

Anca Seaton

From: Carr, Bethany (Avison Young - UK) [REDACTED]
Sent: 13 October 2023 18:16
To: Planning Policy
Cc: Evans, Tim (Avison Young - UK); Ward, Louisa (Avison Young - UK)
Subject: Regulation 19 Representations - Jelson
Attachments: 2023.10.13 Jelson - Callendar Farm - Reg 19 Personal Details Form Part A.pdf;
2023.10.13 Jelson - Callendar Farm - Reg 19 Representations Part B.pdf;
2023.10.13 Nuneaton and Bedworth Reg 19 Representations - Jelson.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Processed

Good Evening,

Please find attached representations to the Regulation 19 Publication Draft Consultation on behalf of our clients Jelson.

For completeness our submission includes:

- Completed Personal Details Form – Part A
- Completed Representations Form – Part B
- Regulation 19 Representations including Appendices

I would be grateful if you could confirm receipt of this submission by return email.

Should you require any further information please do not hesitate to contact me.

Kind regards,
Bethany


Bethany Carr
Senior Planner

[REDACTED]
3 Brindleyplace, Birmingham B1 2JB



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 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Review Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

Borough Plan Review Publication Stage

Please return to Nuneaton and Bedworth Borough Council by 16th October 2023 via:

Email: planning.policy@nuneatonandbedworth.gov.uk

Post: Planning Policy, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, NUNEATON, CV11 5AA

This form has two parts –

Part A – Personal details.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal details* * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.	2. Agent's details (if applicable)
Title	Mr	Mrs
First name	Robert	Bethany
Last name	Thorley	Carr
Job title (where relevant)	Land and Planning Director	Senior Planner
Organisation (where relevant)	Jelson Homes	Avison Young
House no. and street		3 Brindleyplace
Town		Birmingham
Postcode		B1 2JB
Telephone number		
Email address		

(where relevant)		
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Part B – Please use a separate sheet for each representation

Name or Organisation: Avison Young (on behalf of Jelson Homes)

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	
Policies	
Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	
No	

4.(2) Sound?

Yes	
No	X

4.(3) Complies with the Duty to Cooperate?

Yes	
No	

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please refer to the supporting representations and associated documents enclosed within this submission which covers Jelson's position on all aspects of the Regulation 19 Publication Draft Consultation Plan.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in

part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the supporting representations and associated documents enclosed within this submission which covers Jelson's position on all aspects of the Regulation 19 Publication Draft Consultation Plan.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	X

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please refer to the supporting representations and associated documents enclosed within this submission which covers Jelson's position on all aspects of the Regulation 19 Publication Draft Consultation Plan

Please note the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	Bethany Carr
Date:	13/10/2023

Nuneaton and Bedworth Borough Council

Local Plan Review – Publication Draft Plan (Regulation 19)

Representations on behalf of Jelson Homes

October 2023

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Appendices

Appendix 1 Land East of Callendar Farm - Site Location Plan

Appendix 2 Land East of Callendar Farm – Plan showing existing, consented, and proposed development areas surrounding the site

Appendix 3 Land East of Callendar Farm - Site Access Plan

Report title: Jelson Limited

Prepared by: Tim Evans (Director) and Bethany Carr (Senior Planner)

Date: October 2023

For and on behalf of Avison Young (UK) Limited

1. Introduction and Instructions

- 1.1 Avison Young (“AY”) is instructed by Jelson Homes (“Jelson”) to examine the Publication Draft Local Plan, and its evidence base, and to reach conclusions on whether the Plan as it currently stands is sound. If we conclude that it is not sound, we are instructed to offer views on the types of Modifications that are required in order to make it sound. Our findings are set out in these representations.
- 1.2 These representations specifically relate to the promotion of land Jelson controls to the east of Callendar Farm, Nuneaton (‘the Site’).

Soundness

- 1.3 For the Local Plan to be sound it must be:
- a) **Positively prepared** - provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** - that is, an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** - it must be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.4 For reasons that we explain in subsequent Sections of these Representations, the Pre-Submission Local Plan is not sound as currently prepared, but it is capable of being made sound with modifications.

2. Jelson's Land

Land East of Callendar Farm, Nuneaton

- 2.1 Jelson has actively promoted the land that it controls to the east of Callendar Farm, Nuneaton for residential development through the plan making process.
- 2.2 The land 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 is comprised of the southern parcel of 3.31ha (which already benefits from a Local Plan allocation) and a northern parcel of circa 6.19ha which remains unallocated. The sites are bounded to the north by Watling Street (A5), to the east by existing residential properties, and to the west, south and partially to the north by new housing currently under constructions. A Site Location Plan is provided at **Appendix 1**.
- 2.3 It is already well located and in close proximity to a number of existing facilities and services. The District Centre of Horeston Green, which contains several amenities such as food stores, takeaways / restaurants, a pet shop and a nursery, is located approximately 1 mile (1.6 km) south of the Site. There is also a larger Aldi supermarket located approximately 500m east of the Site along Watling Street (A5). Moreover, a new local centre is also to be provided within a short walking distance of the site as part of the permitted developments to the west.
- 2.4 The Site benefits from good public transport links to Nuneaton Town Centre, where a wider range of services and facilities are available, with bus stops located along the Long Shoot (A47), approximately 500m east of the Site.
- 2.5 The southern part of the Site is already allocated for housing development under Policy HSG1 of the adopted Local Plan. It forms part of a Sustainable Urban Extension comprising around 4,400 dwellings, a new local centre and primary school. A wider part of the allocation under HSG1 has the benefit of outline planning permission and several phases of it have been, or are being, built out under a series of reserved matters approvals secured by a number of housebuilders, including Jelson.
- 2.6 The northern part of the Site is not, however, allocated for development. This appears to be solely because the land was not controlled by a developer or willing landowner at the time the current Local Plan was being prepared, and, as a consequence, it was never promoted for 'development' through the Local Plan process. Jelson secured an option over this land in 2021 and is now looking to bring it forward for residential development, as a logical extension to the existing SUE. Jelson alerted the Council to the Site's availability initially, through the submission it made to its Call for Sites process in October 2021, as well as more recently, during the Regulation 18 Local Plan Consultation in July 2022.
- 2.7 As can be seen from the plan at **Appendix 2**, the site forms a very obvious 'missing part of the jigsaw' in terms of the development of this strategic development site and its omission as a formal allocation in the emerging local plan is therefore somewhat puzzling.

