

## Nuneaton & Bedworth Borough Plan Review Examination

Respondent No.104

### Position Statement by Nurton Developments Ltd

#### Matter 2 – Vision, Strategic Objectives and Development Strategy

**Issue 1: Have the vision and strategic objectives been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?**

***Question 24. Does the plan address/meet any identified unmet needs in neighbouring areas? If not, why not?***

**Issue 2: Has the development strategy and the overall distribution of development been positively prepared? Is it justified by a robust and credible evidence base, and is it consistent with National policy?**

***Question 27. Does the development strategy in general, and Strategic Policy DS3 incorporate sufficient flexibility within it? Particularly with regards to the potential for unmet housing and employment need arising from the neighbouring areas in the future.***

1. Because these two issues and related questions refer to the same point – i.e. unmet need from neighbouring areas – we have covered this in the same statement.
2. There is a **clear unmet need for employment land arising from Coventry**. This is evidenced by the following: -
  - Adopted Borough Plan, 2019
  - Coventry & Warwickshire Employment Land Memorandum of Understanding, 2016.
  - Coventry & Warwickshire HEDNA, November 2022 (EB7.1).
  - Coventry Local Plan Review Issues and Options (Regulation 18), August 2023.
3. The Memorandum of Understanding identifies an unmet need arising from Coventry of 241 ha for the period 2011 – 2031. Of this, 26 ha has been distributed to Nuneaton & Bedworth, with this being acknowledged by the adopted Borough Plan. The Borough Plan does not state which allocated sites will meet this need.
4. The draft Plan is silent on how this unmet need has been met or will be met. This is a clear omission.
5. EB7.1 identifies a need of 147.6 ha for industrial and non-strategic warehousing land for Coventry for the period of up to 2041. The draft Coventry Local Plan Review identifies a current supply of just 53.02 ha of industrial and non-strategic warehousing land, made up of consented and allocated land. This leads to a **shortfall of 94.58 ha**. In our view, this will be an absolute minimum as there is some uncertainty whether all of the existing allocations are deliverable.

6. Nuneaton & Bedworth enjoys a close economic and geographical relationship with Coventry – possibly to a much greater extent than the other neighbouring authorities (i.e. Rugby, Warwick, North Warwickshire and Solihull). It is an obvious location to meet any unmet needs from Coventry. However, the draft Plan fails to recognise this, let alone quantify its contribution and identify suitable sites to accommodate such needs.
7. This is a failure of positive plan preparation and inadequate collaboration with neighbouring authorities. It is too serious a failure to be easily remedied by revision to either Policy DS3 or DS8. Instead, the Council should be required to address this issue specifically prior to the examination closing.

**PJL**

**7<sup>th</sup> June 2024**