

## Anca Seaton

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**From:** Jon Power <[REDACTED]>  
**Sent:** 16 October 2023 11:54  
**To:** Planning Policy  
**Cc:** Simon Daly  
**Subject:** Borough Plan Review Publication Local Plan - Response on behalf of Ainscough Strategic Land  
**Attachments:** ASL Galley Common Reg 19 Representations\_FINAL\_16102023.pdf; Appendix 1 - Galley Common Development Statement\_on behalf of ASL\_FINAL.pdf  
**Categories:** Processed

Dear Sir / Madam

Asteer Planning LLP acts on behalf of Ainscough Strategic Land in relation to land at Galley Common, Nuneaton. Thank you for providing an opportunity to comment on the Borough Plan Review Publication (Regulation 19) Consultation. In response to this consultation, please find attached:

1. **Representations** on the on soundness of the Publication Local Plan, including the spatial strategy, policies, allocations and the evidence base which underpins it;
2. A **Development Statement (Appendix 1)** that sets out the availability, suitability and deliverability of land at Galley Common, which has the potential to provide the type and quality of homes and community infrastructure to meet the needs the Borough during the forthcoming Plan Period;

I would be grateful if you could confirm receipt of this submission, and if you have any initial queries or comments, please don't hesitate to let me know.

With kind regards

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Asteer Planning LLP [Legal Disclaimer](#)



# Representations to the Nuneaton and Bedworth Borough Council Publication Local Plan (Regulation 19)

In relation to Land at Galley Common  
Nuneaton

On behalf of Ainscough Strategic Land

October 2023

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## APPENDICES

### APPENDIX 1 GALLEY COMMON DEVELOPMENT STATEMENT

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Version: FINAL

Date: 16<sup>th</sup> October 2023

## 1 INTRODUCTION

- 1.1 These representations have been prepared by Asteer Planning LLP ("Asteer") on behalf of Ainscough Strategic Land ("ASL") in response to the Nuneaton and Bedworth Borough Council ("NBBC" or "the Council") Publication Version Local Plan 2021-2039 ("Publication Plan").
- 1.2 Asteer acts on behalf of ASL in relation to land at Galley Common ("the site"). The site being promoted for development is separated into two parcels - Parcel A is adjacent to Plough Hill Road and extends approximately 6.1 hectares and Parcel B extends approximately 6.2 hectares. The site forms part of a wider land ownership which has the potential to be used for habitat and biodiversity enhancements, as well as multi-functional recreational / amenity space. A location plan of the site is illustrated below as Figure 1.

Figure 1: Site Location Plan



- 1.3 These representations should be read alongside the Development Statement (attached as **Appendix 1**) that was submitted as part of ASL's representations to the Preferred Options (Regulation 18) Local Plan, and which sets out the availability, suitability and deliverability of land at Galley Common, which has the potential to provide the type and quality of homes and community infrastructure to meet the needs the Borough during the next Plan Period.
- 1.4 The site is under the control of ASL, who have a longstanding track record in bringing forward major strategic sites for development in partnership with the UK's largest and most respected housebuilders. The site is deliverable (suitable, available and achievable as defined by the NPPF) and can be brought forward early in the next Plan Period. The Development Statement at Appendix 1 demonstrates that the site is strategically located to meet need on the edge of Nuneaton, the Borough's primary location for growth, and sets out how Galley Common can support a sustainable spatial strategy that builds on successful recent developments on the western edge of the town.
- 1.5 ASL would welcome ongoing engagement with the Council as the preparation of the Local Plan and its evidence base is progressed towards Submission Version and Examination in Public ("EiP"). ASL has an appointed design and technical team to progress plans for the site and to robustly demonstrate the merits of the site at EiP.
- 1.6 ASL would like to reserve the right to appear and speak at EiP.

### **Content & Structure**

- 1.7 These representations set out ASL's comments on the soundness of the Publication Plan and demonstrate how land at Galley Common can meet the needs of the Borough during the next Plan Period. In summary, the remainder of these Representations provide:
- **Comments on the Publication Plan** – providing ASL's overarching and detailed comments on the Publication Plan; including a review of the recently published evidence base documents to underpin conclusions on the soundness of the Publication Plan;
  - **A summary of the deliverability of Galley Common** – supported by the Development Statement at **Appendix 1**; and
  - **Summary and Conclusions**– providing a summary of this submission and concluding views on the soundness of the Publication Plan in its current form.

## 2 COMMENTS ON PUBLICATION PLAN

2.1 ASL welcomes the opportunity to comment on the soundness of the Publication Plan and would like to reserve the opportunity to present these views at EIP.

2.2 These representations provide comment on the relevant elements of the Publication Plan as they relate to its soundness and ability to provide sustainable growth strategy for NBBC to meet the needs of the next the Plan Period. In summary, this section provides:

- a) **Overarching comments** on the soundness of the Publication Plan and its evidence base; and
- b) **Detailed comments** on the specific strategic and detailed policies set out in the Publication Plan.

### a) General Comments

2.3 ASL understands the Council's motivations for undertaking an immediate review of the adopted Local Plan. However, it is crucial that any new Local Plan is underpinned by a sound legal and spatial approach to plan making.

2.4 In summary, ASL are of the view that the Publication Plan in its current form is not sound and is not underpinned by a positively prepared or justified evidence base. The Council has sought to expedite the preparation of the new Local Plan for political reasons, which is leading to an unsound and ill-prepared plan being prepared for publication and submission. A robust and soundly prepared plan should:

- i. Be legally sound and fully consider cross boundary issues and emerging sub-regional evidence.
- ii. Be based on a comprehensive, robust and sound evidence base that underpins the proposed strategic policies, spatial strategy and approach to land allocations.
- iii. Plan fully for the needs of NBBC during the next Plan Period, including its potential to support growth and recognise its strategic location at the heart of the West Midlands.
- iv. Where necessary, consider a review of the settlement boundary that promotes a sustainable approach to development and supports growth in Nuneaton as the Borough's primary settlement. Any review of the Settlement Boundaries should be based on realistic assessment of urban capacity, followed by a review of sustainable sites within the open countryside; before considering sites within the Green Belt.

2.5 The following provides ASL's overarching comments on these issues:

**i) Cross Boundary Legal and Procedural Issues**

2.6 Within the Publication Plan evidence base, there is no indication of how cross boundary need at a sub-regional Coventry and Warwickshire Housing Market Area<sup>1</sup> ("HMA") or Birmingham HMA level is considered.

2.7 Whilst we understand that the 2022 sub-regional Coventry and Warwickshire Housing and Economic Development Needs Assessment ("HEDNA") indicates a lower housing requirement in NBBC and the sub-region, the Duty to Co-operate is a statutory obligation for plan making and should be undertaken throughout the Local Plan process. It is not clear that, at present, the Council has not sought to discharge its Duty to Co-operate or sought to fully understand if any cross boundary need exists. We consider that there is a risk that the Local Plan will not be legally sound unless the Council sets out how cross boundary matters have been fully considered early in the plan making process to underpin the Local Plan strategy.

**ii) Deficient Evidence Base**

2.8 In its current form, ASL consider the Publication Plan evidence base has deficiencies that undermine the soundness of the emerging Local Plan. There are key evidence base documents that should be prepared and should inform the spatial strategy and proposed land allocations. These include (but are not limited to):

- **An Urban Capacity Study** – which is required to provide a realistic assessment of land and sites available within the existing settlement boundary. This should be underpinned by a robust assessment of availability, deliverability and viability to ensure that unrealistic sites are not identified that would fail to deliver during the Plan Period.
- **Review of the Settlement Boundary** – subject to a more comprehensive evidence base being prepared, any review of the settlement boundary should sequentially consider sites outside of the Green Belt before considering any amendment to Green Belt boundaries.

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<sup>1</sup> The Housing Market Area is defined as Coventry and Warwickshire, and comprises the following local authorities: Coventry, Rugby, North Warwickshire, Nuneaton & Bedworth, Stratford-on-Avon and Warwick

- **Local Plan Viability Assessment** – an assessment of viability is critical to understand the deliverability of sites identified in the Plan, and to holistically consider the viability of the Local Plan overall.
- **An updated Infrastructure Delivery Plan (IDP)** – the IDP is critical to understand and holistically plan for the infrastructure required during the next Plan Period, including setting out how new infrastructure will be delivered. The current IDP (which is referenced in the Publication Plan) includes sites that were allocated in the adopted Local Plan but are proposed to be de-allocated in the emerging Local Plan (IDP, 2021, Appendix E). An updated IDP should consider how the removal of these sites will impact on the delivery of infrastructure during the next Plan Period.

### **iii) Supporting Growth and Meeting Need**

- 2.9 As is set out in more detail later in this submission, ASL consider that NBBC should capitalise on its strategic location and support the Borough's potential to achieve greater economic and housing growth. ASL consider that the relationship between housing and employment should be acknowledged and NBBC should plan for a positive economic growth scenario, with a spatial strategy that will support sustainable economic growth and address the affordability issues of the Borough in the long term. The Council should also be pro-active in supporting the growth potential of the wider sub-region including the Birmingham and Coventry & Warwickshire HMA's.

### **iv) Review of the Settlement Boundaries**

- 2.10 As set out above, the evidence base needs to be progressed to understand the issues the Borough is facing, including its housing requirement and the capacity of sites within the urban area. If the outcome of this evidence is an increase in housing need and a requirement to include additional sites in the Local Plan, this should include a review of the existing settlement boundaries around Nuneaton, as the Borough's primary location for growth. Sequentially, any review should consider deliverable sites within the open countryside before any amendment to the Green Belt is considered.

### **Summary**

- 2.11 In general terms, ASL supports a review of the Local Plan. However, it is important that the Local Plan is not prematurely prepared and is based on a sound spatial strategy, underpinned by a robust evidence base.



- 2.12 ASL consider that the current plan is unsound and the Council should undertake a fundamental reset of its strategic policy, spatial and land allocations strategy.

### **b) Comments on the Publication Plan Policies**

- 2.13 This section provides ASL's comments on the strategic policies, spatial strategy and proposed strategic allocations in the Publication Plan.

### **Strategic Policies & Strategy**

#### ***Policy DS1 (Presumption in Favour of Sustainable Development)***

- 2.14 ASL support recognition in Policy DS1 of the presumption in favour of sustainable development, in accordance with the NPPF. It is important that decisions are taken without delay that are in accordance with the Development Plan, and that where policies are out of date, it is recognised that the Council will grant permission unless material considerations dictate otherwise.

#### ***Policy DS2 (Settlement Hierarchy and Roles)***

- 2.15 ASL fully supports the proposed settlement hierarchy in Policy DS2, which identifies Nuneaton as the Borough's primary town where most growth will be directed (in line with the recently published Accessibility and Settlement Hierarchy Paper, 2023). However, ASL consider that Nuneaton, as a primary town, should be accommodating additional growth than what is currently identified in the spatial strategy and identify additional strategic sites given its dominant role in the Borough and settlement hierarchy. Additional housing will also drive economic growth, which is a key objective of the Council throughout the plan.
- 2.16 In particular, there is scope to build on existing growth on the unconstrained western edge of Nuneaton and identify this as a location that could accommodate additional future growth. As the evidence base is developed and the Local Plan is progressed, the Council should consider the objectives of Policy DS2 and, in particular, if a review of the settlement boundary is undertaken, then logical and sustainable non-Green Belt sites on Nuneaton's urban edge should be considered to meet its overall needs.

#### ***Strategic Policy DS3 (Overall Development Needs)***

- 2.17 Policy DS3 states that 9,810 homes (545 dwellings per annum) will be delivered during the Plan Period (2021-2039), which is based on the 2022 Coventry and Warwickshire HEDNA and the Towards a Housing Requirement for Nuneaton & Bedworth paper ("THR"), also published in 2022. This sets a significantly lower housing target than proposed in

the 2022 Preferred Options consultation (646 dpa) and does not consider scenarios where housing need may point to a significantly higher requirement, owing to economic growth, a lack of affordability or via any unmet need from neighbouring Authorities.