Availability

- 2.8 Jelson is an experienced local housebuilder with an exemplary record of delivering high quality traditional new family homes in Leicestershire. The company works across the East Midlands on schemes of varying scale and complexity. Jelson controls the whole site, including land required for access therefore there are no constraints to the development on the Site in terms of landownership, and the Site is available immediately for development. There are no agricultural tenancies or other ownership restrictions. It is Jelson's intent to build out the Site themselves, as they are doing on the surrounding consented sites.

- 2.9 Jelson is in the process of preparing a full planning application for the development of these sites. The capacity analysis that Jelson has undertaken suggests that the sites would be capable of delivering 240 dwellings between them. The technical analysis that has been completed to date indicates that there would be no adverse technical or environmental impacts arising from the development of the sites for the quantum of development proposed.
- 2.10 We therefore conclude that the whole site, including the currently unallocated northern parcel is clearly available for development now, and thereby fulfils this part of the NPPF deliverability test.

Suitability

- 2.11 As with the southern parcel, the additional northern parcel is in a sustainable location and sits adjacent to land allocated for primarily residential uses under Policy HSG1 of the adopted Local Plan which, once built out, will form part of the built-up area of Nuneaton. As set out above, the Site is located within walking distance to a range of amenities, and benefits from good public transport links to Nuneaton Town Centre.
- 2.12 The northern parcel could accommodate in the region of 160 units which when added to the allocated land to the south would deliver in the order of 240 dwellings. This scale of development could easily be accommodated within this part of Nuneaton, where the principal for large-scale residential development is already well established.
- 2.13 The Site is particularly well positioned and could be developed without extending the built-up area of Nuneaton beyond the boundaries of the wider SUE allocation. The Site would be contained to the west, east and south by the development to be delivered under Policy HSG1 and to the north by Watling Street/ A5 and the completed Midland Heart development which fronts the A5. Indeed, the development would infill what is a relatively small gap between the Midland Heart development and older established properties directly fronting the A5 to the East. To this end, it would represent a very logical extension to the existing allocation, without giving rise to any significant visual, landscape or townscape harm.
- 2.14 A range of technical work has been completed for the site which confirms that the Site is suitable for development, and that there are no insurmountable constraints which would prohibit this site from coming forward. Further technical work is being undertaken by Jelson's project team to demonstrate the suitability of the Site as a whole for residential development as part of the full planning application which is being prepared.
- 2.15 We therefore conclude that the Site offers a suitable and highly sustainable location for development now, thereby fulfilling this part of the NPPF deliverability test.

Achievability

- 2.16 As mentioned, Jelson is currently in the process of preparing a full planning application which will seek full (detailed) planning permission for the development of both the allocated part of the Site and the unallocated part. As a consequence of this, a significant amount of technical work has been undertaken to support the planning application. This hasn't revealed any impediments to the development of the Site for housing. Jelson is therefore confident that the development of this site is appropriate and deliverable.
- 2.17 Jelson are committed to delivering policy compliant affordable housing on this scheme, as well as the necessary enhancements (either on-site or off-site) needed to achieve biodiversity net gain.

- 2.18 Financial contributions towards infrastructure improvements needed to mitigate the impacts of the development, where appropriate, will also be provided.
- 2.19 Furthermore, Jelson controls the land to the Site, which means that it could be accessed via its development to the south. The Site can therefore be developed without requiring the construction of a new access onto the A5. The plan shown at **Appendix 3** illustrates the proposed access arrangements.
- 2.20 As the Council may be aware, Jelson has a longstanding reputation as one of the Midlands' leading housebuilders and is currently constructing the Lockley Gardens / The Long Shoot development which lies directly south of the Site. As such, Jelson is very familiar with the area and knows the housing market in Nuneaton extremely well. It is therefore confident that there is demand in both the short, medium and longer term for the type of homes that they build.
- 2.21 Taking all of this into account, we conclude that the development of the Site is not only highly sustainable, but also fits squarely with the Council's stated development strategy as this site offers a sustainable location for growth on the edge of the urban area, adjacent to the existing residential area (existing and that currently being brought forward for development). There is in fact no good planning reason that we can identify for rejecting the extension of the allocation to include this site. The failure to properly consider and allocate this site is clearly irrational and unjustified and should be reconsidered.

