



The countryside charity
Warwickshire

41A Smith Street
Warwick CV34 4JA
Tel 01926 494597

plans_cp_re_warks@outlook.com

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Nuneaton & Bedworth Local Plan Examination: Matter 2 Issue 2 Statement

Development strategy including Policies DS3 and DS6

Question 27- Development strategy

The development strategy provides for more development than is required or is likely.

In Strategic Policy DS3, the overall development needs are stated:

“By 2039, as a minimum, the following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough:

- 9,810 homes based on 545 dwellings per annum.
- 66.45ha of employment land for local industrial and distribution/warehousing development (including 5.35ha for replacement provision).
- 2ha of employment land for office space.
- 19.4ha of employment land for strategic B8 warehousing and distribution development (indicative).”

These amounts of development are in excess of actual need and are too high. The text supporting the policy states (at 6.14 et seq) that using the actual ‘standard methodology’ calculation produces an annual housing requirement of 442 dw/yr, not 545 dw/yr. The most recent HEDNA work finds that the annual requirement is 424 on a trend basis. And then at para 6.18 it is stated that

“The sub-regional HEDNA modelled the new demographic projections and assessed how the population is expected to change over time and applied these alternative projections, through the framework provided, to the standard method to deduce a figure of 409 dwellings per annum.”

The figure in Policy DS3 of a 'minimum' of 545 houses per year which the Plan should deliver is significantly too high. On the assessment done in 2023, the need is in the range 400-425 per year, or 20% less (strictly, 409-424 from the tables in the Plan).

Para 6.26 states that the housing supply (land available) in the new Plan will be 12,100 houses - 2,300 houses higher than even the Plan's projection of a requirement of 9,810 dwellings 2021-2039. The now-calculated real requirement of 409-424 dw/yr means that there are allocations in the Plan which are not necessary and should be deleted.

The Employment land requirement set out in Policy DS3 is well in excess of the actual need. The calculated need for 82.5 ha of employment land is actually for 73.5 ha of B8 Use Class warehousing, 7.1 ha of B2 industrial use, and only 2 ha for offices. Warehousing provides few jobs per hectare and is an inefficient use of land. At 6.46 it is explained that the warehousing 'need' is covered by the 'Faultlands' location (SEA1) on the south side of Nuneaton which already has planning permission. Table 6 at p25 shows that there is a surplus of 19ha because of the availability of industrial land now.

The Plan's overall level of provision above needs means that there is adequate 'flexibility' within this provision.

Question 31 - Site selection process

The sites that were allocated in the adopted Local Plan which are not allocated in the new Local Plan are correctly chosen. They are not needed to meet the housing requirement.

HSG7 Bulkington was unjustifiably allocated in the last Plan having been in the Green Belt until then. It met the purposes of inclusion in the Green Belt until then so does so now.

HSG4 Bedworth Woodlands was in the proposed Green belt published in the 1960s and stayed proposed Green Belt until a 'Policy Box' was set in the Urban Structure Plan for Nuneaton & Bedworth in the late 1970s. That 'Policy Box' left for future detailed decisions meant that the location was left out the Green Belt Subject Plan published by Warwickshire County Council in 1978 and then adopted (setting Green belt boundaries across the whole post-1974 County). This 'Policy Box' status has been left unaltered with no decision on Green Belt status. The whole of the Woodlands

‘white island’ that resulted from abandonment of the larger allocation after an Appeal decision by the Secretary of State in 2001 should have been assessed for inclusion in the Green Belt.

The land which is current housing allocation SHA2 (Arbury) (HSG2 in the adopted Local Plan) should be de-allocated and included in the Green Belt. It met the criteria for inclusion in the Green Belt when the Green Belt Subject Plan was adopted in the late 1970s and was unjustifiably allocated for housing in the adopted Local Plan.

Question 35 and 36 Policy DS6 as a ‘strategic matters’ policy

Green Belt is both a ‘strategic’ policy and one with very detailed application.

Breaking Policy on Green Belt into two different policies to separate ‘strategic’ from ‘detailed’ may be impractical.