

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

## **Hearing Statement.**

### **Matter 4 – Employment-Sufficient Provision of Land.**

On behalf of Catesby Estates.

Date: 8 August 2024 | Pegasus Ref: BIR.5109

Author: David Onions

---



## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
FINAL	15.8.24	DO		



# Contents.

1. INSTRUCTION.....	1
2. MATTER 4 – EMPLOYMENT .....	1

## 1. INTRODUCTION

- 1.1. This statement is prepared on behalf of Catesby Estates and relative to representation ref. no.115.14. The site was previously promoted by L&Q Estates, who had an interest in land west of the A444 and south of Junction 3 of the M6, however following the takeover of L&Q Estates by Catesby Estates, the site will be promoted by Catesby Estates going forward.
- 1.2. This land falls within the Green Belt and has not been proposed as an allocation in the Regulation 19 Local Plan. This representation relates to Matter 4 and in particular whether the strategic policies in the Local Plan regarding employment makes sufficient provision for employment land through the plan period.

## 2. MATTER 4 – EMPLOYMENT

**Issue 1: Whether the strategic policies regarding employment makes sufficient provision for employment land throughout the plan period**

**Q 40 Is the amount and type of employment land set out in the strategic Policy DS3 soundly based and does it accord with the evidence and National Planning Policy and Guidance?**

**41. Has the evidence base supporting the proposed level of employment land been prepared in accordance with advice within the PPG?**

- 2.1. National Planning Policy is contained within the NPPF. Paragraph 86 of the NPPF states that planning policies should:
  - a) Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;
  - b) Set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
  - c) Seek to address potential barriers to investment such as inadequate infrastructure, services or housing or a poor environment; and
  - d) Be flexible enough to accommodate needs not anticipated in the Plan.
- 2.2. The above policy is supplemented in the Planning Practice Guidance (PPG).
- 2.3. The PPG dealing with housing and economic needs assessments sets out in paragraph 29 that the available stock of land in employment use can be compared to the particular requirements of the area so that any gaps or oversupply can be identified. In doing so it is important to consider recent employment land take up, projections and forecasts and to identify instances where sites have been developed or sought for specialist economic uses. Analysing supply and demand will allow the policymakers to identify where there is a mismatch between quantitative and qualitative supply of and demand for employment sites.
- 2.4. The PPG goes on to state that 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. 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.

Against this policy context, which gives significant emphasis on the strategic logistics sector, the NBBC HEDNA does not identify any requirement for strategic logistic development. It does identify a need for 80.5 ha. of industrial land which would include local logistical warehousing but not strategic Class B8 development. As something of an afterthought paragraph 9.42 of the NBBC HEDNA sets out that the Local Plan may need to consider what proportion of need for strategic B8 should be provided and potentially delineate parts of the supply to take account of strategic B8 needs. Such an approach appears inconsistent with the requirements of the PPG summarised above, particularly given locational requirements of strategic B8 development when there are areas in the Borough which appear to be well suited to this type of development.

In reviewing the NBBC HEDNA, key elements include the acknowledgement that the evidence points 'to a very strong market'<sup>1</sup> for industrial and warehouse/ distribution premises and that the Borough Council will need to work with others in the sub-region to confirm what proportion of the need for strategic warehousing it might accommodate. However, when considering the detail of the assessment of employment requirements it remains difficult to reconcile through the mathematics utilised to identify the level of employment land requirement. For instance table 9.10 identifies a total of 329,200 sq. m. of floor area to meet industrial and warehouse need yet paragraph 10.24 refers to a need for 345,300 sq. m. to 2039. This is considered further below.

#### Employment Land Portfolio Review June 2023

2.5. The most recent publication in support of the Council's position on employment land provision is the Employment Land Portfolio Review (ICENI June 2023). This confirms the following:

- The availability of suitable land for strategic development is material to the ultimate conclusions on employment land provision (paragraph 1.9).
- The NBBC HEDNA calculation of employment land for the period 2020–2039 was based on the need to accommodate 329,200 sq. m. of industrial and warehouse floor space as set out below.<sup>2</sup>

---

<sup>1</sup> Paragraph 10.24

<sup>2</sup> Although see Paragraph 10.24 of NBBC HEDNA

## Employment Land Requirement 2021–2039

	Industrial	Warehousing/ Distribution	I&W Total
<b>5 year completions</b>	22,900	220,100	243,000
<b>Margin</b>	12,400	73,900	86,200
<b>Total Floorspace (sq. m.)</b>	35,300	293,900	329,200
<b>Ha</b>	7.1	73.5	80.5

- 2.6. Para 6.7 confirms that the NBBC HEDNA considered completions over a 5 year period (2016–2021) and this was projected forward to form the basis of the employment requirement. It also confirmed that the sub-regional HEDNA excluded strategic B8 development and that the NBBC HEDNA did not. This had the effect of reducing completions projection by 19% in the sub-regional document.