2.18 ASL consider that there are material factors which should support an increase in the Borough's overall housing requirement, including:

1. **Economic growth** - there is a significant opportunity to capitalise on the strategic location and growth potential of the Borough by providing the employment opportunities and homes that will catalyse growth in Nuneaton and Bedworth. The Nuneaton and Bedworth HEDNA (prepared by Icenl in May 2022) and the THR paper (November 2022) do not include any significant adjustments to support accelerated economic growth scenarios in the Borough or the sub-region. We consider that, based the site's location and its potential to support growth (particularly in the sub-region) – including the delivery of town centre regeneration schemes in Nuneaton and Bedworth Town Centres, allocated employment sites in the current Borough Plan and potential jobs growth associated with the proposed new key development site at Judkins Colliery - that an uplift to support an accelerated growth scenario should at the very least be considered as a reasonable option by NBBC.
2. **Affordable housing provision** - the Nuneaton and Bedworth HEDNA (2022) identifies an overall Borough need of 407 affordable homes per annum. The 2022 Borough HEDNA concludes that *"the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area. The scale of the affordable need is influenced by past investment decisions and funding availability as well as losses of stock (such as through right-to-buy/ acquire sales)"*. The Coventry and Warwickshire HEDNA (2022) sets out the affordability issues which are prevalent across the sub-region, identifying that 52.2% of households in NBBC are unable to afford market housing without a subsidy, and more than 3,700 existing households that are currently in 'unsuitable housing'. These indicators point to significant issues with access to affordable housing in the Borough and, as such, a very significant uplift to account for affordability should be considered to prevent a worsening of the Borough's affordability crisis over the next Plan Period.

### ***Policy DS4 (Residential Allocations)***

#### Strategic Housing Allocations

- 2.19 ASL note that all of the strategic housing allocations in the Publication Plan, like its predecessor Preferred Options Local Plan, have been "carried forward" from the adopted Borough Plan, apart from SEA-6 (Bowling Green Lane) which was an employment allocation in the adopted 2019 Plan but is now proposed to be mixed use and deliver 150 homes alongside employment development.
- 2.20 There are, therefore, no significant 'new' strategic housing allocations in the Publication Plan, when compared to the adopted Local Plan.
- 2.21 The carrying forward of allocations from the adopted Local Plan does not provide the quantum or trajectory of housing to meet the requirements of the proposed Plan Period. New allocations are required to support a balanced approach to housing delivery across the Plan Period and ensure that an adequate supply of housing is provided to meet identified needs, particularly towards the end of the Plan Period in 2039.
- 2.22 Additional strategic sites and an amendment to the settlement boundary should be considered ensure that the Local Plan is sound and the Borough's overall strategic development needs are met throughout the entirety of the Plan Period.

### ***Policy DS6 (Green Belt)***

- 2.23 The Publication Plan concludes that there is an absence of exceptional circumstances to support an amendment to the Green Belt (Publication Plan, Paragraph 6.70). As set out earlier, ASL supports an approach that considers land allocations in the open countryside if an amendment to the settlement boundary is required, before any amendment to the Green Belt is considered.
- 2.24 The Publication Plan, as confirmed in the Green Belt Technical Paper (2023) and the Publication Plan Policies Map (2023), seeks to de-allocate a number of sites that were removed from the Green Belt in the adopted Local Plan; but does not propose to return these sites to the Green Belt. This approach leads to inconsistent Green Belt boundaries that are neither permanent nor enduring; and which do not create logical or natural settlement boundaries around Nuneaton and Bedworth. ASL consider that, should these sites be ultimately de-allocated, this land should be returned to the Green Belt to create logical Green Belt and settlement boundaries, and to support a sound Local Plan policies map, spatial strategy and allocations strategy.

## Detailed Policies

2.25 ASL do not intend to comment in detail on the proposed detailed policies contained in the Publication Plan, given the critical importance, first and foremost, of delivering a spatial strategy and set of overarching strategic policies that are sound. However, ASL make the following comments and observations for consideration on the detailed policies in the Publication Plan, where they inter-linked with the strategic policies and spatial strategy:

### Housing Policies

- **Policy H1 (Range and Mix of Housing)** – ASL support the need for a range and mix of housing across the Borough and, in particular, the Council should ensure that an adequate supply of new family and affordable homes is delivered in line with the NBBC HEDNA and THR Paper.
- **Policy H2 (Affordable Housing)** – ASL support the provision of 25% affordable housing on new residential developments in order to address the identified acute affordability issues that are being experienced in the Borough. However, in order to ensure that this policy contributes to meeting affordable housing needs, it is crucial that an ambitious housing requirement and the allocation of viable and deliverable sites are pursued in the emerging Local Plan; that can deliver policy compliant levels of affordable housing, and assist in alleviating the significant need for affordable housing identified in the Borough.

### Healthy, Safe and Inclusive Communities

- **Policy HS1 (Ensuring the Delivery of Infrastructure)** – Policy HS1 will need to be informed by an up to date Infrastructure Delivery Plan (“IDP”). The Publication Plan refers to the Council’s 2021 IDP, which includes strategic allocations are proposed to be de-allocated the Publication Plan. Therefore, the delivery of required plan-wide infrastructure must be considered fully in the context of the proposed allocations that are proposed to be carried forward. The allocation of viable and deliverable sites, particularly where infrastructure can be delivered onsite, will be critical to the delivery of the package of infrastructure required to meet the overall needs of the Plan Period. Sites such as Galley Common, which can contribute to the improvement and expansion of existing infrastructure, are critical to ensuring that the Local Plan viably delivers the infrastructure that will meet the needs of the population during the forthcoming Plan Period.

### **Natural Environment**

- **Policy NE1 (Green and Blue Infrastructure) and Policy NE3 (Biodiversity)** – ASL support the provision and protection of important green and blue infrastructure in the Borough and the intention to secure an uplift in biodiversity on new sites. Strategic sites should be identified that have the capacity and scope to provide opportunities for multi-functional green and blue infrastructure, and opportunities to create new habitats that support increased biodiversity.

### **Built Environment**

- **Policy BE2 (Renewable and Low Carbon Energy) and BE3 (Sustainable Design and Construction)** – ASL support aspirations to address climate change and embed sustainability into new developments. Viable and deliverable strategic sites have the potential to be exemplar in the design and construction of low carbon developments, which should be considered as part of the Council's land allocations strategy.

### **Other Evidence Base Documents**

- 2.26 The Publication Plan has been submitted alongside a number of newly published evidence base documents. A review of other documents which underpin the spatial strategy and approach to land allocations – and therefore the soundness of the Publication Plan - is provided as follows:

#### ***Housing Land and Employment Availability Assessment ("HELAA", 2023)***

- 2.27 The HELAA provides an up to date assessment of all sites promoted or assessed as part of the emerging Local Plan. The site at Galley Common is identified under site ref: GAL-3, as a site with the capacity for 879 units. The site is classified as "omitted" and the site summary states that:

*"The site is located in LCA 12 Galley Common Hills and Valleys of the Landscape Character Assessment. The Landscape is designated as moderate to good. The LCA notes that the character is classified as strong, due to the combination of natural features and small numbers of buildings producing a strong rural character. The LCA recommends the conservation of the rural character by ensuring new development does not increase the prominence of the built form within the landscape. Any new development would need to reflect the infrequent clusters of red brick farmhouse properties within the landscape and ensure it maintains a positive contribution to retaining distinction between settlements, particularly Plough Hill and Galley Common.*

*The site lies outside of the settlement boundary and is not considered integrated with the settlement”.*

- 2.28 ASL strongly disagrees with the conclusions for the site, and therefore the robustness of decision making that has underpinned allocations and the soundness of the Publication Plan.
- 2.29 The HELAA considers the entire Galley Common site (c.41ha) as a development site, and does not consider the sensitive landscape-led masterplan (provided in **Appendix 1**) that includes proposals to retain a large part of the site (where topography is steep and benefits from long range views) as a new area of green infrastructure, biodiversity enhancement and multi-functional amenity space. The illustrative masterplan at Appendix 1 has considered the landscape, visual impact and character of the wider site to create a visually enclosed and limited development platform that forms a natural extension to Galley Common. We consider that the HELAA, and therefore the site selection process, has fundamentally ignored this context, and therefore drawn incorrect and unsound conclusions in relation to the sensitivity and deliverability of the site.
- 2.30 The assessment also does not fully consider the urban influences that new developments at Plough Hill have introduced to the east, nor the Landscape and Visual Appraisal that ASL has commissioned to ensure that a masterplan for the site has been sensitively developed to respect the areas landscape character.

***Accessibility and Settlement Hierarchy Paper (2023)***

- 2.31 ASL fully supports the findings of the Accessibility and Settlement Hierarchy Paper, which firmly identifies Nuneaton as the settlement which should accommodate the greatest level of growth, stating that<sup>2</sup> (emphasis added on **bold**):

*“The overall scores for **the settlement hierarchy indicates that Nuneaton is considered more sustainable than the rest of the settlements**”...and.... “The recommended settlement hierarchy places Nuneaton as the main urban settlement within the Borough. Nuneaton scores the highest number of points, out of all the settlements, ahead of Bedworth”.*

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<sup>2</sup> Accessibility and Settlement Hierarchy Paper (2023), p40

## Summary

- 2.32 Based on the evidence presented for consultation, ASL consider the Publication Plan to be unsound, including the evidence base, strategic policies and spatial strategy. ASL do not consider that the Publication Plan has been positively prepared, justified or is effective; and will not deliver a Local Plan that will meet the needs of the Borough over the next Plan Period. On this basis, ASL consider that the Local Plan requires a fundamental reset, in terms of its evidence, spatial strategy and land allocations; before it progresses towards Examination.
- 2.33 Should additional sites that are deliverable, viable and meet the identified housing and infrastructure needs of the Borough be required, then a sequential approach to site selection should be considered that is predicated on a brownfield first approach, followed by a review of the settlement boundaries on the urban edge of Nuneaton, in areas that are not designated as Green Belt.
- 2.34 The following section and the Development Statement at **Appendix 1** set out how ASL's site at Galley Common is deliverable and ideally positioned to assist in meeting the housing and infrastructure needs of the Borough during the next Plan Period.

### 3 GALLEY COMMON: A DELIVERABLE SITE

- 3.1 The Development Statement attached at **Appendix 1** sets out how the site at Galley Common offers an opportunity to bring forward a deliverable site that will support a viable and deliverable mix of market and affordable housing and community infrastructure.
- 3.2 The site is in a highly accessible location that will support a sustainable pattern of development on the western edge of Nuneaton within close proximity to employment, housing, retail and leisure provision in Nuneaton, the Borough's primary town and premier location for growth. It is one of only a few locations where Nuneaton can grow outside of the Green Belt.
- 3.3 The site represents a logical and appropriate extension to the existing urban area and reinforces the expansion westwards of existing developments to the east of Plough Hill Road, including the redevelopment of Plough Hill Golf Centre to the east of the site for 300 dwellings by Countryside Properties (known as Baberton Grange) and land off Plough Hill Road for 262 dwellings which has been developed by Taylor Wimpey (known as Ribbonfields). The site also sits adjacent to land south of Ansley Common which is allocated for the development of 450 units in the adopted North Warwickshire Local Plan (Policy H10). This site allocation safeguards provision for a possible link road between Plough Hill Road and Coleshill Road in Ansley Common. Whilst this infrastructure is not in any way required to deliver development at Galley Common, ASL is open to exploring whether land to the north of the wider site could be utilised to support this infrastructure and the development of the wider area. This would both help to unlock the allocation within North Warwickshire but would also have significant benefits for the highway network within Nuneaton and Bedworth, particularly at the Coleshill Road/ Plough Hill Road junction, which we are aware is an issue locally.
- 3.4 The site provides an opportunity to deliver a up to 420 high quality family and affordable homes (220 homes at Parcel A and 200 homes at Parcel B as a future phase of development if significant requirement is established) to meet the critical housing needs of NBBC, and could also support the expansion of Galley Common Infant School or an alternative community use if a need is identified. Galley Common can deliver development that meets the highest standards of sustainable construction and design, and supports a significant enhancement in biodiversity and accessible community open space in line with the strategic policy aspirations of the emerging Local Plan.



