Anca Seaton

From: Jonathan Wood <

Sent: 16 October 2023 14:19

To: Planning Policy

Subject: Land at Wolvey Road, Bulkington - Representations on behalf of P Hughes

Holdings Ltd - 16 October 2023 - Borough Plan Review Regulation 19

Consultation

Attachments: Nuneaton & Bedworth Borough Plan Review - Land at Wolvey Road, Bulkington

for P Hughes Holdings - 16.10.23.pdf; Wolvey Road, Bulkington - Vision

Document - 16 October 2023.pdf;

Representation_Form_A___Personal_details__Electronic_ Wolvey Road, Bulkington

- 16 October 2023.pdf;

Representation_Form_B__Your_representation_s__Electronic_ Wolvey Road,

Bulkington - 16 October 2023.pdf

Categories: Processed

Dear Planning Policy Team,

Please find attached the following documents:

- Form A
- Form B
- Representations Document
- Vision Document

It is our view that this site should be considered for a strategic housing-led allocation.

We would be grateful for an opportunity to meet with the Planning Policy Team to explain the submissions.

Kind regards Jonathan

Jonathan Wood Strategic Land & Planning Director



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Borough Plan Review

Publication Stage Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

Borough Plan Review Publication Stage

Please return to Nuneaton and Bedworth Borough Council by 16th October 2023 via:

Email: planning.policy@nuneatonandbedworth.gov.uk

Post: Planning Policy, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, NUNEATON, CV11 5AA

This form has two parts –

Part A – Personal details.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal details* * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.	2. Agent's details (if applicable)
Title	Mr	Mr
First name	Jonathan	Jonathan
Last name	Wood	Wood
Job title		Strategic Land & Planning
(where relevant)		Director
Organisation	Hawksmoor	Hawksmoor
(where relevant)		
House no. and		Suites 1 & 2, City Point,
street		Swan Road
Town		Lichfield
Postcode		WS13 6QZ
Telephone number		
Email address		
(where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation: Hawksmoor

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

Paragraph	See Below
Policy	Development Strategy and Housing Policies
Policies	N/A
Мар	

- 4. Do you consider the Borough Plan is:
- 4.(1) Legally compliant?

Yes	
No	
	Х

4.(2) Sound?

Yes	
No	
	X

4.(3) Complies with the Duty to Cooperate?

Yes	
No	
	Χ

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see representation document enclosed with this form.
(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan 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.

Please see representation document enclosed with this form.	
(C	Continue on a separate sheet / expand box if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No , I do not wish to participate at the oral	
examination	
Yes, I wish to participate at the oral	
examination	

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

A legal right to appear before and be heard by the inspector at a hearing given the objections and specific recommendations made.

Specifically matters relating to Bulkington, the development strategy and housing requirements.

Please note the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

9.

Signature:	
(Please sign the box if you are filling in	
a paper copy. If you are filling in an	
electronic copy, the box can be left	
blank)	
Date:	16.10.23

BULKINGTON GREEN

NEW COMMUNITY

VISION DOCUMENT

October 2023

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Section 1

INTRODUCTION

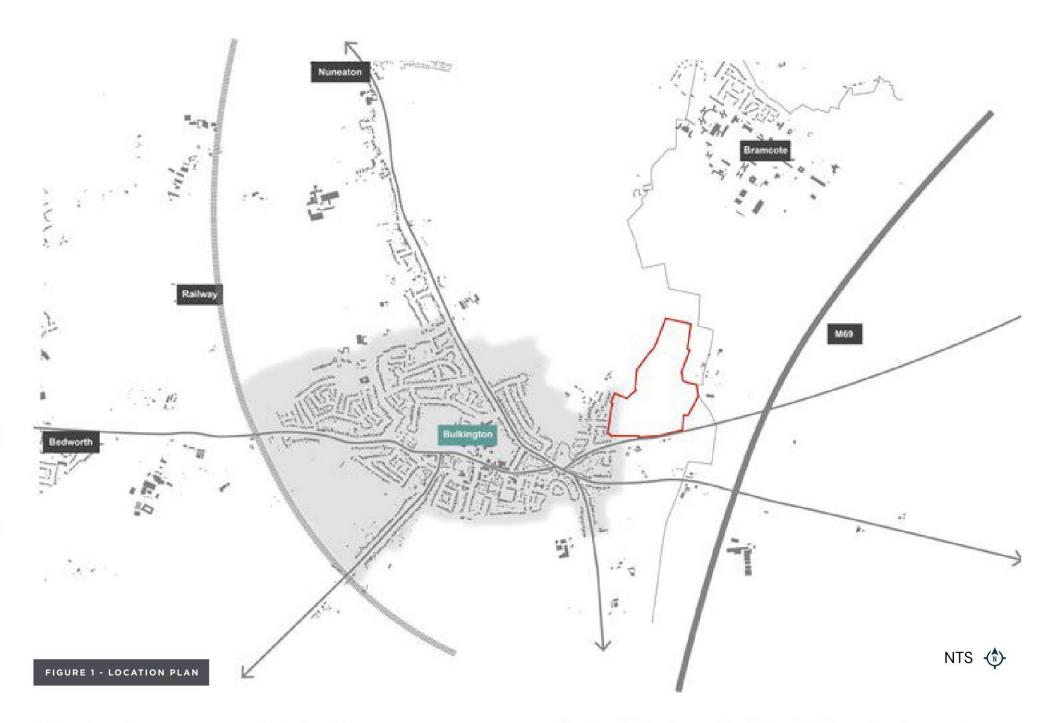
1.1 INTRODUCTION

Bulkington Green is a proposed new neighbourhood located to the east of Bulkington, in Nuneaton and Bedworth . It has the ability to support the community of Bulkington and benefit from the amenities and facilities of the village.