### Analysis of completion period 2016–2021

#### 2016–2017 AMR

- 2.7. Net completion of 2.04 ha. and 9,959 sq. m. of floorspace.

#### 2017–2018 AMR

- 2.8. Net completion of 0.59 ha. and 652 sq. m.

#### 2018–2019

- 2.9. Net completions of 0.97 ha. and 1,973 sq. m.

#### 2019–2020

- 2.10. Net completion of 10.5 ha. The majority of this was a single B8 development at No. 1 St George's Way (4.14 ha.). The other major component was a HGV workshop of 1,980 sq. m. on a site of 4.08 ha. at Bermuda Park (ref. 35006). The new workshop represented a very small proportion of the site which seems to have been left underdeveloped.

#### 2020–2021

- 2.11. Completed 3.15 ha. and 9,060 sq. m. of floorspace.
- 2.12. It can be seen that over the above 5 year period, which was utilised to roll forward the employment land requirement, only 17.25 ha. of employment land was delivered or on

average 3.45 ha. per annum. This represents less than 50% of the annual requirement to deliver the Borough Local Plan employment land requirement of circa. 8.0 ha per annum .

- 2.13. In addition, the above time period (2016/17 to 2020/21) excluded all of the strategic allocations which formed part of the Borough Local Plan employment land portfolio coming forward. As a result the use of this period of completions to justify the basis for a new employment land requirement seems to misrepresent the potential need, there were clear and significant constraints in place in bringing forward the strategic allocations within the Borough Local Plan, especially when the majority consisted of sites removed from the Green Belt which could only have come forward post adoption of the Borough Plan in 2019. Add to this the lead in time to gain an outline planning permission (circa 2 years would be a reasonable estimate) and it is easy to see why all the allocations were not coming forward earlier in the LP time period, and yet it is that period of low completions that is utilised to form the basis of identifying the new employment land requirement.
- 2.14. What the above demonstrates is that constraints on the ability to bring forward allocations in particular will influence the amount of available employment land. This will in turn influence completions. This is easily demonstrated by considering the Employment Land Trajectory for the final year utilised in the 5 year period used to establish completions (2020/21) which shows the actual completions over the relevant period 2016/17–2020/21.

