

Nuneaton and Bedworth Borough Plan Publication (2023).

Hearing Statement.

Matter 4 – Employment– Strategic Warehousing

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		



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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

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?

- 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. Paragraph 31 of this section states that the logistics industry plays a critical role in enabling an efficient, stable and effective supply of goods, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separate from those relating to general

industrial land). The PPG indicates that 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.

- 2.5. The PPG goes on to indicate that authorities will also need to assess the extent to which local policy support is required for other forms of logistic requirements, including the needs of SMEs and of 'last mile' facilities serving local markets. A range of up-to-date evidence may have to be considered in establishing the appropriate amount, time and location of provision.

Approach to Strategic B8 Development– The Borough Plan Review

- 2.6. Policy DS3 of the Borough Plan Review identifies 19.4 ha. of land for strategic B8 development. But states that this is 'indicative'. Paragraph 6.38 states that The Employment Land Portfolio Review also brought together the previous HEDNA studies to determine the need for employment land in the Borough and to segment the contribution of strategic B8, identified in the Draft HEDNA, and provide an indicative figure. Para 6.46 states the strategic B8 need is being met through the Faultlands development, which is an allocated site. However Faultlands is not listed in DS5 as an employment allocation and the supporting text sets out that the site is under construction and forms part of the pipeline of sites.

Sub-regional HEDNA

- 2.7. The sub-regional HEDNA identified a need of 606 ha. of strategic B8 land from 2021 to 2041 (which is just 2 years outside the end date of the LP) and 709 ha. up to 2050. Table 10.18 concludes that by 2031– 8 years before the end date of the Borough Plan Review–there will be a need of 229 HA of land for Strategic B8 development.
- 2.8. The sub-regional HEDNA noted that the need for and location of strategic B8 development was an area where the local authorities in the sub-region cooperate. It reinforced the locational requirements of strategic B8 development and noted at paragraph 10.50 that older stock in this sector is concentrated in Coventry , Rugby and Nuneaton. This reinforces the evidence in the NBBC AMRs which show that in the period 2016/17–2020/21 there was only a single strategic B8 development in NBBC area, which suggests that the majority of units in Nuneaton were older stock.

NBBC HEDNA

- 2.9. 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 the locational requirements of strategic B8 development or whether the needs of other logistic operators have been addressed.
- 2.10. Paragraph 9.29 states that Nuneaton and Bedworth accommodates 173,000 sq. m. of strategic B8 development in 9 units, accounting for 8% of the floorspace in Coventry and Warwickshire.

- 2.11. Paragraph 9.31 states both the M6 and A5 corridors are attractive locations for strategic B8 development.
- 2.12. Paragraph 9.32 identifies that the Faultlands employment area is potentially suitable to meet strategic B8 needs.
- 2.13. Paragraph 9.33 states there are allocations allowing a range of employment uses at the Faultlands site and therefore it is unlikely they will be fully developed for strategic B8 development.
- 2.14. Paragraph 9.42 states ICENI considered the Borough will need to work with others to confer what proportion of the need for strategic B8 development it could accommodate.
- 2.15. Paragraph 10.25 states analysis assumes that future provision is in line with past trends amounting to 19% of the sub-regional total and it may be appropriate to delineate elements of the supply to take account of this market.
- 2.16. It is unclear when considering all the evidence to support the approach of the Borough Plan Review to strategic B8 development how the 19.4 ha. identified in Policy DS3 has been calculated, other than in para 10.25 of the NBBC HEDNA, which states that the analysis contained within the document, should follow 'past trends' accounting for circa. 19% of the subregional total. However utilising past trends, as the LP Review does to support its general employment requirement, shows that there was only a single building constructed at 1 St Georges Way which could be considered strategic B8 development and raises the issue of whether this is representative of demand or whether it is influenced constraints on supply.