The natural extension of the village in an easterly direction between Long Street and the urban influences of Bramcote Main Caravan Park and Storage Facility allows the creation of a sustainable neighbourhood in walking distance of the village centre and brings the benefit of a significant parkland area and green corridor, as well as sports facilities and grow zones for local residents which will encourage sustainable movement and establish the physical, social and environmental conditions new and future residents need to thrive.

Nuneaton and Bedworth Borough (NBBC) is consulting on a new Plan Review for the area. The Nuneaton and Bedworth Borough Plan Review will sets out a spatial vision for the period to 2024-2039.

Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt which was initially established in 1975 and covers almost 1,500sq.m. surrounding the Black Country, Coventry, Birmingham and Solihull. The village is located less than a mile to the east of Bedworth, and one mile south east of Nuneaton.



This vision document sets out high level design principles for how land off Wolvey Road can deliver a substantial contribution to the housing need in the Borough on land that has not been previously considered in local plan making. It is therefore the start of a design process where this vision can develop alongside residents, stakeholders, officers and council members to deliver an exemplary new sustainable neighbourhood.

Section 2 introduces the Vision for future development. Section 3 summarises an initial appraisal of the Site and Context whilst identifying its constraints and opportunities, which leads on to high level Vision and Conceptual Framework Plans. Section 4 provides a summary of the key virtues of the vision.

Section 2

VISION

2.1 VISION FOR BULKINGTON GREEN

Bulkington Green is proposed to be a sustainable neighbourhood that focuses on the health and wellbeing of their residents, by creating a distinct and thriving place that enhances biodiversity, amenity spaces and the countryside and encourages active travel around Bulkington to support low carbon lifestyles and a sense of place.

Bulkington Green is inspired by the local landscape and provides the opportunity to create a new neighbourhood that is highly connected, and functions as an integral part of the village within a 10 minute walking and cycling distance of the village centre..

The development will create a new opportunity to access rural areas to the north and east of Bulkington by linking new public parkland to the existing public footpath network and provide a network of attractive green corridors and movement routes.

The new community will create a long term environment for residents to live healthy, fulfilled and enjoyable lives whilst taking active measures to transition to a net zero carbon community.





The Principles

Nine high level 'vision principles' grouped within the themes of Integrated, Distinctive and Sustainable, will shape the vision and govern its journey to delivery in partnership with local stakeholders.



2.2 PRINCIPLES EVOLUTION

The three themes of Community, Sustainability and Place that shape the vision for Bulkington Green are derived from Building for a Healthy Life published by Design for Homes, in partnership with Homes England, NHS England and NHS Improvement. BHL integrates the findings of the three-year Healthy New Towns Programme led by NHS England and NHS Improvement. Building for a Healthy Life is Homes England's key measure of design quality.

Building for a Healthy Life

	INTEGRATED NEIGHBOURHOODS
1	Natural connections
2	Walking cycling and public transport
3	Facilities and services
4	Homes for everyone
	DISTINCTIVE PLACES
5	Making the most of what's there
6	A memorable character
7	Well defined streets and spaces
8	Easy to find your way around
	STREETS FOR ALL
9	Healthy streets
10	Car and cycle parking
11	Green and Blue Infrastructure
12	Back of Pavement front of home



2.3 BULKINGTON GREEN - VISIONARY PRINCIPLES

Three themes of INTEGRATED, DISTINCTIVE and SUSTAINABLE are derived work together to support the creation of a healthy life. These themes are subdivided into nine high level 'visionary principles' guiding the future possibilities for the site.. These principles have evolved and been tailored to the site's assets and sensitivities, and represent contemporary national and local priorities, and aspirations for new ways of living to 2050. These principles will shape the vision and govern its journey to delivery in partnership with local stakeholders and are explained in more detail on the following pages.

INTEGRATED

One WALKING & CYCLING CONNECTIONS Two LOCAL FACILITIES & SERVICES Three HOUSING FOR ALL

DISTINCTIVE



SUSTAINABLE



INTEGRATED

Vision Principles 1-3 provide for the creation of a strong, cohesive and well integrated proposed community at Bulkington Green as part of the village and within its natural surroundings

One

WALKING & CYCLING CONNECTIONS

The Government state that inactivity contributes to 1 in 6 deaths across the UK (Public Health England, 2016). Additionally, it is reported to cost an estimated £7.4 billion yearly (Public Health England, 2016)

Active travel is defined as physical travel such as walking and cycling. With over a quarter of adults reporting less than 30 minutes of physical activity per week in England (Public Health England, 2016), considering how environmental determinants influence active travel behaviours is essential.

The national design guide states that 'patterns of movement for people are integral to well designed places'. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy.

High quality connections and being easily accessible on





foot, by cycle or by public transport so people are more likely to walk or travel actively – and being accessible to everyone is essential. We believe this aspiration can be enhanced by a 10 minute neighbourhood where schools, local community facilities and services can be accessed within 10 minutes.

In active neighbourhoods priority is given to pedestrian and cycle movements, subject to location and the potential to create connections. Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient and accessible for people of all abilities.

Two

LOCAL FACILITIES & SERVICES

Places that offer social, leisure and recreational opportunities a short walk or cycle from their homes help to forge community and encourage active travel.

Create places where people can meet each other such as public spaces, leisure facilities, community buildings, cafe's and restaurants to provide opportunities for social interaction – helping to improve public health by encouraging physical activity and helping to tackle those affected by loneliness and isolation.

'Play on the way' can make car-free trips more fun for children making them want to walk or cycle to school.



Three

HOUSING FOR ALL

Well-designed neighbourhoods include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use.

Well-designed neighbourhoods provide a variety and choice of home to suit all needs and ages. This includes people who require affordable housing or other rental homes, families, extended families, older people, students, and people with physical disabilities or mental health needs.

Where different tenures are provided, they are wellintegrated and designed to the same high quality to create tenure neutral homes and spaces,

DISTINCTIVE

Vision Principles 4-6 promote the use of existing landscape and settlement form together with principles of high quality design to create a neighbourhood that helps to reinforce local character lost through years of post war development.



