

From: [REDACTED]
Sent: 16 October 2023 16:28
To: Planning Policy
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Dear Sir/Madam,

Please find attached an officer response to your current Regulation 19 consultation, submitted on behalf of Rugby Borough Council.

Regards,

[REDACTED]



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 Our ref



Date 16 October 2023

Dear Planning Policy Team,

Nuneaton and Bedworth Borough Plan Review – Regulation 19 consultation response

Please find below officer responses to the current consultation, on matters of relevance to Rugby Borough. These comments are officer views and are subject to any other views that may be expressed by Rugby Borough Council.

Rugby Borough, like most local authorities across the sub-region is in the early stages of reviewing its adopted local plan and has jointly commissioned evidence documents with our partners, including the HEDNA (referred to in Nuneaton and Bedworth’s Publication draft as the ‘sub-regional HEDNA’), and an ongoing West Midlands Strategic Employment Sites Study.

Housing growth (DS3)

The sub-regional HEDNA, while published, is yet to be formally endorsed by some of the councils that commissioned it, including Rugby Borough Council. As outlined in the publication version of the local plan review, the methodology the HEDNA adopts using more up to date information than the 2014-based household projections which underpin the standard method, resulting in a housing need for Nuneaton and Bedworth which is lower than using the standard method. The reverse is true for Rugby Borough – as noted in Table 2 on page 19 of the publication local plan.

We note the following from the information in the publication version of the local plan:

	Dwellings per annum figure
Standard Method	442
Sub-regional HEDNA	409
Preferred Options/local HEDNA	646
Publication version (2021-2039)	545

As is shown in the table above, Nuneaton and Bedworth Borough Council proposes to plan for housing growth in excess of the standard method and (sub-regional) HEDNA figures, but less than that proposed at Preferred Options.

The proposed approach is explained in *Towards a Housing Requirement for Nuneaton & Bedworth* (November 2022, Icen Projects). It is based on a jobs-based housing projection, providing housing to deliver an additional 8,500 jobs 2021-39 rather than the +5,000 jobs shown in the Cambridge Econometrics trends-based forecast. The additional jobs growth is proposed to result from the delivery of employment sites and town centre regeneration. The housing need arising from the planned economic growth scenario is calculated on the basis that there will be some improvement in the self-containment of the borough, i.e., a higher proportion of residents in work will be employed within the borough than at present.

It is noteworthy that Icen state the following of the projected proposed 545 dwellings per annum target:

“The additional housing provision over and above the Borough’s local housing need figure of 409 dpa would provide ‘headroom’ to contribute to unmet needs arising from other areas in a context in which the additional jobs growth envisaged herein would still be accommodated within the overall housing need identified in the sub-regional HEDNA. This as a contribution to meeting unmet need from other areas would support workforce growth within the Borough and could therefore contribute to and support the Borough’s economic growth.”

At this stage, as explained above, Rugby Borough Council has not formally endorsed the HEDNA as the basis for future plan-making. However, we note that the number for Rugby Borough in the HEDNA (735dpa) is higher than the current standard method number (516dpa) and the average across the current Rugby Borough Local Plan 2011-2031 (620dpa). We have not yet assessed whether the higher number for Rugby Borough shown in the HEDNA would be deliverable. Therefore, at present we reserve our position on whether Rugby Borough Council will ask Nuneaton and Bedworth Borough Council to contribute to meeting its unmet needs.

Employment Land (DS3)

In the publication local plan employment land policy requirements have been identified as follows:

Local industrial and warehousing	66.5ha (including 5.35ha replacement provision)
Office	2ha
Strategic B8	19.4

The proposed requirement for employment land in the borough is based on the Nuneaton and Bedworth Housing and Economic Development Needs Assessment May 2022 rather than the subsequently published sub-regional HEDNA, on the basis that the former included more up to date data on employment land completions and included strategic scale warehousing sites (i.e., sites for warehousing units of 9,000sqm+in floor area) which are dealt with separately in the sub-regional HEDNA as a Warwickshire-wide figure.

The requirement in the May 2022 N&B HEDNA (82.5ha) has been increased by 5.35ha to include replacement of specific sites that it is proposed will no longer be protected as employment land.

The proportion of the industrial and distribution land requirement in the N&B HEDNA that can be counted as contributing to sub-regional need for strategic B8 identified in the sub-regional HEDNA is calculated based on the proportion of strategic B8 as a proportion of overall industrial and warehouse completions 2016-21.

It appears that no additional employment land allocations are proposed in the publication plan beyond those in the current Borough Local Plan 2011-2031.

We wonder whether a greater proportion of the larger consented/allocated employment sites at Faultlands (former EMP1, 26ha), Wilson's Lane (SEA2, 19.09ha), Coventry Road (SEA4, 9.59ha) and Bowling Green Lane (SEA6, 19.89ha) might be able to contribute to meeting the sub-regional strategic B8 need than is suggested by the 19.4ha figure.

It appears that the past completions data on which the 19.4ha figure was based may be influenced by a greater proportion of those past completions occurring on smaller sites which are less proximate to the strategic road network. As completions on larger, strategic sites are expected to form the mainstay of meeting employment land need in the new plan period, it seems likely that the proportion of development that is for strategic scale warehousing will increase.

We look forward to engaging with you further as the plan progresses into the examination process.

Yours faithfully