- 3.5 The Development Statement underpins the potential for this site to be allocated for development if the spatial strategy and allocations are reconsidered in the context of the emerging evidence base – and the site is readily available and deliverable to support a more balanced approach to meeting the Borough’s needs. ASL are in control of the site and have demonstrated that the site is available, suitable and achievable in the context of national planning policy.

### **A Strategic Location**

- 3.6 Nuneaton is strategically located within the West Midlands, in the heart of England, and comprises the largest town in Warwickshire in population terms. It has excellent highways connectivity, being easily accessible from the M6, which provides access to the M1, M5, M42 and M69, in addition to being within close proximity to the A5. Nuneaton is also well-connected by rail, with links to Birmingham, Leicester, Coventry and London.
- 3.7 When considering Nuneaton’s strategic context, it is important to recognise the current sub-national geography, with Nuneaton forming part of a major functional economic geography, as part of the Coventry and Warwickshire Local Enterprise Partnership and a non-constituent member of the West Midlands Combined Authority. This is a region of significant economic growth potential at the heart of the country and it is essential that the Local Plan and its spatial strategy is considered not in isolation, but in the context of this economic potential. The synergy between economic growth and housing is well established and NBBC and the wider region have an opportunity to catalyse growth by providing the type, quality and quantity of housing that is required to underpin a generational change in the regional economy.

### **A Site that Can Deliver Significant Benefits**

- 3.1 The allocation of the site will support new housing in sustainable location and ensure that a quantity, quality and mix is provided to support the needs of NBBC during the next Plan Period. The delivery of the site will provide significant benefits to the Borough, Nuneaton and to Galley Common. The significant economic social and environmental benefits that the site will generate are set out in the Development Statement in full and include:

#### ***Economic Benefits***

- Generating significant investment during the construction phase of development through construction investment, FTE construction jobs and GVA;

- Long term operational benefits including new resident expenditure, new high earning residents to the Borough and direct, flow on and supported jobs;
- Council Tax revenue for the Local Authority; and,
- Catalysing growth for the wider region by providing the quality of housing and community infrastructure that will underpin economic growth.

### ***Social Benefits***

- Delivering high quality market and family homes to meet the needs of the Borough's existing and future residents;
- Providing, at a minimum, a policy compliant level of viable and deliverable affordable homes to address the Borough's affordability crisis;
- Providing self-build and custom build plots that meet the requirements of residents on the Council's custom build register;
- Delivering new and accessible multifunctional space and green infrastructure to benefit existing and future residents – creating a "green heart" that will serve emerging developments in Ansley Common, Plough Hill and Galley Common;
- Offering land to expand the existing Galley Common Infant School (or alternative community use if required), which could address a locally identified need; and,
- Integrating enhanced pedestrian connections within the site that link into the surrounding network.

### ***Environmental Benefits***

- A significant uplift in terms of the biodiversity value of the site through Biodiversity Net Gain, in excess of Government and Local Plan targets, by delivering a significant area of ecological enhancement within the wider site;
- The provision of multi-functional green infrastructure, new habitats and open space to create new green/biodiversity corridors;
- The protection and enhancement of existing features of the site that add value, including woodland, mature trees, hedgerows and existing ponds; and

- The implementation of cutting edge net zero technologies through the design, construction and operation of the proposed new homes.

### **Summary**

3.2 In summary, the site at Galley Common is deliverable early in the Plan Period, will meet the identified needs of the Borough and will generate significant benefits. It also responds to the aspirations of the emerging Local Plan and could assist in supporting a balanced and sound spatial strategy that assists in addressing the fundamental flaws in the current Publication Plan.

## 4 CONCLUSION

- 4.1 In conclusion, ASL consider that the Publication Plan is, in its current form is unsound – not being positively prepared, justified or effective. The proposed spatial strategy and land allocations are underpinned by an evidence based that has not been positively prepared and underpins a Local Plan that is driven by political pressure. ASL consider that the Local Plan requires a fundamental reset, in terms of its evidence, spatial strategy and land allocations; before it progresses towards Examination.
- 4.2 These representations and the Development Statement at **Appendix 1** set out how the site at Galley Common could assist in redressing the balance of the Local Plan and support a sound and deliverable spatial strategy, on a site that is demonstrated to be entirely deliverable and which will generate significant social, economic and environmental benefits for the Borough.
- 4.3 ASL would like to reserve the right to appear and speak at EiP to comment on the soundness of the Local Plan.

## **APPENDIX 1: GALLEY COMMON DEVELOPMENT STATEMENT**

(enclosed separately with the submission)



ainscough strategic land

# Galley Common, Nuneaton

DEVELOPMENT STATEMENT

JULY 2022





# Contents

For more information please contact:

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## Section 1.0

# Introduction

This Development Statement has been prepared by Ainscough Strategic Land (“ASL”) to demonstrate the availability, suitability and deliverability of land at Galley Common, Nuneaton (“the site”). The site is sustainably located on the western urban edge of Nuneaton, which is the primary town in the Borough’s settlement hierarchy. The development of the site offers the potential to provide the type and quality of homes and educational infrastructure that will support the growth aspirations of Nuneaton and Bedworth Borough Council (“NBBC” or “the Council”) during the next Plan period.

The site being promoted for consideration and allocation is separated into two parcels. Parcel A is adjacent to Plough Hill Road and extends approximately 6.1 hectares and represents an immediate opportunity for development. Parcel B extends approximately 6.2 hectares and is a logical future or additional phase of development that can respond to the emerging needs of NBBC. The site forms part of a wider land ownership (“the wider site”) which extends 42 hectares and has the potential to be developed into a significant area of ecological and recreational value - that has significant benefits in terms of biodiversity enhancement and as dual purpose multi-functional recreational space.

Both Parcels A and B represent a logical and appropriate extension to the built-up area of Nuneaton and are sustainable, with access to a range of existing services and facilities. Parcel A provides an opportunity to deliver 220 high quality family and affordable homes, whilst Parcel B, as a further phase, has the potential to deliver up to 200 additional new homes . This site is available to meet the critical housing needs of the Borough and also has the scope to support the expansion of Galley Common Infant School (or an alternative community use if a need is identified) to deliver an improvement in community infrastructure in the west of the town.





# Galley Common, Nuneaton Development Statement

## SECTION 1.0 INTRODUCTION

### Purpose of the Development Statement

This Development Statement has been prepared by ASL to demonstrate the suitability of the site at Galley Common for residential-led development and to set out the merits of amending the Nuneaton settlement boundary and allocating the site for development in the emerging NBBC Local Plan. This document sets out how the site is immediately available and can be delivered early in the next Plan Period.

The Development Statement should be read alongside Representations made by ASL to the Borough Plan Review Preferred Options Consultation ("Preferred Options"), prepared by Asteeer Planning LLP and submitted with this document to NBBC on 22nd July 2022. The Representations provide detailed comments on the overall development strategy, strategic policies and spatial strategy proposed in the emerging Local Plan.

### Contents

This Development Statement has been prepared in conjunction with a professional design and technical team to demonstrate that the site is deliverable and entirely suitable for a residential-led development. In summary, this document includes:

- **Strategic and Site Context** - analysis of the site's strategic location, in addition to a description of the site and its immediate surroundings;
- **Planning Policy** - a review of the planning policy context in the adopted and emerging Local Plan, including the need for new homes, the need to amend the settlement boundary and the suitability of land in the open countryside to meet the needs of the Borough;
- **Environmental and Technical Considerations** - analysis of the key technical and environmental considerations that will influence the development of the site and which have informed the preparation of a sensitive landscape-led masterplan;
- **Vision and Illustrative Masterplan** - underpinned by an overarching vision for the site, the presentation of a rational design evolution and Illustrative Masterplan that demonstrates how Parcel A and B could be brought forward sensitively for development; and
- **Deliverability and Benefits** - a summary of the availability, suitability and achievability of the site, and an articulation of the key benefits that the allocation of the site would deliver.

Should any further information be required by the Council, ASL and the appointed design and technical team would be happy to address any queries or requests. ASL is fully committed to undertaking further detailed design and technical work to support the delivery of the site as the Local Plan progresses through to Regulation 19 and Examination in Public.



- **Site name:**  
Land at Galley Common, Nuneaton
- **Local planning authority:**  
Nuneaton and Bedworth
- **Site size:**  
42 hectares / 104 acres  
Parcel A: 6.1ha / 15.1 acres  
Parcel B: 6.2ha / 15.3 acres
- **Site potential:**  
Up to 420 homes  
Parcel A: circa 220 units  
Parcel B: circa 200 units

### Key

- Site boundary
- Recently developed land
- Housing Allocation H10 (North Warwickshire Local Plan 2021)



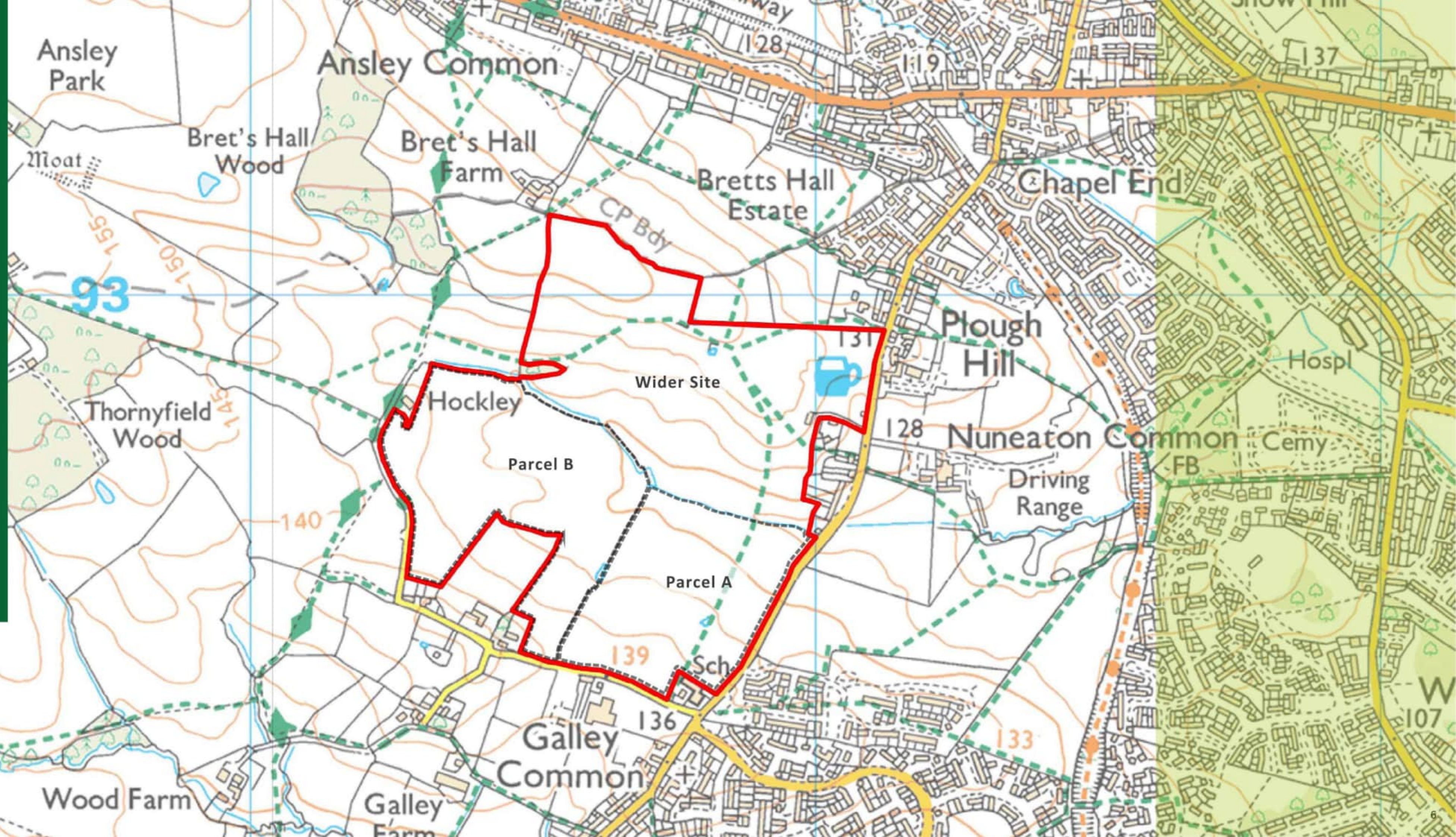
Figure 01  
Aerial Location Plan

## Section 2.0

# Strategic and site context

The wider site is located adjacent to Galley Common and is strategically located on the western urban edge of Nuneaton – which is at the heart of the West Midlands' functional economic geography and an important part of the Coventry and Warwickshire Housing Market Area. Parcels A and B provide an opportunity to deliver a sustainable pattern of development that will form a logical and appropriate extension to the existing built-up area within close proximity to employment, housing, retail and leisure provision in Nuneaton, which is the Borough's primary town, and can respond to the need identified in the emerging evidence base.