Four

LANDSCAPE & CONTEXT LED

Landscape analysis that has been undertaken centres on key physical and perceptual site characteristics that have the opportunity to celebrate the landscape within a contextual inspired development strategy.

New places can be created where contemporary design and the rural environment co-exist in harmony. In planning for future new development at Bulkington Green the ambition is to ensure that the highest level of design quality is achieved.

New developments must protect and respond to the landscapes and built form that characterise them, but also create outstanding new buildings and landscapes that create an iconic legacy for future generations.

Five

MEMORABLE CHARACTER

High quality places are not just characterised by what they look like (though this is integral) but a wider consideration of the 'spirit of the place' is essential in the design process. This includes the patterns of how we live and how we can achieve this. Using a local materials palette (where appropriate) can be a particularly effective way to connect a development to a place.

The aim of the new Bulkington Green's planning and development decisions will be about place-making in its truest sense; beautiful, sustainable developments in the right places in which people can live and play



MATERIALS PALETTE FROM BULKINGTON CONSERVATION AREA ASSESSMENT 2022



BULKINGTON DISTINCTIVE CHARACTER - UNFOLDING VIEW TO

in ways that support choice, sustainability and well-being, whilst being a strong contributor to the success and vitality of the Village Centre.

Six

HEALTHY & DEFINED STREETS

The quality of the spaces between buildings is as important as the buildings themselves. Well-designed public spaces, particularly streets, are designed to support an active life for everyone, and are maintained for continual use. It is important to design them to include all of the users who may wish to use them for activities such as socialising, informal doorstep play, resting and movement. Their success depends on them being fit for purpose, attractive places that people enjoy using. High quality public spaces include natural elements such as tree planting or water.

A network of streets and spaces that are well enclosed by buildings and/or structural landscaping, taking care to ensure that front doors and the principal facades of buildings face streets and public spaces can help to help to overcome crime and the fear of crime.

SUSTAINABLE

Vision Principles 7-9 explore the way the environment should lead the design of the landscape to make a resilient neighbourhood rich in biodiversity



Seven

SPORTS, PLAY & HEALTHY FOOD

The success of open spaces are key to the formation of happy, healthy new communities. Sport, play and food production have the ability to bring communities of all ages together. They are the beating hearts of our communities and play a vital role in strengthening social connections within the places we live, for example, the small interactions between children at a play area or the interactions between parents watching.

Design that enables these activities to take place gives a new community the best possible chance of forming strong social bonds that stand for generations to come.

Eight

BIODIVERSITY LED GREEN/BLUE INFRASTRUCTURE

High-quality green infrastructure is integral to creating a distinctive sense of place. Distinctiveness

of an area should be reinforced through the design of the built environment, but also through the design of green infrastructure. The quality of the spaces around and relationship with, the buildings is as important as the building themselves.

At Bulkington Green nature placed at the heart of development close to where people live, work, learn, play and/or visit, and is designed to optimise use and enjoyment for everyone. Water Management is climate resilient integrating sustainable drainage features to manage flood risk, maintain the natural water cycle and improve water quality, and designed to be drought resistant where ever possible.

Long term and climate resilient net benefits for nature will be optimised by retaining and enhancing any existing ecological assets and creating locally relevant new habitats within the boundary of the project at all stages of development. Protecting existing, and creating new, high-quality green and blue infrastructure provides a significant opportunity to enhance existing, and create new, habitat for wildlife. In turn, green infrastructure can support the conservation status of target species and habitats identified as priorities for the local area.



Vine

CLIMATE CHANGE RESILIENCE

Clear actions can be taken to achieve carbon-free workplaces, homes, shops, schools and community facilities; these include improving building insulation, air tightness and mechanical heat recovery performance. The precise means of delivering these benefits is subject to a focused site wide strategy and will need to adapt to emerging trends and technologies.



Section 3

SITE & CONTEXT

3.1 SITE CONTEXT

Delivering cohesive communities, good design and successful placemaking requires a clear and cohesive understanding of the place. This includes factual and technical information about how it functions, but it must also understand and engage with the spirit or 'genius loci' of a place to visualise the possibilities.

Within the Nuneaton and Bedworth Landscape
Character Assessment the site sits in the Bulkington
Rolling Farmlands, a landscape typically characterised
by gently rolling landform created by a series of shallow
river valleys leading to wide rolling ridges. Streams
are often localised features notable by short belts of
linear woodland or clusters of riparian trees. Pockets of

wetland meadow are present along short sections of streams. Fields are large and regular in shape and size to the north and west becoming smaller and irregular close to the edge of Bulkington.

Bulkington Rolling Farmlands is a rural landscape, primarily of arable farmland, with glimpses towards urban and village fringes. The urban fridge/urbanising elements of the edge of Bulkington, the Barracks and Bramcote Mains Caravan Storage have a greater influence on this site than is characteristic of the wider character area. Development of Gamecock Barracks has an influence on the landscape and has in places resulted in a large scale almost empty landscape on the eastern fringes of the character area.

As visible from the north of the site looking back towards Bulkington, there is a more intimate character close to settlement edges, fields become more open and expansive further away. This site is a vast open and expansive arable field with little intimacy or by way of woodland or hedgerow. It has a narrow stream running through the middle of the northern half of the site.