NBBC Towards a Housing Requirement

- 2.17. Paragraph 4.16 states the 80.5 ha. calculation in the NBBC HEDNA included provision for strategic B8 in line with the past development trends, albeit this was not segmented out from the analysis.
- 2.18. Paragraph 4.17 states the 80.5 ha. figure would appropriately be treated as an assessment of the Borough's need, which includes a contribution to strategic B8 needs. It goes on to state that it may be appropriate to plan above this level to provide supply site flexibility and/or if there is potential to provide a higher contribution to strategic B8 needs.

NBBC Employment Land Portfolio Review 2023

- 2.19. The NBBC Employment Land Portfolio Review 2023 represents the most up to date position of evidence and states the need position shown includes provision for 19.4 ha. of strategic B8 development which is reasonable and likely to be met through development of the Faultlands site. It goes on to state this strategic B8 figure is, however, indicative and should additional suitable sites be identified there may be potential to contribute further to meeting strategic B8 or wider subregional needs. The same document also states that the Faultlands site is part completed with the remainder under construction and has no further development potential.
- 2.20. Para 6.10 of the Employment Review states that a check through the detailed completions data suggests that over the 2016–21 period considered in the local evidence, strategic B8 completions would have comprises one unit: 1 St George's Way in Bermuda Park (21,554

sq.m) which was completed in 2019/20. On this basis and taking account of strategic B8 development as a proportion of overall industrial and warehouse completions between 2016–21, Icen calculate that of the 82.5 ha identified as needed, the implicit assumption would have been that 19.4 ha of this was for strategic B8 development specifically.

Overall Conclusions on Strategic B8 developments

- 2.21. The LP Review refers to the need for this sector being met at the Faultlands site, yet this site is complete and has been removed as an allocation.
- 2.22. The Sub-regional HEDNA identifies a substantial need for Strategic B8 developments to 2041 of 551 HA (2 years after the end date of the LP) and recognises that Nuneaton has older stock of strategic B8 developments. If the LP Review was contribute towards only 10% of this requirement, it would amount to 55Ha.
- 2.23. The NBBC HEDNA does not identify any requirement for strategic B8 development but indicates that the LP should consider its needs.
- 2.24. Towards a Housing Requirement recognises that the 80.5Ha employment land requirement includes a contribution to Strategic B8 development, but it may be appropriate to plan above this.
- 2.25. The Employment Land Review states that an analysis of the detailed completions data over the period 2016–2021 shows that strategic B8 completion would comprise of a single unit known as 1 St Geroge's Way in Bermuda Park (planning permission 36078 21,554 sq. m.) which is completed in 2019/20. The report then states that on this basis and taking account of strategic B8 development as a proportion of overall industrial and warehouse completions between 2016–2021, that 19.4 ha. of the employment land should be identified as specifically for strategic B8 development.
- 2.26. The Council's continued utilisation of completion rates in this way, when none of the allocations within the adopted Borough Plan had been forthcoming, provides an entirely skewed position with regards to provision of strategic Class B8 employment land. The ability of these sites to come forward was evidently hampered by a lack of suitable sites.
- 2.27. This is compounded by impact a single building can have, when in this instance the only strategic warehouse building that came forward was 21,554 sq.m.
- 2.28. From the above it is entirely unclear how the Council have come to their position that strategic B8 development should amount to 19.4 HA and this would be developed at Faultlands, a site that is completed.
- 2.29. The approach in the LP or its evidence pays no regard to the locational specific requirements of strategic B8 development, which need large sites, close to the strategic highway network., with the M6 in the Borough being of particular significance, and with access to power and workforce.
- 2.30. The approach in the LP pays no regard to the overall need for such development identified in the subregional HEDNA. In view of the significant emphasis placed on this sector in the PPG and the significance of B8 development generally in providing employment development, it is imperative that the Local Plan makes greater provision for employment land generally and strategic B8 development in particular. In the absence of this provision



the LP is inconsistent with Government policy as contained in the PPG, is not effective and therefore unsound.

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.

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