Bulkington Residents’ Voice

Representations made on behalf of Bulkington residents:

Reasons for objection to Policy HSG7 of the

Publication Draft Version (2017) of the Nuneaton and Bedworth Borough Plan

Public Consultation: 30 January - 13 March, 2017
## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preamble</td>
<td>2</td>
</tr>
<tr>
<td>1. Outline summary of reasons for objection</td>
<td>3</td>
</tr>
<tr>
<td>Necessary measures</td>
<td>4</td>
</tr>
<tr>
<td>2. Consultation failures</td>
<td>4</td>
</tr>
<tr>
<td>3. Housing policies and provision</td>
<td>5</td>
</tr>
<tr>
<td>4. Housing policy area HSG7</td>
<td>6</td>
</tr>
<tr>
<td>Planning considerations</td>
<td>6</td>
</tr>
<tr>
<td>Access to HSG7</td>
<td>8</td>
</tr>
<tr>
<td>Green Belt</td>
<td>9</td>
</tr>
<tr>
<td>Conclusions</td>
<td>9</td>
</tr>
</tbody>
</table>
Preamble


BRV became established during the Consultation Period as a possible single vehicle for Bulkington's residents to make focussed representations on proposed policies in PDV (2017). The steering group is made up from a small number of Bulkington residents, living in widely separated parts of the village, and who had not even met before the announcement of the Public Consultation exercise.

The objective was to provide a point of contact and to share information, and to assemble a reasoned case to represent local residents' views. BRV has not sought to inhibit individual residents who may wish to make their own, and different representations. It is well understood that there may well be other viewpoints. Nevertheless, it became very apparent that there was enough strong and consistent feeling about Bulkington retaining its identity. Also, there were real concerns about loss of valuable long established Green Belt and open space which people are able to access, coupled with a shift to urbanisation arising from proposals to construct large housing estates around the village.

On 24 February BRV invited residents to a public meeting in the Working Men's Club, Chequers St. There was a huge attendance by an estimated 300 people. The venue was full to capacity. The meeting had an excellent atmosphere, and showed extremely strong and uniform support for the initiatives by BRV to make representations about PDV (2017). BRV have since made best endeavours to keep people informed via the Internet, social media, and several local information points in shops, etc. The end result is wide endorsement and support by residents across the village for the representations now made here on their behalf.

The ‘Outline of summary reasons’ on page 3, is intended to give a concise view of the more detailed case that follows in later sections. The summary should not be taken as fully representative in itself. The detailed reasons that follow the summary take precedence. It was felt this format would be helpful for readers.

Other separate representations by BRV regarding policies and aspects of PDV (2017) have been made using a similar format to this.
1. **Outline summary of reasons for objection**

1.1 The Publication Draft Version (2017), currently the subject of public consultation, between 30 January and 13 March 2017, is unsound for the following reasons:

a) The aims of the Statement of Community Involvement (SCI) have not been met. PDV (2017) contains radical new policies developed at some time between Public Consultation (November - December 2015) on Submission Version (2015), and the date of the NBBC Cabinet meeting on 25 January, 2017. These new policies would greatly affect the village of Bulkington; yet they were developed without any local input, or other involvement.

b) PDV (2017) is rendered unsound by policies additional to Submission Version (2015), which increase the housing provision to the extent that it cannot all be sensibly accommodated within the NBBC area. Bulkington is incapable of delivering infrastructure that would support growth as envisaged in the overarching principle: “3. Urban Focus with Urban Extensions. ..... Strategic urban extensions offer the best opportunity of facilitating the delivery of the infrastructure required to support the growth.”  

1 Policies HSG7 and HSG8 propose housing locations which are themselves unsound for the reasons given in the respective documents submitted by BRV. The policies set in Submission Version (2015) were more effective in meeting the identified needs of the Borough, and adhered more closely to the overarching principle as stated above.

c) Proposed Policy HSG7 for new housing east of Bulkington is unsound for many reasons:

- It has not been demonstrated that exceptional circumstances exist to justify giving up vital and irreplaceable Green Belt, which also comprises Grade 3 agricultural land;
- The policy is not good planning. It would cause a vital and irreplaceable area of Green Belt to be lost, and result in an irregular, far less defensible, boundary for the future;
- The best and most versatile land that would be given up, is well farmed and very productive. At the same time, it conveniently fulfils other subsidiary useful functions e.g. separation between settlements, provides habitat, local open space, and is essential for retaining a local open view of the surrounding area.
- The existing open fields form a pleasing natural approach to the village, accentuating the village's rural position, and setting.
- Existing roads forming the residential areas bordering HSG7 are wholly unsuitable for access to what would be a very large development;
- HSG7 would have a marked adverse effect on the identities of small local communities that have become established in the area, over a long period of time.