3. Spatial Strategy

- 3.1 The Council's proposed spatial strategy (i.e. how it proposes to distribute development and accommodate growth) should promote a sustainable pattern of development that: aligns growth and infrastructure; improves the environment; mitigates climate change and adapts to its effects, in accordance with the NPPF.
- 3.2 A sustainable pattern of development is almost always the one that focusses that majority of growth in and around the settlements that have the infrastructure to support it, and have the greatest range of services, facilities, shops and employers. The outcome of such a strategy is that:
- new residents do not have to rely on the private car to access jobs, services and facilities; or if they continue to use their cars the journeys they need to make are shortened and less polluting than would otherwise be the case; and
 - new businesses have direct access to a larger local workforce and the economic benefits that flow from the clustering of industries.
- 3.3 The draft Plan states that the Council's locational strategy for development is to direct the majority of new development over the plan period to Nuneaton as the primary town, and the most sustainable settlement in the Borough. Development will then be directed to other settlements, at a scale that reflects the role and function of the settlement and its order in the hierarchy, as well as the settlement's ability to accommodate change.
- 3.4 A key priority of the development strategy is to direct growth to the most sustainable locations which make full use of public transport, walking and cycling.
- 3.5 Overall Jelson agrees that a spatial strategy which focusses the majority of development in the urban area with proportionate growth at other sustainable settlements is the most appropriate and sustainable strategy.
- 3.6 The spatial strategy of the emerging Local Plan correlates with the spatial strategy of the existing Local Plan. Of particular relevance to this Site is the element of the strategy which promotes the development of a sustainable urban extension to Nuneaton under the strategic housing allocation HSG1. The Council has therefore, already established that the principle of development in this suitable and sustainable location, is acceptable. The Council also continue to promote development in this location through the strategic housing allocation SHA1, as set out in the Publication Draft Plan (dated September 2023). It is acknowledged that this site forms part of the existing wider HSG1 '*North of Nuneaton*' allocation.
- 3.7 As mentioned above, the emerging Plan anticipates that the majority of development will be directed towards Nuneaton, however from the evidence published by the Council to date, there does not appear to be any justification or explanation as to why capacity around the long-standing '*North of Nuneaton*' SUE is not being maximised. More specifically, it is not clear why the Plan's strategy doesn't seek to incorporate Jelson's land into the SUE, given it is so well physically related to it.
- 3.8 On this basis, Jelson's land east of Callendar Farm, in our view sits squarely with the development strategy and should be incorporated into Housing Allocation HSG1. As things stand, the approach proposed towards the exclusion of the Site is not justified or consistent with national policy which requires the efficient use of land. Therefore, to be considered sound, the Draft Plan should be updated to incorporate this site, which has a capacity to deliver circa 160 additional dwellings.

- 3.9 Alongside this, draft Strategic Policy DS3 (Overall Development Needs) sets out that by 2039, a minimum of 9,810 homes, based on 545 dwellings per annum will be planned for and provided within Nuneaton and Bedworth Borough. It is important to note that the Plan's housing requirement is expressed as a minimum and that need alone cannot be used as justification for denying the allocation of such an obviously sustainable site that is acceptable in all other technical and planning policy respects. Indeed, it is noted that at no-point during the previous stages of plan consultation has the Council provided any reasoned justification for the site's omission.
- 3.10 We conclude that the location of Jelson's site on land east of Callendar Farm is in accordance with the spatial strategy, as set out by Nuneaton and Bedworth Borough Council. As such the development of this site would help positively boost the supply of housing through the addition of the unallocated parcel of land which can accommodate circa 100 additional dwellings, on a site that is sustainably located and entirely in accordance with the Plan's spatial strategy for the delivery of housing in the Borough.

4. Site Selection

- 4.1 The Council has published an updated Housing and Economic Land Availability Assessment (HELAA), dated 2023.
- 4.2 We have extracted elements of the Council’s HELAA assessment of Jelson’s Site at land east of Callendar Farm (reference: WED-5) and set out below our thoughts and observations on some of the statements made, and the scoring given.

Nuneaton and Bedworth Borough Council LAA Criteria	Nuneaton and Bedworth Borough Council LAA Rating	Jelson’s Comments
<p>Accessibility to local facilities</p> <p><i>Is the site within reasonable walking distance of local services and facilities (e.g. convenience shop, primary school, doctor’s surgery, public house)</i></p>	<p>Amber (Some facilities reasonably accessible)</p>	<p>The site is located within walking distance to a range of facilities, services and amenities which are coming forward as part of the wider North of Nuneaton SUE.</p>
<p>Public Transport</p> <p><i>Is the site accessible to public transport services (i.e. 400m/ 5min walk to bus or 800m/10min walk to rail)</i></p>	<p>Amber (Accessible to bus or rail)</p>	<p>Public Transport surrounding the site is due to be enhanced as part of the wider SUE proposals, meaning that once fully built out this site will be located within close proximity to various public transport services. Alongside this, the site will promote active travel measures across the surrounding development parcels contained within the SUE through pedestrian and cycle connectivity, which will link up to the new local centres and facilities on offer as part of the wider SUE.</p>
<p>Landscape Sensitivity</p>	<p>Amber (Medium and medium Low sensitivity)</p>	<p>The analysis that has been undertaken to date by Jelson’s technical consultants as part of the planning application being prepared does not suggest that the site forms part of a particularly attractive landscape. Indeed, development will come forward around it over the plan period, which would result in it becoming an isolated pocket of undeveloped land, diminishing what little landscape quality it has yet further.</p>
<p>Agricultural Land Classification</p> <p><i>Is the site classified as being the best and most versatile agricultural land</i></p>	<p>Amber (Grade 3a, or partly grade 1 or 2).</p>	<p>The analysis that has been undertaken to date by Jelson’s technical consultants as part of the planning application being prepared does not indicate that the proposal would have a detrimental impact on the overall quantum of BMVAL in the Borough. We would also conclude that the Council has already</p>

