

## Anca Seaton

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**From:** Jo Russell [REDACTED]  
**Sent:** 16 October 2023 15:00  
**To:** Planning Policy  
**Subject:** Publication Plan Representations -Stoford  
**Attachments:** NBBC Rep Policy Form.docx; NBBC Rep Objectives.docx; Representation\_Form Stoford.docx; NBBC Rep DS3.docx

Please find attached a copy of our 3 representations, and one personal details form.

Thank you

**Jo Russell** MRTPI | Planning Director




[www.stoford.com](http://www.stoford.com)

# STOFORD

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Registered in England No. 7848231 | Stoford Properties Ltd  
Registered Office: 26-28 Ludgate Hill, Birmingham, B3 1DX



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

Borough Plan Review Publication Stage

**Please return to Nuneaton and Bedworth Borough Council by 16<sup>th</sup> October 2023 via:**

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

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

This form has two parts –

Part A – Personal details.

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

### **Part A**

	<b>1. Personal details*</b> * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.	<b>2. Agent's details (if applicable)</b>
Title	<b>Ms</b>	
First name	<b>Jo</b>	
Last name	<b>Russell</b>	
Job title (where relevant)	<b>Planning Director</b>	
Organisation (where relevant)	<b>Stoford Properties Ltd</b>	
House no. and street	<b>26-28 Ludgate Hill</b>	
Town	<b>Birmingham</b>	
Postcode	<b>B3 1DX</b>	
Telephone number		
Email address (where relevant)		

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

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Name or Organisation:

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

Paragraph	Vision
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 checked="" type="checkbox"/>

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

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

Please mark with an 'X' as appropriate.

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

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

The Vision of the Plan is set out as:

*By 2039, Nuneaton and Bedworth Borough will be a place of sustainable economic growth with diverse job prospects, offering quality housing to meet all our residents needs and supported by an integrated infrastructure network. People in the Borough will live in healthy, safe and inclusive communities which provide opportunities for people to be active and healthy. Nuneaton and Bedworth Borough will be a place where businesses want to invest and people want to live, work and visit. The natural and built environment of the Borough will be improved through greater sustainable transport options, more accessible and higher quality open spaces and leisure facilities, increased tree planting and reduced pollution levels, whilst conserving and enhancing the historic environment. The Borough will have addressed the climate change emergency as far as possible through the planning process.*

Whilst we agree with the spirit of the Vision, the Plan itself will fail to deliver ‘a place of sustainable economic growth with diverse job prospects’ It is therefore not sound, and will be ineffective.

The reason for our position is taken with regard to the Employment Trajectory Appendix C of the Plan). This confirms that all Strategic Employment Allocations will be delivered by 2029. This leaves no new strategic employment land to be delivered between 2029 and 2037 (i.e. the end of the Plan period). The Publication Local Plan simply carries forward the same site allocations from the adopted Local Plan, despite all of these sites benefiting from consent already (or in the case of EMP4, an application is being prepared)

The Borough will therefore not be able to deliver on the Vision that states ‘it will be place that businesses want to invest’, because there will be no opportunities for strategic employment development for the 8 years beyond the last Strategic Site being completed. This is not positive plan preparation and will not effectively deliver the Council’s Economic Strategy.

(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.

A larger supply (and requirement) of strategic employment sites is required in order to rectify this.

(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.

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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:

Stoford are a national developer of strategic employment land, active within the Midlands and Warwickshire.

**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:	

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

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Name or Organisation:

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

Paragraph	Strategic Objectives
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 checked="" type="checkbox"/>

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The Plan presents a series of Strategic Objectives.

Strategic objective 2 states: *Employment opportunities To seek employment opportunities that will support the diversification of the Borough's economy and improve job opportunities for residents.*

However the Plan fails to deliver on this Objective, given the Plan's Strategic Allocations are not new, and do not introduce additional employment land supply to the Brough beyond that which is already committed.

Para 3.3 of the Plan states

*'There are fewer knowledge-based employment opportunities. If this does not change, there will be fewer jobs in the future and more people will have to look for work outside the Borough and*

*A large number of residents commute out of the Borough each day to work in Coventry, Leicestershire and elsewhere in Warwickshire'*

Given this clear evidence is acknowledged by the Council, it is a serious omission for the Plan to not provide for more opportunities, that could attract knowledge based industries, in addition to those in the sector such as industrial and logistics.

