated in the urban area (primarily focused in Nuneaton) delivering approximately 646 dwellings per annum;
 - **Option 2:** existing strategy rolled forward, rolling forward strategic sites with no additional sites needing to be found to meet the housing requirement, delivering approximately 660 dpa;
 - **Option 3:** strategic focus, with strategic sites HSG4 and HSG7 de-allocated and additional growth of at least 1,000 dwellings directed to a new strategic location in either Galley Common (**3a**) or North of Nuneaton (**3b**), delivering approximately 680 dpa;
 - **Option 4:** increased dispersal in urban areas, with additional site allocations through the urban areas, delivering approximately 712 dpa; and
 - **Option 5:** dispersal plus strategic focus, mixing urban dispersal with strategic growth of at least 1,000 dwellings directed either to Galley Common (**5a**) or North of Nuneaton (**5b**), delivering approximately 712 dpa.
- 3.39. The SA Report (at 6.2.1), however, identifies Green Belt release as an 'unreasonable alternative' to Options 1 to 5. It states that: *"The Council consider it unnecessary to continue exploring the potential for Green Belt release to deliver housing growth. There are sufficient sites within the urban area and the countryside that are not Green Belt and these would well exceed identified housing needs in the Borough. Even in the event that needs may increase in response to changes in evidence or cross boundary issues, it is still considered that there are sufficient non-Green Belt sites to explore first."*
- 3.40. The Council's approach to Green Belt land is not supported by L&Q Estates. The fundamental role of a local plan when identifying a strategy for the delivery of new housing development is to deliver sustainable development. Green Belt boundaries, which are largely a historic designation which does not take into account many of the factors that feed into the delivery of sustainable development, should not be utilised in a way which would exclude the consideration of the most sustainable options for the allocation of residential and employment development.
- 3.41. It is not considered appropriate to discount development options without a clear basis in need. Given the concerns raised in regard to the approach to calculating the local need for employment growth and particularly strategic B8 development set out elsewhere within these representations, L&Q Estates considers that this is a potential threat to a finding of soundness with regard to the requirements that development plans should be positively prepared and justified and that all reasonable alternatives should be fully considered.

Site Assessment

- 3.42. The Land West of the A444 and South of M6 Junction 3 is assessed under the SA Report under the reference EXH-10 Land east of St Giles Road.
- 3.43. Site EXH-10 scores highly on a number of sustainability measures. It is identified as being located in an area of low landscape sensitivity, without overlap with any areas identified as potentially sensitive. With regard to biodiversity, the site's development would not cause the direct loss or disturbance of any Special Areas of Conservation, Sites of Special Scientific Interest, ancient woodland or Local Nature Reserves.
- 3.44. The SA also identifies that the site is well-located with regard to local parks, sports and recreational facilities and the nearest primary school. The nearest GP is only 728 m away and the site is 818 m from the Coventry Road / School Lane built-up centre.
- 3.45. The Site also scores highly with regard to access to the strategic road network, with the A444 being located immediately east of the site and M6 Junction 3 being located to the north. An active travel network overlaps with the site (which is crossed by a PRoW) and it is identified as being 74 m from the nearest bus stop (with 15 bus stops within 800 m) and just over 1 km from the nearest railway station.
- 3.46. L&Q Estates questions some aspects of the scoring of the Site within the schedule to the SA Report:
- Whilst the Site is categorised as red for impacts on a local wildlife site, due to Breach Brook cutting through the Site, this is the lowest category of wildlife designation (the Site score green for all higher categories) and the submitted Vision Document demonstrates how development can come forward sensitively incorporating the brook and avoiding any impacts.
 - The loss of Grades 1, 2 and 3 Agricultural Land is given an aggregate score, which does not distinguish between those sites which include the highest grades of agricultural land and those which only contain Grade 3. The Site comprises only Grade 3 Agricultural Land.
 - The use of an 800 m yardstick to gauge accessibility to facilities and public transport masks the overall accessibility of the Site. The Site scores red for access to built up centres, being only 812 m from the nearest built up centre – the SHLAA identifies the Site as "all facilities reasonably accessible". The site scores green for its distance from the nearest railway station (1,167 m) but nevertheless also receives a red score as the distance is greater than 800 m. The reality is that the site is well related to the existing settlement and has access to public transport which can be enhanced through contributions.
 - Coalescence is scored amber, however there is little scope for the site to merge with land to the east in Longford, due to the A444 creating a physical barrier between the two settlements. The consented Wilson Lane site will maintain a substantial landscape buffer alongside the A444 to reinforce the separation. Notwithstanding, coalescence can be avoided through detailed design work and mitigation on site including along the Breach Brook corridor which would further reduce the potential impact.



- The presence of a PROW also leads to a red rating despite the positive aspects of retaining PROWs in terms of connectivity and supporting active travel. On this basis, the presence of a PROW should not result in a red score.

3.47. Section 5 of these representations provides details of the sustainability credentials of Land west of the A444 and south of M6 Junction 3 and it is considered that the Site is particularly well placed in terms of proximity to the strategic road network, existing employment areas, services, facilities and public transport provision. The site is suitable for employment-led development, is immediately available and can be delivered in the short to medium term.

4. REPRESENTATIONS ON THE CONTENT OF THE REGULATION 19 PLAN

Introduction

Plan Period

- 4.1. The plan period to at least 2039 reflects the *minimum* 15-year period from adoption that should be covered by strategic policies according to NPPF (paragraph 22).
- 4.2. L&Q Estates maintains that the vision set out in the BPR Reg 19 should be amended to provide a strategy for a 30-year plan period. As set out previously in the L&Q Reps, an extended planning period would provide greater certainty to the public and the development industry as to how land will come forward into the future and ensure that both development and supporting infrastructure can be appropriately planned for.
- 4.3. There is no reason why a longer plan period should impact the relevance of the underlying evidence, given the NPPF requirement to review local plans every five years to ascertain whether or not they remain up-to-date.
- 4.4. The NPPF is clear that Green Belt boundaries should endure beyond the plan period (paragraph 140). An extended plan period would allow for a more strategic consideration of Green Belt boundaries and whether they still serve their intended purpose, as well as whether Green Belt release is required to meet identified needs.

Evidence

- 4.5. The LPAs in Coventry and Warwickshire commissioned a sub regional Housing and Economic Needs Assessment (HEDNA) to inform the preparation and review of local plans in the area. This has been considered in the previous section.
- 4.6. The Council has also independently commissioned from Icenl the NBBC Draft HEDNA and developed this into the 'A Housing Requirement for Nuneaton and Bedworth (THAR 2022) document. This report draws together further relevance to setting a housing requirement and policies for employment level provision. It is intended to supplement and be read alongside the Sub-Regional HEDNA. Comments on this document are also included in the preceding section.

Duty To Co-Operate

- 4.7. L&Q Estates supports the Council's commitment (at 1.11 of the BPR Reg 19) to positive engagement with relevant bodies on strategic matters that cross administrative boundaries during the preparation of BPR Reg 19.
- 4.8. However, it is notable that the response of Coventry City Council (CCC) to the BPR PO stated that the Local Plan had yet to comply with Duty to Cooperate and would not be considered sound. CCC also referred to the lack of a Memorandum of Understanding and that there was a need to robustly calculate housing need.

- 4.9. North Warwickshire Borough Council also raised concerns that the Duty to Cooperate has not been adequately addressed. In particular NWBC state that they are very disappointed that NBBC is withdrawing from the Memorandum of Understanding, NWBC considered the Local Plan not sound due to a range of factors associated with cross boundary issues.
- 4.10. In view of the above, lack of progress on the Memorandum of Understanding and timing of the Local Plan in advance of others in the sub-region, L&Q Estates are concerned that the Duty to Cooperate Test will not be met.
- 4.11. This view is reinforced when the approach the Council has taken into contributing towards meeting strategic B8 requirements is considered. The LP in Policy DS3 has identified a very small contribution towards meeting these needs based on the fact that a single site had been consented at Faultlands. Instead, the LP should either make a much more substantial contribution or else the LP should be supported by evidence of the sub regional dissemination of this requirement taking into account the specific locational requirements of this sector. Consequently, the Duty to Cooperate has not been met at this stage due to the absence of a strategy to disseminate the employment needs of the sub-region.

Whilst the HEDNA has been prepared to establish the potential level of development requirements, the recent publication of the Coventry Local Plan has shown that there are a number of major issues to be resolved in the sub region. In particular, the CCC Preferred Option relies on departing from Government Policy in order to reduce housing requirements. It also relies on employment sites which were previously part of its LP supply but have not come forward to meet current requirements. L&Q Estates are aware that a number of representations have been made to CCC suggesting that their strategy in the emerging LP conflicts with government policy. There is strong potential that development requirements in Coventry will increase significantly. This further emphasises the need for a Memorandum of Understanding to be agreed at sub-regional level to plan for, and manage, development requirements.

Vision and Objectives

- 4.12. The amended vision and objectives are broadly supported, but L&Q Estates would reiterate that the vision should be extended to cover a 30-year time period.
- 4.13. The vision rightly aims to ensure the Borough is a place of sustainable economic growth with diverse job prospects, housing for all and integrated infrastructure. This is particularly important that employment growth in Nuneaton and Bedworth has been less than other parts of the sub region and West Midlands.
- 4.14. To achieve this vision it will be necessary to provide the right number of new homes to attract and retain economically active residents within the Borough to support the economic growth ambitions. It is also essential that, if employment growth is to increase to compare with elsewhere in the sub-region, the targets for the delivery of housing and economic development land are sufficiently ambitious.
- 4.15. L&Q Estates recognises that the delivery of new infrastructure will be necessary to support new development and address needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the Borough and could assist in addressing a number of the highlighted issues. It is vital that any infrastructure requested in support of development is based on an up-to-date understanding of needs and takes into account the

type of development proposed and any contributions already made through development proposals and permissions. However Strategic Objection 2 could be made more specific to the Borough if it emphasised the advantages of the access to the strategic road network the area benefits from and that this should be maximised especially north of Coventry.

- 4.16. The other objectives are also broadly supported by L&Q Estates. As stated in section 5 of these representations, it is considered that the allocation of the Land West of the A444 and South of M6 Junction 3 for development has the potential to meet Objectives 1, 2, 4, 5, 6, 7 and 8 set out in the BPR PO.

Strategic Development Strategy

Policy DS1 – Sustainable development

- 4.17. The revision of Policy DS1 contained in BPR Reg 19 has taken on board the comments made by L&Q Estates, with the Policy being largely rewritten. The policy now makes a number of references to development 'contributing' towards achieving net zero carbon emissions. However it is unclear how the degree of 'contribution' will be measured. Presumably to fully meet the 'contribution' a development would have to be zero carbon. There is no evidence to substantiate that in Nuneaton and Bedworth all development should be zero carbon nor has this been subject to viability assessment.

Policy DS2 – Settlement hierarchy and roles

- 4.18. L&Q Estates supports the Council's acknowledgement in the supporting text to Policy DS2 that it is necessary to consider the wider context in which the borough is located, including the close proximity of other settlements outside the borough boundary.
- 4.19. L&Q Estates agrees that Nuneaton, Bedworth, Bulkington and the northern Coventry fringe are the most sustainable locations for growth and supports the identification within the supporting text of the role the Plan has in delivering the wider aspirations of the sub-region.
- 4.20. The policy identifies the northern fringe of Coventry as having "a supporting role for housing, shopping and local services". This does not fully reflect the important role parts of the northern fringe play in the delivery of employment land. Land close to M6 Junction 3, at the northern fringe of Coventry and south of Bedworth, has consistently been considered an appropriate location for significant employment development, as evidenced by existing allocations EMP2, EMP6 and EMP7.
- 4.21. As set out in previously large-scale employment uses are most appropriately located on the strategic road network, in order to facilitate the requirements of the businesses that occupy such uses but also to minimise conflict with residential dwellings and their impact on the local road network. The M6 transport corridor is identified as a priority area for strategic investment in the Coventry and Warwickshire Sub-Regional Employment Market Signals Study (July 2019) and programmed improvements to M6 Junction 3 will further increase its capacity and enable it to support additional development. The importance of this area as a focus for employment growth is underlined by significant existing and proposed development including at Prologis Park at Keresley, which is identified for expansion and land at Wilsons Lane, which benefits from a grant of planning permission for development.

- 4.22. It is generally recognised that much of the need for employment land results from the requirements of warehouse/logistics sector. As set out above the M6 corridor had been identified as an important location for this sector.
- 4.23. In particular, the sub regional HEDNA identified the key elements necessary to meet strategic B8 needs. Key factors included accessibility, power supply, labour availability and neighbouring activities. The sub regional HEDNA identified the M6 corridor as being one of 4 key corridors for strategic B8 development. This included Junction 3 north of Coventry. It also recognised the significance of the location being close to Coventry, which is a large population centre with significant levels of deprivation.
- 4.24. In view of the clear evidence for land in the vicinity of J3 to have a role in meeting the need for strategic B8 needs. it is recommended that the policy text is altered to reflect the role of this area in providing employment development.

Policy DS3 – Overall Development Needs

- 4.25. The Policy sets out the development needs for the Borough over the plan period as being:
- 9,810 homes based on 545 dwellings per annum.
 - 66.45ha of employment land for local industrial and distribution/warehousing development (including 5.35ha for replacement provision).
 - 2ha of employment land for office space.
 - 19.4ha of employment land for strategic B8 warehousing and distribution development indicative
- 4.26. The evidence behind these development needs is contained in the report Towards a Housing Requirement (TAHR). This was prepared to supplement and be read alongside the sub-regional HEDNA. Comments on both these documents are set out in the previous section. However serious concerns are raised about the approach towards calculating employment needs set out in the LP on the following grounds:
- If it is to address the specific issues associated with the low level of historic growth in the Borough it will need to make a step change in the provision of employment development, rather than still, at least in part, be based on past employment development trends which are recognised as being unduly constrained due to a lack of sites.
 - The Council's aspiration via its Local Economic Strategy to seek enhanced economic growth would in itself warrant an increase in the provision of employment land.
 - The evidence for the contribution towards strategic Class B8 needs is scant being based on past trends for this sector, which the same report has discounted as the basis for calculating general employment land requirements, due to the limited availability of sites in the Borough in the past. In fact the 'past trends' relates to a single planning permission at the Faultlands site.
 - The scale of contribution towards strategic B8 needs is inadequate and not properly justified being only 3% of the requirement. By identifying the contribution in the Policy,

particularly at such a low level, usurps the sub regional approach on this sector advocated by the Icen reports and casts doubt on the duty to cooperate.

- 4.27. In addition the sub regional HEDNA makes clear that there are specific locational requirements for strategic B8 in the sub region consisting of:
- Road Accessibility
 - Power supply
 - Proximity to rail terminals
 - Labour availability
 - Neighbouring activities
- 4.28. The sub regional HEDNA goes on to identify 4 key areas of which one is the M6 corridor including junctions 3 and 4. These factors are key in delivering the strategic B8 component and should be referenced in the policy.
- 4.29. In view of the above L and Q Estates consider Policy DS3 is failing to adequately provide for the quantum of employment land needed to provide a 'step change' to economic development as required by the Council's Local Economic Strategy. In addition, the policy is failing to meet the need for strategic B8 requirements in locations which would be suitable, based on its own evidence. To address this additional land should be identified in key location such as in close proximity to J3 of the M6. Land West of the A444 and South of M6 Junction 3 would meet with all these requirements. As a result, as drafted the policy is unsound.

Policy DS5 – Employment allocations

- 4.30. The employment allocations in Policy DS5 identify land for 52.15 ha of employment land and associated infrastructure, to address a minimum requirement identified in 66.45 ha of land for industrial and distribution/warehousing development, 2 ha of employment land for office space to meet Nuneaton and Bedworth's needs and 19.4 ha to meet the need for strategic B8 warehousing. The proposed allocations are reduced from those in the existing NBBP, through the re-allocation of part of Land at Bowling Green Lane (reference EMP7 in the NBBP) for residential development.
- 4.31. As stated above, L&Q Estates considers that the employment need set out in the NBBC HEDNA/ TAHR and planned for through the allocations in Policy DS5 is insufficient to help the Borough increase its long-term employment growth rate.
- 4.32. L&Q Estates considers that it is necessary for NBBC to identify additional employment allocations to ensure growth rate targets can be met and that further additional allocations will be required to address previous low levels of growth, the Council's aspirations in its Local Economic Strategy and contribute toward strategic B8 requirements. In addition, it should be noted that SEA2 Wilsons Lane is consented. This further reduces the potential for employment land to come forward later in the plan period.
- 4.33. The Council's approach to meeting this requirement is set out in Table 5. This relies on a windfall allowance of 15.1 ha to contribute towards delivering the requirement. This relates to circa 17% of the 87.85 ha requirement. There is limited evidence to support the size of this

figure. In addition, the reference to extant planning permissions at April 2023 is incorrect as SEA2 Wilsons Lane (19.09 ha) was also consented at this time. On this basis L&Q Estates consider insufficient land is identified in Policy DS5 to deliver the employment need set out in DS1. Additional sites must therefore be identified in locations capable of meeting the need, including meeting the need for strategic B8 development.

- 4.34. As stated elsewhere in these representations, and as previously put forward in the L&Q I+O Reps and L&Q PO, L&Q Estates maintains that the most sustainable locations for employment development should be prioritised no matter whether they are designated as countryside or Green Belt. The area of land around M6 Junction 3 is appropriately located on the strategic road network within the M6 transport corridor, a priority area for strategic investment according to the Coventry and Warwickshire Sub-Regional Employment Market Signals Study (July 2019) and in the sub regional HEDNA. Additional allocations in this location would represent a continuation of a strategy begun through the adopted NBBP, which allocated sited EMP2, EMP6 and EMP7 in the vicinity of M6 Junction 3 based on the NBBP evidence base including the 2014 Employment Land Review.

Policy DS8- Review

- 4.35. The commitment to early review of the Plan if required by changing circumstances is supported, however this does not mean the Council should avoid making an appropriate and reasonable contribution to meeting sub-regional needs through the current LP review process, especially in relation to meeting the need for B8 employment development. As set out at para 23 of the NPPF (2023), *“strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.... this should include planning for and allocating sufficient sites to deliver the strategic priorities of the area”*. At present, the Council are failing to conform with Government Policy by not taking on board the strategic need for Class B8 development in the sub region..

Para 26 of the NPPF (2023) states that, *“joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere”*. As set out previously the situation with Coventry and its development requirements could result in its needs having to be considered by neighbouring LPAs including NBBC and a potential failure of the Duty to Cooperate. **Strategic allocations**

Policy SA1 – Development principles on strategic sites

- 4.36. Policy SA1 seeks to apply a series of requirements to residential development proposals on all strategic sites.
- 4.37. The application of the Nationally Described Space Standard to all residential development would require clear justification in line with footnote 49 of the NPPF and the Government’s Planning Practice Guidance (ref. ID: 56-020-20150327). As also stated above, the proposed requirement for compliance with the Future Homes and Building Standard is potentially unnecessary as the standard will be secured by Building Regulations from 2025.
- 4.38. L&Q Estates also questions the proposed requirement for 95% of residential development on strategic sites to meet the M4(2) Building Regulations standard and 5% of residential development on strategic sites to meet the M4(3) Building Regulations standard. NPPF footnote 49 allows for these optional technical standards for accessible and adaptable

housing to be made use of by planning policy “where this would address an identified need for such properties”. Planning Practice Guidance (ref. ID: 56-007-20150327) sets out the evidence that can be used by local planning authorities to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards. Such evidence has not been provided to date through the Borough Plan Review process, and this policy would therefore not meet the test in NPPF paragraph 31 that the preparation of policies should be underpinned by relevant, up-to-date, adequate, proportionate evidence.

- 4.39. Policy SA1 again seeks compliance with “the principles set out within relevant SPDs”. It is not appropriate to treat the content of SPDs as equivalent to development plan policies, as required in criterion 16, which have been tested through the examination process. It is more appropriate to refer to up-to-date SPDs as material considerations in planning decisions.
- 4.40. The Policy includes specific and prescriptive requirements for employment sites such as car parking being over 50 m away from residential property. It is not clear the basis for this figure which appears arbitrary. These elements should be deleted.

Housing

Policy H1 – Range and mix of housing

- 4.41. L&Q Estates supports the requirement for a range and mix of housing that meets identified and evidenced needs and demands to be delivered through development. Policy H1 currently refers to “the most up-to-date HEDNA Assessment or equivalent” as the appropriate source of evidence of need. L&Q Estates would suggest that it is more appropriate to refer to up-to-date sources of evidence of need more generally, providing flexibility for other valid forms of evidence to be accepted by decision-makers.
- 4.42. It is also important for the policy to allow for departure from the specific mix recommended across the wider Borough where it can be demonstrated that an alternative mix is justified and appropriate for a particular site.
- 4.43. The requirements for development of homes for older people and specialised housing to comply with the emerging WCC Technical Guidance for Specialised Supported Housing and Housing with Care development is not supported. This requirement is both ambiguous, given that it refers to evidence which is not yet complete, and affords inappropriate status to a guidance document. As with SPDs, technical guidance documents are not tested through the local plan examination process and should be treated as material considerations and not be given equivalence to local plan policies.

Policy H2 – Affordable Housing

- 4.44. L&Q Estates supports the delivery of an appropriate amount of affordable housing at residential development sites.
- 4.45. With regard to the delivery of First Homes, the policy states that 25% of the total affordable housing requirement will need to be provided as First Homes. This is in line with Government guidance in the Planning Practice Guidance (Ref. ID: 70-001-20210524).
- 4.46. As with the application of the housing mix for market housing, it is important that Policy H2 allows for flexibility for the justified departure from size and tenure mix sought by the Council. The allowance within Policy H2 for the delivery of an alternative mix on viability grounds or

better suited to local needs is therefore supported. With regard to an alternative suitable mix, it is suggested that a Housing Mix Statement would be a more appropriate evidential requirement than a Viability Statement.

