

# **Nuneaton and Bedworth Local Plan Examination**

## **Hearing Statement on behalf of Jelson Homes**

### **Matter 2: Vision, Strategic Objectives and Development Strategy**

June 2024

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**For and on behalf of Avison Young (UK) Limited**

## **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?**

1. Q20 – Does the Plan set out an appropriate vision for the Borough based upon the evidence?
  - 1.1 We do not believe that the vision for the Borough, as currently formulated, is appropriate.
  - 1.2 Jelson has actively promoted the land that it controls to the east of Callendar Farm, Nuneaton for residential development through the plan making process. The Site is located to the northeast of Nuneaton town and comprises two parcels of agricultural pastureland, extending in total to circa 9.5ha (23 acres) in size. This comprises of a southern parcel of circa 3.31ha and a northern parcel of circa 6.19ha. The southern part of Jelson's Site at Callendar Farm is already allocated for housing development under Policy HSG1 of the adopted Local Plan. It forms part of a Sustainable Urban Extension known as '*North of Nuneaton*' comprising around 4,400 dwellings, a new local centre and primary school. This allocation is not proposed to be carried forward as part of the emerging Local Plan which we believe is an omission.
  - 1.3 The proposed development strategy and general principles for the growth of the Borough through to 2039 set out a clear ambition to secure sustainable development. Emerging Strategic Policy DS2 sets out the settlement hierarchy and their roles. This policy concludes that the majority of new development over the plan period will be directed to Nuneaton, as it plays a primary role for employment, housing, town centre, leisure and service provision. The supporting text to this policy acknowledges that "*a key priority for the development strategy is to direct growth to the most sustainable locations which make full use of public transport, walking and cycling*".
  - 1.4 As discussed at Section 4 of Jelson's Regulation 19 representations, we believe that the assessment of Jelson's Site contained within the Council's 2023 HELAA (reference: WED-5) is flawed because it does not recognise the Site's relationship with the existing '*North of Nuneaton*' Sustainable Urban Extension (SUE), or that the Council has granted planning permission for residential development on three sides of it. Once fully developed out, the wider SUE will contain a range of facilities, services and amenities which will be in close proximity to the site. Jelson has already held pre-application discussions with Officers of the Local Planning Authority about the planning potential of this Site and the detail of its proposal, and is in the process of finalising its scheme before preparing an application which will seek full (detailed) planning permission for the residential redevelopment of the site. Jelson expects to submit this application to the Council during the summer. Jelson's has assembled a team of experts who have undertaken various technical assessments to support its proposal and they are able to confirm that this exercise has not identified any matters which would preclude the development of this Site.
  - 1.5 The consented layouts for the adjacent housing sites have been utilised to ensure that pedestrian and cycle connectivity is enhanced and flows through the proposed layout to a joined-up approach to the promotion of sustainable and active travel measures across the wider SUE. It is therefore unclear why this site was omitted from this assessment and has not been considered further as part of the site selection process.

- 1.6 Paragraph 6.9 of the Publication Draft Plan makes clear that as part of the Plan making process the Local Authority has undertaken a review of its settlement boundaries and where necessary amended them, in line with the methodology set out in the Settlement Boundary Paper (2023). Part of Jelson's Site at Callendar Farm (the southern parcel) already falls within the existing settlement boundary, and Jelson were therefore confused as to why, the Authority has seemingly failed to consider an amendment to the settlement boundary in this location, to take into consideration that that the parcel of land to the north is (i) the last remaining land parcel in this location surrounded on three sides by the wider '*North of Nuneaton*' SUE and is therefore clearly a logical and suitable location for development; (ii) that the land is controlled by an experienced housebuilder; and (iii) has been actively promoted through the Local Plan review process.
- 1.7 As stated in Jelson's Regulation 19 representations, so far as we can tell the only logical reason why the Council failed to allocate Jelson's land for development as part of the '*North of Nuneaton*' SUE, in the current adopted Local Plan, is because the land was not controlled by a developer or willing landowner, at the time the Plan was being prepared and as such, it was never promoted for 'development'. Jelson secured an option on this land in 2021 and since then, has alerted the Council to the Site's availability and promoted the site as a logical extension to the existing SUE at every stage of the Local Plan Review process.
- 1.8 The Council's Development Strategy explains that its objective will be to deliver development in the most sustainable location in the Borough, which it identifies as being Nuneaton. Jelson's site, lies to the north of Nuneaton, immediately adjacent to the existing settlement boundary ('*North of Nuneaton*' SUE). Yet, the Council appears to have discounted this site as being suitable for development and instead, it has chosen to allocate a large number of sites in and adjacent to the Borough's, less sustainable lower order settlements. This flies in the face of the approach set out in the Development Strategy.
- 1.9 On the basis of the above, we do not believe that the Plan, as currently drafted, has been positively prepared based upon the evidence before the Council as the Plan does not include land readily available within the wider adopted '*North of Nuneaton*' SUE. Part of which is currently allocated for development in the adopted plan meaning that the Council have already acknowledged that this is an acceptable and sustainable location for growth which should be maximised. The allocation of Jelson's site at Callendar Farm through a Main Modifications to the Plan would be in accordance with the proposed development strategy. In allocating Jelson's site, the Plan would enable the delivery of a sustainable pattern of development in accordance with the NPPF.
- 2. Q21 – Are the vision and strategic objectives justified, have they been positively prepared, and do they accord with the evidence and national policy?**
- 2.1 As set out in our response to Question 20, we do not believe that the Plan has been positively prepared, and that as currently drafted it does not accord with national policy. We have also reiterated our concern with the Council's evidence base which in our opinion is flawed.