The case and reasoning for each of the above is detailed in the remainder of this document below (see sections 2 to 4).

---

1 Background paper - Stage 1: Assessing options for strategic housing sites - Overarching principles  
2 Submitted document: Bulkington Residents' Voice - Representations made on behalf of Bulkington residents - Reasons for objection to Policy HSG8  

---

Document HSG7 - March 2017  
Page 3 of 10
Necessary measures
1.2 Policies HSG7 and HSG8 should be removed from Publication Draft Version (2017) to make the Plan sound. Also, the Policies Map should be correspondingly amended with the removal housing allocations HSG7 and HSG8 to show the land as Green Belt.

2. Consultation failures
2.1 The National Policy Planning Policy Framework (NPPF) guidance regarding Local Plans advises:

155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be pro-actively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

Yet, our whole community of 6,000 people only learned of major new housing policies that would affect us, at the very late stage of statutory consultation on the Publication Draft Version of the Local Plan. There is no satisfactory explanation for this lack of engagement with our community, or the apparent use of secrecy in developing and fixing these additional policies. The resultant late notification has left people ill prepared to make sensible and meaningful representations and they feel disenfranchised.

2.2 PDV (2017) is not sound because of a failure by NBBC to meet any of the declared aims in para.1.2 of the Statement of Community Involvement (SCI), namely:

- Reflects the needs of the community, stakeholders and other interested parties;
- Appropriate to the type of document being prepared;
- Accessible and transparent, ensuring a sense of community ownership;
- Takes place in a variety of ways.

The last public input to the Plan was in the Consultation stage for Submission Version (2015), which was undertaken in November/December of that year. It did not contain any hint, or information, about intentions to develop around Bulkington village. Since then, substantial and radical new policies have been added, as evidenced in the Landscape Capacity Study - January 2017:

“1.9 NBBC have instructed TEP to re-assess 9 sites from the Stage 2: Individual Site Assessment (see paragraph 1.7). In addition they have highlighted a further 15 sites for assessment.”

The output from this exercise was a raft of new policies, including two new major housing areas (HSG7 & HSG8) around Bulkington village. Although much must have been done behind the scenes in this time, nothing came into the public domain. This lack of consultation with the local community has concerned local residents.

2.3 The majority of the changes would appear to result from a call for sites somewhere in the intervening period between the Public Consultation (November - December 2015) for Submission Version (2015), and the announcement of the NBBC Cabinet meeting in January 2017. The public and the local community only became aware of these additional policies a few days before the NBBC Cabinet meeting on 25 January, 2017. The formal 6
week consultation period for PDV (2017) started on 30 January, 2017. Also, it is noted that NBBC had chosen to withhold the responses to the call for sites, even though respondents were clearly advised that the information was not confidential and would be available for public inspection. When access to the information was requested, NBBC advised that it would only be available after the 25 January Cabinet meeting. This demonstrates a total lack of transparency at this crucial stage of the process. Over a period of a few months, 15 new sites were evaluated and resulted in additional policies, without any public input. These policies dramatically affect the content and potential outcomes from the Plan.

3. **Housing policies and provision**

3.1 PDV (2017) is rendered unsound by the late addition of housing policies, over and above those contained in Submission Version (2015). The added policies increase housing provision to the extent that it cannot all be sensibly accommodated within the NBBC area. This manifests itself through poor choice in the recent selection of policy sites for major housing. These late additions are in locations that do not accord with established guiding principles intended to strengthen and grow the local economy, and to improve prosperity. Also, the added policies are contentious because of their potential adverse effects, if they are carried through. Housing policy HSG7 is one of the casualties from this. Certainly, HSG7 does not satisfy the overarching principle “3. Urban Focus with Urban Extensions. .... Strategic urban extensions offer the best opportunity of facilitating the delivery of the infrastructure required to support the growth.”

Bulkington village is not an urban area in the same sense as Nuneaton, or Bedworth. It is much lower down the settlement hierarchy. Bulkington is incapable of delivering the required infrastructure that would support growth, as envisaged in the Plan for the higher order settlements. Also, policy HSG7 would have adverse impacts on the local community itself, and would cause unacceptable loss of long protected critical areas of Green Belt.

