



The countryside charity
Warwickshire

41A Smith Street
Warwick CV34 4JA
Tel 01926 494597

plans_cppe_warks@outlook.com

2 Sept 2024

Nuneaton & Bedworth Local Plan Examination: Matter 5 Issue 2 Statement STRATEGIC HOUSING ALLOCATIONS

Are each of the Strategic Housing Allocations and their policy requirements soundly based? Are they justified, deliverable/ developable and supported by the evidence?

There is no justification for the housing sites SHA1 and SHA2. They are not required to meet the needs of the Borough as the housing supply in the Plan well exceeds the housing requirement based on annual growth in number of households.

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.

POLICY SHA1 Land at Top Farm north of Nuneaton

Policy SHA1 proposes 1,700 houses, District Centre and other facilities between Weddington and the A5. Some of the site has an outline planning consent. But the houses proposed are not now required due to the lower annual housing requirement for N&B than is the basis of the adopted Local Plan. While there is an outline consent for part of the area of SHA1, the financial requirements of this, including a spine road, may mean that it is not delivered. The loss of countryside and farmland between Nuneaton and the A5 would be complete if SHA1 is allocated.

This housing allocation is not justified. It is not required to meet the projected need in dwellings per year.

The north of Nuneaton does not have the capacity to accept more development,. The sewer network is over-capacity and this results in discharges into the watercourses. Public transport access by a north side entrance to Nuneaton station are not being made. The inclusion of a primary school is not justified as there are primary schools in the Weddington-North Nuneaton area which are under-used. The proposed council-owned sports centre is not likely to be built. Traffic generated at peak hours from recent new development is generating serious delays.

If SHA1 cannot be fully removed from the Borough Plan, the allocation size should be reduced, the primary school requirement withdrawn, waste waste treatment works should be first required and construction of the north side station entrance before any houses are occupied.

POLICY SHA2 Arbury

Policy SHA1 is for the allocation in the existing Local Plan HSG2 (Arbury). This is for 1,525 houses on land between Nuneaton and Arbury Park. There is no need for these houses in the Plan period. On the assessment done in 2023, the need is in the range 400-425 per year (HEDNA para 6.18). SHA2 would supply nearly 4 years housing requirement for Nuneaton & Bedworth by itself, when that level of provision per year can be supplied by other sites large and small.

The land allocated is part of the setting of the Grade 1 Arbury Hall and the Grade II Registered Park and Garden. It was in the Green Belt until removed for allocation HSG2 in 2019.

The whole of SHA2 is well-farmed, attractive farmland of good quality. It was included in the Green Belt until 2019 and the exceptional circumstances judged to apply to remove its Green Belt status in the current Local Plan can be seen now to have been invalid; there is no need for the 1,525 houses proposed.

The policy has many requirements which are difficult to meet and has a serious cost requirement because its lack of road access. Significant new road construction is required and that if financed will not reduce, but rather increase, congestion on existing roads.

While there is a Concept Plan (SPD) adopted and there has been public consultation on it, there has been no planning application in the five years since the existing Plan was adopted. This supports the case for concluding that the allocation is not necessary and thus not justified and not sound.

The lack of need for the housing, and the harm this proposed allocation will do to the environment, landscape, and setting of Arbury Hall justifies removing the allocation and returning the land to the Green Belt.