**Issue 2: Has the development strategy and the overall distribution of development been positively prepared, is it justified by a robust and credible evidence base, and is it consistent with national policy?**

3. **Q27 – Does the development strategy in general, and Strategic Policy DS3 incorporate sufficient flexibility within it? Particularly with regard to the potential for unmet housing and employment need arising from neighbouring areas in the future.**
- 3.1 The wording of emerging Policy DS3 is drafted to express the figures set out within the policy as minimums. Jelson are satisfied with this approach as it enables greater flexibility and the delivery of a greater number of dwellings over the long term in accordance with the provisions of the NPPF.
- 3.2 We do, however, believe that the Council could go further and ensure that Plan provides even more flexibility, by allocating Jelson's Site at Callendar Farm for residential development, given this would help the Authority meet its own housing needs as well as those arising from neighbouring authorities, in the most sustainable way.
4. **Q30 – Has the development strategy been fully informed by the SA and other evidence? Is it soundly based? Does it accord with the Framework?**
- 4.1 Please see our response to Questions 20 and 21 under Issue 1. We do not believe that, as currently drafted, the development strategy contained within the emerging plan is soundly based and as such does not accord with national policy.
5. **Q31 – Is the site selection process clear and suitably robust, supported by the SA and other evidence, with particular regard to the proposal to not allocate some sites that are allocated in the adopted Plan?**
- 5.1 As stated above, the southern part of the Site lies within the defined boundary of the '*North of Nuneaton*' SUE and it is currently allocated for housing development in the adopted Local Plan, to which Policy HSG1 applies.
- 5.2 The Council has confirmed that it is intending to carry over part of the current allocation (through emerging allocation SHA1) which is also currently undeveloped, but forms part of the wider adopted '*North of Nuneaton*' SUE, into the emerging Local Plan. This is an entirely sensible and logical approach in our view. However, we are not sure why therefore, the Council hasn't taken the same approach to the land Jelson controls within the SUE and which is currently undeveloped also. We would welcome some clarity in this regard, given carrying over the remaining undeveloped parts of HSG1 follow the same principle in terms of ensuring the comprehensive redevelopment of the SUE.
- 5.3 By not re-allocating this Site for development, the Council are clearly hindering the overall function of the '*North of Nuneaton*' SUE. Jelson's Site is bordered on three sides by allocated parcels of land which have started to come forward for development. Whilst these parcels are each being delivered by individual developers and landowners, the overall proposals have been designed in a way which complement the adjacent sites to enable opportunities to maximise connectivity and the provision of the necessary infrastructure. Therefore, providing a sustainable opportunity for development.

5.4 As is clear from the Borough Plan Key Diagram on page 13 of the Publication Draft Plan that Jelson's land (both the northern and southern parcels) are the 'missing jigsaw piece' and could be developed without extending the built-up area of Nuneaton beyond the boundaries of the wider SUE allocation.

5.5 We recommend that the emerging Plan is modified to take into account the omission of both parcels of Jelson's land east of Callendar Farm as these present a sustainable, and logical location for development.

**6. Q32 – Have reasonable alternatives been considered and clearly discounted on the evidence?**

6.1 We do not believe that the Council have adequately considered Jelson's Site at Callendar Farm as a reasonable alternative. As detailed in Jelson's Regulation 19 representations, the Council does not appear to give any recognition to the Site's location adjacent to (on three sides) by the wider SUE. As such, the assessment of the Site provided by the Council in the 2023 HELAA is flawed as it does not take into account the facilities, services and amenities that will be delivered on the SUE which will in turn enhance the overall sustainability of the Site.

6.2 Work is underway to prepare a detailed planning application for Jelson's Site, and the technical analysis completed to date indicates that there would be no adverse technical or environmental impacts arising from the development of the Site. The emerging proposals have had regard to the committed schemes coming forward surrounding the Site, to ensure pedestrian and cycle connectivity through Jelson's Site and into the wider SUE are enhanced.

**7. Q34 – Is the overall level, pattern and distribution of development set out in the development strategy viable and deliverable in general terms?**

7.1 Whilst we reserve our position on the strategic and non-strategic housing allocations set out at emerging policy DS4, we provide confirmation that Jelson's Site at Callendar Farm is viable and deliverable.

7.2 A significant amount of technical work has been undertaken to support the planning application and this hasn't revealed any impediments to the development of the Site for housing. Jelson controls the land to the Site, which means that it could be accessed via its development to the south. The Site can therefore be developed without requiring the construction of a new access onto the A5.

7.3 Jelson has a longstanding reputation as one of the Midlands' leading housebuilders and is currently constructing the Lockley Gardens / The Long Shoot development which lies directly south of the Site. As such, Jelson is very familiar with the area and knows the housing market in Nuneaton extremely well. It is therefore confident that there is demand in both the short, medium and longer term for the type of homes that they build. On this basis, we confirm that Jelson's Site is capable of being delivered within the next five years.

# Contact details

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