The site has been heavily farmed and is largely in arable use, with direct frontage to Plough Hill Road and School Lane. Parcels A and B are in an accessible location within walking distance of a range of local services and amenities, and with excellent transport connections to Ansley, Stockingford, and Nuneaton.



# Galley Common, Nuneaton Development Statement

## SECTION 2.0 STRATEGIC AND SITE CONTEXT



### A strategic location

Nuneaton is strategically located within the West Midlands, in the heart of England, and is the largest town in Warwickshire in population terms. It has excellent highways connectivity, being easily accessible from the M6, which provides access to the M1, M5, M42 and M69, in addition to being within close proximity to the A5. Nuneaton is also well-connected by rail, with links to Birmingham, Leicester, Coventry and London.

When considering Nuneaton's strategic context, it is important to recognise the current sub-national geography, with Nuneaton forming part of the Coventry and Warwickshire Local Enterprise Partnership ("CWLEP") area and being a non-constituent member of the West Midlands Combined Authority ("WMCA").

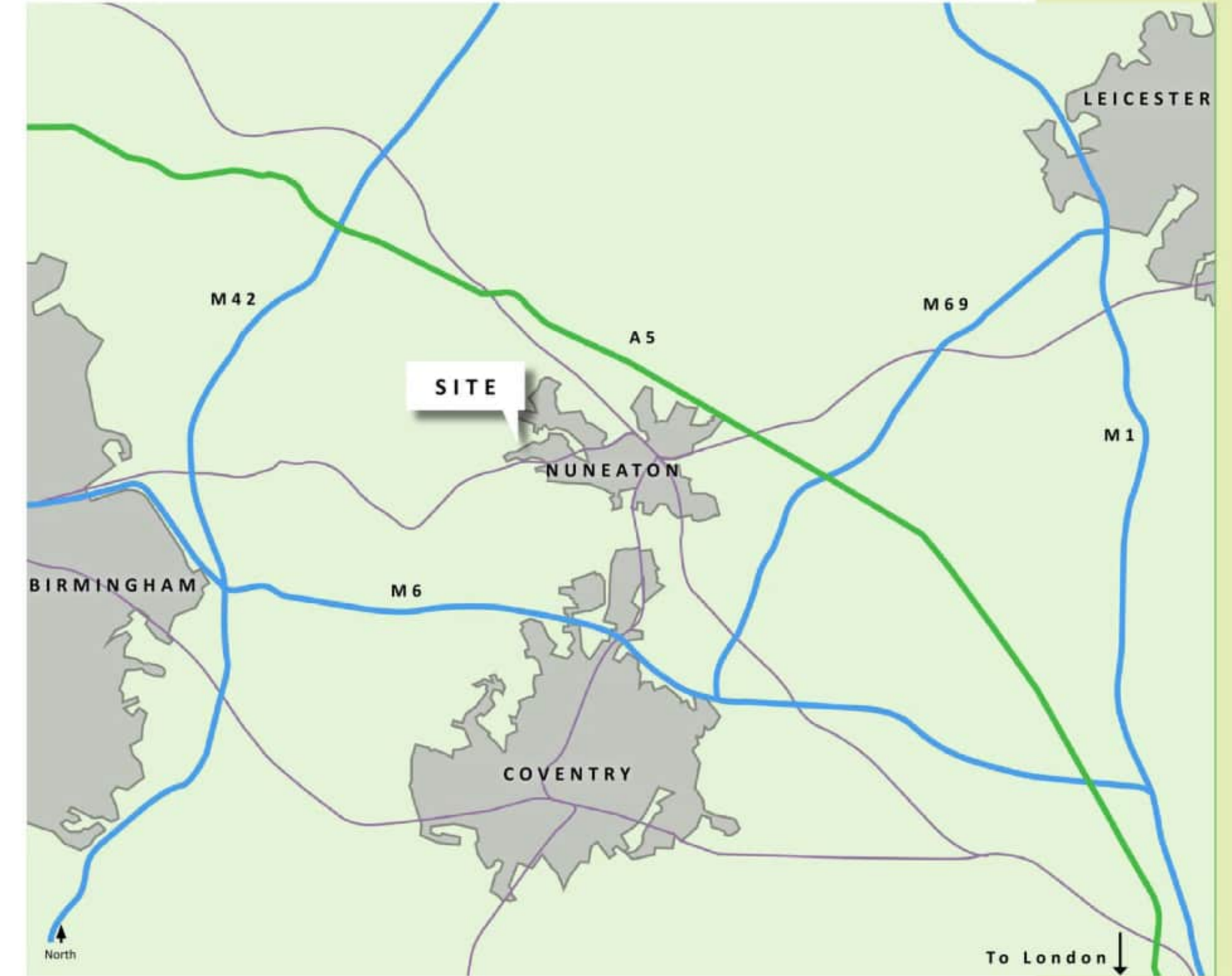
As part of the second Devolution Deal between Government and the WMCA, the mayor and WMCA were given additional funds for housing, "to help the West Midlands to deliver the supply of houses needed to meet the ambition of the West Midlands Strategic Economic Plan of 215,000 homes by 2031..." The WMCA's Strategic Economic Plan (SEP) identifies building homes as a challenge for the area, with the economic vision assuming "a higher level of housebuilding than is currently provided for in development plans, or is being delivered across the area's two strategic housing market areas". The SEP recognises that removing barriers to development to create a higher volume of housing is key to successful growth and emphasis is placed on providing "a better range and more sustainable mix of homes for sale and rent across the area, including attracting a greater proportion of higher income households with the skills to drive a knowledge-led economy to live in the area."

At the Borough-level, NBBC's Corporate Plan, 'Building a Better Borough' (2022), sets out how the Council aims to make the Borough a better place to live, work and visit. The Corporate Plan identifies the need to enable appropriate housing development, stating that, "[NBBC] will seek to provide the right homes, with the right services, in the right places, to meet the needs of [its] residents. This means homes that are affordable to both buy and rent, and which are of good quality."

It is clear that there is an exceptional opportunity for the Borough to grow during the next Plan Period; supported by its strategic location at the heart of the West Midlands and its excellent regional and national connectivity. This growth must be underpinned by the quantum, type and quality of housing and infrastructure that will realise the Borough's potential and which will meet the needs of NBBC over the next 15 years.

Figure 02

Strategic location



**Key**

- Motorway
- A Road
- Railway
- Settlement areas

# Galley Common, Nuneaton Development Statement

## SECTION 2.0 STRATEGIC AND SITE CONTEXT



Figure 03

Site photo location plan

### The site and surroundings

The wider site extends some 42 hectares and has frontages onto School Lane to the south and west, and Plough Hill Road to the east. The wider site is undulating in its topography and slopes down towards a natural development platform to the south of the site at Parcel's A and B, adjacent to Galley Common and existing built development along Plough Hill Road and School Lane. The site in its entirety is predominantly characterised by agricultural land and bounded by hedgerows and scattered trees. Parcels A and B form two distinct agricultural fields, dissected by an strong hedgerow boundary and framed to the west by a clear physical and visual boundary at School Lane.

The wider site is bound to the north by an allocated residential development site (Site H10 in the North Warwickshire Local Plan), beyond which is Ansley Common Village. To the immediate east of the site, Plough Hill Road is characterised by linear residential development, beyond which are recent residential developments constructed by Countryside Properties and Taylor Wimpey, which serve to reinforce the residential nature and westwards expansion of Nuneaton at Plough Hill and Galley Common.

To the south-east of the site is Galley Common Infant School, at the junction of Plough Hill Road and School Lane. To the south of the site is School Lane, which is characterised by existing residential and agricultural uses that extend westwards from Galley Common in a linear fashion. A single dwelling (Hockley Cottage) and further agricultural land also adjoin the western site boundaries. Acornwood Day Nursery is located to the north-west of the site.



Site photo - View 1.1



Site photo - View 1.2



Site photo - View 1.3



Site photo - View 1.4

# Galley Common, Nuneaton Development Statement

## SECTION 2.0 STRATEGIC AND SITE CONTEXT

### Surrounding development context

The area surrounding the site is undergoing considerable change, with several planning applications for residential development having been granted in the past 10 years, including the redevelopment of Plough Hill Golf Centre to the east of the site for 300 dwellings (LPA references: 034600; 035732; 036044; 036109; and, 036690) by Countryside Properties – which is now under construction and known as Baberton Grange. To the south of this, land off Plough Hill Road (LPA references: 033156 and 034543) was approved for 262 dwellings and has been developed by Taylor Wimpey as part of its Ribbonfields development. Consequently, the Borough’s urban area has now extended westwards, with housing development being successfully brought forward owing to the sustainable and accessible characteristics of the western edge of Nuneaton.

In addition to the housing development coming forward within the Borough, the site is situated to the south of land allocated for housing within the North Warwickshire Local Plan (2021). The site is known as “Land south of Coleshill Road, Ansley Common” (Policy H10) and is allocated for 450 dwellings, which reinforces the west of Nuneaton (including Ansley Common) as an appropriate location for growth; and supports the development of Galley Common as a logical and natural extension to this growth that can deliver the land and inherent benefits to benefit these existing and future communities. This site allocation safeguards provision for a possible link road between Plough Hill Road and Coleshill Road in Ansley Common. Whilst this infrastructure is not in any way required to deliver development at Galley Common, ASL is open to exploring whether land to the north of the wider site could be utilised to support this infrastructure and the development of the wider area.



Figure 04

Plan of site and surroundings



### Key

- Site boundary
- Consented development
- Housing Allocation

Figure 05

Bus route plan

**Accessibility**

The site is in a highly accessible location with access to existing services and facilities, and with excellent transport connections to Anley, Stockingford, and Nuneaton.




Within walking distance of the site are two infant schools (Galley Common and Nathaniel Newton), a nursery (Cheeky Monkeys Day Nursery), a secondary school (Hartshill Academy), a public house (The Plough Inn), three convenience stores, a pharmacy and a surgery (Chapel End Surgery).

The closest bus stops to the site are located on Plough Hill Road, on the site's northern frontage. The bus stops provide various services (service nos. 19 and 41) throughout the day from around 7:15am to approximately 8:30pm to destinations such as Anley (around 8 minutes), Stockingford (around 10 minutes), and Nuneaton (around 25 minutes). Therefore, travel by public transport is a real alternative to travelling by car for all journey purposes, including commuting trips.

Nuneaton train station can be accessed via a bus journey and a short walk, or a cycle journey of around 22 minutes. Nuneaton train station is managed by West Midlands Railway and has substantial car and cycle parking facilities. Services from the station travel to 18 services per hour to destinations including London, Birmingham New Street, Nottingham, Edinburgh and Cardiff.

In summary, the site is accessibly located with excellent transport connectivity and is within close proximity to retail, employment and leisure facilities within Nuneaton.

