

Anca Seaton

From: Jonathan Adams <[REDACTED]>
Sent: 16 October 2023 14:33
To: Planning Policy
Subject: Nuneaton and Bedworth Borough Plan Review Publication Draft Plan - Regulation 19 consultation - Land south of former Hawkesbury Golf Course
Attachments: 0912-01.M23 Land south HGC rep 16.10.23.pdf
Categories: WIP

Dear Sir/Madam

Thank you for the opportunity to respond to the Nuneaton and Bedworth Borough Plan Review Publication Draft Plan - Regulation 19 consultation.

Please find attached a representation by Tetlow King Planning on behalf of **Terra Strategic** in relation to its land interests at **land south of former Hawkesbury Golf Course**.

Please confirm receipt.

Best regards,

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 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Review Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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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
First name		Jonathan
Last name		Adams
Job title (where relevant)		Senior Director
Organisation (where relevant)	Terra Strategic	Tetlow King Planning
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Postcode		BS16 5EL
Telephone number		
Email address (where relevant)		



**Nuneaton and Bedworth Borough Council
Planning Policy**

Date: 16 October 2023

Our Ref: JA M23/0912-01

**By email only:
planning.policy@nuneatonandbedworth.gov.uk**

Dear Sir/Madam

**RE: NUNEATON AND BEDWORTH BOROUGH PLAN REVIEW PUBLICATION DRAFT PLAN –
REGULATION 19 CONSULTATION**

LAND SOUTH OF FORMER HAWKESBURY GOLF COURSE

Thank you for the opportunity to respond to the Nuneaton and Bedworth Borough Plan Review Publication Draft Plan - Regulation 19 consultation. **Tetlow King Planning** (TKP) is responding on behalf of **Terra Strategic** in relation to its land interests at **land south of former Hawkesbury Golf Course**.

This representation supplements our previous representations to Nuneaton and Bedworth Borough Council (NBBC) dated 21 July 2022 on the Borough Plan Review – Preferred Options consultation, and 6 August 2021 on the Borough Plan Review – Issues and Options consultation. TKP also submitted a response dated 22 October 2021 to NBBC's call for sites promoting the land for development.

Terra Strategic is a well-regarded residential and strategic land specialist with a proven record of successfully promoting and securing permission for many strategic sites working in partnership with local authorities. TKP is a leading town planning consultancy with a long presence in the West Midlands.

We welcome the opportunity to participate in the consultation and recognise that the preparation of the Publication Draft Plan is an important stage in production of the Borough Plan Review. TKP's comments on the Publication Draft Plan are provided below.

6.0 DEVELOPMENT STRATEGY

Options for the Location of New Residential Uses

Paragraph 7.12 of the previous Preferred Options consultation document states: *“Question 7 of the Issues and Options stage provided three choices to consider. The majority of people considered that option 1 was preferable, that new residential uses were prioritised within the existing urban areas, followed by land designated as countryside and only then would Green Belt be considered. The sustainability appraisal also considered that option 1 was the most positive overall. This approach is considered most consistent with national Policy and is the approach being used to consider the sites brought forward in the last ‘call for sites.’”*

Nuneaton and Bedworth Borough is heavily constrained by Green Belt. The adopted Borough Plan necessitated the need to release an extensive amount of Green Belt land in order to meet housing and economic needs. Indeed, nine out of 12 of the Strategic Housing Allocations in the adopted Borough Plan are sites that were previously located in the Green Belt. The Inspector to the adopted Borough

Plan recognised that exceptional circumstances existed to alter the Borough's Green Belt and that its release was necessary to secure the most sustainable pattern of development and it had a role in meeting Coventry's unmet needs.

Nuneaton and Bedworth is not a Borough with a multitude of brownfield land available to develop. Therefore, alternative sites, greenfield or Green Belt need to be considered. In fact, non-Green Belt greenfield sites are in short supply, limited to a few locations north of Nuneaton, of which adopted Strategic Housing Allocation HSG1 forms a significant part and land to the west of Bedworth adjacent to Strategic Housing Allocation HSG4 Woodlands (which is now proposed to be deallocated in the Publication Draft Plan). This point is acknowledged by NBBC in the Issues and Options consultation document at paragraph 6.6.

Accordingly, we object to the development strategy in the Publication Draft Plan because it is ineffective and unjustified.