Policy H5 Accessible and Adaptable Homes

- 4.47. The policy requires 95% of new developments to meet M4(2) standards and 5% to meet M4(3) standards. As with Policy SA1, specific evidence is required to justify imposing such requirements and in the absence of this the policy is not justified.

Employment

Policy E1 – Nature of employment growth

- 4.48. The specific focus in Policy E1 on use classes B2 and B8 on strategic employment sites and existing employment sites is supported by L&Q Estates.
- 4.49. The emphasis within the policy (at E1.2) on favourable consideration for certain employment sectors includes advanced manufacturing, professional services and research and development but does not include logistics development which up-to-date evidence demonstrates is in strong demand within the West Midlands and which can offer excellent opportunities for full-time employment at a range of professional and non-professional skill levels.
- 4.50. L&Q Estates notes that the sectors listed at Policy E1.2 are those identified in the Economic Development Strategy, which dates from 2016. It is recommended that the Plan should also recognise the current strong demand for, and opportunities offered by logistics development and that this form of development should be added to the list of sectors which will receive favourable consideration under Policy E1.2.
- 4.51. Knight Frank's *LOGIC: Midlands 2021 Review* (Knight Frank Research, February 2022) reported record take up in the Midlands industrial and logistics market in 2021, with the distribution sector accounting for 62% of activity. An acute shortage of immediately available space was identified across all size ranges, with very little stock and a speculative development pipeline which remains behind market demand. For 2022, the report predicted that "*the strong fundamentals for logistics, and the key location benefits offered by the region are likely to underpin robust activity in the year ahead*".
- 4.52. Savills' UK Logistics – January 2022 Big Shed Briefing similarly reported a "*huge uptick in demand*" for warehouse space in the West Midlands during 2021, with the strongest level of take up ever recorded and "*renewed occupier interest from a wide variety of occupiers such as Chinese e-commerce companies and Gigafactories rather than the historically prominent manufacturing and automotive sectors*". Only 0.41 years' supply was identified to meet the burgeoning demand.
- 4.53. The latest *United Kingdom Logistics Market Summary (Q1 2022)* from CBRE Research (April 2022) reported a vacancy rate for logistics space of only 1.66% (with available space down 61% year-on-year) and a year-on-year increase in prime rents of 21.43%.
- 4.54. The sub regional HEDNA recognised the importance of 4 key corridors within the Borough, including the M6 corridor, in meeting strategic warehousing requirements. It also identified the very substantial need for land to meet requirements.

- 4.55. These representations are supported by an Economic Benefits Statement (attached at **Appendix 2**), which sets out the contribution in terms of economic outputs, direct and indirect employment and business rates that could be made by the development of circa 33,300 sqm of B2 or B8 floorspace at the Land West of the A444 and South of M6 Junction M3, which is promoted for inclusion as a residential or employment allocation through the Borough Plan Review.
- 4.56. The Statement, which is summarised more fully in Section 5 of these representations, also sets out the range of occupations and the skills spectrum that are supported by the manufacturing and warehousing sectors in the West Midlands. Based on an analysis of the existing employment profile of the manufacturing and warehousing sectors in the West Midlands, employment opportunities would be supported at all ends of the skills spectrum and not just in lower skilled roles. An estimated 23.1% of jobs in the two sectors are in professional or manager, director and senior official roles and a further 8.5% would be associate professional roles. Employment would be supported across a wide range of occupations on-site, including managerial roles, as well as skilled trade and process, plant and machine operative occupations.
- 4.57. With specific regard to warehousing, the Economic Benefits Report includes a summary of how companies in the logistics sector invest substantially in their workforce, including through measures such as providing learning centres, apprenticeship schemes, partnership schemes and skills programmes, with an emphasis on local employment.
- 4.58. The delivery of logistics and warehousing development at appropriately located sites would therefore meet a strong existing sub-regional demand, promote inward investment and generate a diverse range of high-quality employment opportunities, in line with Objectives 1 and 2 of the Reg 19 Local Plan and Policy E1 and DS1. The Borough Plan Review must recognise the importance of logistics and warehousing development locally and sub-regionally and ensure that such development is appropriately supported. It is therefore suggested that the policy should be amended to emphasis at E1.2 that such development will be favourably considered.

Healthy, safe and inclusive communities

Policy HS1 – Ensuring the delivery of infrastructure

- 4.59. L&Q Estates supports the requirement for development to contribute towards supporting infrastructure appropriate to the impacts of the proposed development, subject to viability considerations.
- 4.60. It is vital that any requests made for the delivery of infrastructure are proportionate and evidence-based and that any requests for planning obligations to support infrastructure delivery meet the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).

Policy HS2 – Strategic accessibility and sustainable transport

- 4.61. L&Q Estates broadly supports Policy HS2 on strategic accessibility and sustainable transport. As with other policies, the reference to accordance with several SPDs is questioned, however in Policy HS2 the reference is a less stringent requirement for proposals to “*consider how they accord with*” SPDs.

- 4.62. The appropriateness of requiring all development to include all of the elements listed under Policy HS2.5 is questioned and a review is recommended to ensure the requirements are reasonable, necessary and proportional and do not present an unjustified obstacle to sustainable development.. For example, the policy as drafted requires all development to provide easier access to rental-bikes and e-bike hubs, which may not be appropriate for certain categories of development.

Policy HS6 – Sport and exercise

- 4.63. Policy HS6 requires, “*where justified*”, either the provision of land for sports, leisure and recreation facilities on-site at no cost or an off-site contribution to fund the facility and the land for the facility. L&Q Estates does not contest the appropriateness of providing a justified and proportionate contribution to sports, leisure and recreation where this is viable, however it is recommended that the circumstances in which delivery will be considered justified are set out within the policy.
- 4.64. The supporting text to Policy HS6 states that “*developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site*”. It is recommended that the Plan includes further detail on the forum for such collaboration and the role that will be played by NBBC and other relevant bodies.

Built Environment

Policy BE3 – Sustainable design and construction

- 4.65. In common with several other policies, described above, Policy BE3 seeks to apply standards to all development proposals which are not yet justified by evidence.
- 4.66. Policy BE3 again seeks to apply Nationally Described Space Standards to all development proposals. As stated above with regard to Policy SA1, the application of the Nationally Described Space Standard to all residential development would require clear justification in line with footnote 49 of the NPPF and the Government’s Planning Practice Guidance (ref. ID: 56-020-20150327).
- 4.67. Policy BE3 point 3 requires all development proposals to meet the standard in regard to water of 110 litres per person per day. Planning Practice Guidance allows for local planning authorities to set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litre/person/day “*where there is a clear local need*” (Ref. ID: 56-014-20150327) and confirms that “*it will be for a local planning authority to establish a clear need*” based on existing evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships, and consideration of the impact on viability and housing supply of such a requirement (Ref. ID: 56-015-20150327). No such evidence has been produced in support of the Borough Plan Review to date.
- 4.68. Policy BE3 applying to residential development seeks to apply requirements that 95% of market housing must meet M4(2) and 5% M4(3) Building Regulations standards. As stated above, the inclusion of optional technical standards for accessible and adaptable housing within planning policy must be justified through evidence of an identified need for such properties, in accordance with NPPF footnote 49 and Planning Practice Guidance (ref. ID: 56-007-20150327).



- 4.69. Policy BE3 point 1 seeks to impose a requirement on all development proposals to be designed to meet the requirements of "any future Concept Plan SPD". As discussed in relation to other policies in the Local Plan, L&Q Estates considers that it is not appropriate to treat the content of SPDs as equivalent to development plan policies which have been tested through the examination process. It is more appropriate to refer to up-to-date SPDs as material considerations in planning decisions. It is particularly inappropriate to require adherence with the contents of a future design SPD which has not yet been issued and which clearly therefore fails the clarity test in NPPF paragraph 16(d).

5. LAND WEST OF THE A444 AND SOUTH OF M6 JUNCTION 3

Site Description

- 5.1. The land west of the A444 and south of M6 Junction 3 (the "Site") comprises approximately 22 ha of land located to the east of Ash Green on the edge of the Coventry urban area.
- 5.2. The site consists predominately of gently sloping pastoral land and grassland separated by a series of well-defined hedgerow boundary parcels which principally are used for crops and grazing. The location of the Site is shown below at Figure 1.

Figure 1: Site Location



- 5.3. The Site borders St. Giles Road to the west, which is largely defined by 20th century housing. Further residential development in Ash Green is located beyond St. Giles Road. Junction 3 of the M6 adjoins the north-eastern boundary of the Site. Immediately east of the site is Phoenix Way (A444) which leads into the Coventry urban area further south.
- 5.4. Breach Brook runs along the Site's north-western edge and joins the River Sowe which runs along the Site's eastern boundary. The Grade II-listed St. Giles Church is located beyond Breach Brook to the north, accessed off Church Lane.

- 5.5. To the south-east are further open fields bounded by mature hedgerows and trees. To the south-west the Site borders further residential development, a local school and associated playing fields located off Ash Green Lane.
- 5.6. In terms of physical site constraints, within the north and east of the Site there are areas of land within Flood Zones 2 and 3 associated with Breach Brook and the River Sowe. The north-eastern parcel of land is also constrained by overhead cables and a Severn Trent water easement.
- 5.7. Public rights of way run through the northern and eastern edges of the Site and through the south-west parcel of land parallel to a well-established hedgerow. The existing links provide excellent connectivity beyond the Site's perimeter.
- 5.8. Topographically, the Site gradually rises from the floodplain associated with the Breach Brook and the River Stowe, with the highest points of the Site located in the south-west corner and at the north-eastern boundary of the Site with M6 Junction 3.
- 5.9. Along the ridgeline of the Site in the south-west corner and adjacent to the public right of way heading south, key landmark views can be seen towards the Coventry Building Society Arena to the south-east and the Grade II-listed St. Giles Church north of the Site.
- 5.10. The Site is located opposite (and west of) the existing Wilsons Lane employment allocation, which has reference EMP2 in the adopted Borough Plan and SEA-2 in the Reg 19 LP. Wilsons Lane is allocated for 18 ha of employment land. Land at Bowling Green Lane, north-west of M6 Junction 3, is currently allocated for 26 ha of employment land (ref. EMP7) but is proposed for re-allocation as a mixed-use site with 19.09 ha of employment land and approximately 150 homes through policy SEA-6 of the Reg 19 LP. These allocated sites are indicated on the extract of the adopted Local Plan Policies Map in Figure 2 below.

Figure 2: Extract of adopted Local Plan Policies Map



Proposed Development

- 5.11. The Site is in one ownership and is available for development for either residential or employment purposes. There is no over-riding constraint on the land which cannot be either resolved through design or adequately mitigated.
- 5.12. The Site was assessed within the Coventry and Warwickshire Joint Green Belt Study (2015) which formed part of the evidence base for the adopted NBBP. It is located within parcels NG2 and NG1 which were considered to be 'mid-performing Green Belt parcels' with their weaker performance being attributable to a range of factors including the presence of the M6 Motorway, pylons and buildings. Land on the opposite side of the A444 was removed from the Green Belt and this shared many of the characteristics of the land on the west side of the A444.
- 5.13. These representations are supported by a Vision Document which demonstrates how the Site can be successfully developed, taking into account all the relevant constraints, to deliver in the order of 300 dwellings or 406,900 sq ft of employment development. The Vision Document draws on comprehensive technical assessments across all key disciplines and includes Indicative Masterplans showing how the Site could be developed. The wealth of site-specific information provided demonstrates that the Site is suitable, developable and deliverable and that an allocation for residential or employment development would be sound.
- 5.14. The Site has previously been considered for allocation through the 2014 Employment Land Review (referred to as site reference: ELR017d – Land East of St Giles Road). The primary constraint identified through the Review, which formed part of the evidence base for the adopted NBBP, was a lack of a direct point of access from the A444, which would otherwise *'...improve the overall connectivity of the site and reduce journey times to junction 3 of the M6.'* To this end, a proposed vehicular access drawing has been prepared by Jubb in order to demonstrate how a direct access off the A444 is, in fact, achievable in a suitable and safe manner. The access as designed by Jubb has been incorporated into the illustrative proposals within the Vision Document.
- 5.15. The Employment Land Review also identified that a large part of the northern section of the Site is classed as being susceptible to surface water flooding and flood zones 2, 3a and 3b and that development of whole site would double the size of Ash Green and would be out of character with development in this area. The Vision Document accordingly demonstrates how this site can be developed without locating any built form within those areas at greatest risk of flooding. The Vision Document also demonstrates how a development can come forward which is sympathetic to the existing residential properties to the west whilst also reflecting the planned employment growth to the east.
- 5.16. The Site is sufficiently flexible to also be able to accommodate a possible residential development. This could relate well to existing development in Ash Green and deliver housing which could contribute towards meeting needs for housing in Coventry, should additional allocations be required once up-to-date evidence is available.
- 5.17. The Vision Document ultimately demonstrates that the Site is a suitable and sustainable location for future employment or residential development and demonstrates that it is a deliverable and developable option and is available immediately, subject to its release from the green belt.

Benefits of Proposed Development

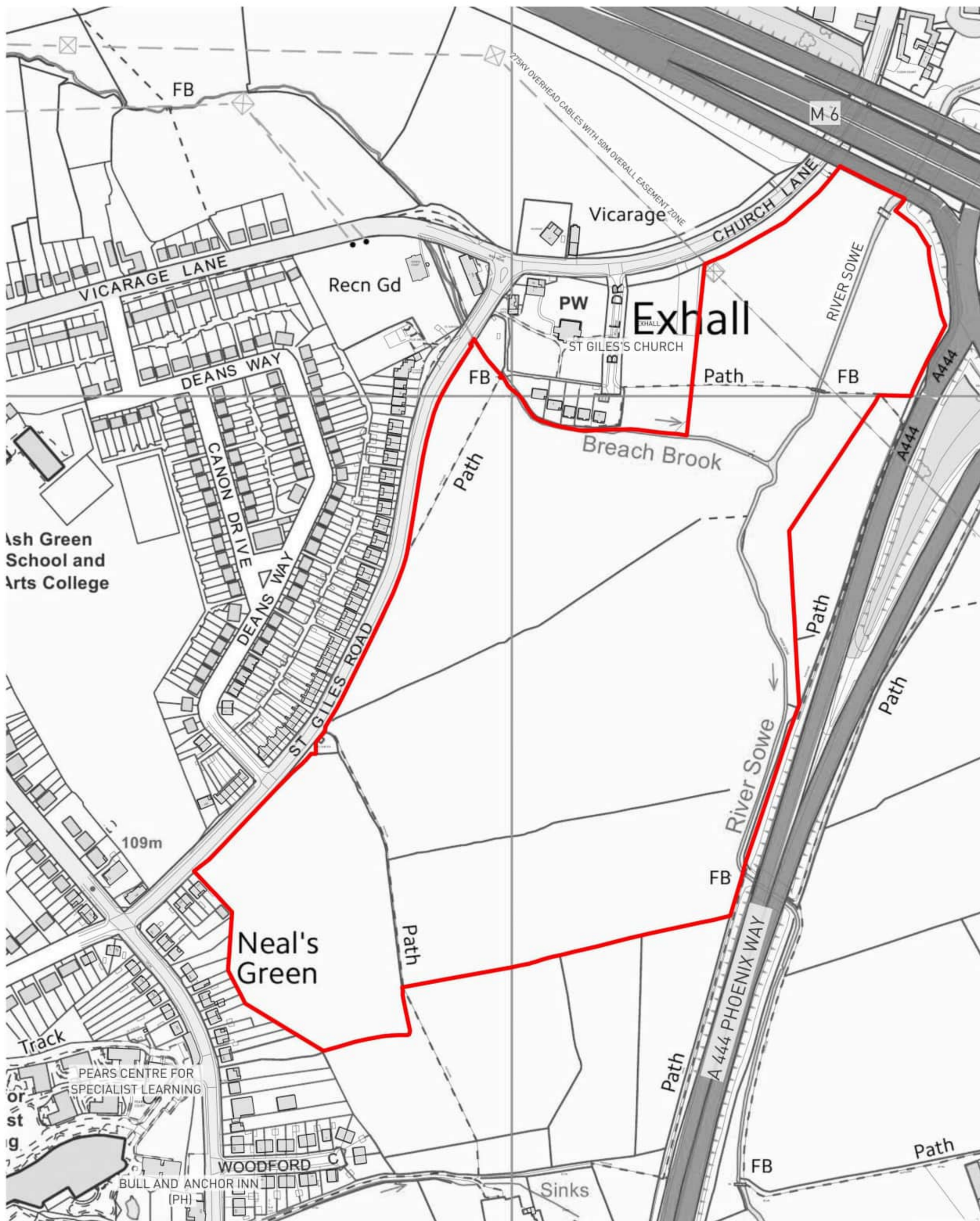
- 5.18. Given the Site's characteristics and location, its allocation for well-designed development has potential to contribute towards meeting the objectives of ensuring new development contributes to improved infrastructure and facilities (Objective 5), improving cycling and walking networks, increasing open space and leisure access and reducing crime (Objective 6), ensuring new development sustains and enhances the historic and natural environments (Objective 7) and addressing climate change by driving sustainability in all new development (Objective 8).
- 5.19. In addition, the allocation of the Site for residential development would support Objective 4 (to provide a steady and adequate level of suitable housing for all).
- 5.20. The allocation of the Site for employment development has potential to provide economic growth which raises the Borough's profile as a more attractive place to live, work and invest in (in line with Objective 1) and also help support the diversification of the borough's economy and improve job opportunities for residents (in line with Objective 2).
- 5.21. The allocation of the Site for an element of employment development has the potential to contribute towards addressing the identified issue of a lack of knowledge-based employment opportunities. As set out in the Economic Benefits Statement (**Appendix 2**) developing the Site for employment uses would support up to 355 temporary jobs on-site and in the wider economy over an estimated 18-month build period. An estimated gross value added ("GVA") of up to £31.8 million would be generated during the 18-month build period, based on current prices.
- 5.22. With regard to operational impacts, the development of the Site for B8 floorspace would be expected to support up to 501 gross permanent full-time equivalent ("FTE") jobs on-site, contribute an estimated £18.9 million per annum in GVA, generate as estimated £14.5 million in wages for on-site employees and generate in the region of £722,000 per annum in business rates.
- 5.23. The development of the Site for B2 floorspace would be expected to support up to 925 gross permanent FTE jobs on-site, contribute an estimated £65.4 million per annum in GVA, generate an estimated £29.1 million per annum in wages for on-site employees and generate in the region of £722,000 per annum in business rates.
- 5.24. Based on an analysis of the existing employment profile of the manufacturing and warehousing sectors in the West Midlands, employment opportunities would be supported at all ends of the skills spectrum and not just in lower skilled roles. An estimated 23.1% of jobs in the two sectors are in professional or manager, director and senior official roles and a further 8.5% would be associate professional roles. Employment would be supported across a wide range of occupations on-site, including managerial roles, as well as skilled trade and process, plant and machine operative occupations.

6. CONCLUSIONS

- 6.1. These representations have been prepared by Pegasus Group on behalf of L&Q Estates.
- 6.2. L&Q Estates has concerns that the Council is not yet able to demonstrate that the Reg 19 LP meets the statutory tests of soundness or the duty to co-operate.
- 6.3. Evidence presented within these representations concludes that, with regard to employment land, the figures in the Council's HEDNA and TAHR the employment floorspace planned for in the Reg 19 LP are insufficient to help the Borough increase its long-term employment growth rate and to address evidence of record levels of sub-regional demand for and constrained supply of logistics and warehousing development focused particularly around the M6 corridor. Additional allocations of employment land are considered to be needed to provide sufficient employment growth to meet Nuneaton and Bedworth's needs, and further allocations are required to make a meaningful contribution towards sub regional needs for strategic B8 development in optimal locations.
- 6.4. The exclusion of Green Belt land from consideration in the strategy for the distribution of development is not considered justified in the context the inadequate amount of employment land proposed in the Reg 19 LP and the ability of well-located sites in the countryside and the Green Belt to deliver sustainable development to meet a range of needs. In these circumstances, and especially the specific circumstances associated with the M6 corridor, it is considered that exceptional circumstances justifying changes to Green Belt boundaries through the Borough Plan Review will be demonstrable.
- 6.5. The Land West of the A444 and south of M6 Junction 3 is considered an appropriate location for removal from the Green Belt and allocation for employment development. It is particularly well-located with regard to the characteristics required to meet burgeoning demand for strategic B8 floorspace within the M6 transport corridor. A Vision Document submitted to accompany these representations demonstrates how appropriate development could be achieved at the Site.
- 6.6. Several of the detailed policies in the Reg 19 LP include requirements of development, including with regard to accessibility standards, internal space standards and water use standards, that are not yet justified by evidence. L&Q Estates has also identified an inappropriate over-reliance on the content of existing and future SPDs and guidance documents within the draft policies, which it is recommended should be addressed.



Appendix 1: Site Location Plan



KEY

SITE LOCATION
53.78 acres / 21.77 hectares



LAND OFF ST GILES ROAD, COVENTRY SITE LOCATION PLAN



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Appendix 2: Economic Benefits Report

Economic Benefits Statement.

Land west of the A444 and south of M6 Junction 3.

L&Q Estates

Date: 21/07/2022 | Pegasus Ref: BIR.5109

Author: Cameron Davis



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	11/07/2022	CD	RC	-
2	20/07/2022	CD	RC	Internal feedback
3	21/07/2022	CD	RC	Floorspace change



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2. Construction Phase Benefits	4
3. Operational Phase Benefits	5



Executive Summary

Background

This report has been produced on behalf of L&Q Estates and presents the economic benefits of developing circa 33,300 sq. m. of B2 (manufacturing) or B8 (warehousing) floorspace land west of the A444 and south of M6 Junction 3.

Main Findings

Construction Impacts

- **Direct and indirect construction-related employment:** Developing the site for employment uses will support up to 355 temporary jobs on-site and in the wider economy over an estimated 18-month build period.
- **Contribution of construction phase to economic output:** An estimated gross value added (GVA) of up to £31.8 million will be generated during the 18-month build period in current prices.