**Key**

-  Site Location
-  19 Nuneaton
-  41 Nuneaton - Atherstone

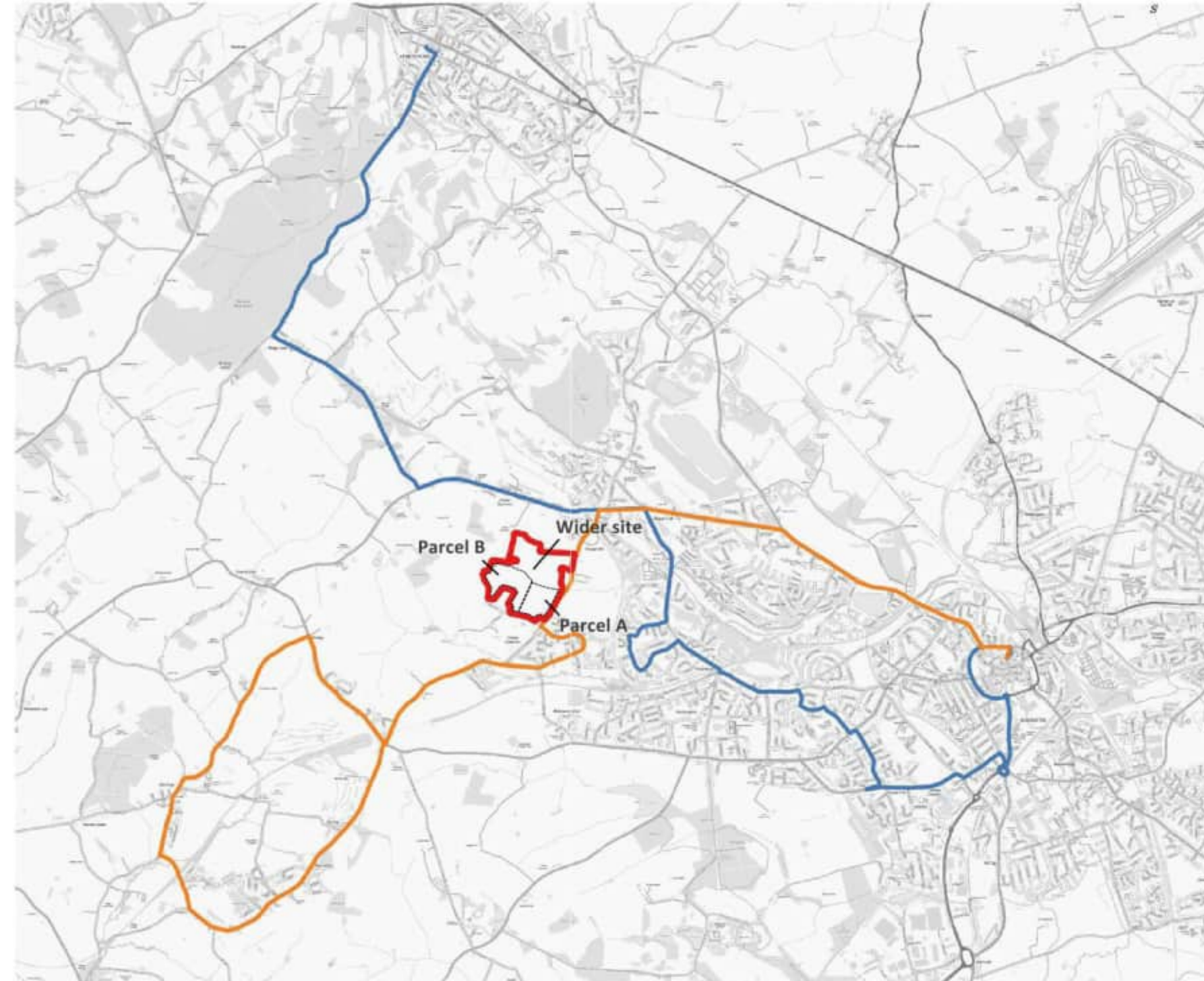
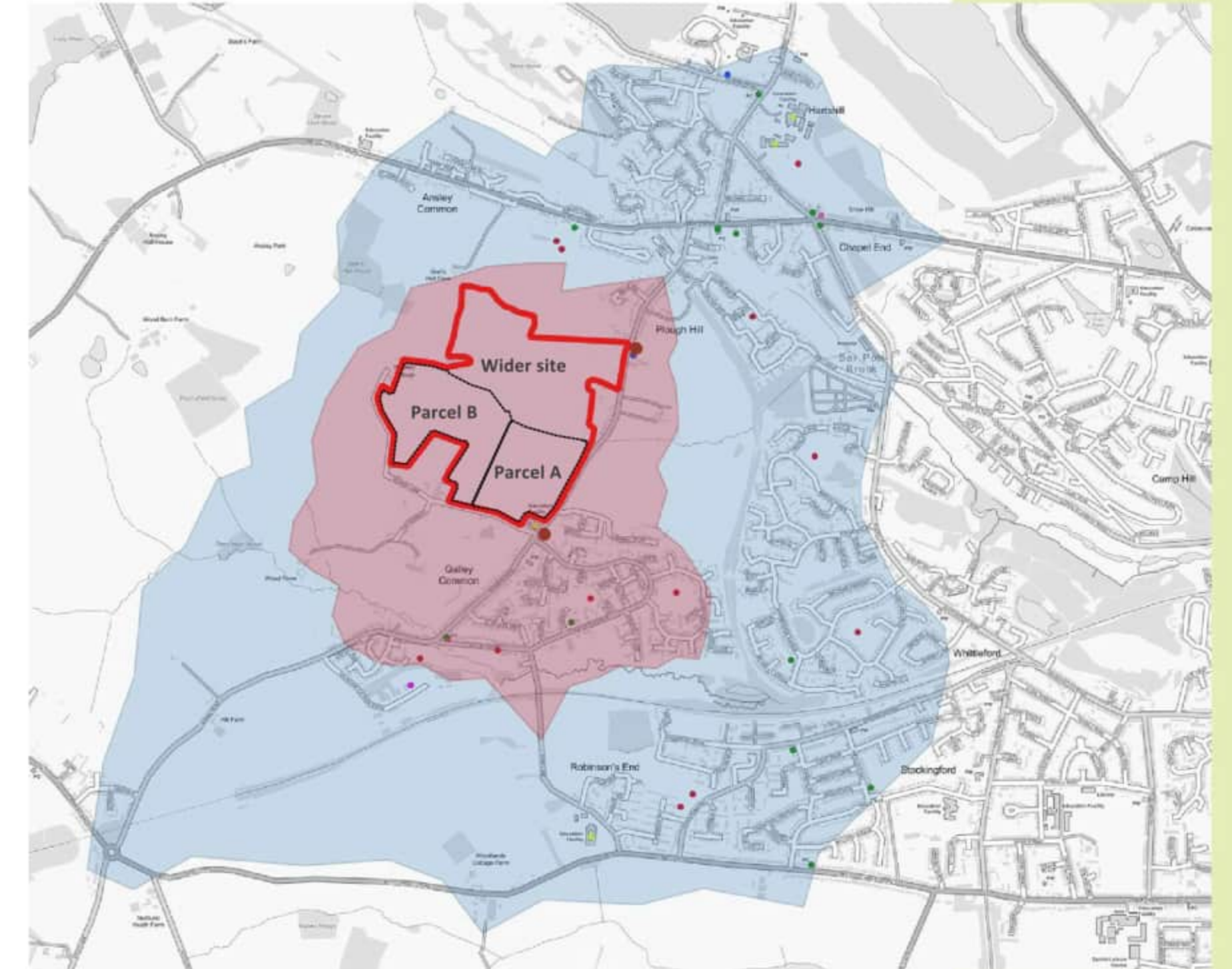


Figure 06

Accessibility plan

**Key**

-  Site Location
-  800m Pedestrian Catchment
-  2km Pedestrian Catchment
-  Nearest Bus Stop
-  Business/Employment
-  Cafe/Takeaway/Public House
-  Education
-  Leisure/Sport
-  Medical/Healthcare
-  Retail



## Section 3.0

# Planning policy

The emerging Local Plan is a significant opportunity for the Borough to plan holistically for its future growth. The Local Plan is a once-in-a-generation opportunity to provide the homes, infrastructure and employment opportunities that will catalyse the growth of the Borough, and the Region, during the 15 year Plan Period and beyond.

To support this growth and to meet the needs of future generations, the Borough must plan for the growth of itself and its neighbours in the wider sub-region – this means supporting the unmet needs of the wider Housing Market Area whilst also supporting the economic growth potential of Nuneaton and Bedworth. We consider that there is a compelling case to amend the settlement boundary in the Borough based on housing need, a lack of new strategic allocations and limited urban capacity - requiring an assessment of sites that lie outside of the settlement boundary and beyond the Green Belt.



# Galley Common, Nuneaton Development Statement

## SECTION 3.0 PLANNING POLICY



### The adopted Development Plan

The adopted Development Plan for the site is the Nuneaton and Bedworth Borough Plan ("the Borough Plan"), which was adopted in June 2019. The Council has committed to undertaking an immediate review of the adopted Borough Plan following the publication of the updated National Planning Policy Framework (NPPF) (2021).

Within the adopted Borough Plan, the site is outside of the settlement boundary and within the 'Open Countryside'. Land within the Open Countryside is largely confined to the north of the Borough, with the majority of land outside the defined settlement boundary to the south, east and west of the Borough designated as Green Belt.

The adopted Borough Plan released a significant amount of land from the Green Belt to meet an annual housing need of 703 dwellings, which included meeting some of the unmet needs of the wider Housing Market Area ("HMA").

### Emerging Local Plan

NBBC formally commenced a review of the Borough Plan on 16th July 2020, following a successful motion at Full Council. Consultation on the Issues and Options document took place between 11th June 2021 and 6th August 2021.

The Borough Plan will influence what development will take place, and how much and where within the Borough it will be located. This emerging Plan extends the timeframe covered by the adopted Borough Plan until 2039.

The Council is currently undertaking consultation on the Preferred Options Local Plan, along with the accompanying Sustainability Appraisal and Habitats Regulations Assessment.