We remain of the opinion that option 1 is not a feasible strategy as there were not enough sites to fulfil the housing requirement of the adopted Borough Plan and the situation has not changed in the four years since the Borough Plan was adopted.

It was inevitable that Green Belt sites were required to be released to meet the housing requirement of the adopted Borough Plan. The release of Green Belt sites is still unavoidable to enable the Borough to meet its future housing needs. Our comments on draft Policy DS3 'Overall development needs' and draft Policy DS4 'Residential allocations' expand on this.

As was the approach to the adopted Borough Plan, the focus needs to be on delivering new homes in the most sustainable locations and therefore the Sustainability Appraisal is a key tool in determining a revised spatial strategy.

The Draft Sustainability Appraisal states: *"The Council consider it unnecessary to continue exploring the potential for Green Belt release to deliver housing growth. There are sufficient sites within the urban area and the countryside that are not Green Belt and these would well exceed identified housing needs for the Borough. Even in the event that needs may increase in response to changes in evidence or cross boundary issues, it is still considered that there are sufficient non-green belt sites to explore first."*

It is imperative that sites in the most sustainable locations are allocated for development and it is inevitable that some of these sites will be located in the Green Belt, given it restricts the Borough's growth so tightly. This is the same approach that was taken to the adopted Borough Plan and it was endorsed as a sound spatial strategy by the Inspector of the adopted Borough Plan.

It is important that the Joint Green Belt Study and the Landscape Capacity Study are reviewed and updated, to reflect the existing allocations and recent Green Belt releases, and form the evidence base to identify future growth options opposed to only considering a limit number of sites.

The Inspector who examined the adopted Borough Plan was critical of NBBC that the sustainability appraisal only considered the sites that were included in the Publication Draft Plan and it failed to appraise alternative sites. We object to the latest Sustainability Appraisal because it fails to consider alternative sites including the allocated sites in the adopted Borough Plan that are now proposed to be deallocated and alternative sustainable sites that perform poorly in the Green Belt including land south of Hawkesbury Golf Course. **Consequently, the development strategy is unsound because it is unjustified. The Council's development strategy is unsupported by evidence.**

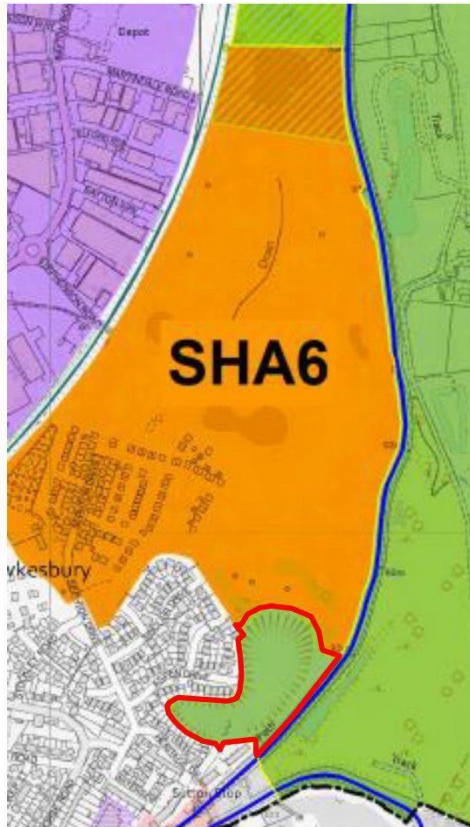
Land South of Former Hawkesbury Golf Course

Terra Strategic has land interests at land to the south of Strategic Housing Allocation HSG12 former Hawkesbury Golf Course in the adopted Borough Plan (draft SHA6 Strategic Housing Allocation in the current Publication Draft Plan).

Policies DS5 and HSG12 allocate the adopted Strategic Housing Allocation site for at least 380 dwellings. Planning permission has been granted for all 380 dwellings through full and outline planning applications.

A location plan is enclosed. Figure 1 below shows the land south of former Hawkesbury Golf Course edged red. The land is coloured green (Green Belt) and the former golf course to the north is identified as SHA6 (Strategic Housing Allocation) where permission has been granted for 380 dwellings. Coventry Canal forms the east boundary.

Figure 1 - Site Context



Source: Publication Draft Plan

The site is approximately 2.2 hectares. To complement housing at the former Hawkesbury Golf Course this site to the south is available and suitable to deliver C2 use development.

