

## **Whitestone Residents Action Group (WRAG)**

### **Comments on the Council's Housing Topic Paper HBBC/33 mainly as it relates to HSG9**

We were unable to find NBBC/30 so we have restricted the comments mainly to HBBC/33. It is difficult for us to comment on HBBC/20 as we cannot view the sources of information which support them.

#### **Housing Target figures**

##### **HBBC/33**

##### **[Clarify the revised requirements of the plan]**

1. it is very difficult for a layman to comment on the facts and figures provided in this and other reports leading to the conclusions. However the numbers have clearly increased from the those provided for the stated "consultation" period of the Borough Plan in early 2017. At that stage the total housing target was **13,374** and the council stated that it had not met the total perceived shortfall from the Coventry and Warwickshire Housing Market Area of **4,029**. The Council have now upgraded the total to **15,223** which includes the Coventry shortfall and a "flexibility" allowance of **1,163**.

2. We do not completely understand how the figure of 4029 for the Coventry shortfall was arrived at. Warwick County Council's publication "Quality of Life in Warwickshire 2014/15" shows Nuneaton to be completely out of step with other authorities within the County in terms of person per square metre. In fact it is 5.75 times the average. Also the size of the area of Nuneaton and Bedworth is miniscule compared with most of the other local authorities.

Also, other authorities in the HMA have to cooperate with other adjoining authorities. For example Stratford have a duty to cooperate with Birmingham. We are informed that Birmingham are substantially reducing their target figures which should have an effect on Stratford's overspill take up. Could this mean they can take a larger proportion of Coventry's overspill instead? That would again alter our local plan target.

We are also not sure that the duty to cooperate means regardless of the density of the town in question. That would lead to total covering of all land in the Borough in a few years. One would expect our share it to be in proportion to land mass and current density. The current allocation appears to be 32.3% of the Coventry shortfall which seems excessive as there are five Council's which are asked to provide this assistance.

3. The Council's own assessed need appears to be based on national statistics. It is not clear what statistical analysis has been carried out to measure the requirements for the Borough which could be much lower than the national average.

### **Response**

a) The statistics used to calculate future demand for housing are open to debate due to changing circumstances such as Brexit and lower age expectation in the Nuneaton area. This debate is also currently happening in Coventry. Although we are not aware of current forecasts it is clear they are starting to lower. This raises the issue of the validity of the total figure used by both Coventry and Nuneaton. Nuneaton's figure is doubtful regarding its own OAN plus the knock-on effect of the additional figures resulting from Coventry's possible enhanced target.

b) The figures used to meet the Coventry shortfall seem excessively high for a town which is already densely populated and lacking in reasonable green space.

c) The flexibility allowance seems to be unreasonable as any shortfall would only become clear later by which time other suitable sites, not currently included, may come forward. This allowance represents a good portion of the Green Belt land included and this is unreasonable when the government states that their aim is to maintain protection for Green Belt land. We are informed that the latest Cabinet report states that the Borough is experiencing an over delivery of houses. This would suggest that adding a flexibility allowance is double accounting.

### **[Site Selection Process - Demonstrate a robust site selection process]**

#### **Green Belt Land**

1. Prior to the current Local Plan publication the Green Belt Area of land covered by HSG9 was always discarded as it did not fit the criteria for selection. (Page 72)

2. The Topic Paper states that HSG9 is a small part of a much larger Green Belt allocation. Local residents do not understand which area of land they are referring to as the Golf Course forms part of the remainder and is not accessible to the public.

3. The report states that the Council accepts there are brown field sites in the north of the Borough but does not want to develop any further in that area.

4. The council claims that HSG9 meets the Sustainability Appraisal.

### **Response**

a) Why has HSG9 suddenly appeared in the plan with no prior consultation with residents? This seems to be contrary to National Planning Framework rules and Planning Policy Guidelines. Any consultation would have informed the Council about

the value placed on this rural footpath walk by the residents of Whitestone and from further afield. It is a popular walk which is highly valued. Therefore HSG9 is an accessible area of open space which is one of the functions of Green Belt status.

- b)** No explanation have been given as to why the previous rejection criteria for HSG9 have suddenly been overcome.
- c)** Green Belt rules suggest they should be used to maintain a space between urban areas. The use of HSG9 leaves one field depth to the boundary with Rugby Council. We do not recognise a larger Green Belt within Nuneaton as the Council have stated in the Topic Paper unless they include the Golf Course which we cannot access..
- d)** What justification can the Council have to decide to use Green Belt land when it admits that there are brown field sites available within its boundary. This again seems to ignore the criteria of exceptional circumstances required to use Green Belt land. What are these circumstances?
- e)** We are informed that the owners of the large area to the west of the A444 still wish to develop this land. This could accommodate around 5000 houses and could also assist with the traffic problems on the west side of the town. This could eliminate the need to allocate the 2017 Green Belt sites in the plan. Why have the Council not checked out this opportunity?
- f)** We have been unable to find any traffic modelling data or any other information to show how the current accepted major traffic problems in Whitestone can be alleviated. Surely this should be dealt with before any consideration is given to adding to the problem.
- g)** There does not appear to have been any real environmental assessment carried out for HSG9. If plans are drawn up in accordance with planning policy guidelines then the need to provide access to clean healthy air for walking and cycling needs to be considered. HSG9 provides an accessible route to an open air environment. Also there does not seem to be any data about the wildlife of the area which is significant. We cannot see any mention of this in any of the supporting papers.
- h)** It would appear that the Green Belt allocations have resulted from the Call for Sites. This begs the question as to who decides what is Green Belt? The Council or land owners who want to profit from their valuable asset?

The Council have failed to demonstrate that they have carried out the same detailed work required to bring HSG9 forward with the same amount of information as other sites considered. This lack of information has led to residents not being properly consulted during the consultation process. We are convinced that there are no good reasons for the incursion onto Whitestone's only real Green Belt countryside access.

(Please note that, having liaised with Bulkington Residents Voice (BVR) because we share similar issues with the Borough Plan, WRAG fully supports the detailed comments they have submitted to you. As a result we submit to you a summarised version of the issues so that you can avoid having to read repeated details.)