

**Savills on behalf of Arbury Estate**

**Respondent ID:**

**Matter 2 – Vision, Strategic Objectives and Development Strategy**

**Issue 1: Have the vision and strategic objectives been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?**

**24. Does the Plan address/meet any identified unmet needs in neighbouring areas? If not, why not?**

No, the plan does not fully address and appears to do nothing to explicitly meet any identified unmet needs in the neighbouring area.

Arbury Estate has recently submitted representations to the Coventry Local Plan Review Regulation 18 – Issues and Options consultation. Within these representations we have made the point that Coventry should be planning for the 35% uplift, as required by the Standard methodology for calculating housing need.

This shortfall will likely need to be at least in part be dealt with by neighbouring LPAs. NBBC should be planning for this eventuality now, rather than looking to progress a plan based on its own needs only, failing to engage suitably with neighbouring LPAs, and therefore failing to comply with the legal Duty to Cooperate.

**Housing Land**

The Duty to Cooperate statement makes reference to there being a MoU related to housing numbers being progressed by NBBC with the input of other LPAs. However, by NBBC's own admission this has been difficult to progress (see paragraph 10.2 & 10.3 of duty to cooperate compliance statement, 2024).

We consider that the examination should be paused until there is a broad agreement on housing numbers, as there is likely to be requirements for residential and employment sites to come forward to meet unmet need. An MoU needs to be signed (as was the case at the last Borough Plan examination) to deal with distribution of that unmet need.

**Employment Land**

In relation to unmet employment land needs, we appreciate that regional evidence base, such as West Midlands Strategic Employment Sites Study Part 2 is not available. However NBBC should be planning positively for a maximum potential employment land requirement. Sites could be safeguarded for this purpose, and reviewed when results of the study are known. If the results are available prior to conclusion of the Local Plan examination, then the addition of employment sites to the emerging Borough Plan review should be explored. Industrial land requirements for large sites is also a matter raised by Rugby Borough Council, having reviewed their Statement of Common ground and is not addressed by the NBBC DtC statement, or taken on board through amendments to the plan.

**Conclusion**

It is considered that the plan should be delayed until there is a broad agreement on housing numbers and large scale employment land requirements. It is unclear what will happen, but there are likely to be requirements for residential and employment sites to come forward to meet unmet need. An MoU needs to be signed (as was the case at the last Borough Plan examination), informed by publication of the West Midlands Strategic Employment Sites Study Part 2.

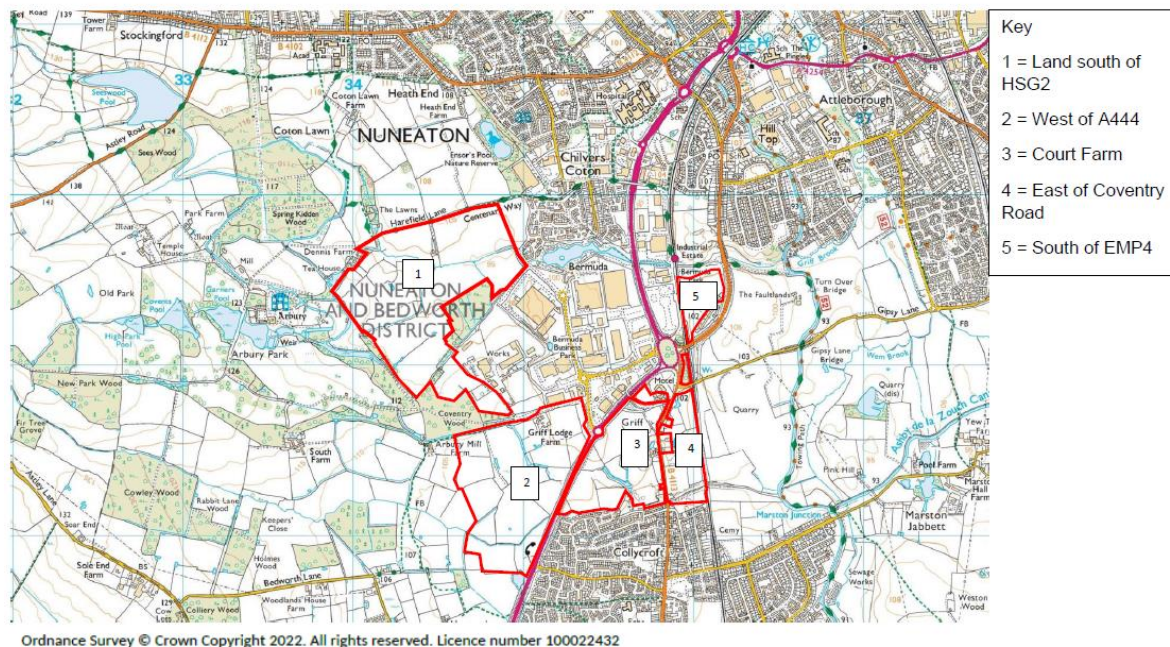
## 25. Is it necessary for the Plan to consider the release of Green Belt land to meet identified development needs?

Yes, and the Council should undertake a Green Belt Review to facilitate this. It should be remembered that NPPF paragraph 147 states that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.