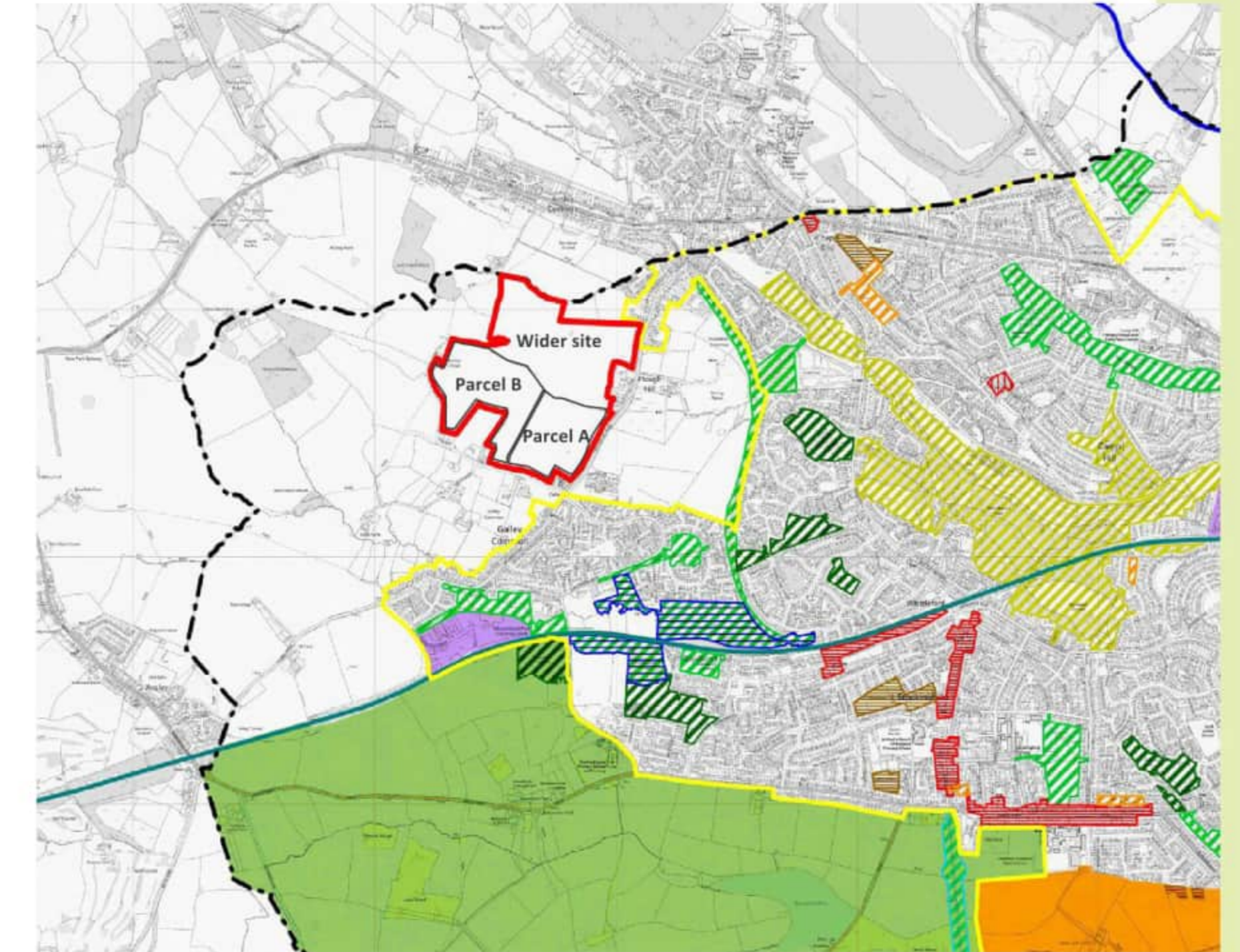
The Galley Common site is not identified as a strategic allocation in the Preferred Options Plan; however, the plan is not accompanied by a detailed Policies Map. For the reasons set out below and in the accompanying Representations, it is considered that there is a case to review the Borough's settlement boundary to meet the Borough's needs, which should include consideration of sites outside of the Green Belt that are within the open countryside.

This submission seeks to promote this site for consideration as part of the emerging Local Plan, as the evidence base, spatial strategy and land allocations are progressed.

- Green Belt
- Existing employment estate in Green Belt
- Existing employment estate
- Strategic housing site
- Strategic employment site
- Employment estate suitable for alternative uses
- Destination park
- Community park
- Local park
- Conservation area
- District centre
- Local centre
- Allotment
- Local nature reserve
- Registered parks and gardens
- Site of Special Scientific Interest
- SSSI - area to be denotified
- Special area of conservation
- Non-strategic housing site
- Rivers and canals
- Railway line
- A road
- Motorway
- Town centre boundary
- George Eliot Hospital
- Scheduled monument
- Development boundary
- Train station
- Borough boundary

**Figure 07**

Policies map





# Galley Common, Nuneaton Development Statement

## SECTION 3.0 PLANNING POLICY



### Reassessing the Emerging Plan: meeting needs & reviewing the spatial approach

The Representations submitted by ASL that accompany this Development Statement consider that the Preferred Options Local Plan in its current form is not based on a sound legal footing and has insufficient evidence to inform the proposed spatial strategy, strategic policies and land allocations. In summary, the Preferred Options Local Plan:

- Is not legally sound and does not discharge its Duty to Co-operate, having no consideration of cross boundary unmet needs and emerging sub-regional evidence.
- Has a deficient evidence base and therefore no sound basis to develop the proposed strategic policies, spatial strategy and approach to land allocations.
- Does not adequately consider the housing requirements of NBBC during the next Plan Period, including its potential to support growth, deliver affordable housing and meet the unmet need of the wider region.
- Carries forward strategic allocations from the adopted Borough Plan but does not consider new allocations or review the settlement boundary.

Based on the above, ASL's Representations recommend that a more balanced and evidence based approach to considering the needs of the Borough over the next Plan Period should be adopted, which should include a reconsideration of strategic site allocations and spatial strategy.

Should sites that are deliverable, viable and meet the identified housing and infrastructure needs of the Borough be required, then a sequential approach to site selection should be considered that is predicated on a brownfield first approach, followed by a review of the settlement boundaries on the urban edge of Nuneaton in areas that are not designated as Green Belt.

### Galley Common: A logical and sustainable extension

Galley Common is in a highly accessible location that will support a sustainable pattern of development on the western edge of Nuneaton, the Borough's primary location for growth, within close proximity to employment, housing, retail and leisure provision.

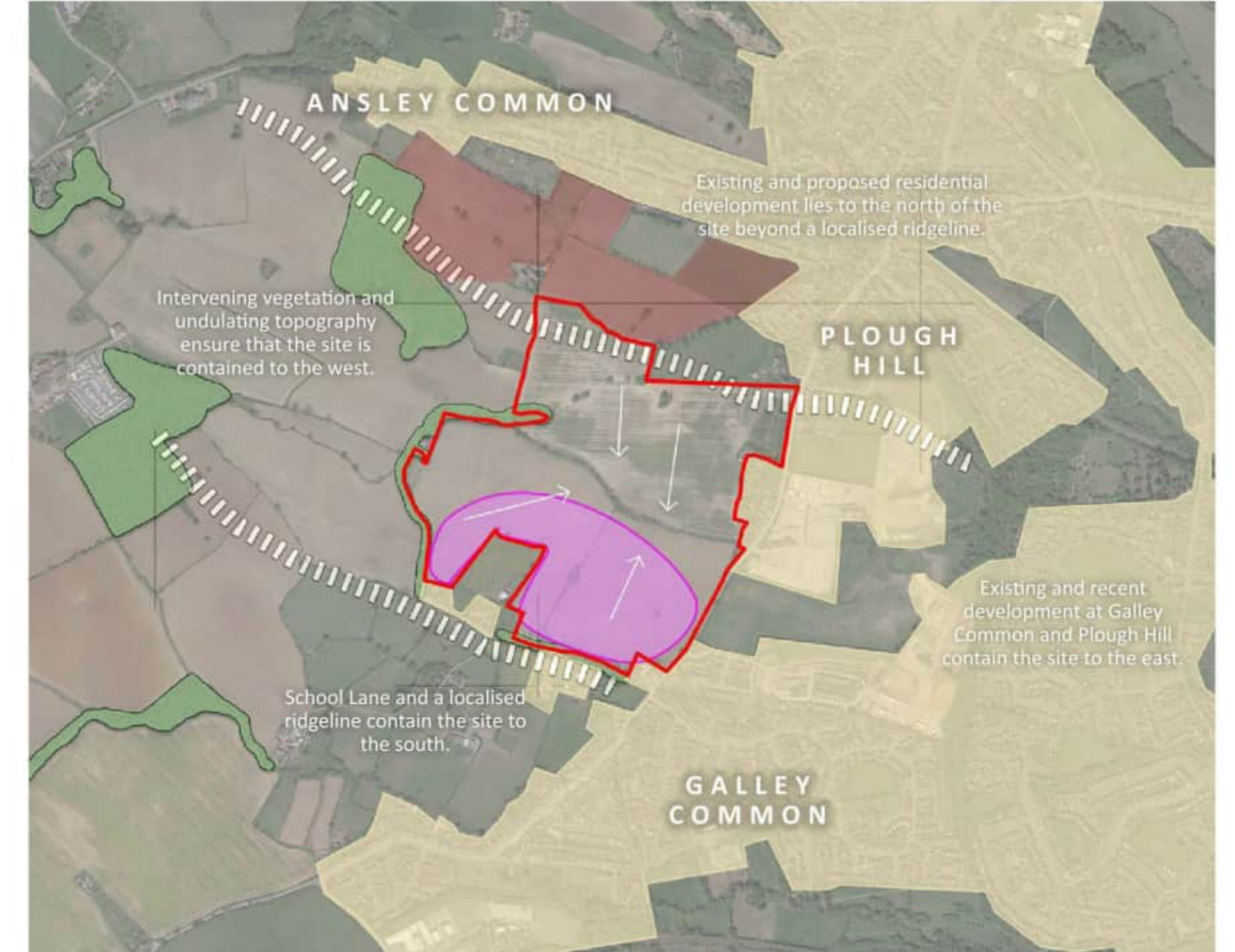
The site represents a logical and appropriate extension to the existing urban area and reinforces the expansion westwards of existing developments to the east of Plough Hill Road. Parcel A, if it were allocated in isolation, would represent a logical extension to the urban area and Galley Common, which is framed to the south along School Lane by new and existing residential development, bounded to the west by a clear physical field boundary that would provide a robust and defensible urban edge; and contained to the north by existing hedgerows and a topography that provides significant visual containment.

If a need for significant new homes is established as the evidence base develops, Parcel B also offers a logical extension to Parcel A as a further extension to the settlement boundary. Parcel B is also framed by existing built form along School Lane and its western boundary is also framed by an extension of School Lane, which provides a clear physical and visual boundary between the site and the open countryside to the west. The northern edge of the site, like Parcel A, is delineated by clear field boundaries with visual enclosure provided by the topography of the wider site to the north.

The wider site is proposed to be used as an area of enhanced ecological mitigation which can be used as multi-functional amenity space for the use of existing and future residents. This area sits at the heart of existing and proposed developments in the local area and would offer a "green heart" that would have significant benefits to the existing and future communities in Galley Common, Plough Hill and Ansley Common.

**Figure 08**

Visual containment plan



## Section 4.0

# Environmental and technical considerations

An illustrative masterplan and the design evolution of the site has been underpinned by detailed technical analysis that has considered any site opportunities and constraints. It has demonstrated that a development could be sensitively brought forward that responds to the site characteristics and respects the character of the surrounding area.

This section sets out our understanding of the environmental and technical considerations, and serves as a framework for more detailed design and technical assessment work as the Local Plan is progressed towards Publication Version and Examination in Public.



# Galley Common, Nuneaton Development Statement

## SECTION 4.0 ENVIRONMENTAL AND TECHNICAL CONSIDERATIONS



### Highways and Access

Eddisons Transport Consultants have been appointed to assess the vehicular access options and highways capacity of the site, and to demonstrate that the site is accessible, can be accessed safely and will be adequately accommodated onto the local highways network.

#### VEHICULAR ACCESS

The primary vehicular access point will be to the south east of the site onto Plough Hill Road. The access road is proposed to be 5.5 metres wide with footways on both sides of 2 metres wide. A formal ghost island right turning lane can be installed to assist the safety and capacity of the junction. Visibility at the junction will be 2.4 metres by 43 metres to accord with the existing 30 mph speed limit. The emergency access will be 3.7 metres wide and will serve as a 'day to day' pedestrian and cycle access onto Plough Hill Road. These access arrangements have the capacity to serve both Parcel A and Parcel B, if required.

Therefore, the site can be satisfactorily accessed by all relevant modes of travel from the local highway network.

