

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.

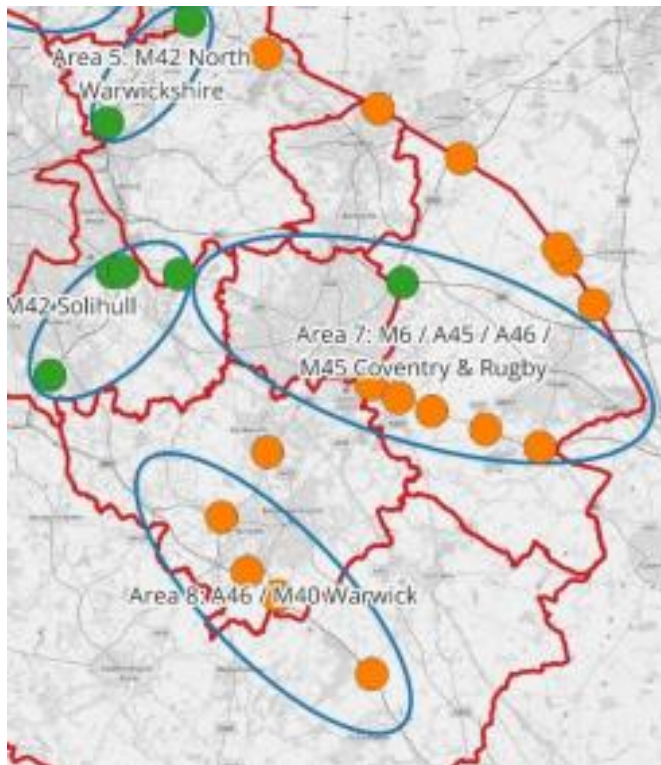
Question 45. Does the Plan make sufficient provision for B8 strategic warehousing to the end of the plan period having regard to the fact that no new employment allocations are proposed?

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.

Addendum to Statement following publication of the West Midlands Strategic Employment Sites Study (WMSESS).

1. Nurton Developments Limited (NDL) considers it is important to acknowledge that the purpose and scope of WMSESS differs to the purpose and scope of the HEDNA (EB7.1).
2. The purpose of EB7.1 is to project the employment land needs for Coventry and Warwickshire. It does so by identifying the needs for offices, industry and non-strategic warehousing by Borough/District and the need for strategic warehousing at a sub-regional level (i.e. FEMA). For the latter, a need of 551ha is identified for the period to 2041.
3. NDL understands that the various authorities which make up the FEMA have commissioned a study to apportion the need of 551 ha (and potentially the need for 735 ha to 2050) to individual authorities. This study is in preparation but has not been published. NDL would welcome an update on the programme for this Study's publication at the hearing session on 24 September 2024.
4. The remit of WMSESS is different to EB7.1. It covers both the manufacturing and distribution sectors and a much wider geographical area. Its stated purpose is to provide land-based recommendations to support the economic growth of the West Midlands. Its scope includes providing recommendations on the overall number and type of strategic employment sites required (including rail-based sites) and advising on their phasing and priority of broad locations.
5. The study is intended to help inform local plan preparation. However, it is recognised that there will be differences between its findings and those contained in existing EDNAs. As such, the study is intended to complement the evidence provided in local and sub-regional EDNAs rather than replace any such evidence.

6. The study identifies 9 Areas of Opportunity. One of these covers the Borough and wider area – Area 7: M6/A45/A46/M45 Coventry and Rugby – as shown below.



7. The study concludes that on the basis of existing supply (i.e. allocations and commitments) there is a need for 1 or 2 B8/mixed employment sites (50 ha + for each site) and 1 or 2 B2 sites (25ha+ for each site) in this area. The assessment of supply - considered to be 20 years for B8 and 23 years for B2 based on current completion trends - leads to the conclusion that future sites will be required later in the study period (to 2045) for this area.
8. Following an initial view, NDL has a concern that the assessment of supply in the WMSESS is overstated, especially in Area 7. A particular concern is that the assessment (with a base date of April 2022) is already out of date and does not take into account completions over the last two years. An obvious example is the inclusion of Faultlands (26 ha) as part of the committed supply for Area 7. This site has been fully developed, is now occupied by Rhenus Logistics, and is no longer available. There are similar cases in Area 7 at Prospero (Ansty), Symmetry Park (Rugby), Prologis Park (Ryton) and SEGRO's Coventry Gateway.
9. In addition, the planning permission for Coventry Airport, which makes up over 70% of the supply for B2, is very restricted, limited to 'the development of a battery manufacturing facility'. It is not available for other B2 uses and should not be included (as it has) in any quantitative assessment of supply for B2 land.
10. In reality, NDL considers the supply of strategic employment sites in Area 7, and within the Borough, is much more limited than portrayed by the study. In NDL's assessment, the supply of land in Area 7 for **B2 is 1.3 years (not 23 years)** and for **B8 is 8.4 years (not 20 years)**. NDL's figures fit much more closely with market sentiment on the balance between the demand and supply of land.

11. NDL intends to share its assessment of supply with commissioning officers of the study as it has potentially significant implications in terms of quantifying the shortfall between need and supply, the resulting number of strategic employment sites required to meet the shortfall, their location and phasing. In the meantime, representatives of NDL are prepared to provide more details of its assessment and clarify any aspects of this submission at the examination hearing.
12. Overall, whilst the publication of WMSESS provides a useful wider context, it does not obviate the essential task of the Local Authorities within the FEMA to agree how the need for strategic B8, identified by EB7.1, is distributed and planned for. This task needs to be completed, and acted upon, for the plan to be sound.

PJL

20th September 2024