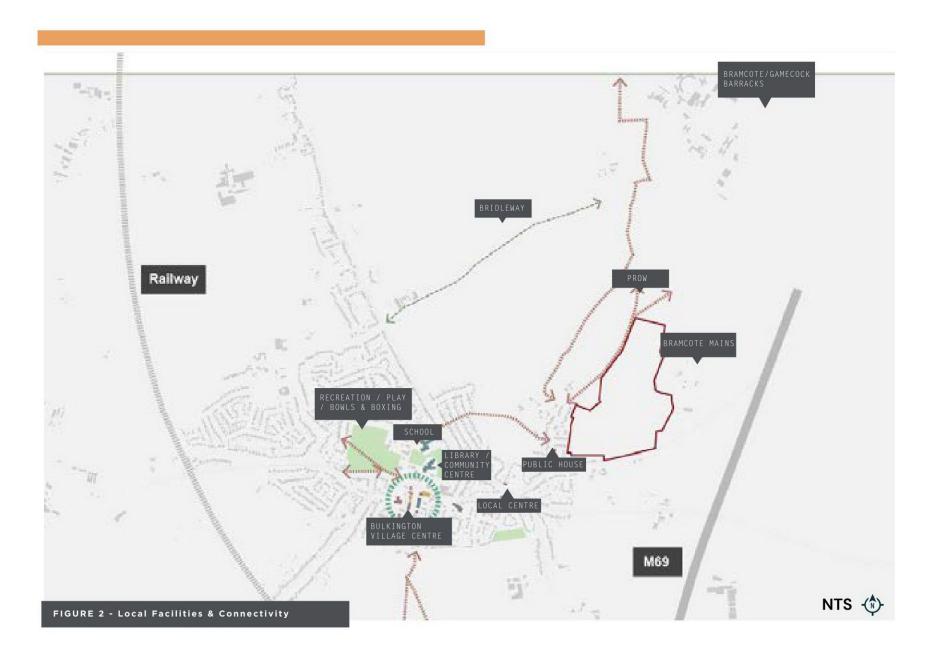
Scattered hedgerow trees are a mix of oak and ash; in places field boundaries are only notable by a line of hedgerow trees.







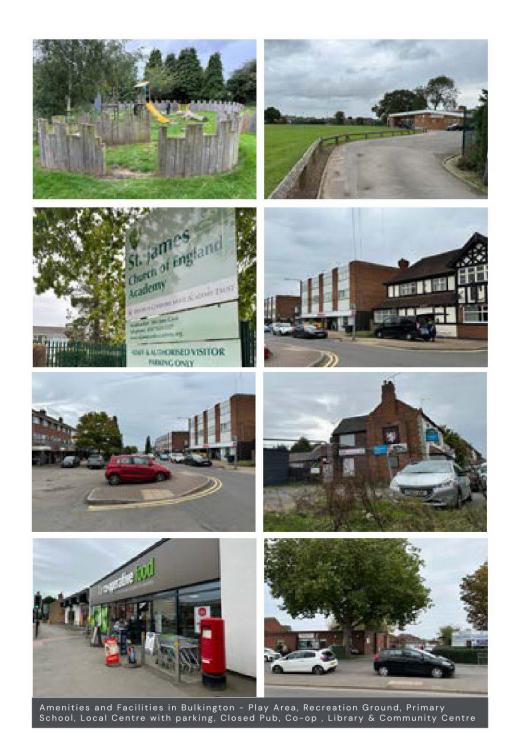
3.2 SITE ANALYSIS



The site lies to the west of Bramcote Main and the M69 in the east of Bulkington within walking distance to the local centre. Within the centre is a collection of retail outlets, cafe/fast food, post office, community centre, library and pharmacy. A small cluster of retail/hospitality premises, hairdressers and doctors surgery is located nearer to the site and a public house on Long Street.

There are a number of public footpaths and a bridleway to the east of the site, however the footpath adjacent, which runs along the boundary of the site is not connected to the north and appears to be largely unused. The footpath that runs from Firleigh Drive off Long Street to Lancing Road and on to Rugby Road appears to be popular and well used.

There are no dedicated cycleways in Bulkington.



3.2 SITE ANALYSIS







DESIGNATIONS

The site lies within the greenbelt outside of the development boundary of Bulkington. To the east of the site is an area of land which was previously allocated in the adopted development plan which is now proposed to be de-allocated from the Borough Plan Review. Conditional planning approval was granted on 3rd October 2023 for residential development of up to 230 dwellings with access off Nuneaton Road and Bramcote Close (with all other matters reserved).

The centre of the village is considered in the borough plan as a District Centre and adjacent to this is the historic heart of the village and is designated as a conservation area. The majority of the listed buildings in the village are clustered within the conservation area with several additional designations to the north of the village.



3.2 SITE ANALYSIS

SITE HYDROLOGY, ECOLOGY & LANDSCAPE

The site consists of a extremely large arable field gently undulating from 113m by Wolvey Road to 105m in its lowest point. It has remnants of a hedge through the centre, southern central and south eastern area. The areas of highest value are limited to the boundaries where the hedges and associated ditches are more established.

There is a ditch running from the centre of the site to the north west, and whilst there is no fluvial or tidal flooding there is an area around the ditch and to the south of the site that has a low risk of surface water flooding.

There are no notable landscape features other than some existing boundary trees along Wolvey Road and an area of woodland too the south west of the site outside the site boundary. Much of the boundary hedges are patchy and not complete and boundaries to properties are often only wire or similar fences. There is a significant security fence to the north east of the site adjacent to Bramcote Main.





3.3 SETTLEMENT CHARACTER

Bulkington is an amalgamation of three historic settlements: Western in Arden, Ryton and Bulkington itself. The present formation is due to the development of mostly 20th century suburban housing that has merged the once separate (but historically closely related) neighbouring small settlements.

The Landscape Character of the Village in proximity to the Bulkington Rolling Landscape appears as a clustered rising roofline nestled within trees; the skyline is formed by a mix of buildings including St. James Church and trees. The village takes an irregular outline to development interspersed with pasture fields creates an impression of a small village edge. Linear ribbon development is frequent along roads and increases urban influences particularly where hedgerow trees are less frequent

Separation between Bulkington and Nuneaton is reduced by ribbon development along Nuneaton Road. White caravans and mobile homes at Mill Farm Park are prominent within the landscape.

There is no overriding architectural style to the 2 storey red brick built form. It comprises a mix of post-war and modern semi-detached properties often set back from main roads within mature gardens.