In our response to the Council's Borough Plan Review – Issues and Options consultation, we noted that the Local Community issues (Page 5 of the Council's consultation document) recognised the needs of the elderly in the 4th point:

“There is a need to cater for an increasing number of young people and older people living on their own. There is a particular need for housing options to enable older people to live independently.”

This point is supported by paragraph 8.10 on page 103 of the Publication Draft Plan, which states:

“It is important to provide appropriate local housing options for an increasingly older population who may have poor health. Maintaining independence and giving people the choice to remain in their own homes is a national and local aim. Many will want to remain in their existing homes, but others may want to downsize to general market housing, or to use supported specialist housing such as sheltered housing, extra care housing or residential care.”

Paragraph 62 of the NPPF recognises the need to address the housing needs of different community groups including older people.

Therefore, more sites including land south of Hawkesbury Golf Course should be allocated to meet specialist housing needs such as for the elderly.

Strategic Policy DS3 – Overall Development Needs

Plan Period 2021 - 2039

A key part of the Borough Plan Review is to review the housing requirement and adjust the Borough Plan period. The adopted Borough Plan has a period of 2011-2031 and therefore at adoption it had only 12 years remaining and not the 15 years required by the NPPF. Nevertheless, the Inspector was satisfied with the Borough Plan period as it aligned with Coventry and Warwickshire authorities in the same Housing Market Area (HMA) where it relied on the same evidence base.

The Publication Draft Plan covers the Plan period 2021 to 2039. Previously the Preferred Options consultation document covered a Plan period of 2024 to 2039. **We object to the Plan period starting in 2021 and consequently, the plan is unsound because it is unjustified.**

Duty to Cooperate (Paragraph 1.11, Section 6.0)

It is important that the Borough continues to meet the unmet needs of Coventry under the duty to cooperate arrangements. Table 2 on page 19 of the Publication Draft Plan sets out that the new standard method annual requirement (2014 household projections with March 2023 affordability ratios) for Coventry results in a housing requirement figure of 3,247 dwellings per annum compared to 1,964 identified in the 2022 sub-regional HEDNA.

Paragraph 7.24 on page 30 of the previous Preferred Options document states: “... Where any authority in the housing market area is able to demonstrate that they are unable to meet their housing or employment land requirement figure and can quantify the unmet need, the Council will co-operate with such authorities in order to fulfil its obligations under the Duty to Co-operate. Key considerations forming the basis of such discussions will be the availability of land, the level to which the land is constrained, the capacity of infrastructure serving the area and other issues such as the scope for potential market saturation.”

Furthermore paragraph 7.52 of the Preferred Options document explained the circumstances in the preparation of the adopted Borough Plan which justified the release of Green Belt land in order to accommodate Coventry’s unmet need. More recently, the HEDNA (2022, page 38) identifies the likelihood of a persisting unmet need in Coventry:

“In addition to the need identified, it will be important as the plan-making process progresses for the Borough to engage through the Duty to Cooperate with adjoining areas to consider any issues of unmet housing need. Through the last round of local plans, an unmet need was identified from Coventry. Whilst there is uncertainty regarding the City’s demographics, there is a reasonable prospect that an unmet need will again arise; and given the strong functional relationship between Nuneaton and Bedworth and Coventry, this may be an important consideration in considering overall housing provision within the Borough Plan Review.”

The duty to accommodate Coventry’s unmet need is recognised by draft Strategic Policy DS3 which sets out a housing requirement of 9,810 homes based on 545 dwellings per annum. This is explained within the evidence base document ‘Towards a Housing Requirement for Nuneaton & Bedworth’ (2022, paragraph 4.37, page 29):

“The additional housing provision over and above the Borough’s local housing need figure of 409 dpa would provide ‘headroom’ to contribute to unmet needs arising from other areas in a context in which the additional jobs growth envisaged herein would still be accommodated within the overall housing need identified in the sub-regional HEDNA. This as a contribution to meeting unmet need from other areas would support workforce growth within the Borough and could therefore contribute to and support the Borough’s economic growth.”

Coventry is in the early stages of a Local Plan Review and is yet to finalise its housing requirement for the new Plan period, but it is inevitable that Coventry will continue to need the support of NBBC and neighbouring Warwickshire authorities to help meet its unmet housing needs, as it did previously and was included in the adopted Borough Plan housing requirement.

As such, the housing requirement of NBBC should be reviewed in line with the housing requirements of the Coventry Local Plan once it has progressed. For this reason the plan is unsound as it is unjustified.