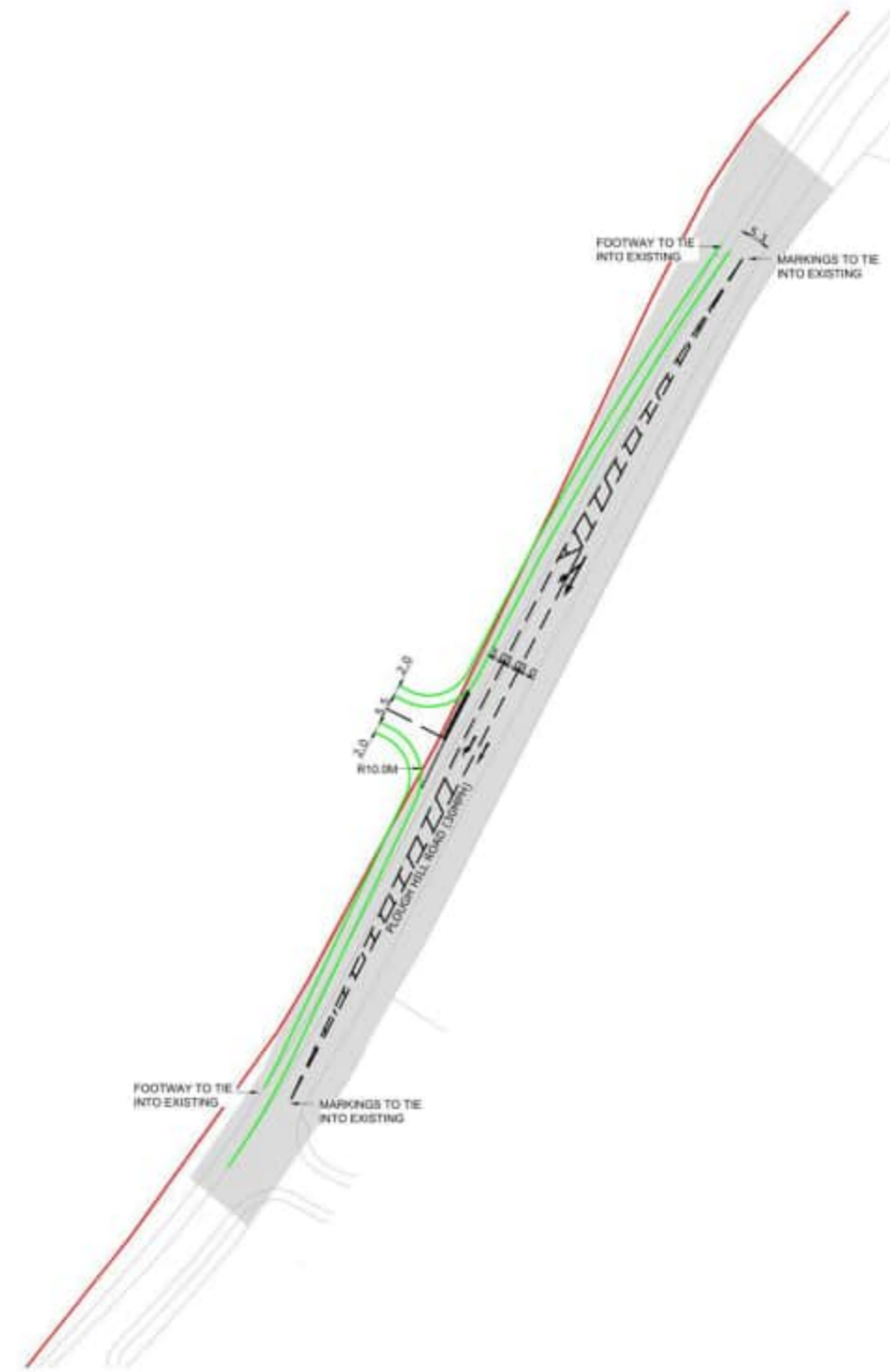
**Figure 09**

Eddisons proposed site access plan



SITE LAYOUT NTS

— INDICATIVE SITE BOUNDARY  
 — DENOTES NEW KERBS



North South aerial view



Proposed emergency access



Adopted highway plan

### Traffic impact

To establish the level of traffic that is likely to be generated by a residential-led development of approximately 220 dwellings at Parcel A and 200 dwellings at Parcel B, the agreed trip rates from the consented site on the eastern side of Plough Hill Road (LPA reference: 034600) have been utilised.

The assessment shows that the Parcel A could generate in the region of 97 two-way trips in the AM peak and around 116 two-way trips in the PM peak hour. This equates to less than two additional two-way vehicle trips per minute in the busiest periods of the day. This traffic will be dispersed as soon as it exits onto Plough Hill Road. Both Parcel A and B, if brought forward together, could generate in the region of 186 two-way trips in the AM peak and around 222 two-way trips in the PM peak hour. To put this into context, this equates to less than two additional two-way vehicle trips per minute in the busiest periods of the day.

The Transport Assessment that supported planning permission 034600 showed that around 40% of traffic was forecast to travel to and from the north along Plough Hill Road and travel through the Coleshill Road junction, the other 60% was forecast to travel south. The traffic calming proposed as part of planning permission 034600 would be likely to restrict travel to and from the north and, therefore, the level of traffic likely to be generated by the Galley Common site would be reasonably low.

Consequently, during even the busiest PM peak hour the traffic generation would only be around 20 additional vehicles travelling north from the site, which equates to less than an additional northbound vehicular movement every 3 minutes. Therefore, there are likely to be no material issues of traffic impact related to the proposed residential-led development of this site.

# Galley Common, Nuneaton Development Statement

## SECTION 4.0 ENVIRONMENTAL AND TECHNICAL CONSIDERATIONS



### Landscape and visual impact

A Landscape and Visual Assessment (LVA) has been carried out for the proposed development by Randall Thorp, to determine the capacity of the wider site (in landscape and visual terms) to accommodate development, and to assess the likely impact on landscape character and visual amenity should development come forward.

### LANDSCAPE

The site is not covered by any statutory landscape designations, such as National Parks or AONB's. The site falls within the Arden NCA 97 National Character Area (NCA). The site, Galley Common and Nuneaton lie on the north eastern edge of this character area. However, there is nothing unique identified in the NCA which applies to the site or its immediate setting.

Nuneaton and Bedworth Borough Council commissioned a Landscape Character Assessment to be carried out in 2012. The assessment is focused on land either covered by Green Belt, Areas of Restraint or Countryside Designations outside of the urban areas. The site lies within the Landscape Character Area identified as LCA12 'Galley Common Hills and Valleys'. The site and its immediate setting are typical of this landscape character area, and most of the descriptions are applicable. However, the character assessment was carried out in 2012 and the landscape of this area is changing as a result of ongoing residential development of the former golf driving range to the east of Plough Hill Road.

The site itself is broadly typical of the local landscape character area, although, owing to topography, it is perceived as a largely 'self-contained' landscape compartment which is influenced by the urban fringe. Appropriate development upon the site would inevitably change the character of this individual landscape compartment but would not be expected to result in any significant adverse effects upon the wider local landscape character area.

Overall, it is considered that there would be limited effects on the national or local landscape character areas as a result of proposed residential development upon the site, subject to appropriate masterplanning. As part of a landscape-led masterplan, it is considered that there will be opportunities to create new multi-functional landscape areas that will mitigate for the loss of arable farmland and will significantly improve the biodiversity of the site.

### VISUAL ASSESSMENT

The wider site has limited visibility in its wider context. Views towards the site are generally experienced in the context of existing residential development at Plough Hill and Galley Common. The northern part of the wider site is more sensitive to development as it features several PRoW routes with views across the site and towards the wider landscape setting to the south and west of the site.

### LVA SUMMARY

The following recommendations are proposed to specifically reduce and mitigate for potential landscape and visual effects arising from the development within the site for residential purposes:

- Retain existing landscape features in public realm and landscape corridors.
- Retain the existing Public Rights of Way along the definitive footpath alignments.
- Avoid development in the northern part of the wider site, to the north of the existing watercourse, to minimise adverse effects of landscape character and views from PRoW network.
- Retain an undeveloped view line from PRoW network on high land in the northern part of the wider site looking south-west towards wider open countryside.
- Retain an undeveloped view line from Plough Hill Road to high land in the northern part of the wider site, to retain a physical break between the settlements of Galley Common and Plough Hill.
- Limit development area to the southern half of the site, at Parcels A and B and provide informal tree planting along the edge of the proposed development area to soften the urban edge in views from the north.
- Provide a central tree lined street through the development to accord with NPPF requirements and to break up the roofscape on the gently rising land which will be visible in views from the north.
- Consider appropriate development densities, providing lower density development in the western part of the site where the settlement edge will extend towards the wider open countryside.
- Provide outward facing housing along the development edges of the site to create an attractive and high-quality settlement edge.
- Use the wider site to provide an area of ecological enhancement and multi-functional open space which can incorporate appropriate landscape features and treatments to contribute to biodiversity net gain and to strengthen local landscape character.

Subject to appropriate masterplanning, it is considered that Parcels A and B could be developed for residential uses without undue harm to the landscape or visual amenity of the wider site and surrounding landscape context.



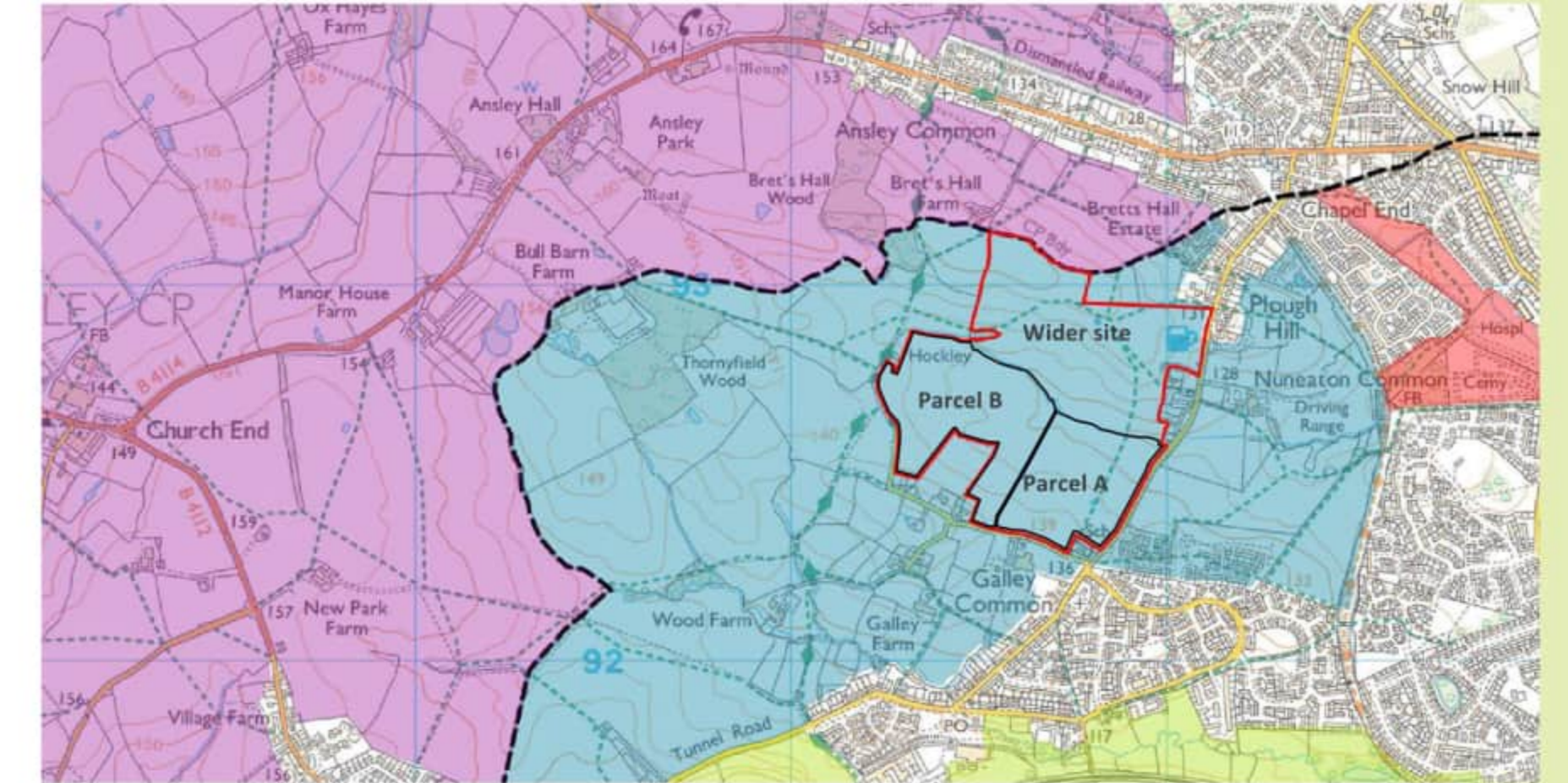
Photograph from the PRoW within the wider site looking back towards Galley Common



View from the national walking route north into the site

Figure 10

Study area and landscape character areas



### Key

— Site boundary

— Metropolitan boundary

North Warwickshire Landscape Character Assessment (November 2009)

Church End to Coley Hills and Valley

Nuneaton and Bedworth Landscape Character Assessment (August 2012)

Galley Common Hills and Valleys Character Area

Galley Common Hill and Robinson's End Valley Character Area

Whitfield Park and Barpool River Valleys Character Area

**Ecology and biodiversity net gain**

An ecological and Biodiversity Net Gain (“BNG”) assessment has been undertaken by EDP to understand the ecological value of the site and to seek to enhance the biodiversity of the site through its future development.