Operational Impacts

The site has the potential to deliver both warehousing and manufacturing space. Two options have therefore been assessed to look at the economic impact of delivering each type of employment floorspace.

Option 1 (B8 floorspace)

- **Permanent Employment:** Up to 501 gross permanent full-time equivalent (FTE) jobs could be supported on-site if warehousing floorspace is delivered.
- **Contribution to economic output:** The GVA attributable to the site once operational and fully occupied is estimated at £18.9million per annum.
- **Employee wages:** The proposed scheme would generate an estimated £14.5million per annum in wages for on-site employees.
- **Business rates:** It is estimated that annual business rates generated by the scheme could be in the region of £722,000 per annum.

Option 2 (B2 floorspace)

- **Permanent Employment:** Up to 925 gross permanent full-time equivalent (FTE) jobs could be supported on-site if manufacturing floorspace is delivered.
- **Contribution to economic output:** The GVA attributable to the site once operational and fully occupied is estimated at £65.4million per annum.
- **Employee wages:** The proposed scheme would generate an estimated £29.1million per annum in wages for on-site employees.
- **Business rates:** It is estimated that annual business rates generated by the scheme could be in the region of £722,000 per annum.



Supporting Labour Market Growth in Nuneaton & Bedworth

- **Employment trends:** Nuneaton & Bedworth saw no change in job numbers between 2015 and 2020. This was in contrast to the increases of 3.8% and 2.4% in the West Midlands and Great Britain respectively. Developing sites in the area that will generate new job opportunities should therefore be a priority for Nuneaton & Bedworth.

Delivering Jobs Across a Range of Skills and occupations (Both Options)

Based on analysis of the existing employment profile of the manufacturing and warehousing sectors in the West Midlands:

- Employment opportunities will be supported at all ends of the **skills spectrum** and not just in lower skilled roles. There will be opportunities for people with degree qualifications, as well as those with no formal qualifications, for example.
- Employment will be supported across a wide range of **occupations** on-site. This includes managerial roles, as well as skilled trades and process, plant & machine operative occupations.

Investing in workforce development and supporting local communities

Looking specifically at warehousing, companies in the logistics sector invest substantially in their workforce and it is reasonable to assume that Nuneaton & Bedworth could benefit from similar kinds of investment should the site be developed for warehousing uses. As an example, the Guardian has looked at the impact of developing large logistics sites – Magna Park in Milton Keynes and the Daventry International Rail Freight Terminal (Dirft). Despite its size, the article notes that Dirft is viewed as being “surprisingly uncontentious”. One of the reasons given for this is that many local residents are employed by companies at the site, meaning it is a valued part of the local economy.

1. Introduction

Scope and Purpose

- 1.1. This report has been produced on behalf of L&Q Estates and presents the economic benefits of developing circa 33,300 sq. m. of B2 (manufacturing) or B8 (warehousing) floorspace on land west of the A444 and south of M6 Junction. It quantifies the benefits that could be created in terms of the construction impacts and the impacts of the scheme once it is operational.

Report Structure

- 1.2. The report looks at the following issues:
 - **What are the benefits of the construction phase?** The report considers how many temporary jobs will be created and the contribution of the construction phase to economic output.
 - **How many permanent jobs will the development support?** The report considers how many jobs will be supported by developing either industrial or warehousing floorspace.
 - **How much will the scheme contribute to enhancing the prosperity of the economy?** For the purposes of this study, the measure used of prosperity is the contribution the scheme will make once completed and fully occupied in terms of increased gross value added – a measure of economic output.
 - **What are the skills and occupational profiles of the on-site jobs?** Drawing on regional level data for the West Midlands, the report considers the skills and occupation types of the on-site jobs that could be created by developing the site.

2. Construction Phase Benefits

Impact of the Construction Phase

- 2.1. During the construction phase of the scheme a number of economic benefits will arise for the local area via the provision of temporary jobs. The construction phase is estimated to be around 18 months.
- 2.2. Construction costs are estimated to be between £26million and £33million over the 18-month period depending on whether warehousing or manufacturing floorspace is developed. The construction costs have been calculated based on data for the West Midlands construction sector sourced from the Build Cost Information Service (BCIS). Costs are exclusive of external works, supporting infrastructure, fees, VAT, finance charges etc.
- 2.3. In order to estimate the number of jobs that will be created during the construction phase, the total estimated construction cost has been divided by the average turnover per construction worker in the West Midlands of £165,170¹. Over the predicted 18-month build, up to 131 jobs could be supported.
- 2.4. It is widely accepted that construction has knock-on effects for other sectors, even more so than most other industries, this leads to higher demand for construction materials and equipment at the building stage, as well as furniture, fittings etc. following completion. This creates and maintains employment in other sectors. This is known as the 'multiplier effect' and analysis published by the Homes & Communities Agency (HCA – now Homes England) indicates that the employment multiplier for construction activities in the UK is 2.7 – i.e., for each job created in construction, a further 1.7 jobs are created in the wider economy. This suggests that as well as the 131 on site jobs that could be created, the development could create a total of up to 223 jobs during the construction phase.
- 2.5. In total, it is estimated that up to **355 temporary jobs** could be created by the 18-month construction phase.²

Contribution to Economic Output

- 2.6. Alternatively, the economic impact of the construction phase can be analysed by calculating the contribution a development makes to wealth creation, as measured by the increase in the value of goods and services generated within an area. This can be done by looking at the increase in gross value added (GVA)³, a common proxy for economic output. Using data from the Office for National Statistics (ONS), it is possible to calculate GVA per employee by sector at a regional level⁴. Applying these estimates to the employment estimates outlined above, the build phase could generate up to £31.8 million over the 18-month build timeframe in current prices.

¹ Calculated using data for the West Midlands construction sector from the 2021 edition of Business Population Estimated produced by the Office for National Statistics.

² Figures may not sum due to rounding.

³ Gross value added is the measure of the value of goods and services produced in an area, industry or sector of an economy.

⁴ GVA per employee estimates calculated using data from the 2020 Business Register and Employment Survey, as well as regional GVA estimates for 2020 – both published by ONS.

3. Operational Phase Benefits

Introduction

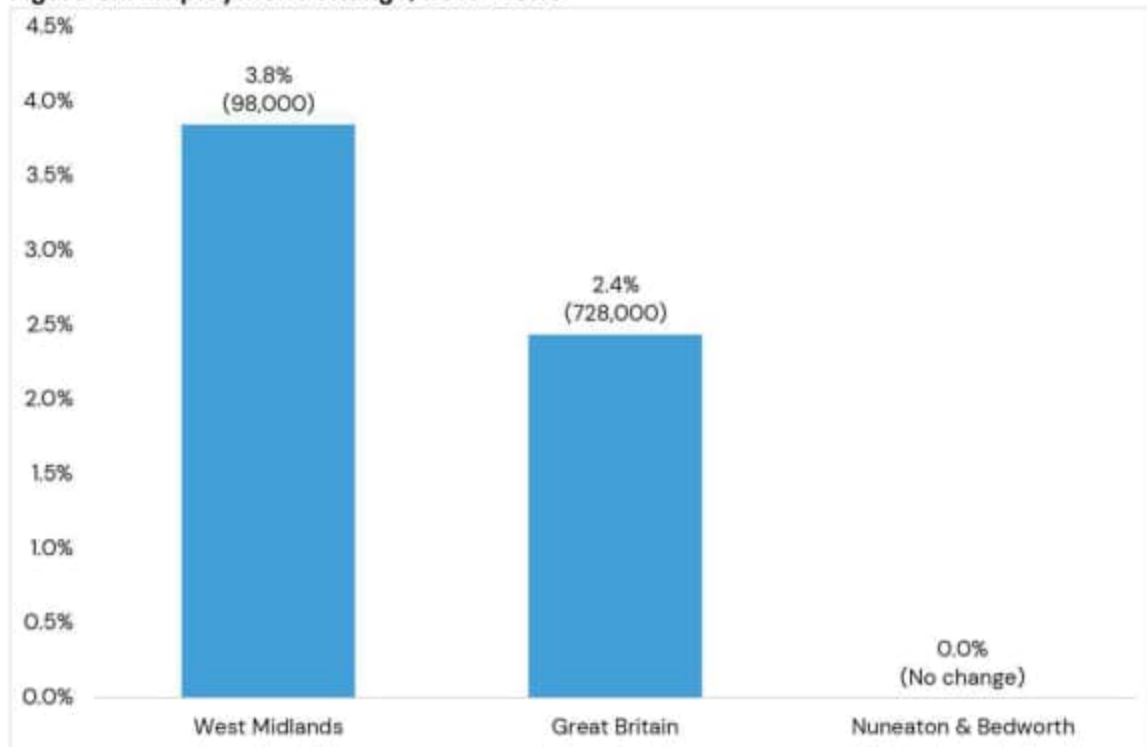
3.1. This section outlines the impact of developing the site for warehousing or manufacturing uses, in terms of generating permanent employment, economic output and business rates in Nuneaton & Bedworth. Two options are presented in order to give lower and upper end estimates of the impacts:

- Option 1: 33,300 sq. m. of B8 floorspace (GIA)
- Option 2: 33,300 sq. m. of B2 floorspace (GIA)

Labour Market Growth in Nuneaton & Bedworth

- 3.2. Prior to looking at job creation associated with the site, it is useful to assess employment change in Nuneaton & Bedworth to ascertain whether the area has experienced positive or negative employment change in recent years. Data from ONS Business Register and Employment Survey (BRES) show that in 2020 there were 45,000 jobs in Nuneaton & Bedworth. This includes self-employment. Compared with 2015, the area has seen no growth in employment. There was some growth in jobs in the years between 2015 and 2020, however Nuneaton & Bedworth experienced a fall in employment between 2019 and 2020 (from 48,000 to 45,000) which is likely to reflect the impact of the Covid-19 pandemic on the labour market.
- 3.3. By contrast, the West Midlands (3.8%) and Great Britain (2.4%) both experienced employment growth between 2015 and 2020. Creating new jobs should therefore be a priority for Nuneaton & Bedworth if it is to move more in line with regional and national trends. Figure 3.1 presents the BRES data in more detail.

Figure 3.1: Employment Change, 2015–2020



Source: BRES

On-site Job Creation

3.4. Job numbers associated with the site are presented in two ways:

- **Gross permanent jobs:** Total employment accommodated on-site.
- **Net additional jobs:** The number of jobs which the scheme can be expected to support in Nuneaton & Bedworth, over and above what would have happened anyway. This calculation makes allowance for leakage, deadweight, displacement and multiplier factors taken from the Homes & Communities Agency (HCA – now Homes England) 2014 Additionality Guide (see Figure 3.2 for explanations of these terms).

Figure 3.2: Additionality Factors

- **Leakage** is defined as, 'the proportion of outputs that benefit those outside the programme/project area or group'. Leakage is assumed to be low-medium at 38%.
- **Deadweight** is the term used to identify the output that would have occurred without the project. Deadweight is assumed to be zero – i.e., without the proposed scheme, no other jobs will be created.
- **Displacement** is defined as 'the proportion of project outputs/outcomes accounted for by reduced outputs/outcomes elsewhere in the target area'. Displacement for the new employment is assumed to be 25%.
- **Economic multipliers** are defined as "further economic activity (jobs, expenditure or income) associated with additional local income and local supplier purchases". A multiplier of 1.29 has been used, which is consistent with the HCA guidance.

Source: Homes & Communities Agency (now Homes England), 2014. Additionality Guide, Fourth Edition.

Option 1 (B8 Warehousing)

Estimated New Employment

- 3.5. Developing the site for warehousing uses will create permanent employment opportunities once it is built, many of which are likely to prove appealing to residents of Nuneaton & Bedworth. On a wider scale, the development could potentially generate a substantial number of job opportunities for people living in the West Midlands.
- 3.6. To quantify the levels of employment creation, an assumption has been made regarding the density of employment that would normally be expected for the proposed floorspace type. This information has been sourced from the Employment Densities Guide (3rd Edition, November 2015), prepared for the Homes and Communities Agency (HCA – now Homes England) by Bilfinger GVA. Using this guidance, a density of one job per 70 sq. m of gross external area (GEA) for the B8 floorspace has been used. The floorspace figures presented in paragraph 3.1 are given in GIA. To convert the B8 floorspace figure into GEA it has been adjusted to reflect that GIA is generally around 5% lower than GEA.
- 3.7. Once the development has been completed and is fully occupied, it is estimated that it will support around 501 gross full-time equivalent (FTE) jobs on-site.
- 3.8. Once allowance is made for the leakage, deadweight, displacement and multiplier effects outlined in Figure 3.1, it is estimated that the development will create 303 net additional FTE jobs in the Nuneaton & Bedworth economy. Table 3.1 presents the impact of each additionality factor.

Table 3.1: Impact of Additionality Factors on Jobs – Option 1

Additionality Factor	Total Jobs
Gross permanent direct jobs created	501
<i>Estimated leakage</i>	188
<i>Estimated job displacement</i>	78
Net jobs before multipliers	235
<i>Multiplier impacts</i>	68
Total net FTEs in Nuneaton & Bedworth	303

Note: Figures may not sum due to rounding

Gross Value Added

- 3.9. The contribution to economic output that will arise from the development has been calculated by taking the gross job creation associated with the development broken down by floorspace type and multiplying this by an estimate of average levels of GVA per employee for the West Midlands economy for the relevant employment sector, in this case transportation and storage.
- 3.10. It is estimated that once completed and fully occupied, GVA generated by the proposed development will equate to around £18.9million per annum.

Wages

- 3.11. Data from the Annual Survey of Hours and Earnings, published by ONS, show that in 2021 the gross median annual salary for full time workers in the West Midlands in transport and storage jobs was £28,864.
- 3.12. Multiplying this by the gross FTE jobs associated with B8 floorspace, the estimated total wages paid to staff on site would be around £14.5million per annum once the development is completed and operational.

Business Rates Estimates

- 3.13. Business rates are a valuable economic contributor for an area. Based on data sourced from the Valuation Office Agency (VOA)⁵, high level calculations suggest that the business rates generated by the scheme could be in the region of £722,000 per annum.

Option 2 (B2 industrial floorspace)

- 3.14. To quantify employment creation for option 2, an employment density of one job per 36 sq. m. of GIA has been used.
- 3.15. Once completed and occupied, it is estimated that the scheme could support around 925 gross full time equivalent (FTE) jobs on-site.
- 3.16. Once allowance is made for leakage, deadweight, displacement and multiplier effects, it is estimated that the development will create 559 net additional FTE jobs in the Nuneaton & Bedworth economy. Table 3.2 shows each additionality calculation in more detail.

⁵ <https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-including-business-floorspace-2019>

Table 3.2: Impact of Additionality Factors on Jobs – Option 2

Additionality Factor	Total Jobs
Gross permanent direct jobs created	925
<i>Estimated leakage</i>	347
<i>Estimated job displacement</i>	145
Net jobs before multipliers	434
<i>Multiplier impacts</i>	126
Total net FTEs in Nuneaton & Bedworth	559

Note: Figures may not sum due to rounding

Gross Value Added

- 3.17. The contribution to economic output that will arise from the development has been calculated using the same method as option one, with the difference being that GVA per job in the manufacturing sector has been used.
- 3.18. It is estimated that once completed and fully occupied, GVA generated by the proposed development will equate to around £65.4million per annum.

Wages

- 3.19. Data from the Annual Survey of Hours and Earnings, published by ONS, show that in 2021 the gross median annual salary for full time workers in the West Midlands in manufacturing jobs was £31,503.
- 3.20. Multiplying this by the gross FTE jobs associated with manufacturing floorspace, the estimated total wages paid to staff on site would be around £29.1million per annum once the development is completed and operational.

Business Rates Estimates

- 3.21. High level calculations suggest that the business rates paid by the proposed development could be in the region of £722,000 per annum. This is the same figure calculated in option one, which reflects the fact that the two floorspace types are classified by the VOA in the same way.

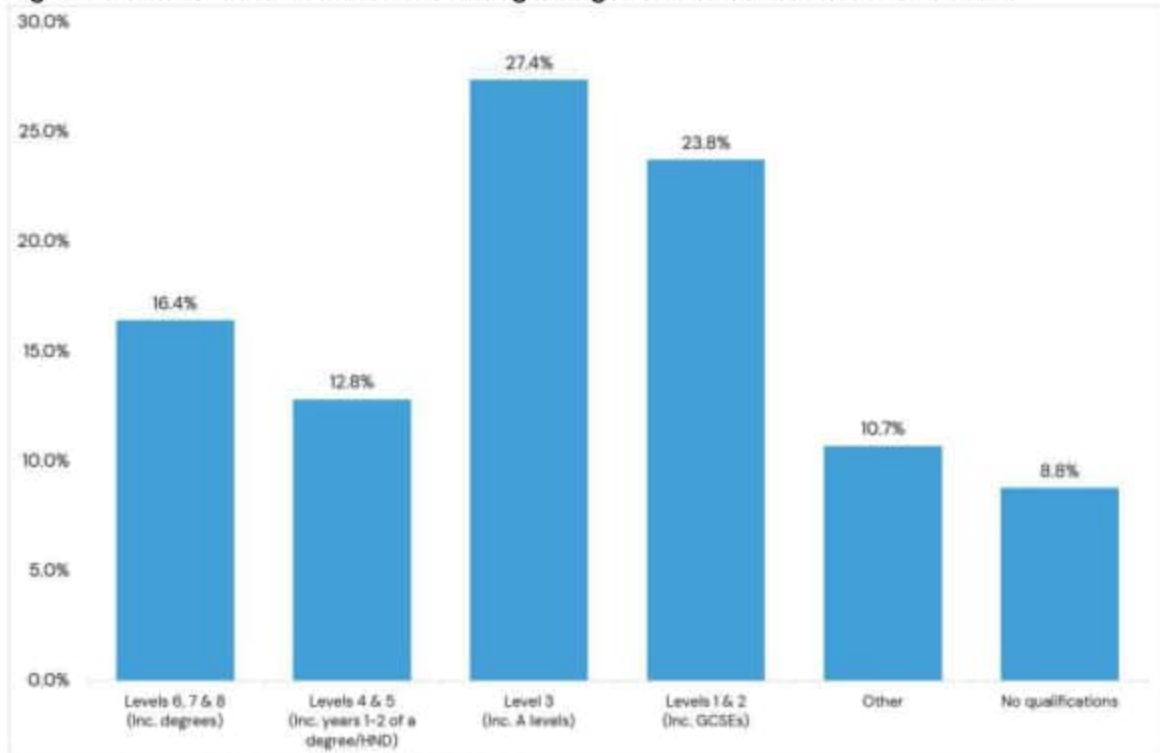
Skills Profile of Jobs (Both Options)

- 3.22. Developing the site for either warehousing or manufacturing uses will provide employment opportunities for people at a range of different skills. Data from the ONS Quarterly Labour Force Survey (February – April 2022) can be analysed to identify the existing skills breakdown of people working in the manufacturing and warehousing⁶ sectors in the West Midlands. These two sectors are most relevant to the commercial floorspace that could be delivered on-site.
- 3.23. The LFS data for the West Midlands show that 16.4% of workers in the manufacturing and warehousing sectors have a degree level of qualification or higher (RQF6+). Around 27.4% have A levels only (RQF3), and 23.8% have GCSEs (RQF 1-2). The LFS data show that 10.7% have other

⁶ Warehousing has been defined using the following Standard Industrial Classifications: 49 – Land transport, including via pipelines; 50 – Water transport; 51 – Air transport; 52 – Warehousing & support for transport; and 53 – Postal & courier activities.

qualifications and 8.8% have no qualifications. Figure 3.3 provides a complete analysis of skill levels in the manufacturing and logistics sectors in the West Midlands. If the jobs created by developing the site are of a similar skills profile, a wide range of skills will be supported on-site.

Figure 3.3: Skills Profile of Manufacturing & Logistics Jobs in the West Midlands

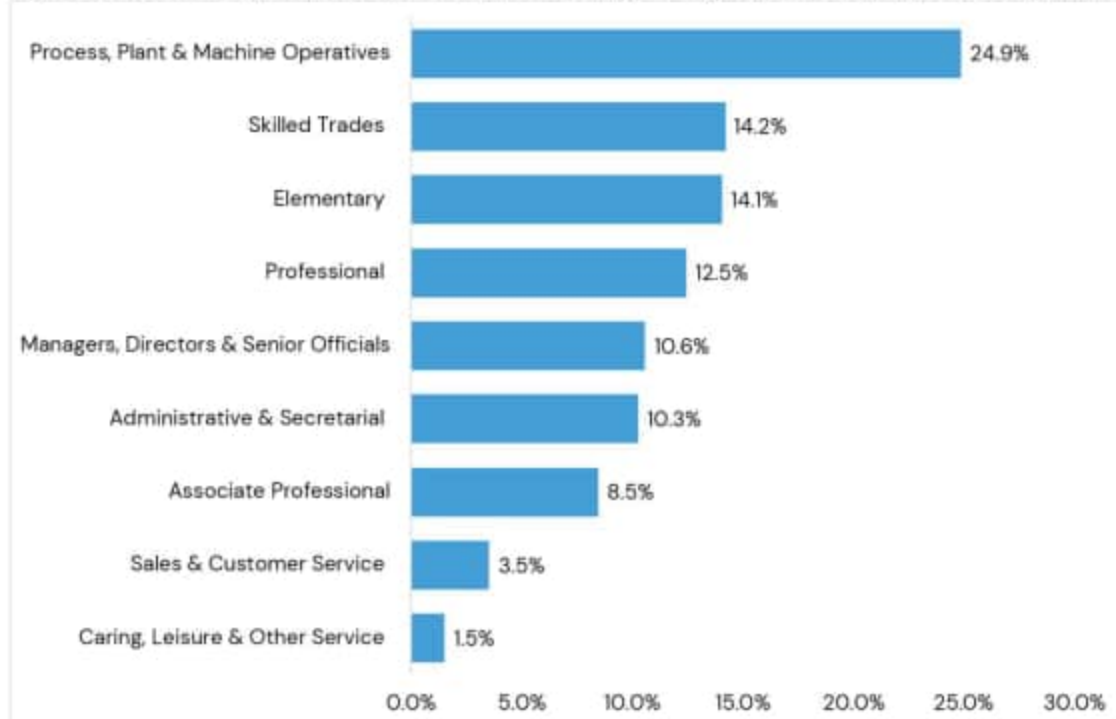


Source: ONS LFS (February – April 2022)

Occupational Profile of Jobs (Both Options)

- 3.24. Similar to the skills analysis above, the ONS LFS data for February – April 2022 can also be analysed to identify the range of occupations supported by the manufacturing and warehousing sectors in the West Midlands.
- 3.25. Based on the LFS data for the West Midlands, an estimated 23.1% of jobs in the two sectors are in professional or manager, director & senior official roles. A further 24.9% of jobs are in process, plant & machine operative roles. Figure 3.4 provides a full breakdown of occupation types in the manufacturing and logistics sectors in the West Midlands. If the jobs created by developing the site are of a similar occupational profile, a wide range of occupations will be supported on-site.