		accepted that loss of BMVAL would occur when it allocated the site for development.
<p>Natural Features</p> <p><i>Are there natural features to the site that may have ecological value or may affect the design and layout e.g. watercourses, ponds, hedgerows etc.</i></p>	Amber (Some impact)	As part of the planning application being prepared we have identified what features within the site have ecological value and the analysis undertaken suggests that these are mainly around the perimeter of the site and could be retained as part of its future redevelopment.
<p>Pollution</p> <p><i>Is the site likely to be affected by either noise or air pollution including AQMAs</i></p>	Amber (Some impact)	The proximity of the site to the A5 is acknowledged, however the site is capable of being sensitively designed to ensure that any noise impacts are appropriately mitigated against.
<p>Site Assembly</p> <p>Could the site form part of a larger site that is suitable for development? Would development of this site restrain other development?</p>	Amber (mitigated by design)	As noted, the development of this site would successfully fill the ‘missing jigsaw piece’ of the wider SUE located to the north of Nuneaton.
<p>Current Use</p> <p><i>Is the site currently in use, is the whole site in use, would existing uses/ tenants need to be relocated</i></p>	Amber (Agricultural use/ vacant/ under-used)	The site is currently in agricultural use.
<p>Suitable and available comment:</p>	<p><i>The site is located on the periphery of the settlement, although it is surrounded by a high amount of new development and is not within close proximity to local services and transport links. There is potential noise pollution from the nearby A5. The southern parcel of the site is located within HSG1”.</i></p>	Jelson wish to reiterate that the site is located on the periphery of the settlement, but is well contained within the existing SUE, with residential development consented on three sides. Once fully developed out, the wider SUE will contain a range of facilities, services and amenities which will be located in close proximity to this Site. As part of the planning application currently being prepared, our technical team have not identified any severe noise impacts which would preclude the development of this parcel. We note that there is existing consented, and built-out, development along the A5 which have successfully mitigated against any noise impacts.
<p>Site History</p> <p><i>Does the planning history provide any information as to the likely development of the site</i></p>	Amber (No permission/ expired)	The planning history of an application site, and/or adjacent land, is capable of being a material consideration, which must be weighed in the balance when a Local Authority makes planning decisions. In this instance, the planning history of the unallocated part of the application site is

		<p>unlikely to be of relevance to its planning potential looking forward. All of the planning decisions, we have been able to examine (dating back to 1982), concern only operational proposals relating the existing agricultural use of the site.</p> <p>Notwithstanding this, there is an extensive planning history relating to adjacent land (the allocated part of the wider SUE), which confirms that the Council has previously considered the principle of the redevelopment of the land for residential, use as well as other uses consistent with Policy HSG1 are acceptable. There is, therefore, nothing to suggest why the Council ought to reach a different conclusion about the acceptability, in principle, of the residential redevelopment of Jelson's land.</p>
<p>Suitable, Available and Achievable comment:</p>	<p><i>The site lies on the periphery of the settlement. Southern part is allocated for development. Site is available.</i></p>	<p>Jelson would therefore confirm that this Site is Suitable, Available and Achievable.</p>
<p>Status</p>	<p><i>Uncertain further information required.</i></p>	<p>The HELAA suggests that sites deemed 'uncertain further information required' are not included within the trajectory because of a known physical or policy constraint that would need further, more detailed resolution before their suitability for residential development could be confirmed. This includes sites where there are access or highway network constraints, heritage or flood risk constraints which would require more detailed work to resolve the issues before permission could be granted. The HELAA goes on to note that it is thought these sites could only be brought forward, through a detailed planning application, to directly address the issues of concern before they could be added to the housing trajectory.</p> <p>Jelson are not aware of any known physical or policy constraint that would preclude the development of this Site.</p>
<p>Housing Assessment Category</p>	<p>Omitted</p>	<p>It is unclear as to why this site has been omitted from this assessment.</p>

- 4.3 Jelson note that as a starting point, the Council does not seem to have given any recognition at all to the Site's location adjacent to (on three sides) by the wider SUE. As such, the Council has not taken into account the facilities, services and amenities that will be delivered on the SUE which enhances the overall sustainability of the Site.
- 4.4 As part of the planning application being prepared for this Site, in connection with the allocated parcel to the south, Jelson's technical team has had regard to the committed schemes coming forward for development around the Site. The consented layouts have been utilised to ensure that pedestrian and cycle connectivity is enhanced and flows through the proposed layout to ensure a joined-up approach to the promotion of sustainable and active travel measures across the wider SUE.