Bulkington's Conservation Area is comprised of a short historic village street with a parish church and burial ground, along with its present and former vicarages and their grounds. The front elevations of some surviving cottages are understood that the most significant and locally distinctive influence for the Conservation Area derived from the 18th and early 19th century local silk weaving industry.

The predominant building style of key buildings in the Conservation Area feature Flemish-bond brickwork. "The area has a special local vernacular character given by the consistent use of lighter header bricks and darker stretchers. This means that the wall has a dark tone with lighter ends of bricks making a diaper pattern. The local bricks are a light brown. Some buildings have been rendered." (Bulkington Conversation Area Appraisal & Management Plan SPD 2022)



Section 4

CONCEPTUAL FRAMEWORK

Retained arable land Potential link to Linear woodland **Footpath Network** edge buffer Linear woodland Wetland Area edge buffer Potentia Link to Footpath Network Sport Facility Ped/Cycle Community Grow Zone **Enhanced Edge** Link to Village Centre via Wolvey Road Possible NTS (N) /Long Street secondary Main access access

FIGURE 5 - CONCEPTUAL FRAMEWORK PLAN

4.1 CONCEPT FRAMEWORK

- A development of 250-300 residential units to meet housing need (including housing for older people and custom/self-build plots) organised in a walkable neighbourhood focused around the a central green space.
- Surface water drainage will be provided in a wetland meadow around the existing drain fed by a network of swales aligned with topography and the movement network.
- New sports facilities linked via an active travel corridor to the village centre will provide amenity for the village as well as the new community.
- A grow zone, a formal central park (with play) as well as an informal linear park adjacent to the development will be complimented by a large new naturalised parkland area with a network of pedestrian and cycle links to existing roads and public footpaths. This will provide social spaces to encourage active healthy lifestyles and enhance community spirit.
- Circa 2.5ha of retained agricultural land.



NTS -

FIGURE 6 - INTEGRATION WITH THE VILLAGE

4.2 INTEGRATED

One Two Three

WALKING LOCAL & CYCLING FACILITIES & CONNECTIONS SERVICES

HOUSING FOR

- Two vehicular access points, with the primary access onto Wolvey Road. Potential connections to be provided to Long Street via Milner Close. Potential vehicular and pedestrian access further east on Wolvey Road (subject to further detailed investigation). Improved pedestrian/cycle links on Wolvey Road.
- 6 Enhanced links to the village centre via the public highway and existing public footpaths.
- 7 Enhanced links from the village centre to new parkland area in the north of the site.
- Provision of links to existing public footpaths to the west (where possible) to create a circular walking experience where existing footpath does not connect (possibly due to Gamecock Barracks).





4.3 DISTINCTIVE

Four Five

LANDSCAPE/ MEMORABLE HEALTHY
CONTEXT LED CHARACTER DEFINED
STREETS

- Development focused in lower lying land adjacent to existing built form around a village green space of formal character with play provision.
- Use of perimeter blocks structure backing onto existing properties within longer than standard garden or where required a small woodland block.
- A hierarchy of well defined street spaces with the provision of street trees where possible to define character and enhance the micro-climate of the development.
- Broad green active travel corridors not only encourage active movement but also break up the development in views from the existing dwellings.
- Dwellings facing outward overlooking parkland/sports/ grow zones to provide views out, definition and natural surveillance. Edges of development broken with new woodland planting blocks and a lower density development of edge character, local styles and materials.



21

THE STATE OF THE S NTS 🕀 FIGURE 8 - SUSTAINABLE

4.4 SUSTAINABLE

SPORTS, PLAY

Eight BIODIVERSITY INSPIRED

Nine CLIMATE RESILIEN

- Provision of new formal sports facilities, grow zones and parkland for use by new and existing residents
- Where possible, restore hedgerow pattern through planting new hedgerows where hedgerows are fragmented
- Consider the characteristic small-scale field pattern close to the edge of settlements including mature hedgerows and trees to soften built form appearance in the landscape
- 17 Blue infrastructure to be accommodated in naturalised wetland meadow area with enhanced riparian tree planting including a mosaic of riparian wetland meadow, trees and woodland and allow natural regeneration to create variety either side of the stream. Network of swales lead through the development to the wetland area following the natura fall of the topography.
- Enhance woodland through planting short linear belts following hedge lines or streams using appropriate local species including oak, field maple and alder.

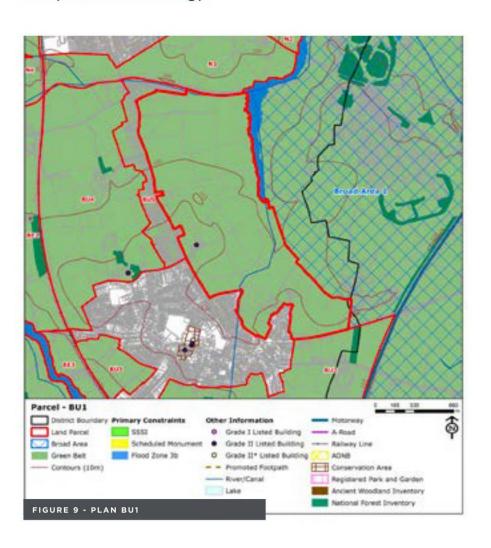


Section 5

CONCLUSIONS

5.1 GREEN BELT

The NPPF sets out the five purposes of the Green Belt at paragraph 138 and the 2015 Joint Green Belt Study considers the performance of large Green Belt parcels with the site located towards the southern extent of parcel BU1. This parcel scores 12 /20 and therefore performs moderately in respect of Green Belt purposes, however, when the position of the proposed site within this wider parcel is taken into consideration, its performance in respect of Green Belt purposes weakens, and the ability to mitigate its impacts increase. We set out below a summary of issues relating to Green belt Purposes 1–3 (4 and 5 not being applicable) as well as an overview of the Green Belt compensation strategy.

