



The countryside charity
Warwickshire

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Nuneaton & Bedworth Local Plan Examination: Matter 2 Issue 1

Objectives and development strategy

Questions 24, 25 and 26

24. Unmet needs in neighbouring areas

The Local Plan does not need to meet any unmet needs from neighbouring areas.

There may be a claim by Coventry City Council that the N&B Local Plan does not meet a claimed unmet housing need from the city of Coventry. Coventry is one of the 19 cities and urban areas to which the 'urban uplift' applies. If the City Council is arguing that under Duty to Cooperate, Nuneaton & Bedworth should provide land for some of this 'uplift' housing, this is not required of N&B unless it makes an agreement itself to accept such housing. The uplift should be accommodated within those cities and urban centres themselves.

Coventry City Council is not able to show that it is unable to meet its own housing needs. It has issued an Issues & Options consultation paper (2023), responses to which are still under review. It has not reached Reg.18 Draft Local Plan stage. Until it does that, it cannot show what housing provision it is making.

Coventry's population growth was seriously overestimated in projections used for its adopted Local Plan. The 2021 Census showed that the projections of the population of Coventry were too high by around 40,000 in 2021, comparing what the Local Plan was assuming for that year with the actual recorded population. (See Representation by Cllr K Kondakor Oct 2023 on Policy DS3, p3/4)

The City Council will not be able to assess its household growth for its Reg.18 Local Plan until the first ONS Sub-National Household Projections post-2021 Census are published. The ONS 2022-based SNHP is due out in early 2025.

No provision should be made for any Coventry housing requirement in the N&B Local Plan. The Council is correct not to do so.

25. Is it necessary to consider release of Green Belt land to meet development needs?

There is no need to consider any release of Green Belt land. Too much Green Belt land was released in the last Local Plan which has not in fact been developed. The claimed unmet need from Coventry which was asserted at the time and was used to justify removal of some land from the Green Belt was not a valid need. As stated above, Coventry's population growth was seriously overestimated in projections used for its adopted Local Plan. The 2021 Census showed that the projections of the population of Coventry were too high by around 40,000 in 2021, comparing what the Local Plan was assuming for that year with the actual recorded population.

26. Is there a need to re-designated previously allocated sites as Green Belt?

Yes. Areas which were once Green Belt and were removed from Green Belt by past decisions, and which are not needed for (and not allocated for) housing in the Plan need to re-designated as Green Belt.

Under the Local Plan, these areas of countryside are given an unclear status – land which is not Green Belt and not allocated for development. Policy **DS2** is the policy that sets the Settlement hierarchy and roles. Its title does not indicate that it sets policy for the rural areas of the Borough. However the fifth paragraph of the Policy states:

“New unallocated development outside the settlement boundaries, as shown on the policies map, is limited to agriculture, forestry, leisure and other uses that can be demonstrated as appropriate, to require a location outside of the settlement boundaries.”

This is a general statement without containing any detailed policy. Yet it is relied on for not re-designating as Green Belt land which was allocated for housing in the adopted Local Plan but is not allocated in the new Plan. Green Belt policy (as stated in the NPPF para 154) includes detailed development control principles for what forms of development are appropriate and can be considered for permission. This very short wording does not do that. Yet it is to control development on land which was Green Belt or had been Proposed Green Belt, and which will be under pressure from developers if left as unallocated land ('white land').

If the Local Plan is going to be adopted with these areas of countryside not returned to the Green Belt, a full and detailed separate policy is needed to make the Plan sound. (See areas shown as 'rural area' (light green) on the District Diagram), Section 5.0 p13.)

Changing the Green Belt boundary to include in it land that was once allocated but is not allocated for development in the new Local Plan will be necessary if the land is not to come under continuous pressure for development.