5. Housing Delivery

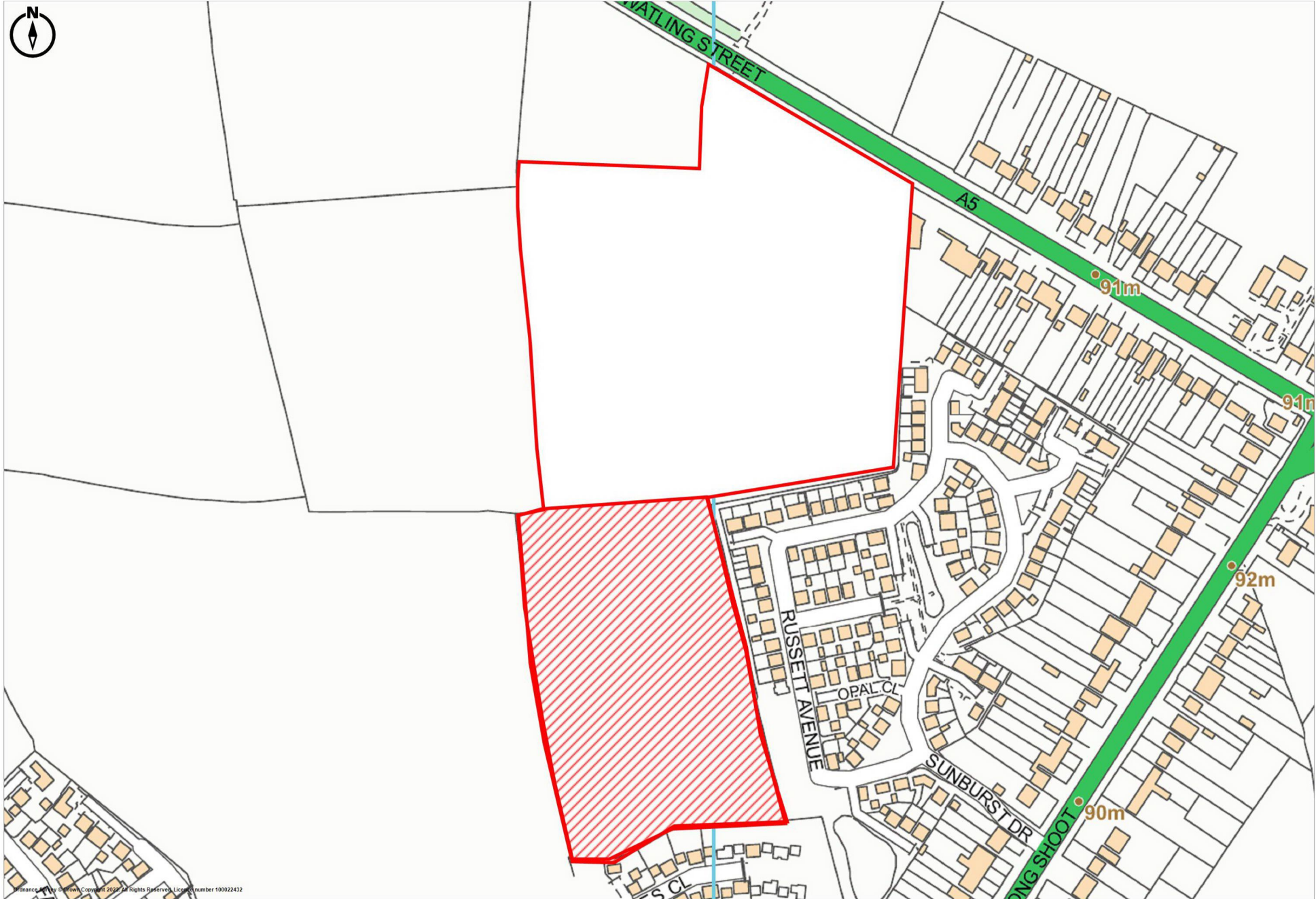
- 5.1 In order for the Local Plan to be sound it must provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. Because the Council must also identify and update annually a supply of specific deliverable sites sufficient to provide minimum of five years' worth of housing against their housing requirement, the Plan is also required to identify specific, deliverable sites for years one to five of the plan period then sufficient developable sites, or broad areas of growth for the remainder of the plan period.
- 5.2 The Glossary to the NPPF defines 'deliverable' sites as being available now, offering a suitable location for development now and be available within a realistic prospect that housing will be delivered on the site within 5 years. For a site to be considered 'developable' it should be in a suitable location for housing development with a reasonable prospect that it will be available and could be viably developed at the point envisaged.
- 5.3 Table 3 of the Publication Draft Plan demonstrates the provision of approximately 12,085 dwellings to come forward through the Borough Plan Review. Such supply is in excess of the minimum housing requirement of 9,810 homes within Strategic Policy DM3.
- 5.4 The Council has taken the view that, in order to guard against housing land supply related risks it should identify specific sites to satisfy, and in fact exceed, the entirety of its housing requirement. We agree that this is appropriate and necessary.