Figure 3.4: Occupational Profile of Manufacturing & Logistics Jobs in the West Midlands



Source: ONS LFS (February – April 2022)

Investing in workforce development and supporting local communities

3.26. Looking specifically at warehousing, companies in the logistics sector invest substantially in their workforce and it is reasonable to assume that Nuneaton & Bedworth could benefit from similar kinds of investment should the site be developed for warehousing uses. For example, case study evidence in research published by the British Property Federation (BPF)⁷ shows that:

- DHL provides a learning centre on site at the Sainsbury's national distribution centre in Daventry to assist individuals in training and learning.
- DPD Group UK offers a four-year apprenticeship programme, with electrical engineering NVQ and a foundation degree. There is also clear evidence of career progression within the company. When BPF research was published in December 2015, the CEO, Director of Technical Services, Director of Central Operations and Director of IT had all started in lower grade roles and worked their way up at DPD Group.
- Sainsbury's and DHL provide an education room within their national distribution centre where employees can improve their English language skills and access the internet to further their careers.

⁷ *Delivering the Goods: The economic impact of the UK logistics sector*. British Property Federation, December 2015.



- DPD Group UK held an open day in partnership with local schools, attended local employment fairs, and delivered mail shots within five miles of its Hinckley hub to promote local recruitment prior to its opening in 2015.

3.27. More recently, the Guardian has looked at the impact of developing large logistics sites – Magna Park in Milton Keynes and the Daventry International Rail Freight Terminal (Dirft). Despite its size, the article notes that Dirft is viewed as being “surprisingly uncontentious”. One of the reasons given for this is the fact that many local residents are employed by companies at the site, meaning it is a valued part of the local economy. In addition, Prologis, who owns the site, helps fund two police community support officers and pays for cycling and pedestrian routes⁸.

⁸ Article available at: <https://www.theguardian.com/artanddesign/2018/apr/15/shed-the-size-of-town-what-britains-giant-distribution-centres-tell-us-about-modern-life>

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Appendix 3: Vision Document

LAND WEST OF THE A444 AND SOUTH OF

M6 JUNCTION 3
VISION DOCUMENT



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NOTE: THIS DOCUMENT IS DESIGNED TO BE VIEWED AS A3 DOUBLE SIDED



FIG 1.1. THE SITE

PURPOSE OF THE DOCUMENT

- 1.1 L&Q Estates are promoting Land west of the A444 and south of M6 Junction 3 (referred to as "the site" throughout the document and shown on the Aerial Plan contained at Fig 1.1) located to the east of Ash Green, on the edge of the Coventry urban area, for residential development of around 300 dwellings or employment development of around 33,300sqm. This Vision Document has been prepared to support the proposals and provides robust background information relating to the site to assist Nuneaton and Bedworth Borough Council ("NBBC") in their assessment of potential new residential and employment sites as part of the emerging Borough Plan.
- 1.2 This document brings together assessment work across a number of disciplines undertaken by the project team which comprises of a wide range of specialist consultants who are advising on the proposals and sets out the design principles that have informed the proposed masterplan. Indicative Masterplans are included at Fig 4.1 and Fig 4.2, illustrating how the site could be developed for residential development or for employment development. The rationale for the masterplans is set out in Section 4 of this Document.

01 | INTRODUCTION

- 1.3 The site is not currently allocated, however its location is highly sustainable adjacent to the edge of Coventry being in close proximity to Arena Park, Coventry Building Society Arena and existing/future employment areas, public transport provision and the strategic road network.
- 1.4 This document demonstrates that the site is suitable, available and achievable for residential or employment development. This is particularly important given the need for the Borough to accommodate more housing and employment land than currently proposed within the Preferred Options Plan. This will entail the need to release land from the Green Belt to achieve this.
- 1.5 Separate representations are made on behalf of L&Q Estates to the Preferred Options Plan. The representations recommend that the Borough Council should consider the release land from the Green Belt to meet needs for housing and employment development. This Document demonstrates that Land west of the A444 & south of M6 Junction 3 is located in a sustainable location, is suitable for residential or employment development and should be considered favourably as a housing or employment allocation.

DOCUMENT FORMAT

- 1.6 Following this introduction, the document sets out the planning policy context for the site and its development potential. The emerging proposals for the site are then set out, demonstrating the suitability of the site for residential or employment development as shown on the Indicative Masterplans (Fig 4.1 and Fig 4.2). This is then followed by an assessment of the site which provides an overview of the technical studies and assessments that have been undertaken and explains how these have informed the design of the proposals.
- 1.7 This Document is sub divided into separate sections as follows:

Section 1	Introduction
Section 2	The Development Site
Section 3	Planning Policy Context
Section 4	Emerging Proposals
Section 5	Landscape and Visual Issues
Section 6	Movement and Access
Section 7	Flood Risk and Drainage
Section 8	Ecology
Section 9	Archaeology and Heritage
Section 10	Other Matters
Section 11	Conclusions

L&Q ESTATES

- 1.8 L&Q Estates has been in the business of identifying, promoting and acquiring land for over 60 years. Throughout this journey L&Q Estates has gained experience of working with a wide range of people, creating communities that work for everyone. With significant financial resources, combined with the experience and expertise to assemble land, promote and secure planning and deliver the infrastructure required, L&Q Estates is at the forefront of facilitating much-needed housing and commercial development in the UK.

02 | THE DEVELOPMENT SITE

THE DEVELOPMENT SITE

- 2.1 L&Q Estates has an interest in some 21.7 hectares (53.62 acres) of land west of the A444 & south of M6 Junction 3, comprising predominantly of gradually sloping pastoral and grass land separated by a series of well-defined hedgerow boundary parcels which principally are used for crops and grazing.
- 2.2 In the context of the adopted Nuneaton and Bedworth Borough Plan 2011-2031, the site is located within the designated Green Belt, positioned on the eastern edge of Ash Green. The site is centrally located in terms of distance from both Nuneaton (7.5km) and Coventry (5.9km).
- 2.3 The site borders St. Giles Road to the west and is largely defined by 20th century housing. Further residential development of Ash Green is located beyond. To the north of the site is Breach Brook and the River Sowe which also runs down the eastern boundary of the site. The Grade II Listed St. Giles Church is located beyond Breach Brook to the north, accessed off Church Lane. Junction 3 of the M6 adjoins the north-eastern boundary of the site. To the south-east are further open fields consisting of mature hedgerows and trees, whilst to the south-west the site borders further residential development, local school and associated playing fields located off Ash Green lane. To the east of the site is Jimmy Hill Way (A444) which leads into the Coventry urban area further south.

- 2.4 In terms of physical site constraints, to the north and east of the site there are areas of land within Flood Zones 2 and 3 associated with Breach Brook and the River Sowe. The north-eastern parcel of land is also constrained by national grid overhead cables, a Severn Trent water easement running through the site (existing water main with 6m overall easement zone) and existing sewer with 10m overall easement zone
- 2.5 Public rights of way run through the northern and eastern edges of the site and through the south-west parcel of land parallel to a well established hedgerow. The existing links create connectivity north to south of the site perimeter.
- 2.6 Topographically, the site gradually rises from the floodplain associated with the Breach Brook and the River Sowe, with the highest points of the site located in the south-west corner and at the north-eastern boundary of the site with Junction 3 of M6.
- 2.7 Along the ridgeline of the site in the south west corner and adjacent to the public right of way heading in a southern direction key landmark views can be seen toward the Coventry Building Society Arena in the South and the Grade II listed St Giles Church north of the site.



1. ST. GILES CHURCH
2. ST. GILES ROAD
3. EXISTING SITE ACCESS OFF ST. GILES ROAD

KEY

-  SITE LOCATION (TBC)
53.75 ACRES / 21.77 HECTARES
-  MOTORWAY
-  PRIMARY ROAD
-  SECONDARY ROAD
-  LISTED BUILDINGS
-  RESIDENTIAL VIEWS INTO THE SITE
-  VIEWS INTO THE SITE
-  VEGETATION (INDICATIVE)
-  OVERHEAD CABLES WITH A 50M OVERALL EASEMENT
-  ELECTRICITY PYLONS
-  BUS STOP
-  SITE LOW AND HIGH POINT
-  PUBLIC RIGHTS OF WAY
-  POTENTIAL NOISE SOURCE
-  DECIDUOUS WOODLAND PRIORITY HABITAT INVENTORY FOR ENGLAND
-  RIVER SOWE / BREACH BROOK
-  ESTIMATED FLOOD ZONE FROM SURFACE WATER (E A MAY 2015)
-  ESTIMATED FLOOD ZONE FROM RIVERS AND SEAS (E A MAY 2015)
-  5M CONTOUR
-  VIEW FROM CHURCH LANE/ST GILES ROAD TOWARDS LOCALISED RIDGELINE
-  VIEW TOWARDS COVENTRY BUILDING SOCIETY ARENA
-  EXISTING WATER MAIN WITH 5M OVERALL EASEMENT ZONE
-  EXISTING SEWER WITH A 10M OVERALL EASEMENT (TBC)



FIG. 2.1. PRELIMINARY SITE AND CONTEXTUAL ANALYSIS



03 | PLANNING POLICY CONTEXT

3.1 This Section summarises the extant and emerging policy context for this site at the time of writing this document. The Development Plan for the area comprises the policies of the Nuneaton and Bedworth Borough Plan ("NBBP", adopted June 2019). The policies of the National Planning Policy Framework also apply to plan-making and decision-taking.

NUNEATON AND BEDWORTH PLAN 2011-2031

- 3.2 The adopted NBBP was intended to guide development and the use of land in the Borough up to 2031. It influences what development will take place, how much and where in the Borough it will be located.
- 3.3 The National Planning Policy Framework (para 33) requires local planning authorities to review their development plan at least once every five years to assess whether they need updating and then update policies as necessary. As the NBBP was adopted on 11 June 2019, the next review should be completed no later than 11 June 2024. Nuneaton and Bedworth Borough Council is currently in the process of carrying out a Borough Plan Review (BPR). The Council aims to submit the Borough Plan Review to the Secretary of State for examination in February 2023 following BPR Preferred Options and Publication consultations.
- 3.4 The site is located within the Green Belt, immediately adjoining the eastern boundary of Ash Green/Neal's Green, positioned to the north of Coventry. The NPPF confirms that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated, through the preparation or updating of plans. The Borough's Green Belt boundaries were altered by the NBBP, in order to release sufficient land to meet the needs of the Borough and the unmet needs of neighbouring authorities. Should insufficient land be available within the Borough to meet the updated needs

identified by evidence, it may be necessary for the BPR to remove additional land from the Green Belt and allocate it for development.

3.5 Paragraph 159 of the NPPF requires development to be directed away from areas at highest risk of flooding. A portion of the northern and eastern parts of the site is located within Flood Zones 2 and 3 on the Environment Agency's indicative flood risk map, associated with

the River Sowe and Breach Brook which run through the site. Section 7 of this document provides an initial assessment in relation to flood risk and drainage confirming that the majority of the site is located within Flood Zone 1 with portions of the northern and western areas of the site being identified as Flood Zones 2 and 3. The Indicative Masterplans (Fig 4.1 and Fig 4.2) demonstrate that all development is proposed within Flood Zone 1.

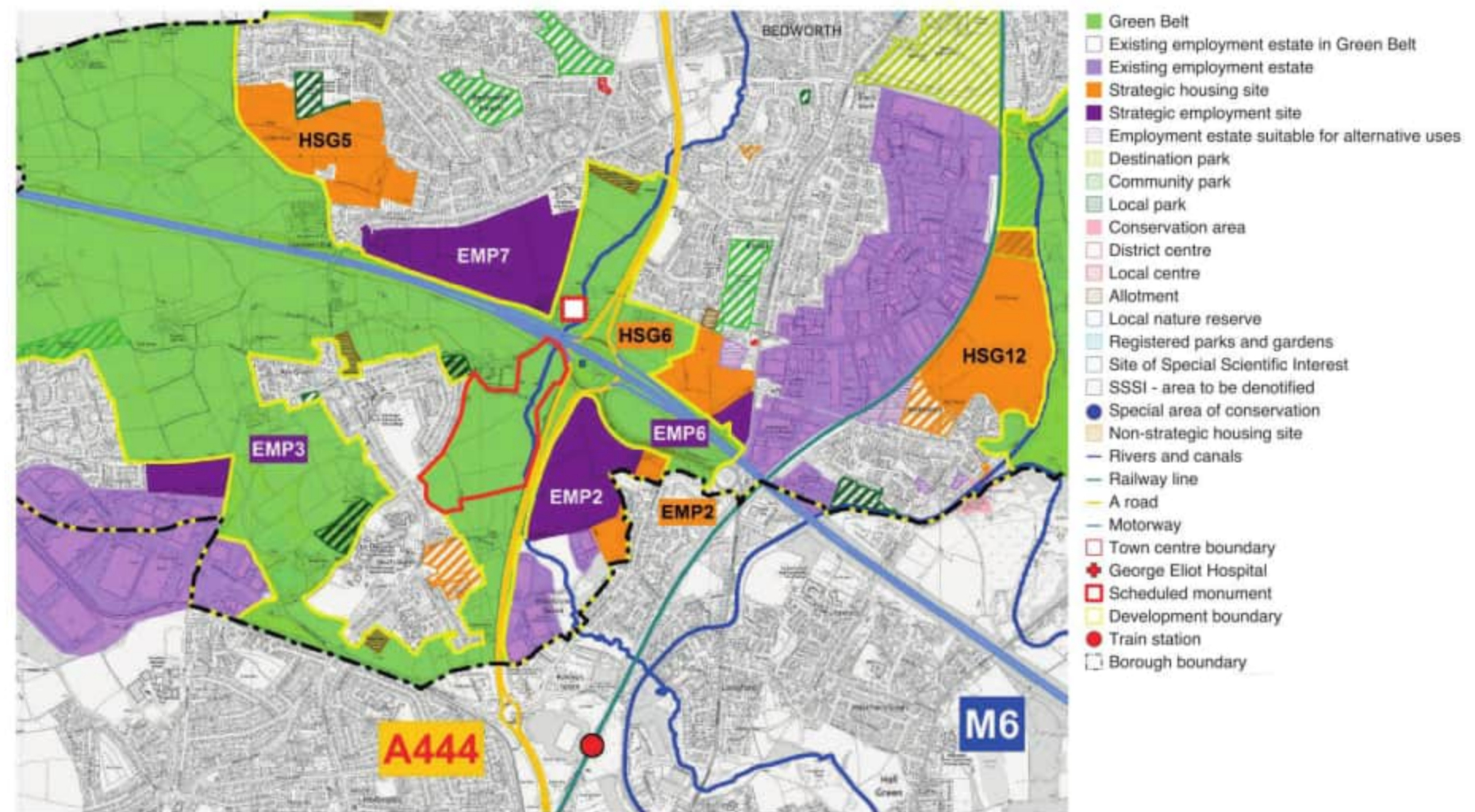


FIG 3.1. EXTRACT FROM NUNEATON & BEDWORTH BOROUGH PLAN 2011-2031 POLICIES MAP

DUTY TO CO-OPERATE

- 3.6 NBBC has committed to co-operate with neighbouring authorities in order to meet its obligations under the duty for local planning authorities to co-operate on strategic matters that cross administrative boundaries.
- 3.7 The adopted NBBP includes allocated development sites to meet both the identified needs within the Borough and a proportion of the unmet housing and economic development needs of Coventry City Council (4,020 homes and 26 ha of employment land). The redistribution of Coventry's unmet need was agreed between the six Coventry and Warwickshire local authorities during engagement under the duty-to-co-operate.
- 3.8 The Preferred Options version of the BPR sets out a strategy to meet only Nuneaton and Bedworth's own needs, based on interim conclusions in evidence produced by Icen Projects.
- 3.9 The six Coventry and Warwickshire authorities have jointly commissioned Icen Projects to produce a Housing and Economic Development Needs Assessment ("HEDNA") incorporating the latest data from the 2021 Census. The work on the joint HEDNA will help to confirm up-to-date housing and economic development needs, to establish whether any individual authority is unable to meet their housing or employment land requirement and to quantify the level of unmet need.
- 3.10 It is likely that there will be a need for NBBC to allocate additional housing and employment sites, over and above those proposed for allocation in the Preferred Options version of the BPR to meet a proportion of any unmet need identified under the forthcoming joint HEDNA.

EMERGING BOROUGH PLAN REVIEW

Preferred Options Plan, June 2022

- 3.11 The Preferred Options version of the Borough Plan Review ("BPR-PO") was published in June 2022 and covers the period up to 2039. The BPR-PO sets out the long-term vision and objectives with policies that will guide development up to 2039. These include:
- Using economic growth to regenerate the Borough, including town centres, and raise its profile as a more attractive place to live, work and invest in.
 - Seeking employment opportunities that will support the diversification of the Borough's economy and improve job opportunities for residents.
 - To provide a steady and adequate level of suitable housing for all.
 - To ensure that all new development and investment contributes to a significant improvement in infrastructure and facilities that serve the borough.
 - To improve cycling and walking networks, increase open space and leisure access and reduce crime.
 - To ensure that new development sustains and enhances the historic and natural environment.
 - To address climate change by driving sustainability in all new development.
- 3.12 The BPR-PO makes provision within **Policy DS4** to deliver a total of 9,690 homes and 80.5 ha of new employment land across the Borough over the plan period to 2039 to meet the Borough's own needs. As set out in **Policy DS5**, new homes are proposed to be delivered across a number of strategic and non-strategic sites. The Council's current preferred option for the delivery of new homes is the de-allocation of two strategic sites in the adopted NBBP and the allocation of additional sites in the urban area (primarily focused on Nuneaton) to substitute for the de-allocation. No Green Belt release is currently proposed under the BPR-PO, but it is as yet unclear how any unmet needs from neighbouring authorities will be addressed.
- 3.13 Eight strategic sites are currently identified in the BPR-PO to deliver a total of 4,770 homes. A further 27 non-strategic residential sites are identified for the delivery of a combined 912 homes.
- 3.14 As set out in **Policy DS6**, six sites are proposed to be allocated for employment development under the BPR-PO: Faultlands Farm (SEA-1, 26 ha); Wilsons Lane (SEA-2, 18 ha); Prologis Extension (SEA-3, 5.3 ha); Coventry Road, Nuneaton (SEA-4, 9 ha); Longford Road (SEA-5, 2 ha); and Bowling Green Lane (SEA-6, 19 ha).
- 3.15 Land west of the A444 and south of M6 Junction 3 is not identified for development in the BPR-PO and is proposed to remain in the Green Belt.
- 3.16 Although Green Belt release is not currently proposed in the BPR-PO, it is considered that following the publication of forthcoming up-to-date sub-regional housing and economic needs evidence, it may be appropriate to consider the release of appropriately located Green Belt land to meet the Council's own identified needs and the unmet needs of neighbouring authorities. The evidence base for the adopted NBBP included the Coventry and Warwickshire Joint Green Belt Study (2015). The site was assessed within the Green Belt Study for its performance in relation to each of the five purposes of the Green Belt identified in the NPPF. The site is located within parcels NG2 and NG1 which were considered to be 'mid-performing Green Belt parcels' with their weaker performance being attributable to a range of factors including the presence of the M6 Motorway, pylons and buildings as fully detailed within Section 5 – Landscape and Visual Issues. A residential or employment proposal on Land west of the A444 and south of M6 Junction 3 could assist NBBC in meeting housing and employment requirements including the yet-to-be-quantified unmet needs of Coventry.
- 3.17 As part of the Examination of the BPR, there will be legal requirement to test whether NBBC has complied with the duty to co-operate. In light of the need to work collaboratively with other authorities to address any shortfall in housing and employment land, it is anticipated that the Council will need to allocate additional housing and employment sites within the emerging BPR as fully detailed in the accompanying representations to the BPR-PO.

Sustainability Appraisal, Interim Report, June 2022

- 3.18 As part of the evidence base for the emerging BPR, the Council has commissioned the preparation of a Sustainability Appraisal ("SA"). All aspects of the SA will be brought together in a full SA Report at Regulation 19 stage, however the BPR-PO is accompanied by a SA Interim Report (June 2022) including an assessment of a variety of sites across the Borough, to establish their desirability for housing and employment development.
- 3.19 The site is assessed under the SA Interim Report under the reference **EXH-10 Land east of St Giles Road**.
- 3.20 Site EXH-10 scores highly on a number of sustainability measures. It is identified as being located in an area of low landscape sensitivity, without overlap with any areas identified as potentially sensitive. With regard to biodiversity, the site's development would not cause the direct loss or disturbance of any Special Areas of Conservation, Sites of Special Scientific Interest, ancient woodland or Local Nature Reserves.
- 3.21 The SA Interim Report also identifies that the site is well-located with regard to local parks, sports and recreational facilities and the nearest primary school. The nearest GP is only 728 m away and the site is 818 m from the Coventry Road / School Lane built-up centre.
- 3.22 The site also scores highly with regard to access to the strategic road network, with the A444 being located immediately east of the site and M6 Junction 3 being located to the north. An active travel network overlaps with the site (which is cross by a PRoW) and it is identified as being 74 m from the nearest bus stop (with 15 bus stops within 800 m) and just over 1 km from the nearest railway station.
- 3.23 Section 6 of this document provides details of the sustainability credentials of Land west of the A444 and south of M6 Junction 3 and it is considered that the site is particularly well placed in terms of proximity to the strategic road network, existing employment areas, services, facilities and public transport provision.