Housing Land Requirement

Draft Strategic Policy DS3 'Overall development needs' states that the following level of housing development will be planned for and provided within the Borough between the Plan period 2021 and 2039: "9,810 homes based on 545 dwellings per annum."

This housing requirement is a significant reduction to the Borough Plan housing requirement of 14,060 homes for the period 2011-2031 (703 dwellings per annum). This is despite the Borough Plan and housing requirement being adopted only four years ago.

Whilst it is appreciated that the housing requirement set out in Policy DS3 has attempted to factor in the unmet housing needs of Coventry, Coventry City Council is still considering the potential of accommodating its housing needs through a Local Plan Review. Therefore the capacity of Coventry and the subsequent quantity of unmet need that will need to be accounted for across the HMA remains largely unknown.

NBBC should take a proactive approach to planning to address the unmet housing need that Coventry is likely to declare and take a realistic position on the likely 'exceptional circumstances' that will warrant an updated Green Belt review. Considering Coventry's latest housing need position, it is possible that similar circumstances persist that warranted the release of Green Belt land for the Borough Plan (2019), as acknowledged by paragraph 7.52 of the Publication Draft Plan:

*"For the adopted Borough Plan (2019), Green Belt release was considered necessary to meet the overall housing and employment needs determined at the time. The objectively assessed need for the Borough, which was informed by demographic based need, supporting economic growth, improving affordability, and accommodating overspill from Coventry's unmet need, delivered an average housing need figure of 735 dwellings per annum. **Based on the limited capacity/few approved planning applications available and the need to deliver a sustainable development strategy for the Borough with the Coventry overspill, the Inspector considered that there were exceptional circumstances to justify Green Belt release at the time.**" (Emphasis added).*

Land south of Hawkesbury Golf Course is well placed to contribute positively to addressing an increased level of housing need for the authority without having a negative impact on the integrity of the Green Belt (see our response to Strategic Policy DS6 – Green Belt).

Strategic Policy DS4 – Residential Allocations

Evidence Base (Paragraph 6.58)

To ensure that the Borough Plan Review is robust and can withstand thorough scrutiny by the Inspector, it is imperative that the new evidence base is commissioned, otherwise the Borough Plan Review serves no purpose.

Green Belt Review

Joint Green Belt studies for Nuneaton and Bedworth Borough (and Coventry and the Warwickshire authorities) in 2009 (P1.1-2) and 2015 (LUC, P2.1-10) formed an integral part of the evidence base for the adopted Borough Plan. However, the urbanised context of these sites has changed which has implications for the purpose of the Green Belt test. For example the former Hawkesbury Golf Course is now removed from the Green Belt (HSG12 / draft SHA6) yet land to the south of former Hawkesbury Golf Course remains in the Green Belt despite being surrounded by the allocation and development.

Whilst it is acknowledged that NBBC has commissioned and published a New Green Belt Technical Report (Arup 2023) this report does not consider the performance of all Green Belt land in relation to the five purposes set out within the NPPF. Instead, it only explores whether two deallocated sites (HSG4 and HSG7) should be designated as Green Belt. As already noted elsewhere in this letter, Nuneaton

and Bedworth Borough is heavily constrained by Green Belt and non-Green Belt greenfield sites are in short supply. Considering the deallocations set out above NBBC should be seeking to release further sites from the Green Belt to aid in housing delivery in the most sustainable locations.

It is essential that the Joint Green Belt Study (LUC 2015) is updated as part of the review of NBBC's evidence, especially as several of the sites in the study are no longer in the Green Belt and have been allocated for housing. **The Plan is unsound because the development strategy is unsupported by evidence and is ineffective and unjustified.**

More justification for a Green Belt Review is discussed below in relation to Strategic Policy DS6 – Green Belt.

Deletion of Existing Allocated Sites in Strategic Policy DS4

As the Borough Plan was only adopted four years ago, the existing allocated sites should be up to date and provide a realistic development strategy for the Borough in the coming years of the Plan period.

The Borough Plan identified 12 Strategic Housing Allocations for development and many of them required Green Belt release. The allocation sites were fully scrutinised by a Planning Inspector at the Borough Plan examination. It is therefore not surprising, given only four years have passed since the Borough Plan was adopted, that some of the Strategic Housing Allocations do not yet have detailed planning permission. They are large strategic sites that will take time to deliver. It is of course prudent to review the existing allocations as part of an overall review of sites in the Borough as a whole but the deletion of Strategic Housing Allocations cannot be justified given the Borough's ever pressing housing needs.