6. Conclusions and Modifications Required

- 6.1 When a Local Plan is submitted for examination, the plan-making authority must be satisfied that it is sound. It must not submit a Plan for Examination that it knows to be unsound in the hope or expectation that the Examination will highlight the modifications that need to be made to make it sound.
- 6.2 It is clear from the analysis that we have undertaken that the Local Plan is not sound in its current form. It will, therefore, need to be amended before it is submitted for examination.
- 6.3 Jelson believe that the changes that need to be made to the Plan and the key elements of evidence base relate to the inclusion of Jelson’s land to the east of Callendar Farm.
- 6.4 As we have demonstrated through this response this Site is Suitable, Available and Achievable.
- 6.5 This Site fits squarely with the Council’s stated development strategy as this site offers a sustainable location for growth on the edge of the urban area, adjacent to the existing residential area (existing and that currently being brought forward for development). There is in fact no good planning reason that we can identify for rejecting the extension of the allocation to include this site. The failure to properly consider and allocate this site is clearly irrational and unjustified and should be reconsidered.
- 6.6 It is on this basis that Jelson conclude that its land east of Callendar Farm should be allocated in the Local Plan as the approach proposed towards the exclusion of the Site is not justified or consistent with national policy which requires the efficient use of land. Therefore, to be considered sound, the Draft Plan should be updated to incorporate this site, which has a capacity to deliver circa 160 dwellings.

Appendix 1

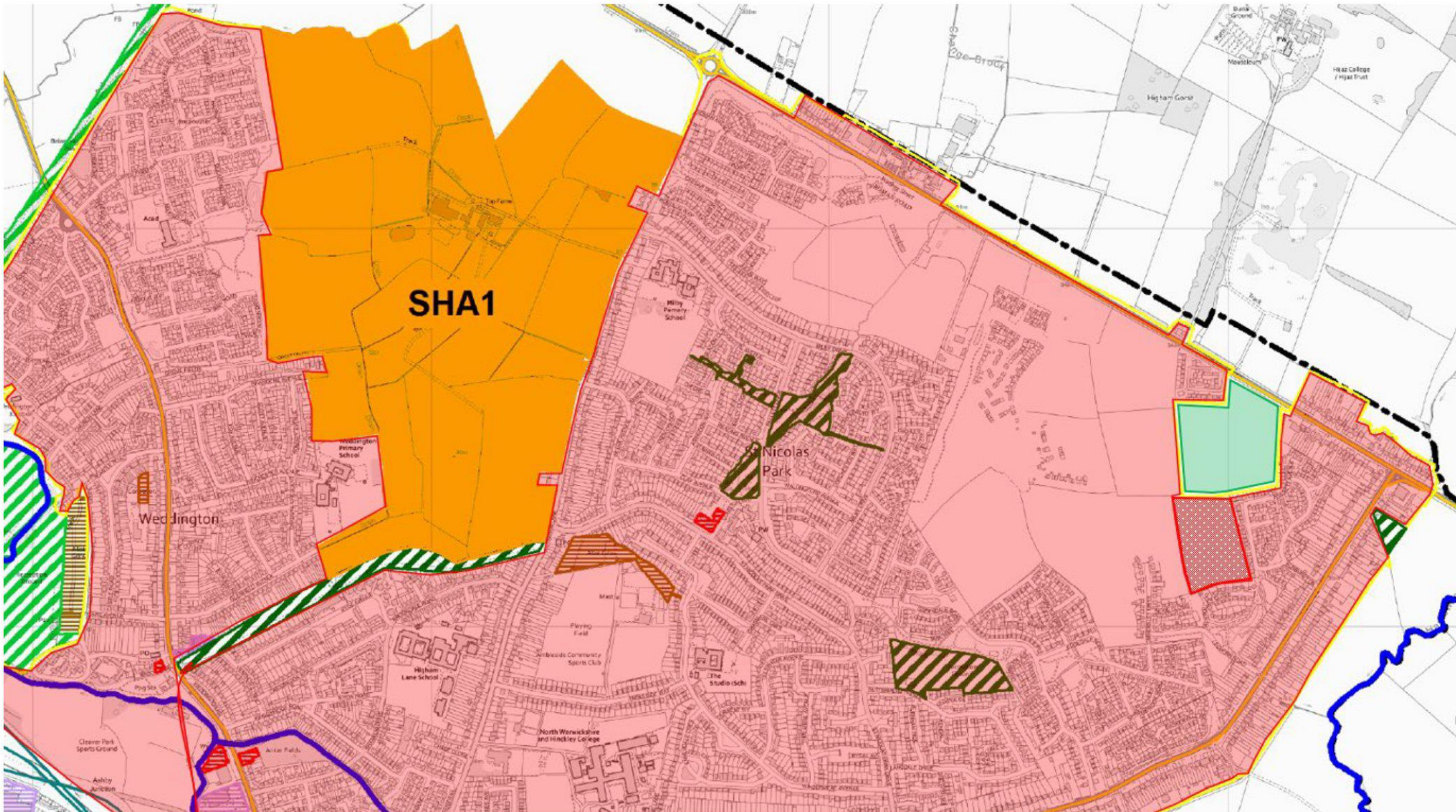
Land East of Callendar Farm - Site Location Plan



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Appendix 2

Land East of Callendar Farm – Plan showing existing, consented, and proposed development areas surrounding the site