Strategic Housing Land Availability Assessment (SHLAA), 2021

- 3.24 The Strategic Housing Land Availability Assessment is another key document produced for the evidence base accompanying the emerging BPR. The site is assessed in the SHLAA under the reference **ECH10 Land east of St Giles Road**.
- 3.25 The SHLAA assesses sites against a number of planning considerations, such as access, heritage, ecology etc. Scoring is split into a traffic light system, with sites considered to have a significant impact on each category scoring red, and sites considered to have a minor/no impact scoring green. Sites that will have some impact on certain categories are scored as amber.
- 3.26 The site scores green on 17 of the 28 site suitability criteria in the SHLAA, including impact on AONBs, Conservation Areas, designated and non-designated heritage assets, European/national and local wildlife sites and protected species, local geological sites, minerals and waste, contaminated land, Tree Preservation Orders, landscape sensitivity, site assembly and site topography and shape. It is also rated green for access to the site from the road network and accessibility to local facilities.
- 3.27 The site receives an amber score (some impact) on a number of categories. Several of these scores relate to factors that can be successfully mitigated through design, including the integration of the site into the existing built form through landscaping, design to avoid building on the parts in the north of the site affected by Flood Zones 2 and 3 and the incorporation of natural features. The amber score in relation to agricultural land does not take into account (as confirmed in the SA) that only grade 3 land is present. With regard to availability, amber scores in relation to both the intentions and legal criteria are not considered appropriate as the site has been submitted on behalf of L&Q Estates therefore having a developer in place and there are no known legal constraints to the site coming forward for development.

- 3.28 The site scores red on three criteria, namely access to public transport services, Public Rights of Way and the site's location in the Green Belt. It is not considered that a red score is reflective of the site's proximity to existing public transport provision, which (as confirmed in the SA) includes bus stops and the site being within 1.2 km of a railway station. A more appropriate score would be an amber to green for this criterion. In relation to PRoWs, there is an existing PRoW which runs through the northern and eastern edges of the site and alongside the western part of the site. This does not present a constraint to development coming forward on the site and as shown on the Indicative Masterplans (Fig 4.1 and 4.2), the existing route of the PRoW is to be retained and incorporated within the land to be retained within private ownership and within the proposed green infrastructure.
- 3.29 The SHLAA includes a summary dealing with suitability, availability and deliverability of the site. With regard to suitability, the summary outlines how the site falls within a Green Belt parcel which scored 11/20 in the 2015 Green Belt Study, scoring high in purposes 2 and 5 but low in purposes 1, 3 and 4. The summary goes on to set out that encroachment of the countryside to the east of the parcel (to the east of Ash Green) in parcel BE5 significantly increases the importance of the Green Belt in this parcel and that, as the area to the east is allocated as a strategic site EMP2 in the current Borough Plan, this site has an increased importance in terms of separation of settlements. This ignores the A444 corridor which runs the entire eastern boundary of the site forming a permanent and defensible boundary that would prevent further encroachment and avoid coalescence. In addition, as detailed within Section 5 of this document, the landscape strategy for the site will strengthen the structure of the landscape to create a new robust, defensible Green Belt boundary along the southern, eastern and northern areas of the site.

3.30 The SHLAA states that there are a number of constraints which make the site unsuitable for development and that noise/air pollution, sensitive landscape and flooding constraints would need to be considered in the northern part of the site. Notwithstanding that both the SHLAA and the SA identify the landscape around the site generally as being of low sensitivity, the Indicative Masterplans (Fig 4.1 and 4.2) show that development is outside of the existing Flood Zones 2 and 3 to the northern and along the eastern part of the site and as demonstrated within this document, the emerging proposals for the site have been informed by a number of technical disciplines and there are no suitability constraints to the site coming forward for residential or employment development as shown on the Indicative Masterplans.

3.31 In terms of availability, the land is under option to a developer and there are no identified constraints.

3.32 The 2021 SHLAA does not assess the site in terms of its achievability. When the site was assessed by the Council previously in the 2017 SHLAA, it was alleged that there are no defensible boundaries to act as a long term barrier to prevent further encroachment into the Green Belt parcel and avoid coalescence with the proposed employment allocation to the east. Should this continue to be a concern for NBBC, as set out above and discussed fully in Section 7 of the Document the A444 Jimmy Hill Way acts as a defensible boundary to the east. The landscape led approach to the development of the site is such that the boundary to the east will be strengthened in addition to the northern and southern boundaries which will create new robust, defensible Green Belt boundaries to the site such that the proposed development would not lead to coalescence to the southern edge of Bedworth, the northern edge of Coventry or coalescence with Neal's Green and Woodshires Green.

SUMMARY

3.33 This Section has provided the planning context within which the Land west of the A444 and south of M6 Junction 3 is to be considered. There is considered to be a clear case for the removal of the site from the Green Belt and its allocation for residential or employment development to ensure that the BPR will meet up-to-date local needs.











3.34 With consideration to the policy context outlined above the remainder of this Document provides the Council with an assessment of the suitability of the site for housing or employment development and provides a sound basis upon which the Council are respectfully requested to strategically allocate the site within the emerging BPR.

KEY PRINCIPLES

1. PROPOSED VEHICULAR ACCESS OFF ST GILES ROAD
2. PRINCIPAL TREE LINED ROUTE
3. ENHANCED PLANTING BUFFER SOUTH
4. EXISTING LINEAR HERGROVE
5. EXISTING PUBLIC RIGHT OF WAY
6. PROPOSED PEDESTRIAN LINKS
7. RESIDENTIAL SET BACK FROM EXISTING VEGETATION
8. INDICATIVE CHILDREN'S AREA OF PLAY
9. KEY VIEW TOWARDS COVENTRY BUILDING SOCIETY ARENA
10. KEY VIEW TOWARDS ST GILES CHURCH
11. BUILDINGS WITH OUTWARD FACING WINDOWS CREATING NATURAL SURVEILLANCE AREAS PUBLIC OPEN SPACE
12. WIDE GREEN OPEN SPACE WITH BIODIVERSITY IMPROVEMENTS
13. SUSTAINABLE URBAN DRAINAGE
14. OVERHEAD CABLES WITH 50M OVERALL EASEMENT ZONE



KEY

-  SITE LOCATION
-  RESIDENTIAL DEVELOPMENT
-  PROPOSED ACCESS
-  EXISTING LANDSCAPE (INDICATIVE)
-  VIEW TOWARDS COVENTRY BUILDING SOCIETY ARENA
-  VIEW TOWARDS ST GILES'S CHURCH FROM LOCALISED RIDGELINE
-  PROPOSED LANDSCAPE
-  PROPOSED CHILDREN'S AREA OF AREA
-  EXISTING PUBLIC RIGHT OF WAY
-  PROPOSED PEDESTRIAN LINKS

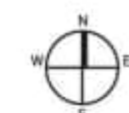


FIG 4.1 PROPOSED INDICATIVE MASTERPLAN Residential Development

04 | EMERGING PROPOSALS

RESIDENTIAL OPTION

DEVELOPMENT AND QUANTUM

- 4.1 The net developable area of the proposed residential development is approximately 7.53 hectares of the sum 21.7 hectares. The remaining site area will comprise of public open space or be retained as private open land.
- 4.2 Green spaces are intended to soften edges of the development site establish and maintain key views as identified and complement a lower density environment to the outward facing dwelling edges of the site.
- 4.3 Taking into account the location of the site density of existing neighbouring residential area, an average density of 35 dwellings per net hectare has been applied to the allocated areas of residential use which will provide approximately 265 dwellings, and at 40 dwellings per net hectare, approximately 300 dwellings could be provided. The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of housing, sizes and tenures.
- 4.4 Outward facing frontages envelop all elements of the site edges and will assist in the surveillance of landscaped public open space and the proposed location of the western edge children's play area.
- 4.5 Dwellings will be offset from the central hedgerow green corridors presently identified as existing vegetation which has some ecological sensitivity in order to maintain the natural habitat.

ACCESS

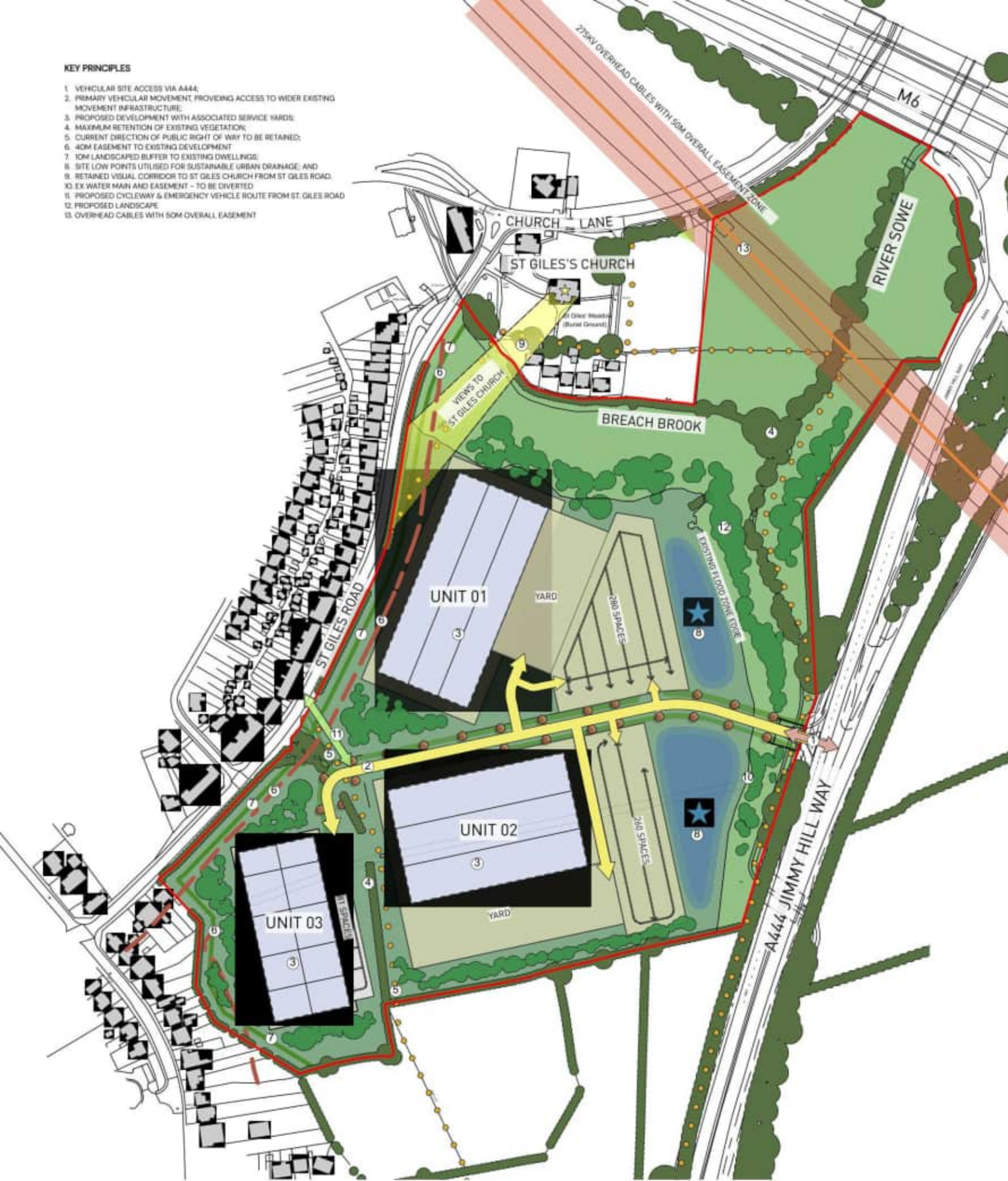
- 4.6 Vehicular access into the development will be located off St Giles Road with the current working assumption that there will be two serving vehicular access points, taking the form of priority 'give-way' junctions directly off St Giles Road.
- 4.7 The principal access point is located from an existing serving access approximately 65 metres northeast of the junction from Deans Way. A secondary access point is proposed to be located 130 metres north east of the principal access. This will allow for a primary return route through the development serving circa 300 dwellings.
- 4.8 A principal tree lined street enters the site via a landscaped green space which will define the circuitous route. Traffic will continue along a series of defined primary streets which will in turn disburse traffic around the development. The route passes through the most southern and south west field and meanders alongside the defined mature hedgerow.
- 4.9 The established primary route also underpins a hierarchy of streets which includes secondary linked shared surfaces and lanes and tertiary designed private driveways in accordance with manual for streets.
- 4.10 The principles of development will take account of the established public right of way existing network routes ensuring pedestrian access points offer connectivity east to west of the development.
- 4.11 A number of proposed pedestrian links could be established to further improve accessibility to the local recreation fields situated north-west and south-west of the development. These linkages have been indicated on the indicative masterplan at Fig 4.1

GREEN INFRASTRUCTURE

- 4.12 A significant part of the site will be retained as green space incorporating existing hedgerows, with a proposed pedestrian access linking to the existing public right of way located at the north point of the site allowing access to the existing entry off Church lane.
- 4.13 Interconnected green space corridors around the east west southern fringes of the development provide an attractive soft edge to compliment lower density development.
- 4.14 The majority of existing trees and linear shrub vegetation is proposed to be retained save for where sections need to be removed for access and internal connectivity.
- 4.15 Public right of ways are maintained through a series of proposed green networks with the provision of additional routes to ensure key pedestrian links north to south, east to west of the site are fully achieved.
- 4.16 The site low point is on the eastern side of any proposed development and on the western bank of the River Sowe. Attenuation features are to be placed clear of the flood zone.
- 4.17 Taking into consideration the location of the site and scale of the proposed development, a proposed equipped area for play is identified on the proposals and indicatively shown toward the northwest boundary of the site between existing and proposed communities. Informal open areas of green space are proposed to achieve soft development edges.
- 4.18 The open space extends to approximately 13.8 hectares (about 34.3 acres) which will include site attenuation measures and areas at risk of Zone 2 and 3a flooding, at this stage will exceed public open space provision requirements.

KEY PRINCIPLES

1. VEHICULAR SITE ACCESS VIA A444;
2. PRIMARY VEHICULAR MOVEMENT PROVIDING ACCESS TO WIDER EXISTING MOVEMENT INFRASTRUCTURE;
3. PROPOSED DEVELOPMENT WITH ASSOCIATED SERVICE YARDS;
4. MAXIMUM RETENTION OF EXISTING VEGETATION;
5. CURRENT DIRECTION OF PUBLIC RIGHT OF WAY TO BE RETAINED;
6. 40M EASEMENT TO EXISTING DEVELOPMENT
7. 10M LANDSCAPED BUFFER TO EXISTING DWELLINGS;
8. SITE LOW POINTS UTILISED FOR SUSTAINABLE URBAN DRAINAGE; AND
9. RETAINED VISUAL CORRIDOR TO ST GILES CHURCH FROM ST GILES ROAD.
10. EX WATER MAIN AND EASEMENT - TO BE DIVERTED
11. PROPOSED CYCLEWAY & EMERGENCY VEHICLE ROUTE FROM ST. GILES ROAD
12. PROPOSED LANDSCAPE
13. OVERHEAD CABLES WITH 50M OVERALL EASEMENT



KEY

- SITE BOUNDARY
21.7 HECTARES / 53.62 ACRES
- VEHICULAR ACCESS VIA
A444 JIMMY HILL WAY
- PRIMARY ROAD PROVIDING ACCESS
TO ALL UNITS
- PUBLIC RIGHT OF WAY
- KEY BUILDING (EXISTING)
- PROPOSED LANDSCAPED
10M BUFFER ZONE
- PROPOSED TREE-LINED AVENUE
& ORNAMENTAL PLANTING
- PROPOSED SUSTAINABLE URBAN
DRAINAGE (TBC BY ENGINEER)
- EXISTING LOCAL DISTANCE VIEWS
FROM EXISTING SETTLEMENT
- PROPOSED BUILT FORM
- PROPOSED PARKING COURTS & YARDS
- PROPOSED PARKING
- EMERGENCY & PEDESTRIAN/CYCLE ACCESS
- 10m LANDSCAPE BUFFER
- 40m EASEMENT TO EXISTING PROPERTIES
- PROPOSED LANDSCAPE



FIG 4.2 PROPOSED INDICATIVE MASTERPLAN
Employment Development

COMMERCIAL OPTION

DEVELOPMENT AND QUANTUM

4.19 The net developable area of the proposed employment development is approximately 8.31 hectares of the sum 21.7 hectares. The remaining site area will comprise of public open space or be retained as private open land.

4.20 The proposed built form measures:

UNIT 1	12,600 m ²	135,625 ft ²
UNIT 2	12,600 m ²	135,625 ft ²
UNIT 3	8,100 m ²	87,200 ft ²
TOTAL	33,300 m²	358,450 ft²

4.21 Green spaces and proposed landscape planting are intended to soften the edges of the development site and maintain key views as identified. The proposed layout sets back development from existing dwellings along the western boundary by 40m and includes a 10m landscape buffer.

ACCESS

4.22 Vehicular access into the development will be located off Jimmy Hill Way (A444) with the current working assumption that there will be one vehicular access point, taking the form a signalised left in-left out arrangement.

4.23 The primary access road will be tree lined and enters the site via a landscaped green space containing attenuation basins. The linear road provides access to Unit 1 to the north, Unit 2 to the south and terminates at Unit 3 in the south-western corner of the site.

4.24 An emergency access incorporating pedestrian and cycle access is provided between the primary access road and St Giles Road on the western boundary.

4.25 The existing public rights of way crossing the site are retained in their existing locations on the indicative masterplan at Fig 4.2. The potential exists to divert the PROWs to maximise the developable land and make best use of the Site whilst retaining connectivity across the Site. L&Q Estates are happy to explore this design option with the Council if this would be desirable.

GREEN INFRASTRUCTURE

4.26 A significant part of the site will be retained as green space incorporating existing hedgerows.

4.27 Interconnected green space corridors around the fringes of the development provide an attractive soft edge and reduce visual impacts.

4.28 The majority of existing trees and linear shrub vegetation is proposed to be retained. However, both the hedgerow in the centre of the site and that which runs along proposed access road will be removed.

4.29 Public right of ways are retained within the green infrastructure.

4.30 The site low point is on the eastern side of any proposed development and on the western bank of the River Sowe. Attenuation features are to be placed clear of the flood zone.

4.31 The open space extends to approximately 13.3 hectares which will include site attenuation measures and areas at risk of Zone 2 and 3a flooding, which will exceed public open space provision requirements.

05 | LANDSCAPE VISUAL ISSUES

LANDSCAPE CHARACTER

- 5.1 In relation to the published landscape character evidence base, at the national level the site is located within National Character Area 97: Arden. The Warwickshire Landscape Guidelines identify the site as lying within the Industrial Arden Landscape Character Area (LCA). The overall character and qualities of this area are set out as a variable, often run-down urban fringe landscape characterised by mining settlement, spoil heaps, and pockets of farmland. In this location, the 'Industrial Arden' landscape is also characterised by motorway infrastructure.
- 5.2 At a local level, the landscape character volume of the Nuneaton and Bedworth Land Use Designations Study places the land within the Keresley Urban Fringe Landscape Character Area (LCA 7). The key characteristics of this character area, relevant to the site and its context are summarised as follows:
- An urban fringe character created through the mixture of land uses and the fragmentation and isolation of farmland as a result of roads and urban development;
 - The field pattern is variable with many fields are small and irregular in shape close to streams becoming larger where arable farming takes place on higher ground;
 - Woodland is present as linear belts along the M6 and A444. Elsewhere a wooded character is created by mature trees within mature hedgerows; and
 - Views always comprise development which includes warehouses, the Coventry Building Society Arena and residential development. Development is indivisible between settlements and in association with ribbon development often creates the impression of the land being surrounded by urban development rather than separate settlements. The church of St Giles is a feature within the landscape.

- 5.3 The published study concludes that the Keresley Urban Fringe LCA has a 'weak' character, and the landscape condition is 'poor'. A landscape strategy has been set out in the document as follows:

"Emphasis should be placed on creating a sense of place and distinctiveness whilst retaining and restoring features such as hedgerows, hedgerow trees, woodland and wooded streams through new green infrastructure to reinforce character and a sense of place. New planting could help to reduce the prominence of urban fringes. Change which enhances the wetlands along streams and rivers could provide a positive connection between each pocket of farmland.

Any new development should be set in a strong landscape framework which incorporates existing landscape structure where possible. Development would need to create distinctiveness between settlements; retain views towards St Giles Church; maintain the village character around the junction of Church Lane and St Giles Road."

- 5.4 In relation to the character of the site itself, the landform of the site rises from ca. +95m AOD in the north to ca. +105m AOD to the south-west. The River Sowe passes through the site along its eastern edge and Breach Brook connects to the Sowe, passing south of the Church of St Giles, a listed building. The pattern of vegetation on site and within its immediate context is characterised by a network of mature hedgerows, some of which are heavily fragmented, and individual mature hedgerow trees. There are four sections of public rights of way (footpaths) which pass through the site, connecting St Giles Road to Neal's Green in the south and the Church of St Giles to the north.