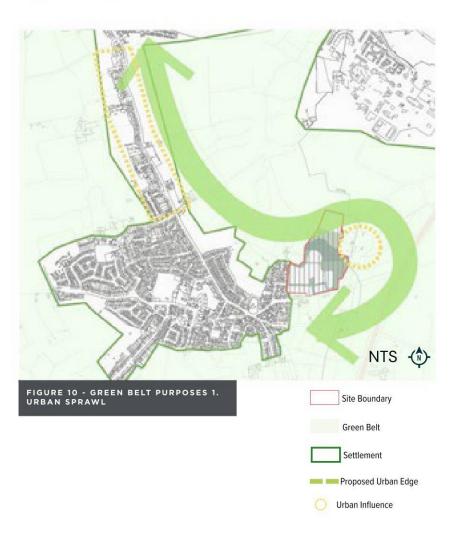


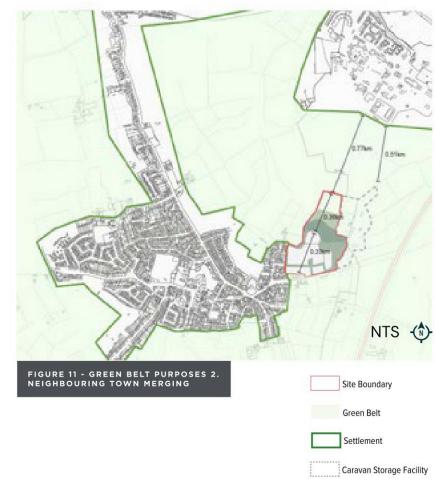
GB PURPOSE 1 – URBAN SPRAWL

Whilst the site is located adjacent to Wolvey Road, some ribbon development exists in this location and an existing caravan storage / park creates a significant urban influence on the eastern part of parcel BU1. In combination with the extensive area of green infrastructure enclosing the proposed development area, the impact of urban sprawl is significantly reduced.

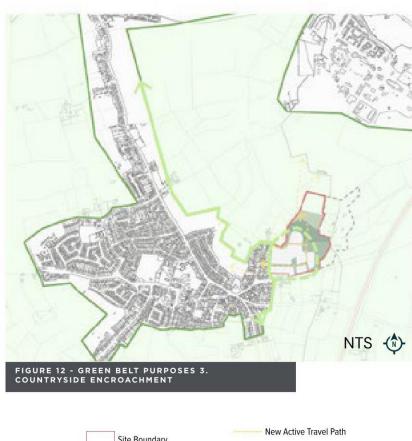
GB PURPOSE 2 - NEIGHBOURING TOWNS MERGING

Whilst this parcel sits in a gap between Bulkington and Nuneaton, the site is located to the immediate east of Bulkington, and the sensitive positioning of development to the southern part of the site has no notable impact on the performance of this gap.





GB PURPOSE 3 - COUNTRYSIDE ENCROACHMENT

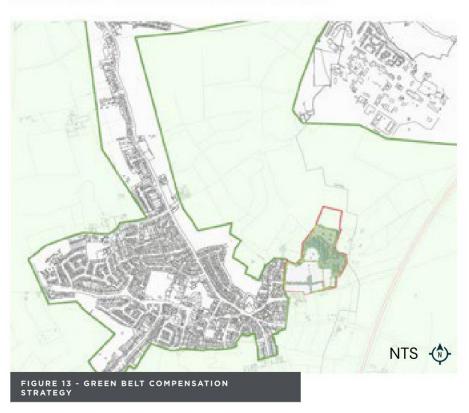




Development will encroach into this parcel of land, however it has no public access and immediately abuts the existing urban edge of Bulkington and extends to an existing substantial caravan storage / park.

Moreover, the site proposals establish a significant area of naturalistic parkland whilst creating new public footpath routes and stitching together the existing routes to a more integrated solution, thereby enabling greatly increased access to the countryside for existing and new residents.

GREEN BELT COMPENSATION STRATEGY.



In accordance with National Planning Practice Guidance, the emerging vision for the site embeds a number of compensatory improvements that mitigate Green Belt impacts, these include:

- ~ 8.5hectares of new green infrastructure (44% of the site area)
- significant areas of new woodland planting, aligned with local landscape character guidance
- increased landscape and visual quality due to these green infrastructure benefits
- significantly enhanced biodiversity net gain, habitat connectivity and natural capital diversity
- 2300 metres of new public footpaths, with off site connectivity benefits
- provision of notable new public open space, providing sports and recreational benefits to existing and future residents.

5.2 CONCLUSIONS

The high level vision for the site brings together the nine Principles representing Building a Healthy Life to create a framework with which to begin working with local stakeholders and communities in order to deliver an exemplary 21st century scheme.

It delivers a neighbourhood focused around green spaces with attractive and diverse green corridors, spaces and movement routes, encouraging sustainable patterns of living and healthy fulfilled active lifestyles.

The site benefits from its close functional relationship with the village centre and village wide facilities and amenities, and focuses on linking the site to the centre via modes of active healthy travel such as walking and cycling to support and encourage sustainable movement and establish the physical, social and environmental conditions new and future residents need to thrive.