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Date:	



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

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Name or Organisation:

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

Paragraph	
Policy	DS 3 and DS5
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

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

4.(2) Sound?

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

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

Yes	<input type="checkbox"/>
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Policy DS3 states

*By 2039, as a minimum, the following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough:*

- 9,810 homes based on 545 dwellings per annum. Borough Plan Review - Publication Draft Plan 18
- 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).

We object to this Policy and the requirement of 66.45ha of local industrial and distribution/warehousing development and 19.4ha of employment land for strategic B8 warehousing and distribution development.

We consider that this is insufficient to meet the Strategic Objectives of the Plan, and the employment land requirements that this Plan should provide for.

The Publication Plan does not adequately reflect the evidence base, namely the sub regional HEDNA prepared by Iceni in November 2022, that identifies an employment and needs as:

**Table 2.1 Employment Land Needs 2021-2041**

Hectares	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	551
N. and Bedworth	2.2	5.5	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	
<b>Total</b>	<b>37.7</b>	<b>621.9</b>	<b>659.6</b>	

Extract from HEDNA Executive Summary, 2022

The Publication Plan does not provide justification for only seeking to meet 19.4ha of strategic B8 land, when the sub regional total is significantly higher. This is contrary also to the fact that Nuneaton and Bedworth is well located in terms of strategic highways – the M6, A5, A444 - and Iceni note this, as paragraph 6.32 of the Publication Plan advises

*‘Iceni’s analysis indicates a very strong demand for industrial and warehouse/distribution premises in the Borough over the plan period.’*

It is appreciated that the strategic figure across Coventry and Warwickshire is yet to be formally disaggregated , however with Nuneaton and Bedworth opting to just meet 19.4ha of this need, there is a real concern that the strategic B8 needs will be overlooked.

The area of Nuneaton and Bedworth is already heavily constrained by Green Belt, as are neighbouring Authorities - Coventry, North Warwickshire, Rugby, and to a slightly lesser extent, Warwick. Therefore it is imperative that an exercise of cross working is undertaken to ensure the Coventry and Warwickshire Authorities look to meet this Strategic B8 need, taking account of local circumstances – both constraints and opportunities.

Paragraph 11.24 of the HEDNA 2022 does suggest that there are key corridors that could accommodate strategic B8, and lists locations that fall within the Borough such as the A5, the M6. However rather than additional new, additional sites, the Publication Plan only reallocate previous sites from the adopted Plan, despite the majority already being committed and offering little by way of new supply.

#### **Employment Land Supply – DS5**

Table 5 of the Publication Plan lists the sources of supply that are presented to meet the employment land needed between 2021-3029. We disagree with the intention to count the extant allocations (52.15ha) towards that supply. These allocations are effectively being carried across from the adopted Local Plan and were intended to meet the requirements of that Plan Period, and not to be ‘stretched’ to cover an extent, new Period through to 2039. In addition, all allocations benefits from either a planning permission or are awaiting determination. As such, the sites will make little to no contribution towards the second half of the Plan period.

We also object to the reference at para. 6.46 that suggests the existing allocation of Faultlands Farm will meet the strategic B8 need within the Borough, given that this allocation pre dates the evidence base that identified there was a Strategic Need. The role of Faultlands Farm was to meet identified needs arising from Nuneaton and Bedworth in the adopted Plan – indeed the Inspectors Report (2017) refers to the role of that site in 2017 as ‘meeting the needs of the growing logistics sector’. In allocating Faultlands Farm in the adopted Plan, there was no reference to there being a role for that site, beyond the needs of Nuneaton and Bedworth.

The decision to recount that same land for future needs, evidenced in the 2022 sub regional Assessment is not acceptable.

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

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The Council should agree through a Statement of Common Ground, what proportion of the Strategic B8 quantum identified in the 2022 HEDNA, should be delivered through this Local Plan. It is not acceptable to take a reduced figure of 19.4ha and leave the residual Strategic B8 land to other LPAS to find, who are further behind in their preparation of Local Plans.

Additional sites are required to provide choice and land for meeting future employment land needs.

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