VISUAL AMENITY

- 5.5 Views towards the site from the wider landscape/ townscape are limited by the motorway/embankment to the north and the well vegetated A444 to the east. From close to and within the site itself, there are views from the public right of way network that passes along the eastern, north-western and south-eastern parts of it. The rising landform of the site means that for views from lower elevations to the north (Church Lane / Vicarage Lane, as well as the Church of St Giles), the skyline is defined by the southern part of the site, which appears as a localised ridgeline.
- 5.6 In terms of the sites' visual relationship with the existing settlement edge; the site does have a direct physical and visual relationship with the residential area of Ash Green to the west and Neal's Green to the south-west. The residential edge is relatively exposed in most locations. In relation to the wider townscape, locations from where there are views of both the southern edge of Bedworth and the northern edge of Coventry are very limited. This is generally due to the physical and visual barrier of the motorway, which is generally elevated. As local landform falls away from the high point on the site itself, views from beyond it are more open and the Coventry Building Society Arena appears as a prominent landmark along the skyline.

LEGEND













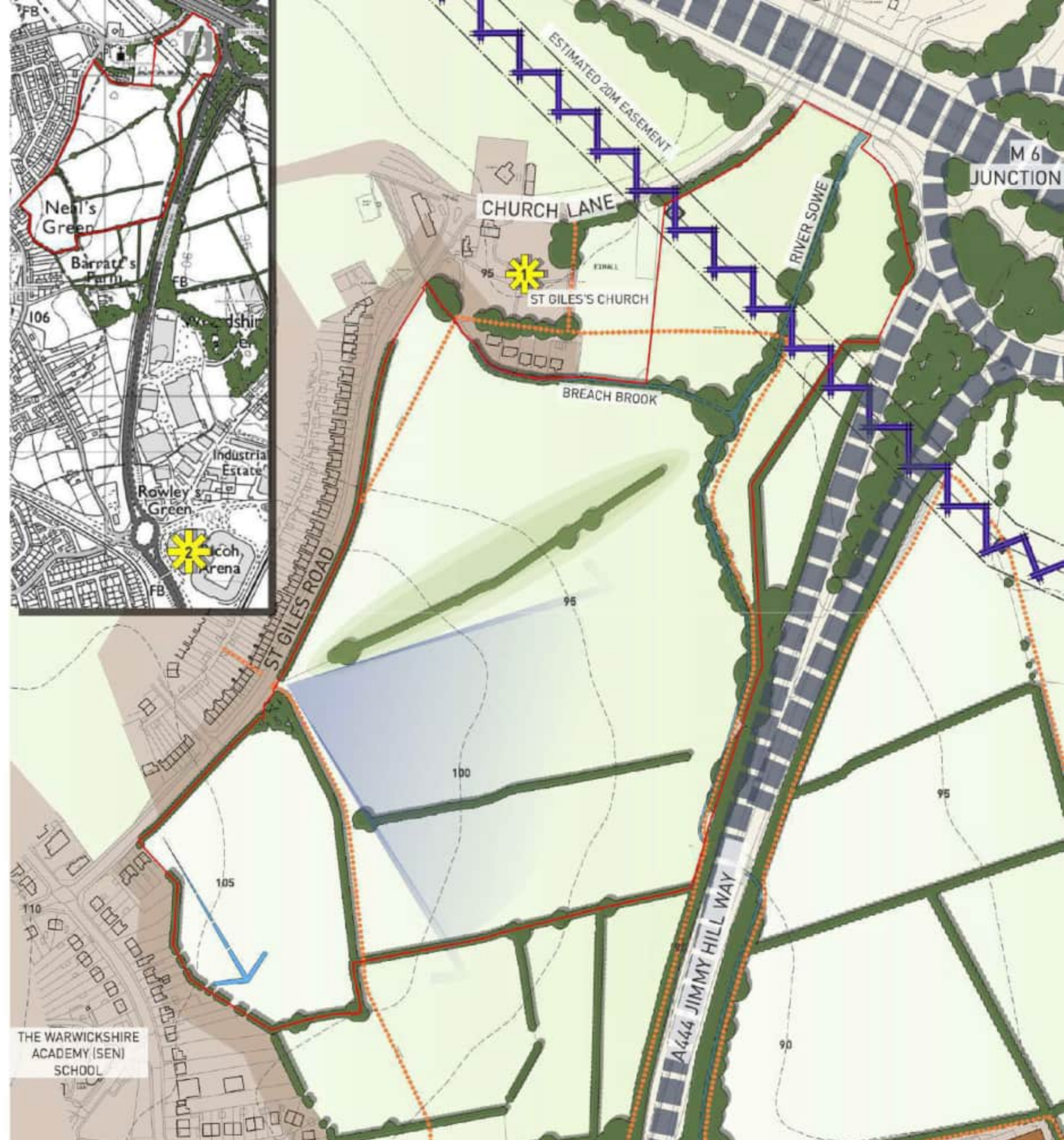
-  Site boundary
-  Existing trees and hedgerows
-  Local land mark buildings:
1: St Gile's Church
2: Coventry Building Society Arena
-  Existing contours
-  Visual detractor: electricity pylons
-  Major road infrastructure
-  View towards Coventry Building Society Arena
-  Views across townscape from localised highpoint
-  Existing public rights of way
-  Existing urban edge
-  Existing large scale built form
-  River Sowe



FIG 5.1. LANDSCAPE AND VISUAL ANALYSIS



ROLE OF THE SITE IN THE GREEN BELT

- 5.7 The site is located within parcel NG2 and in part, NG1 of the Joint Green Belt Study. This document identifies specific land parcels of the Green Belt around Coventry, Nuneaton and Bedworth and considers them in relation to the five purposes of the Green Belt. Its findings for NG2, within which the site largely sits, is summarised as follows.
- 5.8 The Joint Green Belt Study states that the parcel plays no role in preventing ribbon development. In relation to openness, it notes north of the rugby club at Burbages Lane, with the exception of a few derelict buildings in the centre of the parcel to the west of Woodford Lane, the parcel comprises open fields that are free from development.
- 5.9 In relation to the potential merging of towns, the Study states that the parcel contains the only open space between Coventry to the east and Ash Green and Neal's Green to the west.
- 5.10 With regard to safeguarding the countryside from encroachment, the Study states that the noise of A444 to the east and the hardstanding and floodlights associated with the rugby club to the south serve to urbanise the land within the southern portion of the parcel. It also considers that the A444 protects the countryside to the east from encroachment from Ash Green. Breach Brook also provides containment to the north. The Study notes however that the southern half the parcel represents the only countryside between Coventry and Neal's Green.
- 5.11 In relation to preserving the setting and special character of historic towns, the Study notes that the parcel does not overlap with a Conservation Area within a historic town. In addition, there is no intervisibility between the historic core of a historic town and the parcel. The Study considers that all Green Belt parcels make an equally significant contribution to the development of derelict and other urban land within settlements.
- 5.12 The overall conclusion on the performance of both parcel NG1 and NG2 is that they are 'mid-performing' Green Belt parcels, and their weaker performance is attributable to a range of factors including:
- The presence of buildings, M6 motorway and pylons that compromise the openness of the Green Belt within the parcel; and
 - The urban fringe context the parcels are located in and the lack of prominent boundaries limits the role of parcel in safeguarding of the countryside from encroachment.

LANDSCAPE STRATEGY

- 5.13 The landscape strategy for the site is summarised as follows:
- Retain and enhance the existing tree and hedgerow network to reinforce local landscape character. This can include strengthening and diversifying vegetation cover through planting of native tree and hedgerow species;
 - Set back of the development envelope from the Church Lane / St Giles Road junction so as to maintain the character of the area surrounding the Church of St Giles as far as possible;
 - Limit building heights so as to reduce potential visual impacts from more sensitive visual receptors using the local public right of way network and those occupiers of residential properties in close proximity;
 - Set back the development envelope east of Ash Green Lane as far as possible to retain built form away from the highest elevations of the site;
 - Orientate new built form away from higher sensitivity receptors and retain local views as far as possible; and
 - Creation of a strong landscape buffer to the south of the site, utilising existing hedgerows and trees and contributing to a new defensible Green Belt boundary in this location.

LEGEND
















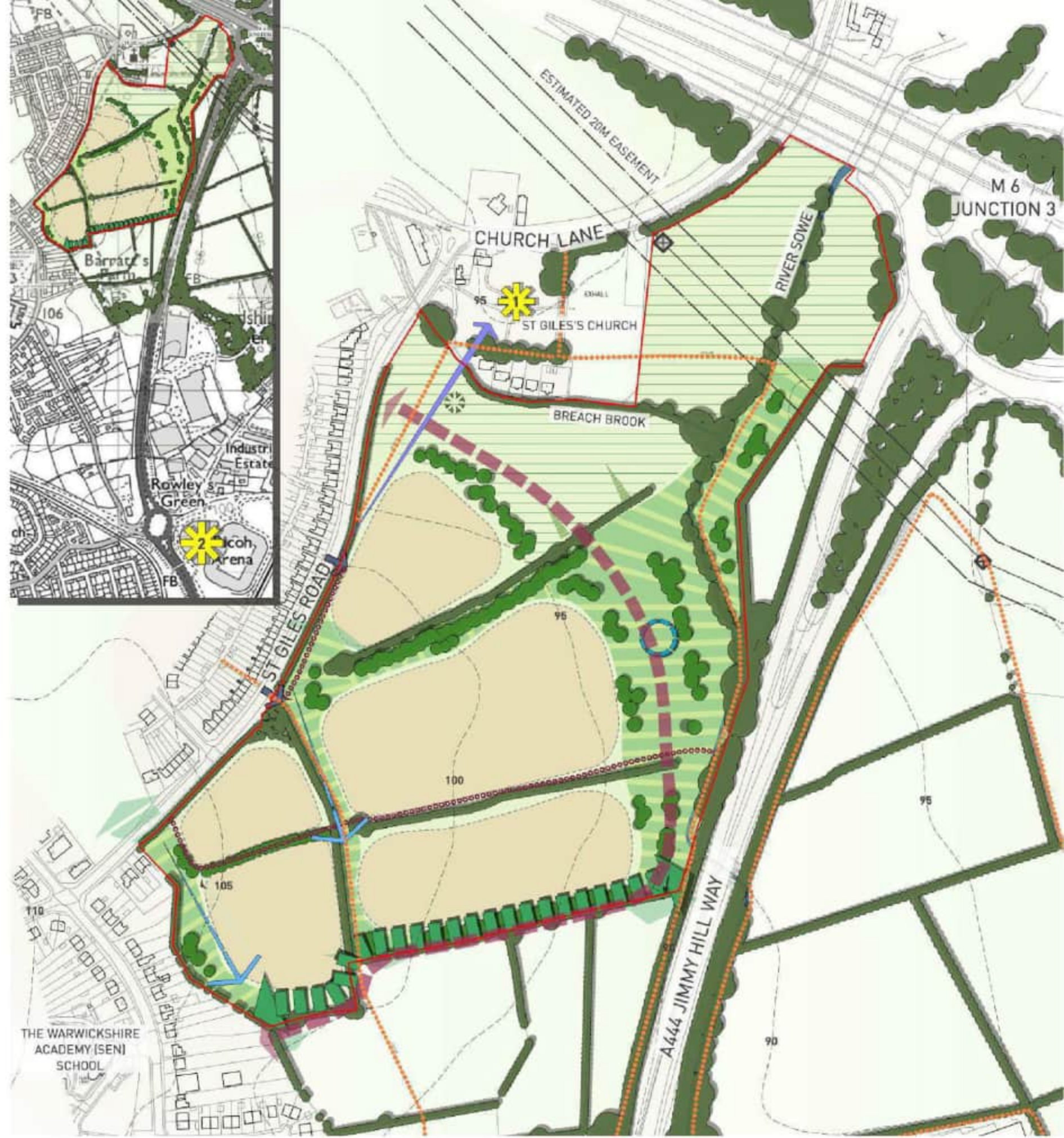
-  Site boundary
-  Existing trees and hedgerows to be retained and enhanced
-  Existing water body
-  Local land mark buildings:
1: St Giles's Church
2: Coventry Building Society Arena
-  Existing public rights of way
-  Existing electricity pylons
-  Existing contours
-  Localised sloping landform
-  View towards St Giles Church
-  View towards Coventry Building Society Arena
-  Proposed development envelope
-  Public open space with opportunity to integrate with Sustainable Urban Drainage System
-  Linear open space retains views to landmark building
-  Wilder green open space with biodiversity improvements
-  Proposed green infrastructure corridor
-  Proposed buffer planting
-  Proposed green infrastructure planting along southern site boundary
-  Potential play area
-  Proposed vehicular access
-  Proposed footpath linking existing footpath network
-  New Green Belt boundary



FIG 5.2. LANDSCAPE STRATEGY





1. VIEW LOOKING EAST TOWARDS A444 FROM NORTHERN PARCEL

2. VIEW LOOKING WEST FROM MIDPOINT OF SITE TOWARDS EXISTING DWELLING ON ST GILES ROAD

3. VIEW LOOKING SOUTH WEST TOWARDS EXISTING DWELLINGS ON ST GILES ROAD NEAR ASH GREEN LANE

4. VIEW ALONG PUBLIC RIGHT OF WAY LOOKING SOUTH TOWARD COVENTRY BUILDING SOCIETY ARENA

5. VIEW LOOKING NORTH TOWARDS FLOOD PLAIN



CREATION OF A DEFENSIBLE GREEN BELT BOUNDARY

- 5.14 At paragraph 143(f) of the NPPF (2021), it states that when defining Green Belt boundaries, they should be defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 5.15 As set out previously, the land is characterised by falling topography influenced by the River Sowe and the Breach Brook; a network of hedgerows in varying condition with some mature trees; and a physical and visual relationship with the motorway and other road infrastructure in this location.
- 5.16 In terms of a defensible Green Belt boundary, it is these features, in combination with the existing public access network and the potential for the creation of new green

infrastructure, which could combine to form a new Green Belt boundary. In tandem with this, and based on the preliminary landscape and visual analysis, this boundary can be further reinforced by the creation of a robust landscape planting, that can combine both existing and proposed elements of green infrastructure.

- 5.17 The introduction of a new Green Belt boundary at the southern, eastern and northern areas of the site using physical landscape features such as the mature hedgerow and tree boundaries will mean both that the purposes of the green belt are maintained, and any future development will be set within a strong vegetation framework, such that it is landscape and visually led as far as possible.

- 5.18 The following table considers the proposed development in relation to the five purposes of the Green Belt, as set out by the Joint Green Belt Study.

SUMMARY

- 5.19 Overall, the scale and form of proposed development has been influenced by the landscape constraints and opportunities of the site and its context. Furthermore, the proposals for green infrastructure and landscaping will deliver a number of enhancements in terms of the physical landscape and the strengthening of the structure of the landscape to create a new robust, defensible Green Belt boundary along the southern, eastern and northern areas of the site.

NPPF Green Belt Purpose	Issue	Comments
To check the unrestricted sprawl of large built-up areas.	Ribbon development	The development envelope is located within parcel NG2, which as set out in the Joint Green Belt study, plays no role in preventing ribbon development.
	Openness	The site is located within an urban context, and the perception of openness in visual terms is limited by a combination of urban elements, such as the elevated M6 motorway, residential development, electricity pylons, the A444 road corridor, street lighting and larger scale warehouse development. The perception of openness in visual terms is however stronger from the Church of St Giles, and the junction between Church Road and St Giles Road looking south towards the localised ridgeline. The development envelope has been set back from the church in order to help maintain this sense of openness as far as possible.
To prevent neighbouring towns merging into one another	Location of parcel and distance between neighbouring settlements	The proposed development is contained so as to maintain a robust landscape buffer along its eastern edge. It would not result in the physical coalescence of the southern edge of Bedworth and the northern edge of Coventry; nor will it result in any physical coalescence of Neal's Green and Woodshires Green. Any visual coalescence could be mitigated by the implementation of a robust, inherent landscape strategy.
To assist in safeguarding the countryside from encroachment	Significance of existing urbanising influences	The proposed development envelope and its immediate landscape context are located within an urban fringe landscape character area and are influenced by a range of urban elements and features. Notwithstanding the urban influence of the context, development would be placed within the existing landscape framework which would also be enhanced to minimise the visual impact of the proposed development.
	Significance of boundaries / features to contain development and prevent encroachment	The River Sowe and its associated flood zone, together with the A444 could provide robust boundaries to the south and east. The section of enhanced hedgerow to the south of the site defines the southern boundary of the development envelope.
To preserve the setting and special character of historic towns	Parcel forms an historical and/or visual setting to the historic town	The development envelopment has been set back from the church of St Giles in order to retain local views to and from the church and the local character of its surroundings as far as possible. There are no Conservation Areas in the vicinity of the site.
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	The need to incentivise development on derelict and other urban land within settlements	The site is influenced by urbanising features. It is considered that all areas of Green Belt by their nature and designation should contribute to the recycling of derelict and urban land as Green Belt is generally a prohibitive designation where development is rarely acceptable, thus development is focused into urban areas.

06 | MOVEMENT & ACCESS

EXISTING SITE AND SURROUNDS

- 6.1 The site is located to the south of the M6 Junction 3 and is bounded by the dual carriageway A444 to the east, Church Lane and St Giles Road to the west and existing agricultural land to the south. The site occupies approximately 22ha of open fields immediately adjacent to the eastern boundary of the residential area of Ash Green / Neal's Green. In terms of the surrounding area, Longford is located to the east, Bedworth to the north and the urban area of Coventry to the south.
- 6.2 The roads to the west in the vicinity of the site are generally a mixture of residential and local distributors with a network of footways, street lighting and dropped kerbs at crossing points near to junctions.
- 6.3 Five public rights of way run through the site; these would be incorporated into the development layout.

SUSTAINABILITY

- 6.4 The site is favourably located with regard to access to local facilities and services, with a range of employment, education, retail and healthcare options within a 2km walk of the site. The site benefits from an extensive footway network that radiates away from the site. Existing continuous footway links, with streetlight provision and pedestrian crossing facilities, make the surrounding areas permeable on foot. The site is in close proximity to facilities at Arena Park adjacent to the Coventry Building Society Arena (defined in the Coventry UDP as a District Centre), which includes a range of shops such as Tesco Extra, Boots and M&S, other food and retail outlets and banking facilities. The site benefits from being located in proximity to existing employment areas for the potential residential development and to existing residential areas for the potential employment development.

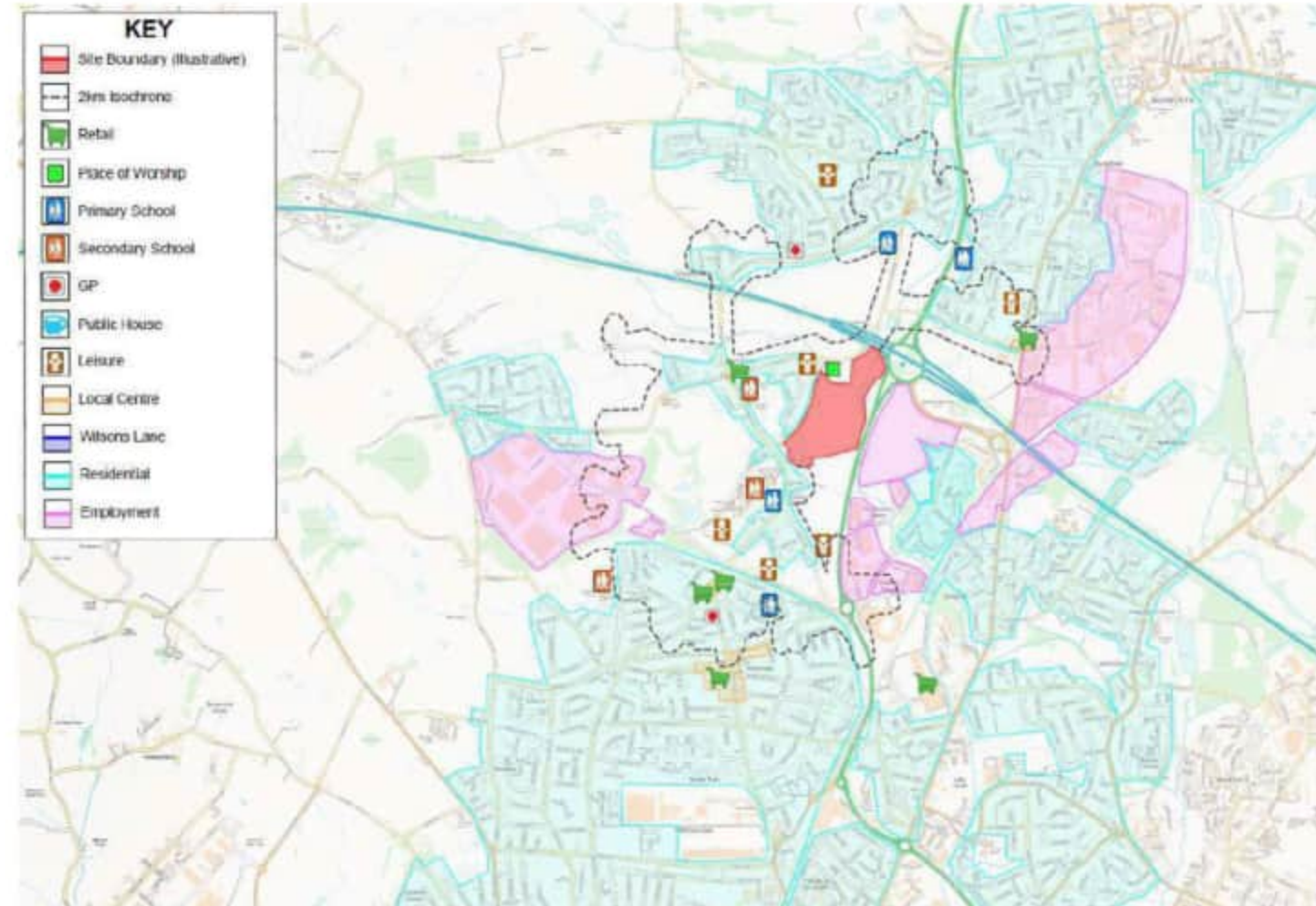


FIG 6.1. LOCAL SERVICES AND FACILITIES, EMPLOYMENT SITES AND RESIDENTIAL AREAS

- 6.5 The site benefits from good public transport links, with the nearest bus stops, located on Ash Green Lane, being within a short 6-minute walk of the site. These stops are served by the 55 & 56 services which run from Coventry to Nuneaton and provide access to Coventry College with a combined frequency of four services per hour.
- 6.6 Further services, serving the wider urban area, are available at the Arena Park bus interchange providing access to supermarkets, University Hospital and the University of Warwick. The Coventry Arena Railway Station, located adjacent to the Coventry Building Society Arena, provides hourly services between Nuneaton and Leamington Spa passing through to Coventry Railway Station, where regional and national services can be accessed.