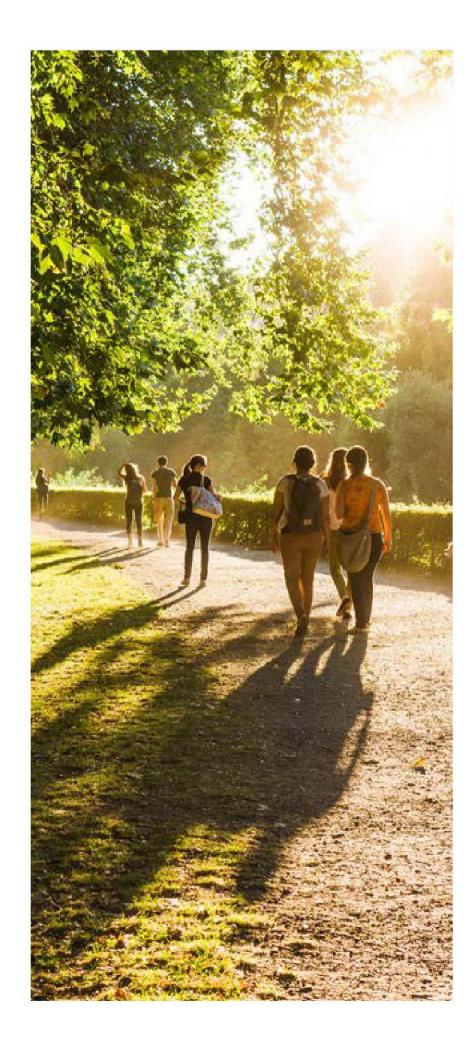
This vision document sets out high level principles that demonstrate that Bulkington Green can deliver close pedestrian and cyclist focused movement, that is unimpeded by its surrounding movement context and would promote sustainable movement and 'local living'. Furthermore, a landscapeled design approach, coupled with a focus on

reinforcing local built character will ensure that Bulkington Green does not further diminish or undermine the identity of the village.

The emerging conceptual framework demonstrates how the existing surface water flood zones can be redesigned to ensure a water sensitive urban design approach is taken.

It would provide useable green space to Bulkington whilst promoting a positive green and blue infrastructure concept that would deliver significant biodiversity gain, and new landscape features consistent with local character.

It would also enhance local footpaths, and realign them where necessary to facilitate a more connected and enhanced network of routes for existing and new residents and visitors.





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NUNEATON & BEDWORTH BOROUGH PLAN REVIEW

Publication Stage Representation

ON BEHALF OF

P HUGHES HOLDINGS LIMITED

LAND AT WOLVEY ROAD,
BULKINGTON

HAWKSMOOR PROPERTY SERVICES LIMITED
CHARTERED SURVEYORS

Suites 1 & 2, City Point Swan Road Lichfield

October 2023 www.hawksmoorps.co.uk

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Appendix 1: Vision Document

1. Introduction

1.1. These representations are submitted on behalf of P Hughes Holdings Limited who have land interests at land north of Wolvey Road, Bulkington as identified in figure 1 below.



- 1.2. This site parcel has not previously been submitted to the Council as part of the Borough Plan Review process and it is therefore the intention of this representation and the Vision Document to present background information on the site, its characteristics and credentials to deliver housing over the forthcoming plan period.
- 1.3. The site lies to the west of Bramcote Main Caravan Park to the east of Bulkington within walking distance to a vast array of services, amenities and facilities. Our Vision Document highlights that the site is inspired by the local landscape and provides the opportunity to create a new neighbourhood that is highly connected. It has the potential to function as an integral part of the village within a 10-minute walking and cycling distance of the village centre. The proposals will also provide a network of attractive green corridors and movement routes. The site's location is very much urbanised through adjacent residential development, main roads and Bramcote Mains which have a greater influence on this site than is characteristic of the wider character area.
- 1.4. Positively, in terms of heritage and biodiversity impact, the site is located over 4km from any SSSI, 1km from Church of St James (a Grade II* Listed Building). Together, the site's location less than 1km from a GP surgery, play areas, a primary school, bus connections and the built-up centre of the town, make a strong case for a sustainable and appropriate development of up to 300 homes.
- 1.5. The Accessibility and Settlement Hierarchy Study 2023 categorises Bulkington as a sustainable settlement which is "close enough to be classed as within a suitable and sustainable distance

of Nuneaton and Bedworth". The clear inference is that the services and facilities here are very accessible to current and future Bulkington residents.

2. Development Strategy

- 2.1. The aim of Nuneaton and Bedworth Borough being a place where businesses want to invest and people want to live, work and visit is fully supported.
- 2.2. Paragraph 6.7 (within the descriptive sections of Policy DS2) states that the main spatial areas of Nuneaton, Bedworth, Bulkington and the northern Coventry fringe are the most sustainable locations for growth. The locations for growth enable them to connect to, and utilise, the existing infrastructure in these areas.
- 2.3. Objection is raised to the overarching development strategy's reliance on a limited number of large and medium sized site allocations at Nuneaton and Bedworth to deliver the new homes required for the Borough. Indeed, the proposed allocation known as SHA2 which was previously allocated in the Borough Plan adopted in 2019 has still not come forward by way of a planning application. Infrastructure delivery and the complexity of the proposed planning application raises the prospect of further delays to delivery.
- 2.4. As parts of the technical evidence base and indeed the Borough Plan Review, state Bulkington is close enough to Nuneaton and Bedworth to access its facilities and services and has its own vast array of amenities, services and facilities (including shops, schools, allotments and recreation areas) to accommodate additional housing. This site would be extremely capable of early delivery in a highly sustainable location. The Borough Plan Review should be based on a strategy which delivers a sufficient supply and mix of deliverable sites to meet the requirement of years 1 to 5 of the plan, and sites or areas for years 6-10.
- 2.5. It is recommended that the Council produce and prepare a Spatial Distribution Statement which provides a rationale for the new housing proposed and a justification as to why a greater or smaller number is not proposed for Bulkington and other settlements. Policies DS1 to DS5 put forward an unsustainable growth strategy for the Borough, which fails to have regard to the evidence base, and which fails to follow through on the recognition of the settlement hierarchy, notably, at Bulkington for which the updated Borough Plan Review proposes to deallocate 'East of Bulkington (HSG7)'. It is set out in the March 2023 New Green Belt Technical Report that 'the site' was removed due to the lack of delivery and potential viability issues. However, outline planning permission was granted in October 2023, though questions may remain as to the site's deliverability credentials. There is a concern as to whether housing requirements will continue to be met over the plan period and as to whether alternative greenfield sites in Bulkington were properly assessed and whether proactive contact was made with all potentially suitable landowners to assess the availability of all greenfield land parcels.