NPPF paragraph 147 goes on to state that:

***“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.”***

The sites submitted by Arbury Estate (see plan below) are well served by public transport, so should be preferred as sites for development. These sites are shown on the plan overleaf, and were submitted for consideration as part of Nuneaton & Bedworth’s Call for Sites in 2021:



In relation to sites 3 – 5, a regular bus service runs along Coventry Road providing services to Nuneaton and Coventry at a frequency of around every 10 minutes. A number of bus stops on this route are located adjacent to these sites. Sites 1 & 2 are of a strategic scale that will allow for bus services to potentially be diverted to serve these sites specifically. This therefore demonstrates that the sites submitted by Arbury Estate are well served by public transport, so should be preferred as sites for development.

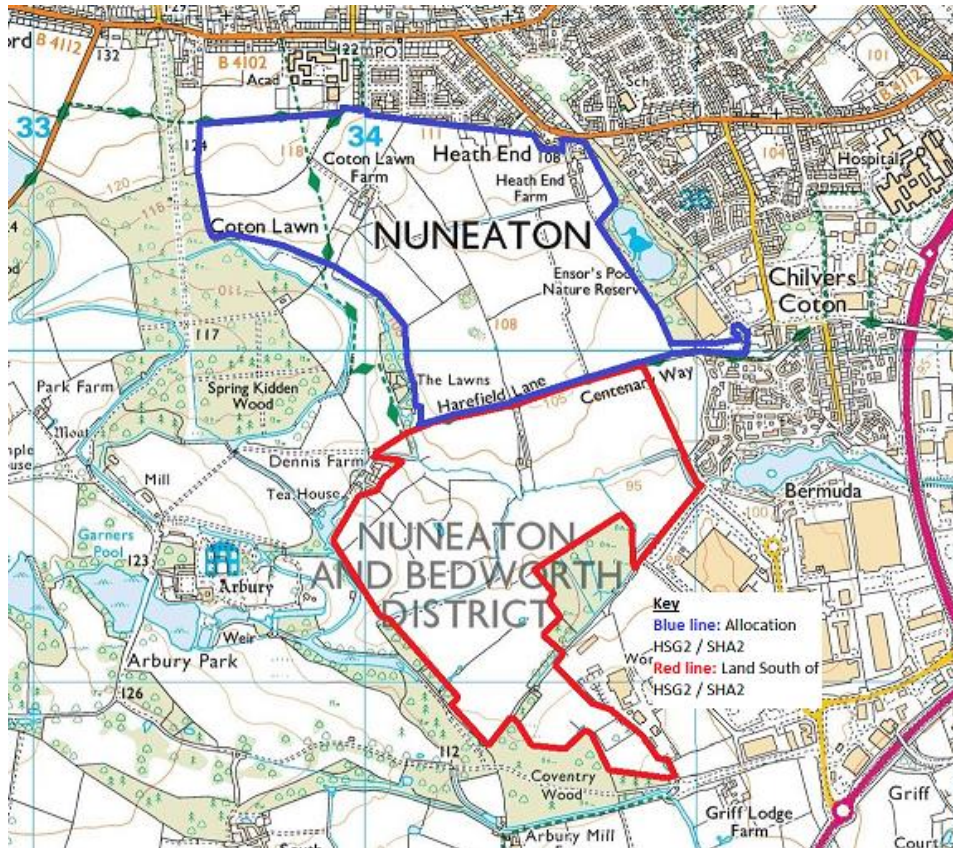
The sites sit within “the wider Bermuda Park area”, an area identified as an area for potential development by emerging strategic policy DS5 – employment allocations, which states that: “The wider Bermuda Park area, south of Nuneaton, including Faultlands and SEA4, is an employment location of regional significance for inward and local investment.”. There is therefore a clear case for the consideration of Green Belt release in ensuring that current and future strategic housing and employment needs (including unmet need from neighbouring LPAs) are met.

The rationale and reasoning for a Green Belt Review is also demonstrated by the case of Land South of HSG2. The “suitability and availability” section of the HELAA site matrix in relation to “Land South of HSG2” states that: “The site is Green Belt. The sites fall within parcel N9/N8 of the 2015 Green Belt



study with a score of 10/20 and 11/20 medium performing parcels. There are concerns regarding transport in the area, particularly when considering the impact of the existing allocation.”

In relation to the site’s credentials for both employment and residential development, we consider that this is a flawed conclusions to reach. This is based on a Green Belt Review that is over 8 years old, and does not take into account that site SHA-2 (HSG2) has been removed from the Green Belt and is allocated for development in the adopted and emerging Borough Plan, as is shown in the plan overleaf:



This severely weakens the Green Belt value of the site, and a Green Belt Review is required in order to establish where sites such as south of HSG2 may have credentials to come forward for development, as they now perform weakly against the purposes of the Green Belt.

In relation to the employment sites submitted, a key consideration for their allocation is the net outflow of commuters to Coventry, from the Borough which stands at -6,517, which is 43% of the overall net out commuting experienced in the Borough . This shows the strong link between Coventry and the Borough, both in relation to employment, and by extension the basis for any unmet need being considered to be facilitated in Nuneaton and Bedworth. We consider that the Arbury Estate’s sites submitted are well placed to provide good quality accessible employment sites to reduce the level of out commuting, particularly to Coventry.