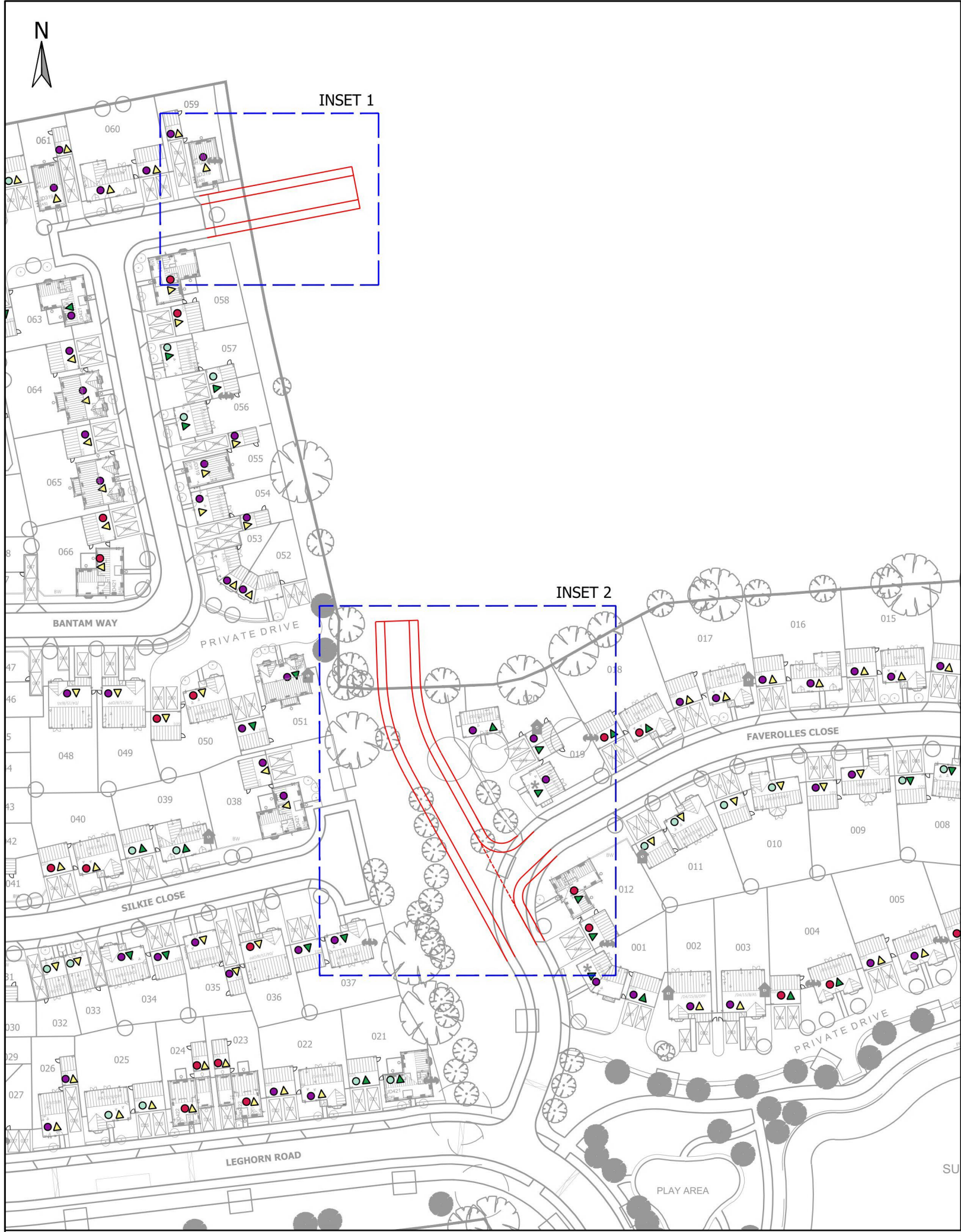


- Strategic Housing Allocation – SHA1
- Existing built development and consented development
- Jelson's land East of Callendar Farm – **Un-allocated**
- Jelson's land East of Callendar Farm - **Allocated**
- Proposed Development Boundary