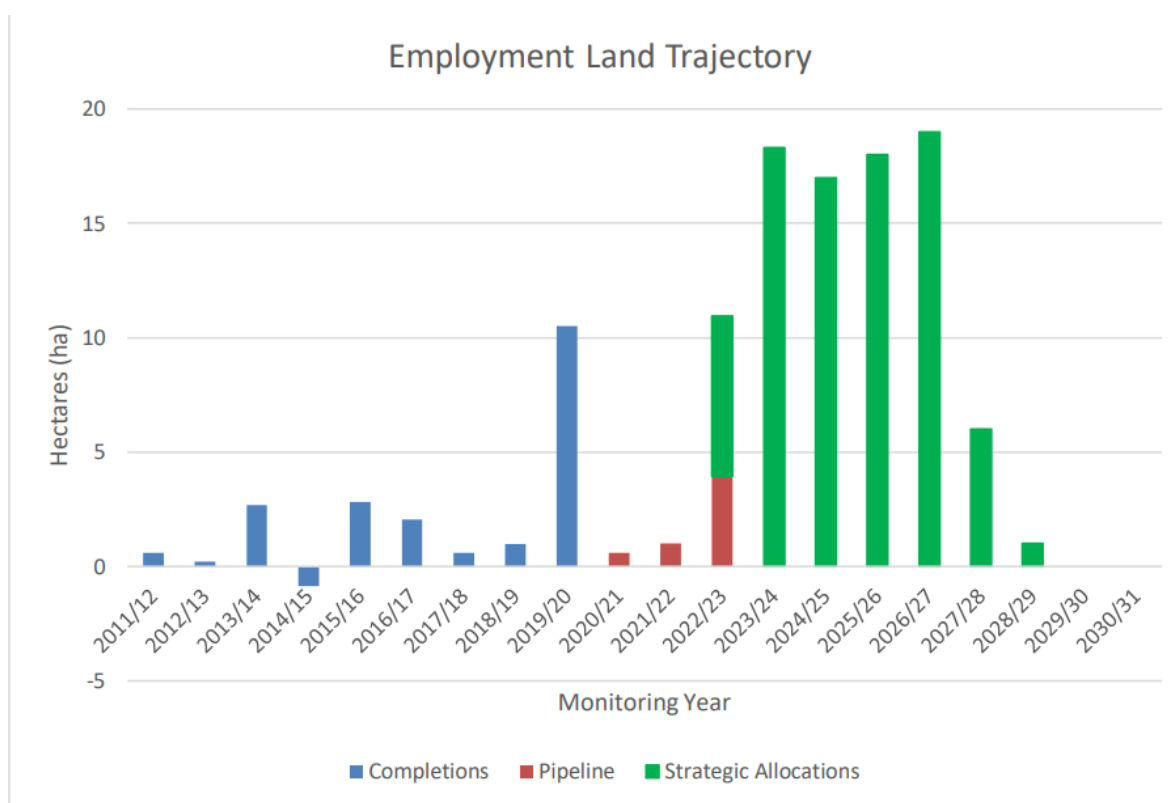


Figure 6: Employment Land Trajectory, updated for 2020/21

- 2.15. The spike in completions in 2019/20 has been explained in part above, but it is clear that this period is a time when employment delivery is low. This will inevitably result in a suppressed completion rate and influence how it is used as the basis for future projections.

**Question 43. All of the strategic employment allocations included in the Plan are brought forward from the adopted plan. Given this, is there a need to include new strategic employment allocations in the Plan? If not, why not?**

Relationship of Borough Plan Review to the adopted Borough Plan

2.16. The adopted Borough Plan covered the period 2011–2031. It was adopted in June 2019. Policy DS4 identified a requirement of 107.8 ha. of employment land. Page 35 of the Local Plan sets out an identified trajectory for the delivery of the employment land with allocations delivering from 2020–2021 onwards.

2.17. Policy DS6 sets out the allocations which were as follows:

EMP 1	Faultlands	26 ha.
EMP 2	Wilsons Lane	18 ha.
EMP 3	Prologis Extension	5.3 ha.
EMP 4	Coventry Road	9 ha.
EMP 6	Longford Road	2 ha.
EMP 7	Bowling Green Lane	26 ha.

2.18. The latest information regarding delivery of employment land relative to the requirements of the adopted Borough Plan and Policy DS4 is within the 2022/23 Annual Monitoring Report (AMR). This demonstrates at page 14 that against an employment land target of 107.8 ha., a total of 25.09 ha. had been completed with 82.71 ha. remaining. If the LP was to meet its employment land target by 2031, then over 10 ha. of employment land would need to be developed per year.

2.19. Policy DS3 of the Borough Plan Review identifies the need for 66.45 ha. of employment land, 2 ha. of employment land for office space and 19.4 ha. of employment land for strategic B8 warehousing and distribution development.

2.20. The Borough Plan Review covers the plan period 2021–2039, rolling forward the plan period by 8 years in comparison to the adopted plan.

2.21. Policy DS5 of the Local Plan Review identifies 4 employment sites as follows:

SEA 2	Wilsons Lane	19.09 ha.
-------	--------------	-----------



SEA 3	Prologis Extension	3.58 ha.
SEA 4	Coventry Road, Nuneaton	9.59 ha.
SEA 6	Bowling Green Lane	19.89 ha.

- 2.22. All of the above formed part of the employment allocations in the adopted Borough Plan.
- 2.23. It can be seen that the approach of the Borough Plan Review in terms of meeting employment needs for the additional 8 year period beyond that covered by the adopted Local Plan is to provide no additional employment land. This appears to be justified on the need for employment land reducing in the period between the adoption of the Borough Plan in 2019 and now. In particular it is noted that the Borough Plan had a contribution of 26 ha. to meet Coventry's needs, in addition to 87 ha. to meet its own needs. Ultimately the adopted Local Plan could only accommodate 107.8 ha but this was found a sound approach in the examination of the LP. It is evident that the Borough Plan review does not now identify any contribution to meeting unmet needs in Coventry and a conclusion can be drawn that this element of the employment land requirement has been 'lost'. However if that is the case then it means the Borough Plan will not deliver on its employment land requirements.
- 2.24. It would therefore appear that there is some doubt that the adopted LP will deliver its own employment land requirements but more significantly the new LP add no additional land despite it covering an addition 8 years of plan period.

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

**Birmingham (City)**

5th Floor, 1 Newhall Street, Birmingham, B3 3NH  
T 0121 308 9570  
Birmingham@pegasusgroup.co.uk  
Offices throughout the UK.

## Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: 33 Sheep Street, Cirencester, GL7 1RQ

We are ISO certified 9001, 14001, 45001



Pegasus\_Group



pegasusgroup



Pegasus\_Group

**PEGASUSGROUP.CO.UK**