

Nuneaton & Bedworth Borough Plan Review Examination

Respondent No.104

Position Statement by Nurton Developments Ltd

Matter 4 – Employment

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

Question 45. Does the Plan make sufficient provision for B8 strategic warehousing to the end of the plan period having regard to the fact that no new employment allocations are proposed?

Paragraph 6.46 of the plan refers to the strategic B8 need being met by the Faultlands development. Given that the Faultlands development is not an allocated site (it is stated that it was removed due to the site being under construction), how is the Plan meeting the strategic B8 need identified in Strategic Policy DS3.

1. No, the draft Plan does not make sufficient provision for strategic B8 warehousing. The provision made is wholly disproportionate to the overall identified need for strategic B8 warehousing for the FEMA (Coventry & Warwickshire). It also makes no provision for the majority of the plan period (i.e. 2024 – 2039).
2. Policy DS3 makes provision for 19.4 ha of employment for Strategic B8 Warehousing. This is separate to 66.45 ha provided to meet the needs of local industry and non-strategic distribution.
3. EB7.1 identifies a need of 551 ha for the FEMA covering the period to 2041. **The provision of 19.4 ha by the draft Plan represents just 3.5% of this wider need.**
4. Nuneaton & Bedworth enjoys strong communications and an available labour force. EB7.1 (Paragraph 11.24) identifies the M6 corridor (particularly Junctions 2 & 3) north of Coventry as one of four potential key corridors within the sub-region. Given these circumstances, the proposed contribution is insignificant and wholly inadequate.
5. The Faultlands development has now been completed. Rhenus Logistics have occupied two large warehouses. No further land remains from this consented (and previously allocated) site. As such, the supply of land identified by the draft Plan to meet this particular need has already been exhausted before the Plan is adopted.
6. Paragraph 4.4 of CD15 states that other employment allocations could potentially accommodate larger B8 units which could contribute to strategic needs. However, these sites have been allocated expressly to meet the needs of local industry and non-strategic warehousing. In any event, the employment land trajectory (Appendix E to CD15) projects all strategic allocations will be exhausted by 2028/29. Thereafter, the remaining 10 years of the plan period will be supplied only by windfall development.

7. In reality, the draft Plan does not provide for the future needs of strategic B8 warehousing at all. This is a failure of positive plan making. It is also a result of inadequate collaboration between neighbouring authorities to work out and agree how the wider need of 551 ha, identified over 18 months ago, should be distributed.
8. Policy DS8 – Review has been amended by the suggested Main Modifications (CD21) to add a further criterion, stating that strategic employment land need will be reviewed following publication of the West Midlands Strategic Employment Land Needs Study. However, as referred to in our Position Statement on Matter 1 (Issue 1), the remit and scope of this study differs to EB7.1. It covers the whole of the West Midlands and deals with industry and warehousing, not just strategic B8 warehousing. Its impending publication does not obviate the essential task of the local authorities of the FEMA to agree how the identified need for strategic B8 warehousing is distributed and planned for.

PJL

7th June 2024