

# **Nuneaton and Bedworth Local Plan Examination**

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

### **Matter 5: Strategic and Non-Strategic Site Allocations (Block 2)**

August 2024



**Report title:** Nuneaton and Bedworth Local Plan Examination – Hearing Statement – Matter 5

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**Status:** Final

**Draft date:** August 2024

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



## **Matter 5 – Strategic and Non-Strategic Site Allocations**

### **Issue 1: Strategic Policy SA1 – Development Principles on Strategic sites**

1. Q46 - Are the requirements within requirement 1 justified? Is this requirement a duplication of the requirement in policies H5, BE3 and to some extent policies H1 and H2 and is there consistency between the policies on the matters covered by requirement 1?
  - 1.1 Jelson feels that the requirement 1 of Strategic Policy SA1 duplicates other policies contained within the emerging plan.
  - 1.2 Requirement 1 requires proposals on all strategic sites to meet the requirements of the Nationally Described Space Standards (NDSS) amongst other points. However, criteria (f) of paragraph 135 of the NPPF and the corresponding footnote (52) makes clear that *“Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified”* [our emphasis]. If the Council intends to pursue such a policy, then it needs to commission the necessary evidence to support its approach.
  - 1.3 The NPPG makes clear that *“where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies”*. The NPPG also makes clear that in doing so, local authorities should take into account matters such as *“need, viability and timing”*. It is noted that the emerging Plan is supported by a Plan Viability Assessment however it is felt that more work needs to be done by the Council to justify its approach on NDSS for strategic sites.
  - 1.4 Even if such a policy can be evidenced, Jelson remains concerned about the proposal to introduce NDSS as a blanket requirement. Housing size is a key determinant of cost and affordability, and it is not necessarily the case that simply because a house is bigger it will better meet the needs of every consumer. Keeping prices low will remain a priority for many purchasers rather than imposing arbitrary space requirements, particularly in times when the cost of living is high. Jelson would therefore encourage any evidence-based policy to seek a proportion of homes to be NDSS compliant rather than every home so that consumers can continue to prioritise what is important to them when making house purchasing decisions.

### **Issue 2: Strategic Housing Allocations**

2. Q53 A) Are each of the Strategic Housing Allocations and their policy requirements soundly based? Are they justified, deliverable/ developable and supported by the evidence?
  - 2.1 We write in relation to the Strategic Allocation Policy SHA1: Land at Top Farm, North of Nuneaton.
  - 2.2 Whilst Jelson considers that the allocation SHA1 is soundly based, it believes the Council needs to go further in reviewing and setting the boundary for this allocation to ensure that the development opportunity presented by this highly sustainable location is maximised. As highlighted in Appendix 1, Jelson controls land that is locationally and functionally linked to this allocation, but for unexplained reasons has not been included as part of the allocation.
  - 2.3 The Council has confirmed that it is intending to carry over part of a current allocation (*‘North of Nuneaton’* SUE – Policy HSG1) into the emerging Local Plan through the emerging allocation SHA1. It forms part of a Sustainable Urban Extension known as *‘North of Nuneaton’* comprising around 4,400



dwelling, a new local centre and primary school. We note that this site is currently undeveloped. Carrying forward this allocation 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 other land Jelison controls immediately adjacent to the SUE and which is also currently undeveloped.

- 2.4 As noted in Jelison's Matter 2 representations, Jelison has actively promoted the land that it controls to the east of Callendar Farm, Nuneaton for residential development through the plan making process. We have maintained from the outset that this land represents an obvious component of SHA1 and that its omission as an allocation is perverse and illogical. We have yet to see any document or analysis from the Council explaining the reasoning behind its omission. 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 the land was previously allocated for housing development under Policy HSG1 of the adopted Local Plan and now sits within the urban area boundary.
- 2.5 The northern part of the site, however, remains as unallocated white land on the proposals map which is an obvious and unexplained oversight. This part of the site is bordered on three and a half sides by existing / allocated housing land which has started to come forward for development. As Appendix 1 very clearly highlights, it is to all intents and purposes the clearly missing part of the SHA1 jigsaw.
- 2.6 Work is underway to prepare a detailed planning application for Jelison'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. Appendix 2 shows Jelison's Concept Layout for the Site and sets out how development can come forward. 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. Importantly, Appendix 2 demonstrates that the incorporation of this land parcel in the allocation is critical to providing safe and attractive pedestrian and cycling connectivity between the existing allocation and the services and facilities along the A5 (the purple dashed route on the plan). The inclusion of this site also enables the landscaping of the allocation to be completed.
- 2.7 We recommend that the emerging Plan is modified to adjust the boundary of allocation SHA1 to include the presently unallocated portion of the Jelison land. This presents a highly sustainable, and logical amendment that will enhance the wider adopted '*North of Nuneaton*' SUE / SHA1. Not making this adjustment will miss the opportunity to maximise the development potential of the SUE in terms of housing numbers and pedestrian and cycle connectivity.