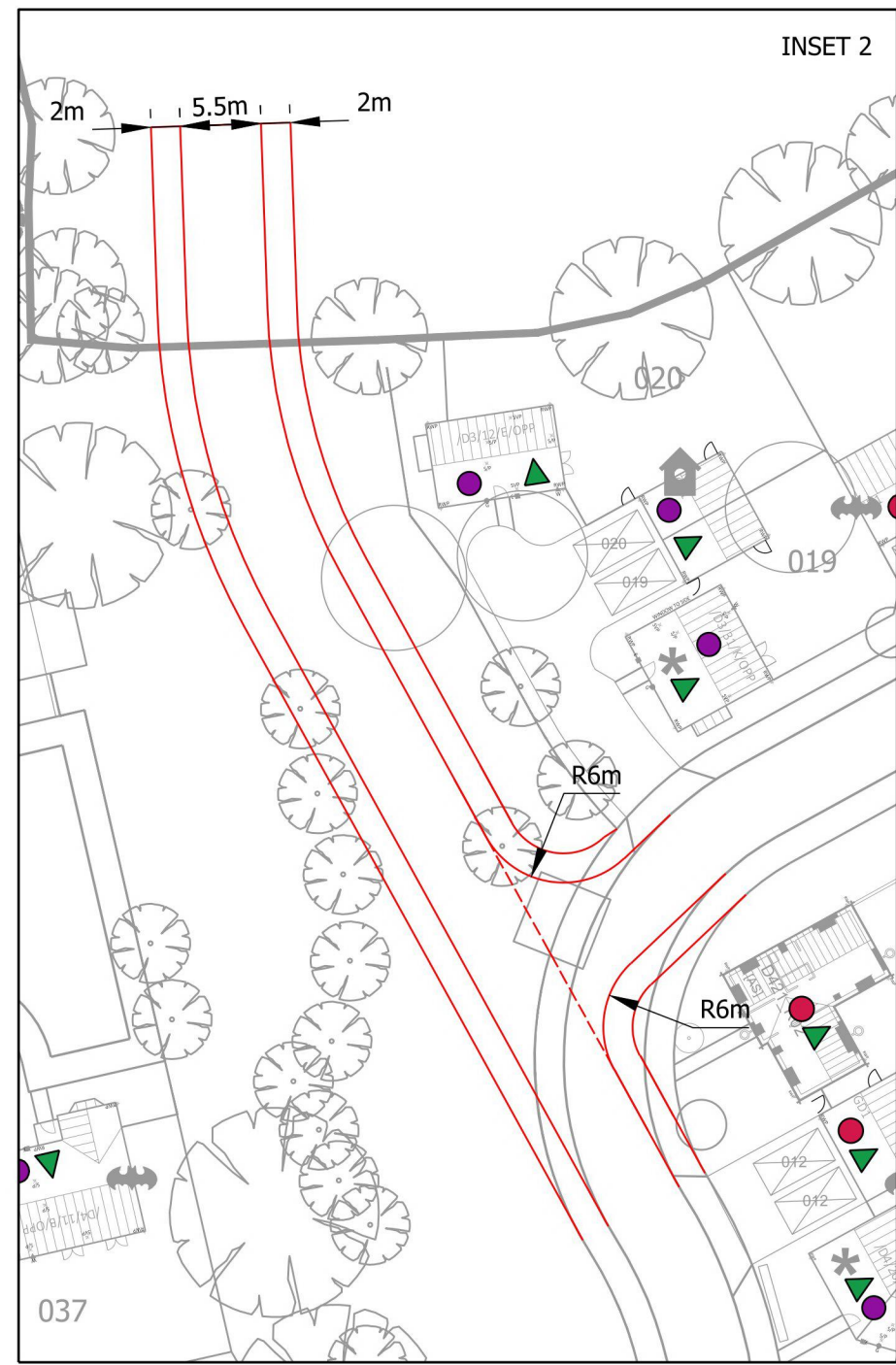
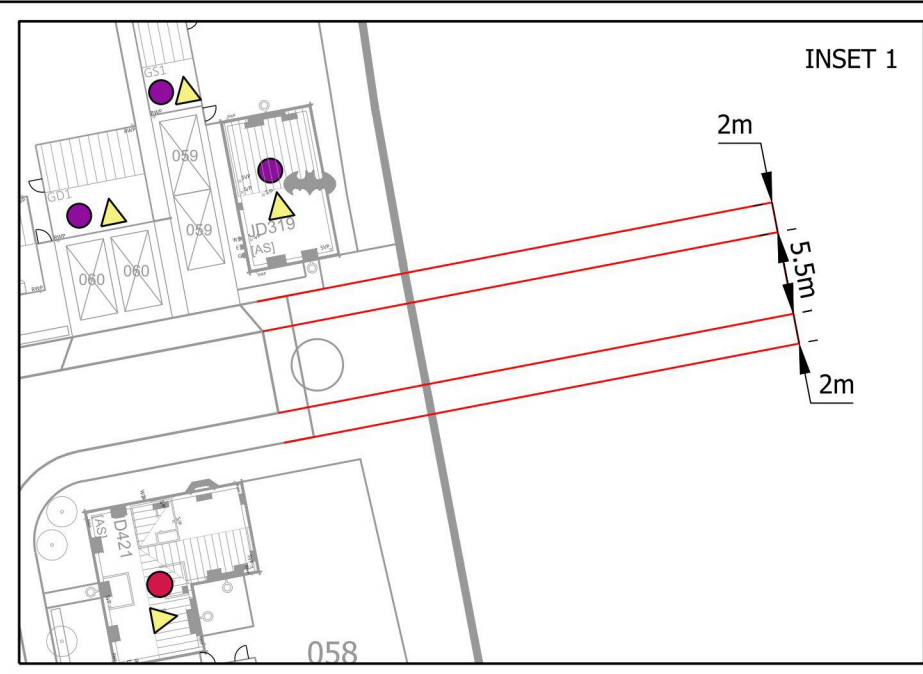
Plan showing existing, consented and proposed development areas surrounding Jelson's Site

Appendix 3

Land East of Callendar Farm - Site Access Plan



0 10 20 30 40 50m
SCALE 1:1000



0 5 10 15 20 25m
SCALE 1:500

Key
— PROPOSED ACCESS

PRELIMINARY ISSUE

P01	PRELIMINARY FIRST ISSUE	21.04.2022	NJ	SS	RJH
Rev	Description	Date	Drawn	Checked	Appr
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Client:
JELSON

Project Name:
LAND ADJACENT TO A5, NUNEATON

Sheet Title:
PROPOSED SITE ACCESS

TTE Project Number	Drawn By	Date	Checked By	Date	Approved By	Date	Scale @ A3	Suitability
B038427	NJ	'Apr '22	SS	'Apr '22	RJH	'Apr '22	as shown	S0
Client Project Number	Originator	Volume/System	Level/Location	Type/Code	Role	Number	Revision	
PRJ01	TTE	- 00	- ZZ	- DR	- O	- 00001	P01	

Contact details

Enquiries

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