It seems appropriate that Strategic Housing Allocations are reviewed in light of their capacity to deliver new homes (i.e. reviewing densities) but any suggestion that the Strategic Housing Allocations are not deliverable (NPPF definition) seems unwarranted given their recent scrutiny by the Borough Plan Inspector.

The New Green Belt Technical Report explains that the deallocation of sites *"is primarily due to the lack of delivery and potential viability issues relating to these sites."* Despite this, NBBC has not published clear justification for deleting Strategic Housing Allocations or reducing the number of homes at a Strategic Housing Allocation on the basis that some of those homes have been granted planning permission. The allocation of a site lasts for the duration of the Borough Plan period 15 years. In contrast planning permission only lasts for three years and future application proposals might be necessary that should be able to rely on the site's allocation.

Strategic Policy DS6 – Green Belt

Joint Green Belt studies for Nuneaton and Bedworth, Borough (and Coventry and the Warwickshire authorities) in 2009 (P1.1-2) and 2015 (P2.1-10) supported the adopted Borough Plan. Both Green Belt studies conclude that the former Hawkesbury Golf Course site (including the land identified on the enclosed location plan as land south of Hawkesbury Golf Course) performs the least purposes of the Green Belt in the entire Nuneaton and Bedworth Borough and it is the prime candidate for development in the event that the Green Belt is needed to accommodate housing needs.

The Green Belt Study 2015 (paragraph 5.8) recommends that the lowest performing parcels of Green Belt could be considered for removal from the Green Belt. These include BE4 Former Hawkesbury Golf Course, including land south of Hawkesbury Golf Course.

Figure 2 summarises the findings of the Joint Green Belt Study 2015, and highlights that the former Hawkesbury Golf Course site was ranked joint 2nd out of all the Green Belt sites allocated in the adopted Borough Plan.

Figure 2 - Summary of findings of Green Belt Study 2015

Borough Plan Site Ref.	2015 GB Study		2015 GB Study recommends sites for release
	Score	Rank	
HSG12 (SHA6) Former Hawkesbury Golf Course	9	Joint 2 nd	Yes
HSG2: Arbury	10	3 rd	No
HSG3: Gipsy Lane	13	Joint 6 th	No
HSG5: Hospital Lane	13	Joint 6 th	No
HSG6: School Lane	6	Joint 1 st	Yes
HSG7: East of Bulkington	12	5 th	No
HSG8: West of Bulkington	13	Joint 6 th	No
HSG9: Land at Golf Drive	11	Joint 4 th	No
EMP2: Phoenix Way/Wilsons Lane	6	Joint 1 st	Yes
NUN181: Stockley Road	9	Joint 2 nd	Yes
NUN286/317: Burbages Lane	11	Joint 4 th	No

The very limited contribution that the Green Belt Study 2015 attached to Parcel BE4 towards the purposes of the Green Belt has since been reduced significantly by the allocation of HSG12 (draft SHA6) in the adopted Borough Plan and the grant of planning permissions across the entire allocation for 380 dwellings, which are now under construction.

Paragraph 137 of the NPPF states: *“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

Paragraph 138 adds:

“Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

The land south of former Hawkesbury Golf Course does not perform any of the purposes for the Green Belt for the following reasons:

Purposes a, b, c – The land south of former Hawkesbury Golf Course is surrounded by development that is outside of the Green Belt – to the north by adopted Strategic Housing Allocation HSG12 (SHA6 in the current Publication Draft Plan); to the south by dwellings off Sephton Drive; to the west by Bayton Road Industrial Estate; and bordered to the east by Coventry Canal.

Purpose d – The development (built and under construction) that surrounds the land south of former Hawkesbury Golf Course is not of historic value. Coventry Canal that runs along the east boundary already fronts development in this location and development of the land south of former Hawkesbury Golf Course will not harm its setting.

Purpose e – The site was previously used for mining and then landfill.

It is very clear that the land south of former Hawksbury Golf Course serves none of the purposes of the Green Belt.