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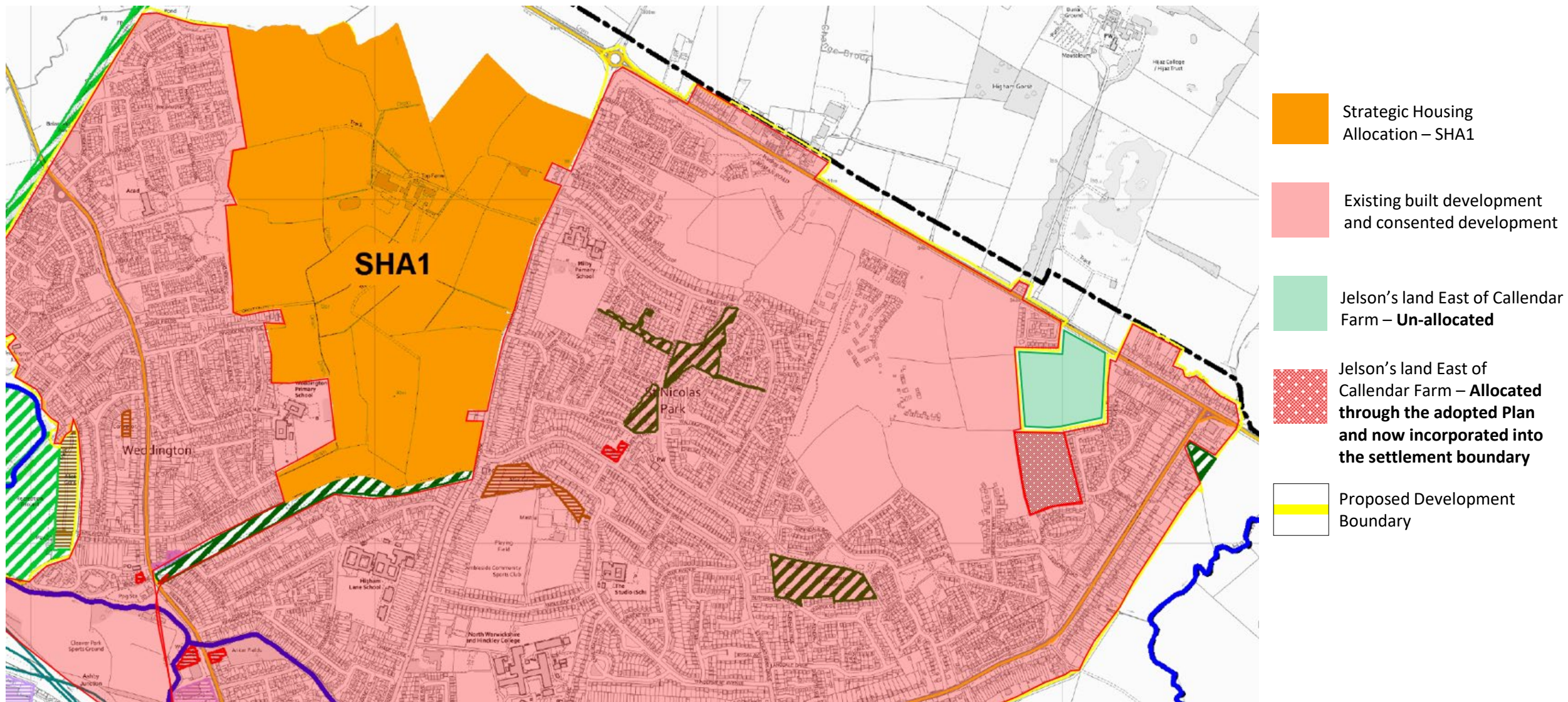
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### Avison Young

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Plan showing existing, consented and proposed development areas surrounding Jelson's Site





Site Legend   Publicly Accessible Green Space		
Target of 3.07ha or 30,700ha for approx. 190no. plots		
	Area	Approx. Area (m²)
	Area 1	18,175
	Area 2	8,330
	Area 3	2,488
	Area 4	2,711
Approximate Total		31,704

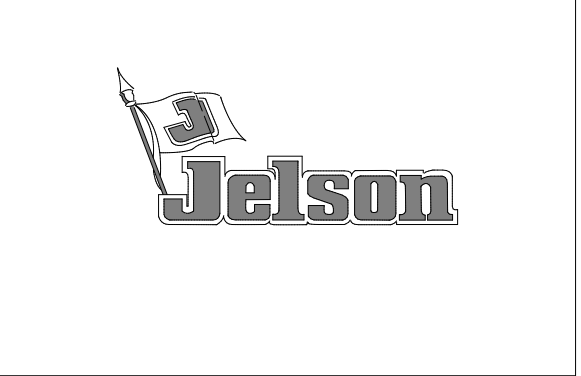
Circulation Key	
	Circulation that relates to overall vehicle movement around the site.
	Indicative routes for proposed 3m dual-use pedestrian footpath and cycleway.
	Indicative routes for proposed pedestrian footpath.
	Circulation that relates to any notable existing / expected off-site circulation (includes pedestrian, cycle, and vehicle movement).

Circulation Key	
	Red line site boundary. (Refer to land ownership registry plan for specific curtilage).
	Key vistas across the site have been identified.
	Existing trees and hedgerows.
	Indicative areas of planting for illustrative purposes only.
	Type of planting, (including species and whether it is a tree, shrub, and other will be designed by the landscape architect).
	Indicative areas of permanent bodies of water within an accessible SuDS Pond. Final design subject to civil engineer's design and specification.
	Buffers to existing ditches that bound the site. Ditches within PAG / soft landscaped areas have not been shown but will be retained with the appropriate buffer from built form.
	Indicative locations of private rear gardens.
	Indicative areas of built form, (including houses, garages, and tandem parking).
	Hatched areas indicate 'key facades' which act as defining points of the site.
	Indicative positions for primary 5.5m adopted road with 2m footpaths either side.
	Indicative positions for secondary 5m adopted road with 2m footpaths either side.
	Indicative positions for 5m unadopted private drives.
	Indicative areas where frontage parking may be suitable.

Rev	Date	Drawn Note
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Source File: j1118-6 27 Callendar Farm Phase III.pn



Client		Jelson Ltd.
Project Title		Residential Development Callendar Farm - Phase III Land via Long Shoot, Nuneaton
Drawing Title		Site Layout   Concept Site Layout
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