
Part B – Please use a separate sheet for each representation

Name or Organisation: Nuneaton and Bedworth Borough Council

3. To which part of the Local Plan Review does this representation relate?

Paragraph

Policy

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please ✓ tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Nuneaton and Bedworth Borough Council (NBBC) has worked with Coventry City Council (CCC) on a range of cross boundary strategic matters in accordance with the Duty to Cooperate. The NBBC Borough Plan Review (BPR) is at an advanced stage of preparation with the Regulation 19 Examination in Public hearing undertaken in July to October 2024.

Policy JE2: Provision of Employment Land and Premises identify sites to meet the OAN which results in a shortfall. NBBC considers that there is further work to be undertaken as employment land is sought beyond CCC administrative boundaries. CCC has undertaken a Housing and Economic Land Availability Assessment to identify a future supply of land. PPG sets out that the initial survey should take into account national policy and designations (Paragraph: 014 Reference ID: 3-014-20190722). The HELAA (2024) details that sites considered unsuitable will include policy constraints that restrict development, such as Green Belt (para. 3.33). NBBC agrees that this is appropriate to consider policy constraints as part of the initial survey.

The HELAA states that discounted sites that are not considered suitable will be clearly identified and not considered further through the local plan review process

(para. 3.34). The HELAA sets out that CCC is committed to maximising development on previously developed brownfield sites (para. 3.73) therefore Green Belt sites are discarded. The omission of sites after the initial assessment contributes towards a shortfall in employment land supply. No further analysis is undertaken following the initial assessment. NBBC does not agree that the assessment process ends after the initial survey. Where constraints are identified PPG sets out the procedures for stage 2 of the assessment. In cases where constraints are identified the assessment will need to consider what action could be taken to overcome them. PPG uses examples of constraints to overcome include policies in the National Planning Policy Framework and the adopted or emerging development plan (Paragraph: 021 Reference ID: 3-021-20190722). NBBC contends that NPPF Green Belt policy and the approach towards Green Belt in the emerging Local Plan are constraints to overcome.

The HELAA identifies 'Land North of A45 and West of Brickhill Lane' the site area is 11.81 ha and would help towards the identified need but is discarded due to Green Belt designations. The site is located in Green Belt Area 1: Northwest Coventry. The HELAA do not Green Belt Study Technical Update consider that the southern section of the site includes a recently built slip road and roundabout which gives access from the A45 to the nearby H2:2 Eastern Green SUE. This is a significant strategic infrastructure project which will give access from the strategic highway. According to the Green Belt Technical Update Study July 2024 the traffic island and slip road are within the Green Belt. There is no assessment of the presence on the of significant highway infrastructure which potentially harms the openness of the Green Belt in this area. The economic benefits of an employment site with immediate access to the strategic highway and within close proximity to other allocated employment sites and supply of labour are similarly not assessed. The result is a higher unmet need figure which could be potentially reduced when the constraints are assessed.

Policy JE2 seeks to protect certain employment sites from non-economic development. There are certain sectors of employment which do not require large units on strategic sites. The ELR notes that demand for small units is high. NBBC is supportive of protecting existing employment sites, particularly where they provide potential for small business units.

NBBC believes that existing employment sites are a potential source of supply with CCC administrative boundary which have not been identified. The HELAA sets out that windfall rates are not applied to employment sites (para.3.53). However, the HEDNA is based on gross completions data, the HEDNA states, 'Using the gross completions does assume that past losses will to an extent continue and some of the forecast need may occur on recycled existing industrial premises.' It is appropriate to identify provision for a quantum of employment development expected to take place on existing employment sites over the plan period. Recycled sites will make provision of smaller units for businesses that do not require the allocation of large employment sites. Making provision for this is important to support investment and regeneration and should be identified in the supply.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PPG requires that when constraints are identified there should be consideration to how they can be overcome. NBBC considers that a targeted Green Belt assessment of 'Land North of A45 and West of Brickhill Lane' should be undertaken. Particularly given the southern section of the site is in the Green Belt but contains a recently completed major road infrastructure project. The economic benefits of the site should also be assessed given the proximity to the nearby SUE and access to the strategic road network.

Calculate an amount of employment land provision from recycled sites to meet the recycled need identified in the HEDNA.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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No, I do not wish to participate in hearing session(s)

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Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below.

(Continue on a separate sheet /expand box if necessary)

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.