Paragraph 143 of the NPPF provides advice to local planning authorities on the defining of Green Belt boundaries. Paragraph 143 states:

“When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) **not include land which it is unnecessary to keep permanently open;***
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) **define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”** (Emphasis added)*

The land south of former Hawksbury Golf Course should not be retained in the Green Belt because it is unnecessary to keep the land permanently open (paragraph 143b). As explained above, the land is surrounded by development that is outside of the Green Belt – to the north by adopted Strategic Housing Allocation HSG12 (SHA6 in the current Publication Draft Plan); to the south by dwellings off Sephton Drive; to the west by Bayton Road Industrial Estate; and bordered to the east by Coventry Canal.

In accordance with paragraph 143f, the land should be removed from the Green Belt because it is bounded on all sides by built/permitted development. Coventry Canal along the east boundary is a physical feature that is readily recognisable and permanent.

In removing the Strategic Housing Allocation HSG12 (SHA6 in the current Publication Draft Plan) from the Green Belt in the adopted Borough Plan, NBBC should have also removed the land south of Hawksbury Golf Course from the Green Belt. It is clear that the land serves none of the purposes of the Green Belt (NPPF paragraph 138) and that it should have been removed from the Green Belt in accordance with paragraph 143 of the NPPF.

NBBC should address this anomaly of the land remaining in the Green Belt through a Green Belt Review, which would replace the now out of date Joint Green Belt Study (LUC 2015). Other local authorities have prepared a Green Belt Review to rectify anomalies in the Green Belt boundary (for example, the Mole Valley Green Belt Review, January 2020 ([GBBR_2020b.pdf \(molevalley.gov.uk\)](#))).

At present the Council’s approach to Green Belt boundaries is not ‘Consistent with national policy’ and is not ‘Justified’ as it is not based off proportionate evidence, such an approach is therefore unsound.

8.0 HOUSING

Strategic Policy H1 – Range and Mix of Housing

Land South of Former Hawkesbury Golf Course

In our above response to the development strategy, we explain that Terra Strategic has land interests at land to the south of Strategic Housing Allocation HSG12 former Hawkesbury Golf Course (SHA6 in the Publication Draft Plan). The site is approximately 2.2 hectares. This site can deliver a C2 use development. It is evident that none of the existing adopted Borough Plan or Borough Plan Review allocations are required to make provision for C2 residential care development.

More sites including land south of Hawkesbury Golf Course should be allocated to meet specialist housing needs such as for the elderly. **Strategic Policy H1 is unsound because it is insufficiently supportive of housing for older people.**

Policy H4 – Nationally Described Space Standards Space Standards

Draft Policy H4 states “All residential dwellings should comply with the NDSS including any dwelling which does not fall within a C3 use class; for example, extra care accommodation, assisted living housing or houses in multiple occupation; or from change of use or conversion.”

A blanket application of NDSS across all residential development could undermine the viability of many development schemes. This will potentially result in fewer homes being delivered as optional technical standards have implications for build costs and sales values, with implications in turn for development viability.

It is possible that many eligible households in Nuneaton and Bedworth may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs. We recommend that meeting the NDSS is not made mandatory unless it can be demonstrated that there is a clear need for such a standard in dwellings in Nuneaton and Bedworth.

Draft Policy H4 is unsound because it is ineffective and unjustified.

13.0 Built Environment

Strategic Policy BE3 – Sustainable design and construction

Carbon Neutrality

NBBC has pledged to provide direction to enable the Borough to become carbon neutral by 2050.

Terra Strategic recognises the critical role developers play in ensuring that residents have safe, secure and efficient homes that are future proof across their developments. Promoting sustainable development is the core objective of the plan-led system and it is important that all new developments continue to support this aim.

However, we ask NBBC to be wary of the way that such policies could impact development viability which may restrict the provision of much needed market and affordable housing across Nuneaton and Bedworth.

We would also like to remind NBBC that building requirements in the Borough should be reflective of Government requirements. As such the Council should not be seeking to introduce stringent building standards on issues already covered by adopted and emerging national Policy.

Terra Strategic and TKP support the preparation of the Borough Plan Review and welcomes the opportunity to comment on its preparation. We trust that you find this consultation response helpful, and we would like to be consulted on further stages of the above document and other publications by the Council.

Please notify TKP of any updates to the Borough Plan Review by email at [REDACTED]

Yours faithfully

[REDACTED]
JONATHAN ADAMS
SENIOR DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING

[REDACTED]
Encs.

Site location plan showing Terra Strategic land south of former Hawkesbury Golf Course edged red

