Anca Seaton

From: Jonathan Adams <

Sent: 16 October 2023 15:59

To: Planning Policy

Nuneaton and Bedworth Borough Plan Review Publication Draft Plan - Regulation Subject:

19 consultation - SHA6 land at former Hawkesbury Golf Course

1107-05.M22 Strategic Location SHA6 rep 16.10.23.pdf; Rep Form A 1107-05.M22 **Attachments:**

Strategic Location SHA6 rep 16.10.23.pdf

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 Tilia Homes in relation to its land interests at Strategic Housing Allocation SHA6 – land at former Hawkesbury Golf Course.

Please confirm receipt.

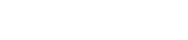
Best regards,

Jonathan Adams BA (Hons) BTP MRTPI **Senior Director TETLOW KING PLANNING**



Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol, BS16 5EL



















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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
First name		Jonathan
Last name		Adams
Job title (where relevant)		Senior Director
Organisation (where relevant)	Tilia Homes	Tetlow King Planning
House no. and		Unit 2 Eclipse Office Park,
street		High Street
Town		Bristol
Postcode		BS16 5EL
Telephone number		
Email address		
(where relevant)		<u> </u>





Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL

T: 0117 956 1916

E: all@tetlow-king.co.uk
W: www.tetlow-king.co.uk

Nuneaton and Bedworth Borough Council Planning Policy

Date:

16 October 2023

Our Ref:

f: JA M22/1107-05

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

Dear Sir/Madam

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

STRATEGIC POLICY SHA6 - STRATEGIC HOUSING ALLOCATION SHA6 - LAND AT 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 **Tilia Homes** in relation to its land interests at **land at former Hawkesbury Golf Course**.

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 in relation to Strategic Housing Allocation SHA6 – land at former Hawkesbury Golf Course are provided below.

STRATEGIC POLICY SHA6 - LAND AT FORMER HAWKESBURY GOLF COURSE

Planning background

Former Hawkesbury Golf Course strategic allocation

The former Hawkesbury Golf Course site is a strategic allocation in the Nuneaton and Bedworth Borough Plan, adopted July 2019. Policies DS5 and HSG12 allocate the site for at least 380 dwellings.

West part of Hawkesbury Golf Course strategic allocation

Following allocation of the site in the adopted Borough Plan, TKP submitted full planning application 036870 on behalf of Terra Strategic for the west part of the strategic allocation comprising 204 homes, community building, allotments, community orchard, open spaces and park provision, cycle and pedestrian routes and landscaping. NBBC granted the full application in May 2021.

Vistry Partnerships acquired the west part of the strategic allocation in 2021. Vistry submitted S73 application 038193 to make minor changes to the permitted house types and full layout plan, which NBBC granted in January 2022.

East part of Hawkesbury Golf Course strategic allocation

On behalf of Terra Strategic, TKP submitted outline planning application 037807 for the remaining east part of the strategic allocation comprising 176 homes, open spaces and park provision, cycle and pedestrian routes, highway works, landscaping and associated infrastructure (outline including access). NBBC Planning Committee considered the outline planning application in May 2022. All officers and



technical consultees supported the proposal. Planning Committee resolved to grant the application and outline planning permission was granted in August 2022.

Reserved matters application proposal

Tilia Homes acquired the outline application area later in 2022. On behalf of Tilia Homes, TKP submitted reserved matters application 039446 in 2023 for 110 dwellings, community park, open space, landscaping, pedestrian and cycle routes and associated infrastructure. The reserved matters application is under consideration.

The reserved matters application area is the north part of the approved outline area. Tilia Homes will submit another reserved matters application for the south part of the outline area following determination of the current reserved matters application.

Policies map

An extract of the draft Policies Map showing Strategic Housing Allocation SHA6 is provided below for reference:



The northern area of SHA6 is shown as hatched with diagonal green lines. This is not shown on the Policies Map key. It is assumed that the hatched area denotes a community park, which is similar to the Policies Map key:



If the hatched area does denote a community park, it is shown in a different part of the site that is shown on the indicative masterplan that accompanied the outline permission (037807). The current reserved matters application (039446) also shows the community park in the same location as the indicative outline masterplan.

We support the inclusion of a community park as a key principle in the draft Policy SHA6 but in order to avoid confusion in the determination of the current reserved matters application, we request that the community park is not identified on the Policies Map.

Key principles

Draft Policy SHA6 lists the key principles to be delivered at SHA6. This includes:

"17. Dwellings should address areas of open space both formal and informal, as well as the canal, where appropriate and make use of the opportunities the canal can provide. Canalside housing should



be a traditional design, <u>no more than 2 storeys high</u> and face the canal across gardens, access drives and canalside landscaping. A 10m building-free buffer zone should also be provided along the canal frontage." (Emphasis added)

Draft Policy SHA6 does not explain why houses more than two storeys high would be unacceptable along Coventry Canal. We request that this requirement is deleted from the key principles and instead, is considered as part of the design of an application proposal.

The current adopted Borough Plan Policy HSG12 lists the provision of a canal marina as a key principle. The subsequent outline permission (037807) fronts Coventry Canal along the full length of SHA6. NBBC agreed that the demand for a canal marina no longer exists and permitted the outline application, which does not make provision for a canal marina. Consequently, we support the omission of a canal marina from the key principles of draft Policy SHA6.

8.0 HOUSING

Policy H4 - Nationally Described Space Standards

Draft Policy H4 states "All residential dwellings should comply with the NDSS..."

A blanket application of NDSS across all dwellings 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 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.

13.0 Built Environment

Strategic Policy BE3 – Sustainable design and construction

Carbon Neutrality

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

We request that NBBC is 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. Building requirements in the Borough should be reflective of Government requirements and not beyond without justification that accounts for viability and need.

Tilia Homes supports 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 consultation@tetlow-king.co.uk.

Yours faithfully

JONATHAN ADAMS SENIOR DIRECTOR

For and On Behalf Of TETLOW KING PLANNING