3.2 The underlying reason, for these later disparate housing areas, appears to be that the policies set in Submission Version (2015) had already scraped the barrel in terms of suitable sites that fitted the overarching principles and the preferred strategies for the Plan. The Submission Version (2015) target was to meet an objectively assessed housing need of 10,040 dwellings by 2031. However, under PDV (2017) policy DS4 (page 26) seeks to provide 13,374 homes by 2031. The additional major housing policy sites, needed to achieve this, seem to have their origin in offers made under a late 'call for sites'. Hence, the choice of sites was no longer plan led. The end result is an assortment of unreasonable major developments in locations that would not otherwise be justifiable or fit into a structured or coordinated borough development plan. It is clearly unsound in planning terms, and cannot be described as a proper, or viable, strategy, and it is unsustainable in terms of the scale, benefits to the local community or future infrastructure requirements. Furthermore, it fails to deliver against the overarching principles that are central to achieving the established desired Borough objectives, whilst causing unacceptable secondary issues (as exampled in this document).

3.3 The NBBC area is already heavily urbanised, being described as “.....the most densely populated area of the county with 1,592 persons per square km, compared to the Warwickshire average of 277.”

The latest proposals would lead to over-development,
which is not something that would be attractive to the entrepreneurs hoped for, in Objective 4 (PDV 2017) “(a) Aspirational housing that will attract residents who can make a significant investment in the development of businesses in the area.” By definition, these people will be able to exercise choice. It is more likely that they will be looking at greener and more affluent parts of the county, or perhaps even more distant locations, rather than moving into the most heavily urbanised district in the county. Conversely, proceeding to over-develop the Borough could well cause successful entrepreneur residents to consider moving elsewhere. Again, because they have choice.

3.4 In conclusion it is considered that PDV (2017) is unsound. Whereas, the policies set in Submission Version (2015) are considered to have been more effective in meeting the identified needs of the Borough. Also, they adhered more closely to the overarching principles established earlier in the plan process. Key issues were well set out, and the proposals broadly met identified needs, even if with great difficulty in respect of housing. Nevertheless, the loss of irreplaceable Green Belt remains deprecated, when the only justification is an imprecise forecast of housing need.

4. Housing policy area HSG7

4.1 The proposal to give up this vital piece of Green Belt for housing is wholly unsound in terms of both planning and land use.

Planning considerations

4.2.1 The current Green Belt at HSG7 has stood as a defensible boundary for 60 years. Under the new development proposals this boundary would be substantially weakened. It would no longer be defensible, opening up and inviting further urban sprawl to the north, and to the east of HSG7. Future defensibility would be hindered by the extremely irregular shape of HSG7 boundary. There is a further concern that to achieve an acceptable layout for HSG7 the proposed boundary may itself become breached. Further to this in the NBBC Open Space strategy 2011-2021 this area has been designated as a potential community park. It will be difficult to provide this at an appropriate scale if almost 200 homes are to be built. Added to this we face the prospect of further homes when it is later decided to 'tidy up' the boundary. Any community park would not benefit existing residents due to its location in the middle of a new estate; and it is a largely a facility that we already enjoy at no cost to the Borough, or anyone else. This is contrary to NBBC Open Space Strategy which acknowledges a shortage of open and public space within Bulkington.

4.2.2 The sewerage system for the area is very dated and it is believed that it has no reserve capacity to meet the demand of an additional 195 dwellings without significant investment and improvement to the systems infrastructure (Infrastructure Development Plan 2017). The existing pumping station of Lancing Road is critical to the service of any new development, and may need to be improved, or even replaced. There does not appear to be any clear guarantee that this has been fully assessed, before making decisions.

4.2.3 NBBC has described area HSG7 as both “pleasant” and “has some views” (NBBC Landscape Capacity Study 2017). These views are especially prominent from Lancing Road, Ryton Gardens and Bramcote Close. The hedgerow which serves as a boundary has helped keep this area peaceful. In addition to agriculture, this land provides a valued and much needed recreational facility on the edge of the village. Especially as many villagers use the PROW to access the fields for dog walking, and for children to play in. To destroy,
or alter this piece of land is contrary to NBBC's own Open Space strategy document 2011-2021, which stresses the importance and significance of such open spaces. As the council acknowledges in this report, open space is only rated as being between 'poor and fair', at best within the community. The remainder of HSG7 is actively farmed and is very productive 'best and most versatile' Grade 3 agricultural land. The whole area provides valuable, long established habitat. For the reasons given, the exceptional circumstances needed to justify loss of Green Belt and Grade 3 agricultural land have not been demonstrated, therefore PDV (2017) is unsound.