1. EXISTING ACCESS TO THE SITE VIA ST GILES ROAD
2. ST GILES ROAD
3. CHURCH LANE EXISTING NORTHERN ACCESS
4. LOCAL PEDESTRIAN FOOTPATH



6.7 The site benefits from being in proximity to key cycle routes. There is an existing segregated foot/cycleway which runs along Winding House Lane approximately 1km (4-minute cycle) to the south of the site which forms part of Cycle Coventry Route 1 and provides links into the wide network of advisory cycle routes. In addition, the Coventry Canal towpath (Cycle Coventry Route 2) which forms part of National Cycle Route 52 is located to the east of the site, providing a green corridor for both commuting and leisure; access to the route is via Cycle Coventry Route 1 and Rowley's Green Lane, Woodshires Road and Sydnall Road which form part of Coventry's advisory cycle network.

6.8 The existing PRoWs which route within the site would be incorporated into the potential development and provide access to the leisure routes available to the west, towards and extending beyond Corley. The nearby development at Wilsons Lane will be providing improvements to the nearby PRoW network enabling better access between the area and Longford.

6.9 The site is therefore well located to benefit from sustainable transport modes, primarily walking, cycling and public transport, all of which offer a viable and realistic alternative to the private car. The potential development would therefore be located in a suitable, accessible location for sustainable residential or employment development.

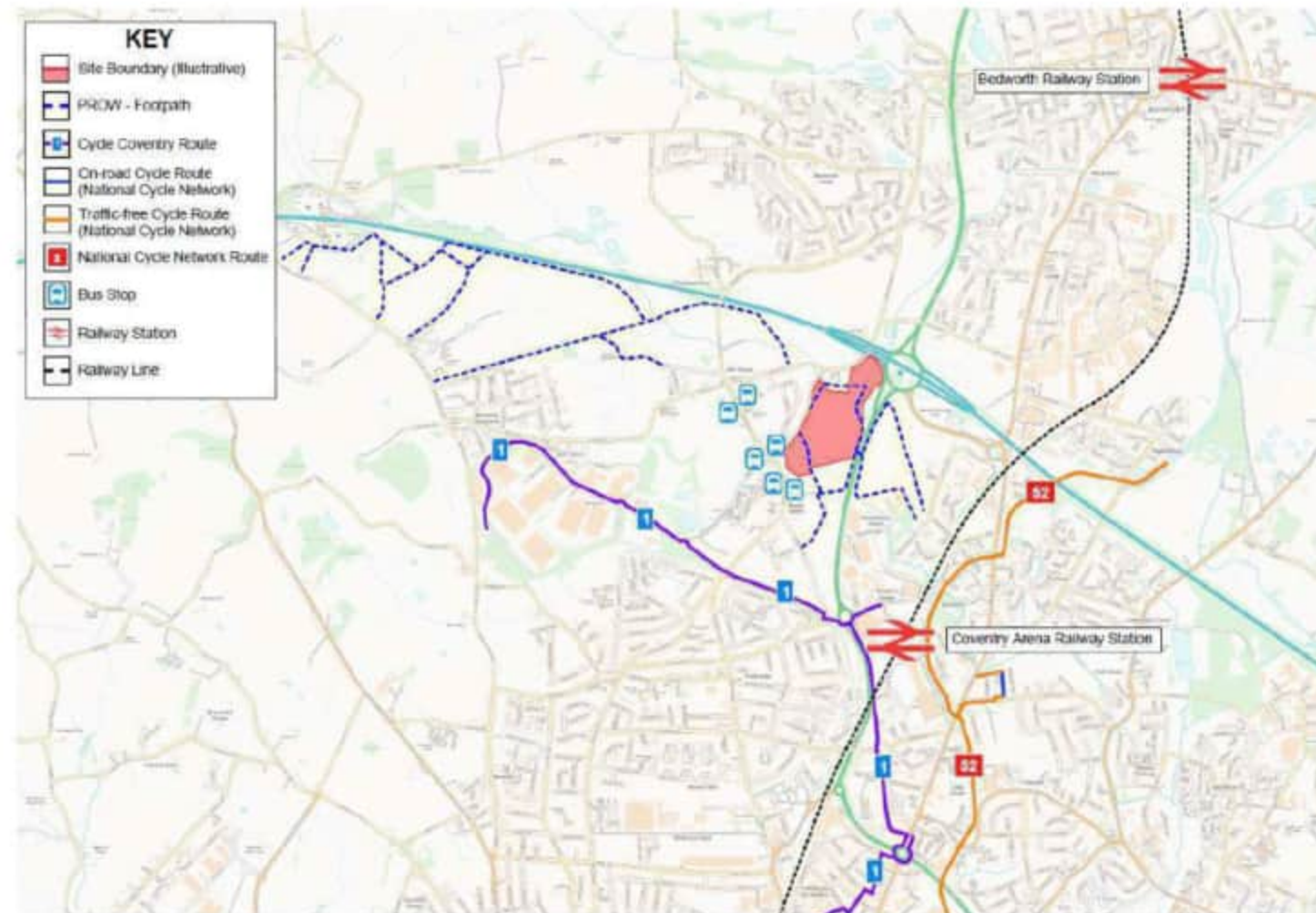


FIG 6.2. EXISTING ACTIVE TRAVEL AND PUBLIC TRANSPORT INFRASTRUCTURE

ACCESS PROPOSALS

6.10 The site is currently accessed via two gated access points: one off Church Lane to the north and one off St Giles Road to the west of the site.

Residential Scheme

6.11 The potential residential development would be served by two priority 'giveaway' junction off St. Giles Road, the principal access could utilise the existing access into the site and a second access point could be located 130m northeast of the principal access.

6.12 The vehicular access would be designed in line with the Manual for Streets guidance and pedestrian footways would be provided to either side of the carriageway. Pedestrian footways and pedestrian crossing points would be included where appropriate, and would allow the new footways to link with the existing footway network.

6.13 The five existing Public Rights of Way which run through the site would be incorporated in the development layout with the development providing links into the routes to create permeability.

6.14 The internal road hierarchy would be designed to reflect the volume and type of trips likely on each link and the number of properties accessed and would be subject to a speed limit of 20mph. It is envisaged that the Principal Access Routes would likely comprise of a 5.5m wide carriageway, with 2m wide footway either side of the carriageway, joining to St. Giles Road using a 6m radii. The remainder of the site roads would likely comprise of 4.8m wide carriageway, with 2m wide footways to either side, and 6m radii to junctions.

6.15 Appropriate parking would be provided to serve the residential development and suitable cycle storage would be provided as appropriate. A Residential Travel Plan, or a financial contribution towards travel planning, would be undertaken in order to raise resident's awareness of sustainable travel; reduce dependency on car use; discourage unnecessary car journeys; and encourage a modal shift towards walking, cycling and public transport.

Employment Scheme

6.16 The potential employment proposal would be served via a single access in the form of a signalised left-in, left-out junction from the A444 (Jimmy Hill Way) northbound carriageway. Locating the access onto the A444 provides direct access to the Strategic Road Network via the M6 Junction 3 and removes the HGV impact from the adjacent residential areas. As the access enters the site a bridge would be provided over the river Sowe; options for the existing Public Right of Way have been investigated and include maintaining the footpath beneath the proposed bridge or, a short diversion bringing the footpath up and over the bridge and complemented by a suitable crossing facility.

6.17 An emergency access, which would also provide a western access point for pedestrians and cyclists, would be located on St Giles Road in a suitable location that takes into consideration desire lines and the layout of the potential scheme.

6.18 The five existing Public Rights of Way which run through the site would be incorporated in the development layout with the development providing links into the routes to create permeability.

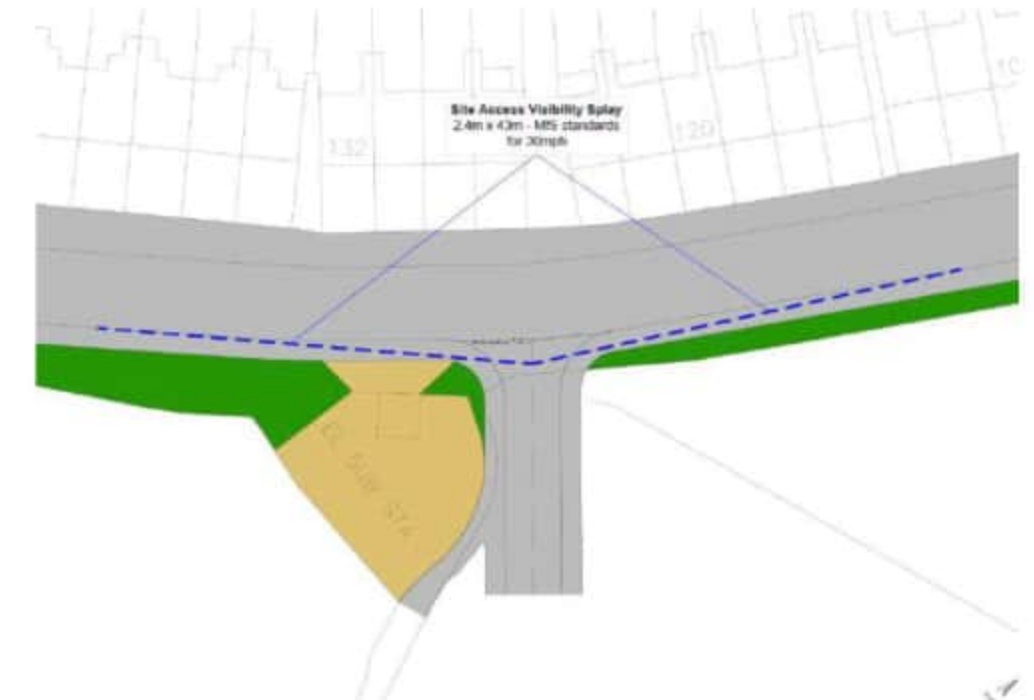


FIG 6.3 POTENTIAL FORMALISATION OF EXISTING VEHICULAR ACCESS ONTO ST GILES ROAD

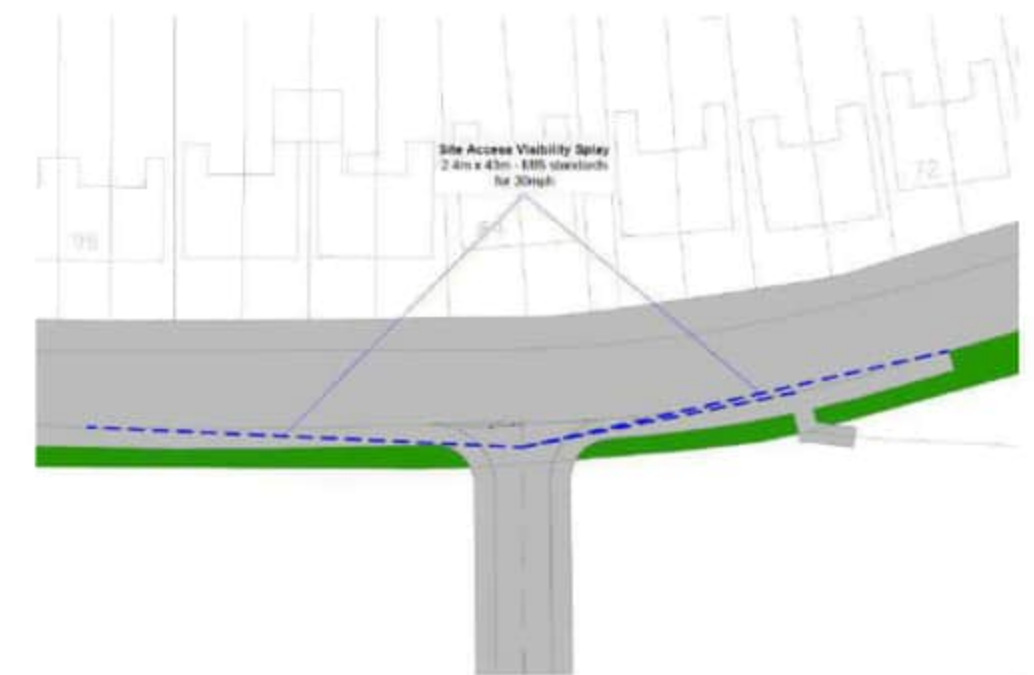


FIG 6.4 POTENTIAL NEW VEHICULAR ACCESS ONTO ST GILES ROAD

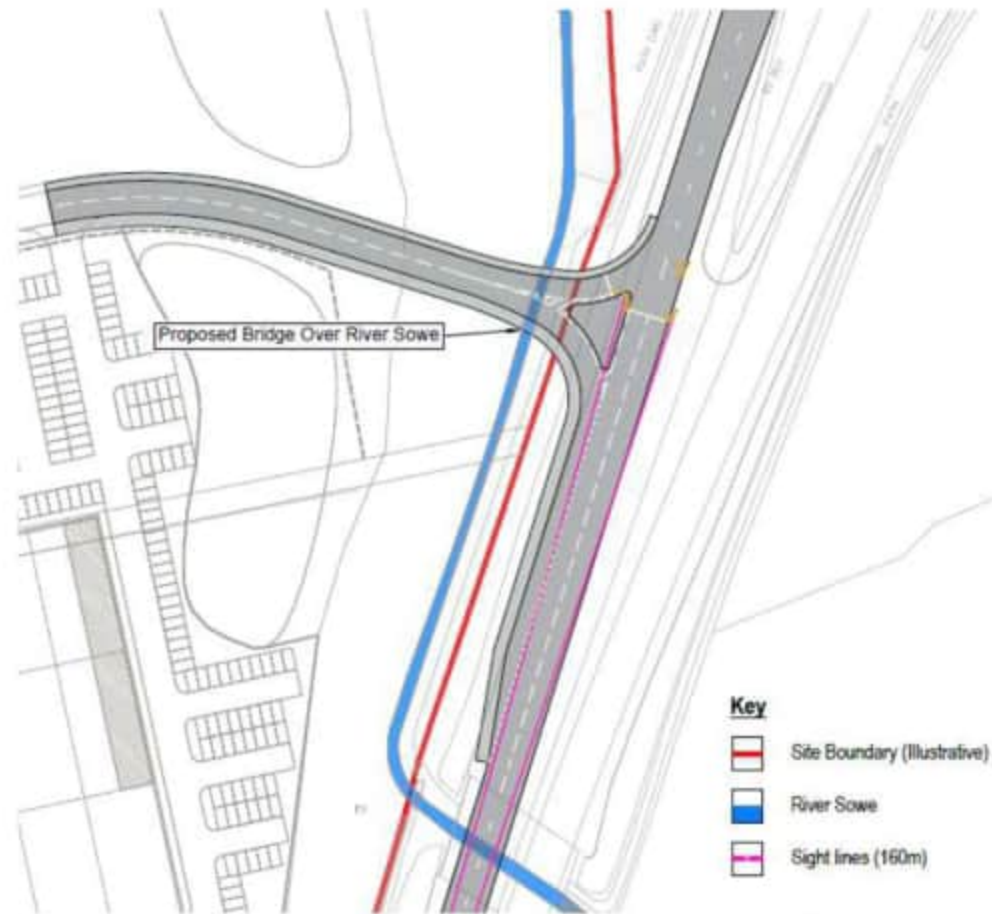


FIG 6.5 POTENTIAL NEW VEHICULAR ACCESS ONTO A444

6.19 Additional active travel routes through the site would be considered along with new pedestrian/cycle access points onto St Giles Road and Church Lane where these would be of benefit to creating separated facilities which provide journey time benefits.

6.20 Appropriate parking would be provided to serve the employment development and suitable cycle storage would be provided as appropriate. An Employment Travel Plan would be introduced to raise employees' awareness of sustainable travel; reduce dependency on car use; discourage unnecessary car journeys; and encourage a modal shift towards walking, cycling and public transport.

TRAFFIC IMPACT

6.21 A 'Strategic Transport Assessment Modelling Report' (STAMR) has been undertaken by Vectos Consultants to evaluate the emerging Local Plan proposals using Warwickshire County Council's Nuneaton and Bedworth Wide Area Paramics model.

6.22 Vectos' STAMR identified a package of outline mitigation works across 35 locations across Nuneaton and Bedworth Borough. These mitigation measures are necessary to ensure that the Council's emerging Borough Plan allocation strategy can be delivered with a minimal impact on the surrounding highway network. Any development at the potential site would seek to make proportional contributions to the necessary mitigation measures for the Borough Plan.

6.23 Of particular note is the identified impact at M6 Junction 3. Warwickshire County Council have developed an 'interim scheme' comprising of widening and signalisation of the B4113 arm along with the installation of MOVA across the junction to accommodate the growth planned in the Local Plans for Nuneaton and Bedworth Borough Council and Coventry City Council. The scheme is planned for delivery no later than 2026

Residential

6.24 A preliminary assessment of the potential development has been undertaken based on an expected quantum of up to 300 dwellings. Although the absolute quantum of the potential scheme remains fluid to allow flexibility in its potential scale at this stage, based on the above quantum the potential development would see a predicted trip generation of 180 vehicles in the AM and PM peak hours.

6.25 The preliminary assessment indicates that there are no highway or transport reasons to prevent the site from coming forward for residential development subject to the provision of suitable pedestrian, cycle and vehicle accesses and proportionate contributions to identified STAMR improvement schemes. A Transport Assessment and Travel Plan would be prepared to accompany any planning application at this site.

Employment

6.26 A preliminary assessment of the potential development has been undertaken on an expected quantum of up to 33,300sq.m of employment uses. Although the absolute quantum of the potential scheme remains fluid to allow flexibility in its potential scale at this stage, based on the above quantum and employment use ratios used for the nearby Wilsons Lane planning application (5% B1, 10% B2 and 85% B8), the potential development would see a predicted trip generation of 93 vehicles in the AM peak hour and 81 vehicles in the PM peak hour.

6.27 The preliminary assessment undertook preliminary capacity modelling of the M6 Junction 3 'interim scheme' and the Rowley's Green roundabout which indicated that there are no highway or transport reasons to prevent the site from coming forward for employment subject to the provision of suitable pedestrian, cycle and vehicle accesses and proportionate contributions to identified STAMR improvement schemes. A Transport Assessment and Travel Plan would be prepared to accompany any planning application at this site.

07 | FLOOD RISK & DRAINAGE

FLOOD RISK

- 7.1 The Environment Agency (EA) Flood Map for Planning indicates that the majority of the site is located in Flood Zone 1. However, a portion of the site to the north and along the eastern boundary is located within Flood Zones 2 and 3, which is defined as land with a medium to high risk of flooding. The risk of flooding is identified to be following the route of the River Sowe and Breach Brook.
- 7.2 The EA Risk of Flooding from Surface Water Map shows the majority of the site is at a very low risk of surface water flooding. However, the north of the site and along the eastern boundary is identified as a low to high risk of flooding, following the route of the River Sowe and Breach Brook.

- 7.3 An initial geotechnical site appraisal has identified the potential of shallow groundwater levels beneath the site. Further site investigation is required to assess the risk of groundwater flooding to the site. Given the site contours, this is likely to align with the surface water extents which would leave large areas of the site available for development.

SURFACE WATER DRAINAGE

- 7.4 It is proposed that surface water flows from the development will be discharged via the use of Sustainable Urban Drainage techniques. The preferred method of disposal would be via the use of infiltration techniques, subject to suitable ground conditions.

- 7.5 Surface water run-off from the development will be conveyed to attenuation features to the east of both residential and employment development options. Until the viability of infiltration is confirmed, it is proposed that the surface water will discharge into an existing watercourse (River Sowe) located along the eastern boundary with rates restricted to greenfield runoff.
- 7.6 The attenuation areas will either be infiltration basins if infiltration suitable or attenuation basins with discharge to the River Sowe if infiltration not suitable.



EXAMPLES OF SUSTAINABLE DRAINAGE

08 | ECOLOGY

ECOLOGY

- 8.1 A Preliminary Ecological Appraisal (PEA) was undertaken in August 2016 to identify the baseline ecological conditions at the site. This comprised of a desk study and extended Phase 1 Habitat survey to identify habitats and features of ecological importance as well as the potential presence of protected species. The PEA has been used to inform the initial design of the proposal and highlight opportunities for ecological enhancement of the site.
- 8.2 The Site comprises of six arable fields bounded by hedgerows and trees with areas of colonising ground, semi-improved grassland, scrub and tall ruderal vegetation. The River Sowe and Breach Brook flow through the Site. The Site is located immediately to the south of the M6, and to the west of the A444 dual carriageway and trunk road. It is bounded by roads on the western boundary and permanent grassland to the south.
- 8.3 There are no statutory ecological designations covering any part of the site. In the surrounding area, the Ensor's Pool SAC is located approx. 5km north of the site; the Bedworth Sloughs LNR is located approx. 1.9km to the north and Wyken Slough LNR is approx. 2.2km to the south-east. There are no Ancient Woodland sites covering any part of the site or adjacent land.

