

**Nuneaton and Bedworth Borough Plan
Publication (2023).**

Hearing Statement.

**Matter 2 Vision, strategic Objections and
Development strategy**

On behalf of L&Q Estates.

Date: 5 June 2024 | Pegasus Ref: BIR.5109

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Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	05.06.2024	D Onions		

1. Introduction

- 1.1. This Statement is prepared on behalf of L&Q Estates and relative to representation reference number 115. L&Q Estates have interests on land west of the A444 and south of junction 3 of the M6. This land falls within the Green Belt and has not been proposed as an allocation in the Regulation 19 Local Plan. The representations also comment on the vision, policies and evidence base which make up the Local Plan as well as the wider context in which it was prepared.

2. Matter Two – Vision, Strategic Objectives and Development Strategy

- 2.1. Paragraph 4.12–4.16 of representation 115 comment upon the vision and objectives within the plan. In particular they recognise that Strategic Objective 2 could be made more specific to the Borough if it emphasised the advantages it has to access the strategic road network. This is particularly notable north of Coventry and south of Bedworth. This location has been identified in documents such as the Coventry and Warwickshire sub regional employment market signal study (July 2019) as an important potential location for employment growth. Similarly, the sub regional HEDNA identified junction 3 of the M6 as being of significance for strategic B8 development. The vision for the local plan should recognise this significant node on the transport network, as being an asset which should be recognised and utilized in the Local Plan.

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

- 2.2. As set out in our statement relating to the Duty to Cooperate, there is little if any evidence to substantiate that the Regulation 19 Local Plan has sufficient flexibility within it to contribute towards any additional needs arising from the sub region. The constrained nature of the Borough, particularly with the approach taken in the Regulation 19 local plan to exclude consideration of any Green Belt land at all, has made any meaningful contribution towards meeting unmet needs elsewhere in the sub region extremely difficult.
- 2.3. As set out in our Statement under Matter 1, the failure of the Regulation 19 Local Plan to more fully consider meeting wider subregional needs and the refusal to consider the utilisation of Green Belt locations to meet this need, represents an ineffective strategy which is inconsistent with the delivery of sustainable development. In particular, the fact that the local plan does not address the unmet needs from the wider subregion is contrary to the concept of preparing Local Plan in a positive way.
- 2.4. In addition, the general approach of the Council in preparing the local plan at the current time, in advance of the signing of the Memorandum of Understanding, in advance of the completion of the subregional study into strategic Class B8 storage and distribution development and in advance of the next iteration of the Coventry Local Plan, suggests there is some haste to prepare a local plan in advance of the conclusion of these subregional planning matters, possibly over concerns this would increase the need for development within NBBC.

- 2.5. In particular, within the representations made on behalf of L&Q Estates, comments have been raised in connection with the evidence base contained in the HEDNA and the earlier NBBC HEDNA. As highlighted in the above representations, it is considered that there is a need for additional employment allocations which should be focused in those locations which are of most strategic importance and this would include junction 3 of the M6. Similarly, the Towards a Housing Requirement for Nuneaton and Bedworth document (TAHR) is also referred to in our representations, criticised the utilisation of past completions in the strategic Class B8 sector as they appear to suppress the contribution needed towards meeting the need for strategic B8 development. The fact that the Borough contains one of the four key locations for strategic B8 development identified in the subregion (the M6 corridor) yet this significant locational advantage is not highlighted or utilised to meet the needs for strategic Class B8 development, is a failing of the Local Plan. The Local Plan seeks to largely ignore the issue of strategic B8 development even though the Borough contains M6 Junction 3.

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 BS3 incorporate sufficient flexibility within it? Particularly with regard to the potential for unmet housing and employment need arising from neighbouring areas in the future.

- 2.6. As set out previously, there is little apparent flexibility within the local plan to meet any needs arising from the wider sub region. Significant emphasis in the Local Plan is placed on the utilisation of brownfield land within the urban area. Much of the remaining areas of land fall within the Green Belt and the Council have determined not to consider this as an option. The local plan does not introduce the concept of safeguarded land for longer term growth and added flexibility. There is no mention in Policy DS3 of any allowance to meet needs arising from outside of the Borough. The Local Plan has largely failed to engage on the issue and to an extent appears to be timed to avoid having to do so.

Question 28 – Strategic policy DS1 requires all new developments to contribute towards the need to achieve net zero carbon emissions. Does the plan make it clear how this would be achieved?

- 2.7. As set out in our representations, it is not clear how a “contribution” will be measured. To fully accord with DS 1 a “contribution” would have to be zero a carbon development and there is no evidence to substantiate that in NBBC all development must be zero carbon nor have the viability considerations resulting from this policy approach been assessed.

Question 32 – Have reasonable alternatives been considered and clearly discounted on the evidence?

- 2.8. As set out earlier, the approach of the Council to refuse to consider Green Belt sites has significantly undermined the ability of the Regulation 19 Local Plan to either deliver sustainable development or contribute towards meeting requirements arising from outside its administrative area. As will be set out in regard to Matter 4, Issue 1, L&Q Estates do not consider the amount and type of employment land provided in the local plan is sufficient nor supported by evidence.

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