4.2.4 At a meeting held in Bulkington Village Library (16/02/17) Councillor Beaumont stated between £1-2 million pounds would be made available for future development of infrastructure within the community. This was to cover the improvement of roads, sewerage, parking and improvement to the recreational ground. In the absence of properly presented programmes, and schedules against identifiable schemes/works, it is strongly doubted that this sum of money would be sufficient for the breadth of infrastructure improvements actually needed as a consequence of the development of HSG7 and HSG8; and indeed other facilities being promised by NBBC. Even allowing for the fact these are strategic proposals, the supporting documents are too nebulous. For example IDP (2017) advises:

**Fit for purpose**

8.4 From consultation with STW representatives there are some capacity issues within the Borough, although it is understood that with appropriate mitigation these can be overcome. In relation to waste water treatment, at this stage no issues have been identified relating to capacity.

8.5 The 2016 Water Cycle Study update confirmed that whilst there may be some capacity issues at the receiving waste water treatment works in the future, these can be overcome through capacity upgrades.

**Future delivery programme**

8.8 The Water Industry Act 1991 sets out the requirement for STW to allow for new growth and adequately invest in their infrastructure. Since the Preferred Options consultation the strategic growth sites identified in the Preferred Options consultation have been reviewed by STW. From the consultation to date there are some issues on the network. However, in terms of the specific investment required Severn Trent were not in a position to provide any further information as they will be required to undertake hydraulic modelling on all of the strategic sites.

The two statements highlighted above, in paragraphs 8.4 and 8.5, do not inspire confidence. There is a mild acknowledgement that there may be some capacity issues, but the reader is not given any sense of their scale, or an indication how soon they might arise. Is it likely to be next year, in 5 years, or in 10 years? This matters in understanding lead time and the critical path to achieving delivery, even at strategic level. Paragraph 8.8 is an even greater concern as it specifically refers to growth sites identified in the Preferred Options. There is a clear admission that STW had not been able to model all of these sites, and it has not been possible to quantify the investment needed. We can add to this the new sites that have appeared in PDV (2017) about which presumably even less is known, if that is possible.
4.2.5 The example cited above demonstrates that planning process, and decision making was not well informed about at least one key component of infrastructure. Therefore, PDV (2017) is unsound.

Access to HSG7

4.3.1 Development of HSG7 with access from Bramcote Close would have unwanted environmental and other adverse impacts upon what is at the moment a very pleasant and peaceful cul de sac. The close comprises just 13 dwellings, creating a strong sense of community within the close itself, and other streets in the immediate vicinity, that together make up the local area known as Ryton. All residents are on good terms and value highly the sense of community this affords. Five Bramcote Close residents are original occupiers, with most others intending to make it their long term, and possibly final, home. Development of HSG7 would generate substantial through traffic, especially during the busier periods of the day. It would bring road safety issues which are simply non-existent at the moment. Mitigation in the form of traffic calming would not be an improvement, and would be most unwelcome, especially as there is absolutely no need for it at present.

4.3.2 The Department of Transport Manual For Streets states, in paras 1.15 and 1.16, that the design of roads should help strengthen the communities they serve. Streets should not be unwelcoming for pedestrians or cyclists. Bramcote Close would certainly lose these very desirable qualities, if HSG7 is allowed to remain in PDV (2017). The same issues can be found within Lancing Road, which is a quiet residential street with a strong sense of community, tucked away on the current defensible boundary.