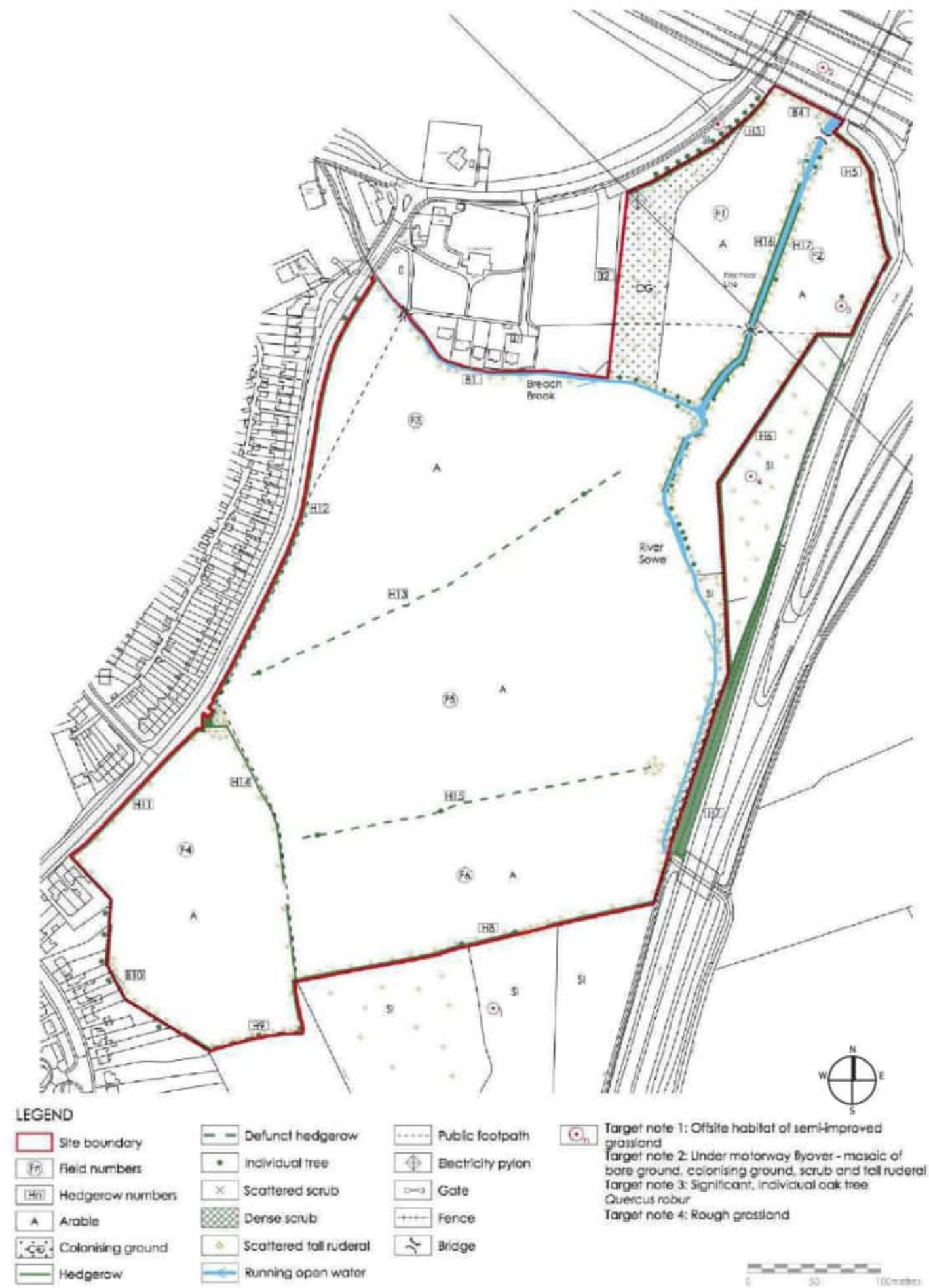


FIG 8.1. ECOLOGY ASSESSMENT PLAN



8.4 The PEA has identified the presence of mature trees and hedgerows, and nesting birds as ecological constraints at this site. As a result of the habitats that have been identified on the proposed site, it is acknowledged that some additional investigation/survey work is required to be undertaken as part of an Ecological Impact Assessment of the proposed development. This will include: -

- Consultation with LPA with regard to potential effects on River Sowe and Tributaries (pLWS) and Breach Brook (pLWS) and possible residual populations of white-clawed crayfish.
- Further surveys in relation to badgers, bats, water voles & otters, reptiles and great crested newts are considered to be necessary to understand the status or presence/absence of these species or groups.

8.5 The PEA recommends that mature trees and hedgerows are retained and protected as part of the proposal, where possible. It also recommends that it would be appropriate to provide a green buffer to the watercourses that run through the site as part of the proposed development. The indicative masterplan fully respects these features and provides a significant green buffer to the northern and eastern parts of the site.

8.6 The development proposals offer opportunities for ecological enhancements through the incorporation of native hedgerow, tree and wildflower planting as part of the landscape proposals; improved connectivity of green infrastructure through wildflower margins and hedgerow planting; aquatic habitat creation; and potential bat and bird roosting opportunities.

8.7 The PEA confirms that there are no overriding constraints to development and the site is considered to have a good capacity to support development, subject to the implementation of mitigation and further survey work.



EXISTING DWELLINGS ON BELL DRIVE

09 | ARCHAEOLOGY AND HERITAGE

9.1 An assessment has been made of the any potential heritage constraints to the development of Land West of the A444 and South of M6 Junction 3 for residential and employment development. This has considered built and below-ground heritage issues.

9.2 Sources consulted have comprised:

- The National Heritage List for England;
- Coventry City Council and Warwickshire Historic Environments Records;
- Warwickshire County Records Office and Coventry History Centre; and
- A site visit.

BUILT HERITAGE

9.3 Potential impacts to the significance of designated heritage assets in the vicinity of the site through changes to setting have been considered. Two potentially sensitive assets or groups of assets were assessed. These comprised:

St Giles Church Grade II* Listed building, and associated Grade II Listed chest tombs (three), former font and sundial, 80m to the north of the site.

Residential development

- Assessment concluded that the elements of the setting of these structures that contribute the most to their significance through setting comprised the churchyard in which they are located and the settlement of Neal's Green. Due to screening vegetation at the churchyard and built form (houses) to the south of the church, most of the site is not intervisible with the Listed assets. Filtered views of the church are possible from the north-easternmost area of the site. Built form is not proposed here in the emerging development framework for the site. With the offset between built form and the Listed assets in the emerging framework for the site, it is not anticipated that development to these parameters would impact upon the significance of the Listed assets through changes to setting.

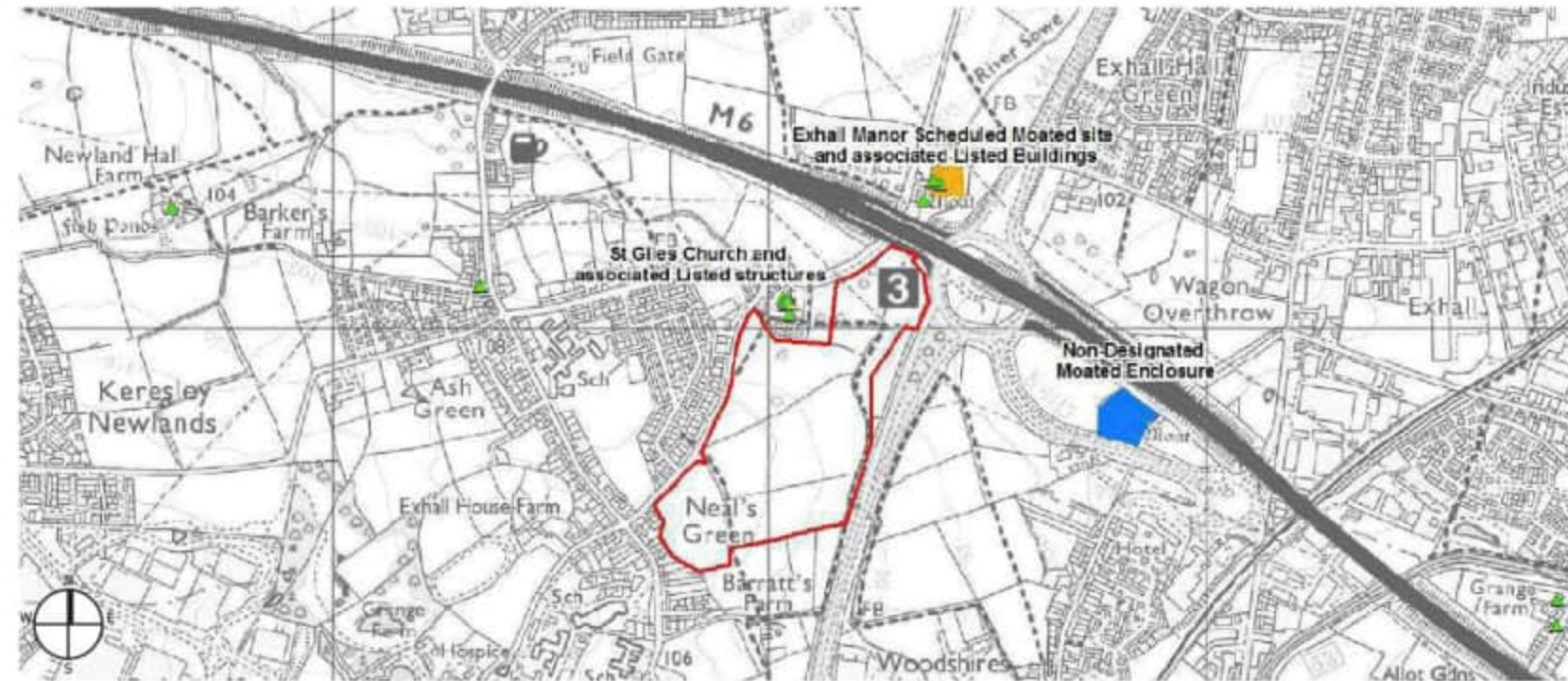


FIG 9.1. LOCAL HERITAGE DESIGNATIONS

Employment development

- The proposed development is anticipated to result in a minor change to the wider setting of the heritage assets at St Giles Church, with the extent ultimately being dependent upon the proposed layout and building heights, alongside any additional screening included as part of the landscaping scheme.

Built form is directed away from the north-western land parcel, where greatest intervisibility is possible, thus minimising the level of change to the setting of the Listed assets. It is strongly recommended that this spatial separation is maintained, and maximised where possible, to safeguard the sense of separation between the church and surrounding built form currently afforded by the site. In turn, this will ensure that the role of the church as a local landmark is not challenged by the introduction of large built form. It

will also minimise the visual intrusion of structures that are visible from within the churchyard or located within the backdrop of views towards the church from the surrounding area. Appropriate screening by way of boundary planting will also play an important role in minimising the level of change to the settings of the Listed structures.

Subject to appropriate implementation of the above recommendations, and taking account of the existing baseline and contribution of the site towards the assets' overall heritage significance, it may be possible to deliver the proposed development without impact upon the special architectural and historic interest of the Listed assets.



VIEW LOOKING NORTH-WEST TOWARDS GRADE II* LISTED CHURCH OF ST GILES



VIEW FROM WITHIN THE SITE LOOKING NORTH TOWARDS EXHALL HALL MOATED SITE

Exhall Hall Scheduled moated site, and Grade II Listed house, barn and bridge, 450m to the north of the site.

Residential development

- Due to the very large built form of the M6 junction and the associated vegetation, the site does not contribute to the significance of these assets through setting. Development within the site, if it were to be visible which is considered to be unlikely, would be behind the modern interchange and would not impact upon the significance of the assets. Development within the site would not interrupt any visual connections with contemporary sites in the vicinity.

Employment development

- It is not anticipated that any development within the Site will be visible from the assets. In the unlikely event that that intervisibility is possible, in light of the extensive screening provided by the motorway infrastructure and mature vegetation, any alterations to the setting of the assets would be negligible. The proposed development is therefore not considered to impact upon the special interest of the Scheduled Moated Site or Grade II Listed Exhall Hall and associated Listed structures, and thus no harm is considered to arise via a change in their setting.

ARCHAEOLOGY

- 9.4 Consultation of the Coventry Historic Environment Record and other online data sets has not revealed any recorded sites in the vicinity suggestive of archaeological remains within the site that would be a constraint to development.
- 9.5 The findspot of a Roman coin is recorded at Church Lane to the north of the site. No other Roman remains are recorded in the vicinity.
- 9.6 The findspot of a medieval token is recorded in the north-eastern area of the site. St Giles Church to the north of the site is of medieval origin, but there is no evidence from historic mapping to suggest that contemporary remains extended south into the site. An inn, The Bell Inn, is recorded to the south of the church on historic maps, but this lay to the north of the site where modern houses are present, north of the Breach Brook. No built form is proposed in the area of the medieval findspot or the area closest to the church, to the south of the building.

CONCLUSIONS

- 9.7 Assessment of recorded heritage assets within and in the vicinity of the site, and their settings, has concluded that there is no evidence for major heritage constraints to residential or employment development.

10 | OTHER MATTERS

GROUND CONTAMINATION AND POLLUTION

The site has been subject to preliminary geo-technical assessment to determine its suitability and identify any constraints to development. Assessment of available historic mapping data (1884–2015) shows that the site has undergone a minimal amount of change over that period and has remained as open farm land, the only changes locally have been the expansion of existing and creation of new areas of residential and industrial land uses and the development of the M6 and other roadways surrounding the site.

- 10.1 Environment Agency landfill data shows that the site has not been used for landfill. Coal Authority mapping shows that while extensive coal mining has taken place about 2km to the east, that due to the form and thickness of the underlying geology, any mining under the site would have taken places at considerable depth and therefore unlikely to affect any development.
- 10.2 Radon emissions are in the lowest band of radon potential with less than 1% of homes in the area above the Action Level and therefore radon protection measures will not be required for any development at the site. The site is not located within an Air Quality Management Area
- 10.3 In summary the geotechnical characteristics of the site have been explored and it is considered that through suitable engineering design that a residential and commercial development can be delivered on the site.

NOISE

- 10.4 A noise and vibration survey will accompany any future planning application on the site. Road noise is likely to be the main noise source affecting the site. The retention and enhancement of existing landscape features along the eastern boundary and the extensive green buffer as shown on the indicative masterplan (Fig 4.1) will ensure that appropriate level of amenity will be provided for the proposed residential development.
- 10.5 Careful masterplanning (using buildings to shield sensitive uses) and other mitigation could also limit any impacts from noise.

UTILITY SERVICES

- 10.6 Initial investigations have identified that there are existing electricity and water supply infrastructure located within the site boundaries. Beyond the site boundaries the local service providers have confirmed that there is existing electricity, portable water supply, gas and telecoms infrastructure located in close proximity to the site. These services run within the local highways supplying local residential and commercial properties in the area.
- 10.7 National Grid has confirmed that existing high voltage overhead transmission lines cut across the northern region of the site. Severn Trent water have confirmed that there is an existing 700mm diameter mains water supply network which runs from the A444, in a south westerly direction across the southern region of the site.

- 10.8 Severn Trent water operate and maintain the existing public drainage networks supplying the surrounding area. There are no existing public surface water sewers located within the site or in the nearby vicinity, it is therefore proposed that surface water flows from the development will be discharged via the use of sustainable urban drainage techniques or if ground conditions prove unsuitable for infiltration it would be proposed to discharge flows to the existing watercourse at a restricted rate.
- 10.9 Severn Trent Water asset plans confirm there is a number of large existing foul networks located within the proposed site boundaries which run within the northern region of the site before running in a southerly direction in parallel to the eastern site boundary. The new development will require a new foul water drainage network to service the development. It is proposed that the foul flows will be discharged into the existing Severn Trent network. Severn Trent Water have confirmed there is sufficient capacity within the existing network to accommodate the additional flows from the development.

11 | CONCLUSION

- 11.1 Nuneaton and Bedworth is in the process of reviewing its Borough Plan to direct development up to 2039. Although Green Belt release is not currently proposed in the Borough Plan Review, it is considered that following the publication of forthcoming up-to-date sub-regional housing and economic needs evidence, it may be appropriate to consider the release of appropriately located Green Belt land to meet the Council's own identified needs and the unmet needs of neighbouring authorities. A residential or employment proposal on Land west of the A444 and south of M6 Junction 3 could assist NBBC in meeting housing and employment requirements including the yet-to-be-quantified unmet needs of Coventry in an appropriate location.
- 11.2 L&Q Estates' emerging proposals for Land West of the A444 and South of M6 Junction 3 demonstrate how the site would be capable of contributing positively to the housing requirements or the employment land requirements of Nuneaton and Bedworth and neighbouring authorities at a sustainable location on the edge of Coventry. With regard to residential development, the site benefits from easy access to the existing facilities within the surrounding area, is in close proximity to existing employment opportunities and is favourably located in terms of access to public transport provision including local bus services and the near-by railway station at Coventry Building Society Arena. As an employment site it would benefit from excellent access to the strategic road network and to nearby settlements.
- 11.3 The technical information that has been provided within this Vision Document set out that there are no insurmountable physical constraints to the development of the site for residential or employment development.
- 11.4 A landscape led approach to the masterplanning of the site has ensured the retention of the existing tree and hedgerow network within the site. The existing trees which bisect the site and within the site boundaries will be enhanced and strengthened through the planting of native trees and hedgerow species. The existing hedgerow to the southern side of the site will be restored and additional planting is proposed to provide a robust green infrastructure corridor which will provide a new defensible Green Belt boundary to the site. The set back of development from St Giles Church to the north, the River Sowe corridor and the A444 (Jimmy Hill Way) to the east and St Giles Road to the west provide appropriate landscape buffers with significant areas of public open space.
- 11.5 An assessment of the site within Section 5 confirms that the proposals would not unacceptably harm the 5 purposes of the Green Belt as identified in the NPPF. There would not be unrestricted urban sprawl into the surrounding countryside. The site is located within an urban context, the perception of openness is stronger from the church of St Giles and the junction between Church Road and St Giles Road looking south towards the localised ridgeline. There would not be coalescence with other settlements, the countryside would be safeguarded from encroachment and the setting of the church of St Giles will be respected. The proposals for green infrastructure and landscaping will deliver a number of enhancements in terms of the physical landscape and the strengthening of the structure of the landscape creating a new, robust, defensible Green Belt boundary along the southern, eastern and northern areas of the site.
- 11.6 The work that has been undertaken by the project team demonstrates that Land West of the A444 and South of M6 Junction 3 is suitable, achievable and deliverable for residential or employment development, providing up to 300 dwellings or approximately 33,300sqm of employment development. L&Q Estates looks forward to engaging with Nuneaton and Bedworth Borough Council to discuss the site further.











KEY PRINCIPLES

1. PROPOSED VEHICULAR ACCESS OFF ST GILES ROAD.
2. PRINCIPAL TREE LINED ROUTE.
3. ENHANCED PLANTING BUFFER SOUTH.
4. EXISTING LINEAR HEDGEROWS.
5. EXISTING PUBLIC RIGHT OF WAY.
6. PROPOSED FEES/TWAK LINKS.
7. RESIDENTIAL SET BACK FROM EXISTING VEGETATION.
8. INDICATE CHILDREN'S AREA OF PLAY.
9. KEY VIEW TOWARDS COVENTRY BUILDING SOCIETY ARENA.
10. KEY VIEW TOWARDS ST GILES'S CHURCH.
11. BUILDINGS WITH OUTWARD FACING VIEWS CREATING NATURAL SURVEILLANCE AREAS PUBLIC OPEN SPACE.
12. WIDER GREEN OPEN SPACE WITH BIODIVERSITY IMPROVEMENTS.
13. SUSTAINABLE URBAN DRAINAGE.
14. OVERHEAD CABLES WITH 50M OVERALL EASEMENT ZONE.



Residential Development

KEY

-  SITE LOCATION
-  RESIDENTIAL DEVELOPMENT
-  PROPOSED ACCESS
-  EXISTING LANDSCAPE (INDICATIVE)
-  VIEW TOWARDS COVENTRY BUILDING SOCIETY ARENA
-  VIEW TOWARDS ST GILES'S CHURCH FROM LOCALISED RIDGE LINE
-  PROPOSED LANDSCAPE
-  PROPOSED CHILDREN'S AREA OF AREA
-  EXISTING PUBLIC RIGHT OF WAY
-  PROPOSED PEDESTRIAN LINKS



THE WARWICKSHIRE
ACADEMY (SENS)
SCHOOL

KEY PRINCIPLES

1. VEHICULAR SITE ACCESS VIA A444
2. PRIMARY VEHICULAR MOVEMENT, PROVIDING ACCESS TO WIDER EXISTING MOVEMENT INFRASTRUCTURE
3. PROPOSED DEVELOPMENT WITH ASSOCIATED SERVICE YARDS
4. MAXIMUM RETENTION OF EXISTING VEGETATION
5. CURRENT DIRECTION OF PUBLIC RIGHT OF WAY TO BE RETAINED
6. 40M EASEMENT TO EXISTING DEVELOPMENT
7. 10M LANDSCAPED BUFFER TO EXISTING DWELLINGS
8. SITE LOW POINTS UTILISED FOR SUSTAINABLE URBAN DRAINAGE, AND
9. RETAINED VISUAL CORRIDOR TO ST GILES CHURCH FROM ST GILES ROAD
10. EX WATER MAIN AND EASEMENT - TO BE DIVERTED
11. PROPOSED CYCLEWAY & EMERGENCY VEHICLE ROUTE FROM ST. GILES ROAD
12. PROPOSED LANDSCAPE
13. OVERHEAD CABLES WITH 50M OVERALL EASEMENT



Employment Development

KEY

- SITE BOUNDARY
21.7 HECTARES / 53.62 ACRES
- VEHICULAR ACCESS VIA
A444 JIMMY HILL WAY
- PRIMARY ROAD PROVIDING ACCESS
TO ALL UNITS
- PUBLIC RIGHT OF WAY
- KEY BUILDING (EXISTING)
- PROPOSED LANDSCAPED
10M BUFFER ZONE
- PROPOSED TREE-LINED AVENUE
& ORNAMENTAL PLANTING
- PROPOSED SUSTAINABLE URBAN
DRAINAGE (TBC BY ENGINEER)
- EXISTING LOCAL DISTANCE VIEWS
FROM EXISTING SETTLEMENT
- PROPOSED BUILT FORM
- PROPOSED PARKING COURTS & YARDS
- PROPOSED PARKING
- EMERGENCY & PEDESTRIAN/CYCLE ACCESS
- 10m LANDSCAPE BUFFER
- 40m EASEMENT TO EXISTING PROPERTIES
- PROPOSED LANDSCAPE



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