3. Green Belt

- 3.1. The March 2023 New Green Belt Technical Report was produced to build on the findings of the Joint Green Belt Study (June 2015) and to review the likelihood of establishing the necessary exceptional circumstances to designate two sites (a combined allocation) as new Green Belt allocations. It was ultimately determined within the Inspector's Report on the Borough Plan (9 April 2019) that the site now known through the Borough Plan Review as HSG7 scored moderately well against Green Belt purposes and that the necessary exceptional circumstances to alter the Green Belt boundary existed.
- 3.2. Our site proposal, the land, which is now the subject of these representations, is also within the wider parcel BU1 from the Joint Green Belt Study and scores moderately well against Green Belt purposes. Set against the green belt purposes test, it is evident from our Vision Document (see appendix 1) that any proposed development at this site will not affect the separation between Bulkington and the Barracks/Bramcote. Our vision document highlights how the site can be developed sustainably to not act as unrestricted sprawl of the settlement, how it will not merge neighbouring towns into one another and how it can be master planned sensitively to safeguard the countryside from encroachment and preserve the setting and special character of historic towns.
- 3.3. The alternative approach of the Council in the Borough Plan Review is to allocate more land in the urban areas of Nuneaton and Bedworth. A key principle of being deliverable, as set out in the NPPF, is that the sites must be available now. It is therefore critical that the Council assess the brownfield sites with the same scrutiny to ensure they have factored in relevant information about site viability, ownership constraints or infrastructure provision requirements for these newly allocated sites.
- 3.4. It is recommended that the Council commit to a more site-specific Green Belt review (for its future Local Plans) within the proposed Borough Plan Review given the Borough's significant relationship with the green belt and its aspirations for sustainable growth of the wider area.

4. Housing Requirements

- 4.1. Nuneaton and Bedworth Borough will make provision for 9,810 dwellings between 2021 and 2039. What is not accounted for by this Borough Plan Review, is a clear mechanism by which under delivery is addressed. One option for the Council is to allocate reserve sites when monitoring indicators and policy parameters are not being met. This would enable the Plan to contain sufficient safeguards to maintain the required delivery of homes.
- 4.2. "Lichfield Start to Finish" 2nd Edition (February 2020) discusses the realism of housing trajectory assumptions and highlights some key areas of consideration. These are that large schemes can take 5+ years and that Local Plans are likely to also require a good mix of smaller sites. The Council should therefore be ensuring that the housing needs are met at a consistent

- rate throughout the Borough Plan Review. Local plans should also reflect that where viable higher rates of affordable housing support greater rates of delivery.
- 4.3. Paragraph 35 of the NPPF states that a Local Plan should be positively prepared and provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. There is a significant opportunity for the Borough to capitalise on its strategic location and the growth potential of the Borough. The "Towards a Housing Requirement" Final Report (November 2022) provides commentary that the Borough is close to substantial employment growth areas with Coventry expected to see the strongest absolute jobs growth in the HMA. It is therefore our assertion that the Borough have missed an opportunity to go over and above the numbers needed to meet population and demographic projections and be more ambitious in the creation of this Borough Plan Review. Furthermore, the issue of unmet need should be addressed now rather than deferred as set out in policy DS9.
- 4.4. With regard to the provision of housing for older people, the emerging housing strategy is silent on the role that settlements such as Bulkington may play in meeting that specific tenure. NPPF para 62 makes clear that the housing needs of older people are to be specifically addressed in planning policies. The Council's spatial strategy should reflect this, and modifications are recommended. Furthermore, the lack of sites allocated for self and custom build is also a missed opportunity within the Plan.

5. Duty to Cooperate

- 5.1. The Plan as drafted has yet to comply with the requirements of the Duty to Cooperate and therefore could not be considered sound. It is noted that paragraph 1.11 in the Borough Plan Review has a brief, limited section on the Duty to Cooperate which does not address how this engagement will occur, or how the legal requirement for the Duty to Cooperate will be taken forward.
- 5.2. A Duty to Cooperate Statement should be published before the Borough Plan Review is examined which credibly identifies green belt considerations, housing, employment, infrastructure, protected sites, commercial/retail/leisure development and heritage as matters of strategic/cross boundary significance. More detail should be provided on which parties have been engaging, the management and working arrangements and proposed ongoing co-operation.
- 5.3. This would also be in line Paragraph 35 of the NPPF which makes it clear that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

6. Conclusions

- 6.1. These representations and the Vision Document highlight through technical analysis how this site has the potential to accommodate medium to large scale development of up to 300 homes and associated infrastructure. The site proposals deliver a neighbourhood focused on a thriving village centre linked by attractive and diverse green corridors, spaces and movement routes, the delivery of biodiversity enhancements, encouraging sustainable patterns of living and healthy fulfilled active lifestyles.
- 6.2. The development strategy fails to recognise Bulkington's sustainability as a settlement to accommodate additional and much required market and affordable homes. The site would not rely upon the delivery of any major infrastructure to be considered a sustainable and suitable location for new development. The landscape led design approach, coupled with the existing landscape and visual qualities of the local area, will ensure that our proposals do not further diminish or undermine the identity of the village.
- 6.3. It is clear that Bulkington is a sustainable location that is well connected and associated to Nuneaton and Bedworth's service and facilities. Our site is in a very sensible location for growth and is available now to help the very nearby local services, amenities, businesses and shops through the additional population which would also help enhance the vitality of the town.
- 6.4. Paragraph 69 of the NPPF states that medium sized sites such as the 'Land at Wolvey Road' can make an important contribution to meeting the housing requirement of an area. Hawksmoor, the project team and our landowner are very much ready to engage with the Council to confirm its suitability, availability and deliverability credentials for a full strategic housing allocation or reserve strategic housing allocation now.