4.3.3 Traffic capacity would be very limited because of the reduced road width, and extensive normal residential parking, particularly where Bramcote Close joins Long Street, Ryton. Due to lack of garages and off street parking the effective road width is often down to a single vehicle at many points. This is not a problem at the moment because of the low volume, and very low speed that residents adopt in the Close, and indeed when joining / leaving Long Street. Also, it serves to prevent speeds becoming an issue. All residents are comfortable with the present arrangements, and this is assisted by the fact that it is a relatively close community. Any traffic increase above existing levels would lead to a tipping point, with congestion at peak times. The impacts and adverse environmental effects would certainly be felt more widely, affecting the quality of life for local residents in Bramcote Close, Long Street, Wolvey Road, Ryton Gardens and Oakham Crescent. Already, access is potentially difficult for blue light services, and large servicing vehicles, because of the generally poor alignment and constrained nature of these local roads and closes. It would not be practical, or even desirable, to consider local widening. As stated, pedestrian safety is currently not an issue. However, a substantial increase in local population would increase demand for the minimal on-street parking in the vicinity of the Weavers Arms. Parking would most probably spill into Oakham Crescent which provides sheltered accommodation for the elderly. As is already the case in Bramcote Close and Long street.

4.3.4 Given that Bramcote Close is not suitable as a means of vehicular access to HSG7, it is important to recognise that the residential area Lancing Road / Arundel Road / Amberley Avenue does not offer any suitable alternative as a means of vehicular access, either. All of these roads have very restricted carriageways and are no more than 5 metres width for much of their length. They would be wholly unsuitable as a reliable access to any further development of any kind. There is considerable on street parking at times, which simply compounds the problems of traversing these roads. The original development dates to the
early 1960's and the road construction should be expected to have a very limited residual life. A further concern of increased off road parking would further add to the congestion of Lancing Road, Arundel Road and Amberley Avenue, making it impassable during peak times and leading to conflict between residents.

4.3.5 The constraints identified above demonstrate that the principal means of access to HSG7 would need to be from some point other than Bramcote Close, Lancing Road, Arundel Road, Amberley Avenue. The land envelope for HSG7 is very poorly conditioned, and for the reasons given, a principal access would need to take a long tortuous route, and would be nothing more than a very long cul-de-sac. This is a very undesirable feature because of the potential difficulties for large servicing vehicles, and more importantly accessibility and attendance times by blue light services.

4.4 Green Belt
4.4.1 It is for good reason that the edge of the village has been maintained for the past 60 years. The green belt has served to provide vital separation and is key in maintaining the individual character and nature of the local community that has developed over the years. The way that residents have joined together, with so little notice, to make their views known, demonstrates just how much local people value their community. It is generally felt that to go beyond the present 6,000 (approx) population would cause irrevocable change with significant adverse effects. Importantly, there is no economic benefit to Nuneaton and Bedworth in forcing these changes.

4.4.2 PDV (2017) proposes future defensible boundaries. Yet the failure to defend the green belt now, increases the risk of reducing important separation for Bramcote Barracks, which we believe needs to be reasonably remote, for its own purposes. Continued development east of Bulkington would be urban sprawl. It would eat into best and most versatile agricultural land, and rural habitats. Furthermore, development will range closer to the NBBC administrative boundary as it pushes outwards.

4.4.3 The green belt around HSG7 is the habitat for a great variety species, including muntjac deer, bats and newts. All as seen and reported by local residents. There is concern that further erosion of the green belt would result in a loss of these species to the area.

4.4.4 From extensive local knowledge over a long period of time, there is a concern that HSG7 site is unsuitable for development because of its propensity to hold water, especially during wet spells of weather. The site slopes down to a low point, such that surface water run off gravitates towards the Lancing Road area. The gov.uk website illustrates using data from the 2013 the Environment Agency, working with lead local flood authorities [LLFAs] acknowledges that the area poses a medium to high risk from surface water. We would also record that if it becomes established as a POS it is likely to be unusable for large parts of the year for the reasons given. NBBC do not appear to have addressed this issue and it is strongly doubted that realistic provision has been made for what may appear to be a simple exercise, in the absence of local knowledge.

4.5 Conclusions
4.5.1 The broad conclusion is that site evaluation has become driven by offers from the 'call for sites', at the expense of good planning. Existing residential roads, Bramcote Close, Arundel Road, Lancing Road, Amberley Avenue are all unsuitable for vehicular access for
to the proposed housing area HSG7. The scale and location of HSG7 shows a clear failure to look at the real impact a large development would have on the relatively small community of Ryton. Locally, the Green Belt and the immediate fields within it, are an essential part of local life and preserving Ryton's character. Existing spatial relationships would be destroyed by housing policy HSG7. The planning process really needs to protect small communities like Ryton. There is great concern that this obvious need has become lost in the current Local Plan. Housing policy HSG7 makes PDV (2017) unsound, and should be removed. Also, the Policies Map should be amended by the removal of housing allocation HSG7 and showing the land as Green Belt.