No part of the site is covered by any statutory designations. There is a single statutory designation of International/European value within 10km of the site and there are a further 5 statutory designations of National value within 5km of the site.

The records returned by WBRC identified a number of non-statutory designations within the site’s Potential Zone of Influence (2km). The Hockley Hedge and Plantation potential Local Wildlife Site (pLWS) falls partly within the site (Ref: 651/39) and includes an area of low-value intensively managed arable land. On the basis of the findings from the Extended Phase 1 Habitat Survey it is considered that the boundary of the pLWS is incorrectly drawn as it includes an area of intensively managed arable land, of negligible intrinsic ecological value, which is not mentioned within the site’s listing as a key feature or reason for designation. Notwithstanding this, the pLWS and all identified areas of habitat value are proposed to be retained and enhanced, and would not be impacted by the land being promoted for development.

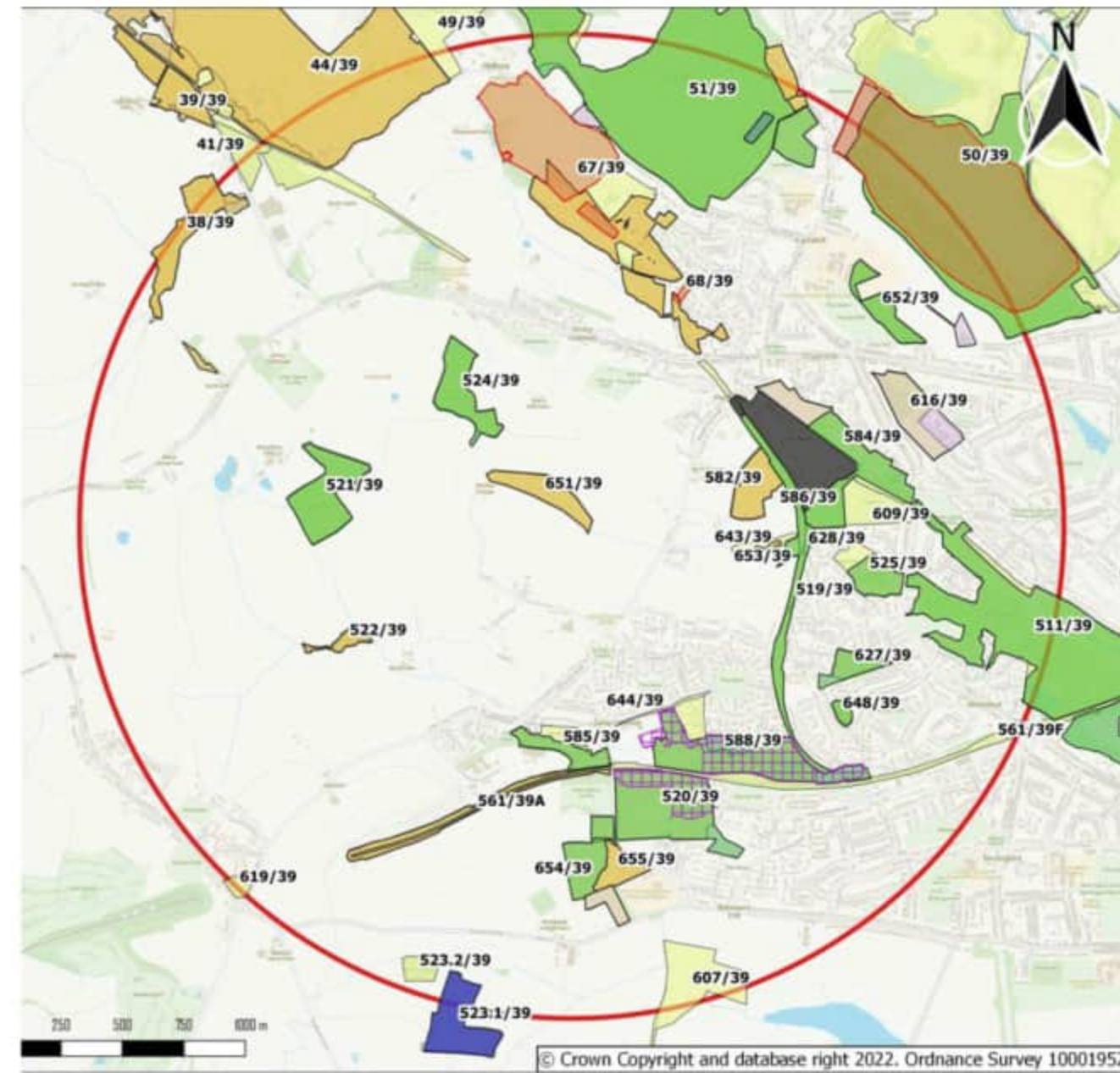
Owing to the dominance of low-value intensively managed arable land across the site, there is significant opportunity to deliver a net biodiversity gain subject to a sensitively designed masterplan which incorporates a range of new habitats within the site’s green and blue infrastructure. An initial assessment of BNG, undertaken by EDP, suggests that that site could deliver an uplift in biodiversity that is well in excess of current Government targets of 10%, by delivering significant areas of ecological enhancement, that can be used as multi-functional and accessible amenity space, within the wider site.

The initial ecological studies undertaken to inform the site’s promotion for residential development have confirmed that there are no significant ‘in principle’ constraints to the proposed development of the site. The habitats present on-site are predominantly low/negligible (site-level) in their intrinsic value and are unlikely to support either unique or exceptional species populations/assemblages. Moreover, the site provides an opportunity to deliver significant public benefits by delivering a considerable uplift in the present biodiversity value of the site – creating a new accessible area of ecological enhancement at the heart of existing and emerging residential communities.

**Key**

- Sites of Special Scientific Interest
- Deferred Local Wildlife Sites
- Potential Local Wildlife Sites
- Local Nature Reserves
- Destroyed Local Wildlife Sites
- Rejected Local Wildlife Sites
- Local Geological Sites
- Local Wildlife Sites
- Ecosites

**Figure 11**  
Statutory and Non-Statutory Landscape Designations



WBRC non-statutory designated sites data search with 2km potential influence zone

**Flood risk and drainage**

The site is entirely located in Flood Zone 1 which has the lowest risk of flooding (defined as land as having less than 1 in 1000 years’ annual probability of flooding).

Any surface water drainage from the development will be fully assessed and could be adequately managed via Sustainable Urban Drainage Systems (SuDS). In summary, it is not considered that, with suitable mitigation, that there are any flood risk or drainage constraints preventing the site being brought forward for residential development.

**Topography**

The site slopes down from the northern boundary at 150 AOD and southern boundaries at 140 AOD towards the dry ditch which traverses the site on an east west alignment, broadly central to the site. Parcels A and B form a natural and visually contained development platform that sits comfortably within the landscape and logically within the existing and emerging development context.

**Utilities, Infrastructure & Energy**

The site is immediately adjacent to Galley Common and, therefore, it is anticipated that appropriate services, including electricity, water and broadband will be available.

As more detailed plans for the site are development and as the Local Plan is progressed, more detailed technical work will be undertaken to assess the utilities capacity of the proposed development. However, it is not anticipated that there are any significant utilities infrastructure constraints that would prevent the site coming forward for development.

**Air Quality & Noise**

The site is not within an AQMA and there are not anticipated to be any air quality constraints that would prevent the site being brought forward for development.

The site is not within proximity to any significant noise receptors that could not be treated with mitigation.

Further noise and air quality assessment will be undertaken as detailed plans for the site are developed; however, there are not considered to be any air quality or noise constraints that would prevent the development of the site for residential uses.

**Public Rights of Way**

There are three Public Rights of Way that cross the site. The masterplan has been designed to ensure that all public rights of way are retained and enhanced as part of the future development of the site.

**Sustainability & Energy**

The emerging Local Plan and adopted Supplementary Planning Guidance place emphasis on sustainable design and construction. In addition, NBBC declared a Climate Emergency on 4th December 2019 and, in doing so, has committed to becoming a carbon neutral organisation by 2030. It is envisaged that the design of future development proposals at the site will seek to have holistic low energy, passive design concepts and emphasis on energy efficiency.

**Agricultural Land**

The site is in agricultural use and the Agricultural Land Classification (“ALC”) Map for the West Midlands Region (ALC004) suggest that the site is Grade 3 agricultural land – classified as ‘Good to Moderate’.

A more detailed assessment of the agricultural land quality would be undertaken as detailed plans are progressed; however, it is not considered that Grade 3 agricultural land would prevent the site being brought forward for development.

**Summary**

In summary, extensive technical work has been commissioned to understand the site constraints and opportunities. This has been used to inform the design evolution and underpin a deliverable masterplan for the site, which demonstrates how a landscape-led scheme, for residential and community uses, could be brought forward.

The design and technical work undertaken could be used to work up a detailed scheme for the site and would support the delivery of the site early in the Plan Period.



Agricultural Land Classification Map

## Section 5.0

# Vision and illustrative masterplan

This section explains our overarching vision and presents an Illustrative Masterplan to demonstrate how land at Galley Common can be sensitively developed to provide much needed, high quality new homes in Nuneaton and Bedworth.



# Galley Common, Nuneaton Development Statement

## SECTION 5.0 VISION AND ILLUSTRATIVE MASTERPLAN



The site provides an opportunity to deliver approximately 220 high quality family and affordable homes on Parcel A, whilst Parcel B, as a further phase if need is identified, has the potential to deliver up to an 200 additional new homes. The wider site can deliver approximately 29.1ha of green infrastructure, including a publicly accessible, biodiversity-rich area of ecological enhancement that serves as multi-fictional amenity space. The site will provide a range of housing to meet the needs of the area, whilst also delivering a sensitive and carefully designed development that respects and enhances the site's environmental assets and its setting.

### The vision

**“To create an attractive residential-led development with considerable green infrastructure, biodiversity enhancement and multi-functional amenity space; which forms a natural and logical extension to the existing built-up area of Nuneaton and offers a choice of new homes to meet local need”**



Existing housing along School Lane

### Site Opportunities & Considerations

Residential-led development on the site would provide a logical extension to the existing settlement form in the vicinity of Galley Common. Largely due to undulating topography, the self-contained nature of the site in its entirety provides scope to create a new residential area set within a framework of extensive, publicly accessible open space with areas of ecological enhancement and multi-functional amenity space, which will have limited impacts upon the wider landscape setting and significant enhancements in biodiversity. The scale and location of the site provides a unique opportunity to make land available to the local community. This could be utilised to expand Galley Common Primary School, offer a school parking/drop off facility, or to provide local sports pitch provision (or an alternative community use where the Council or School identifies a local need).

Safe and viable vehicular access into the site can be taken from Plough Hill Road. This access can serve the full development potential of the site (including Parcels A and B) when supplemented by a second controlled emergency vehicular access point onto Plough Hill Road. This would serve as a new pedestrian/cycle connection into the site on a day-to-day basis.

The site is crossed by a network of Public Rights of Way (PROWs) which provide north-south and east-west connectivity. These can be accommodated within the masterplan, with development sensitively located to minimise harm to the setting and key views from these routes. Additional new pedestrian and cycle connections can be accommodated within the masterplan to improve accessibility to the wider area and public transport network.

The local topography is undulating which results in localised ridge lines occurring to the north and south of the site. The northern ridge, distinctive in its openness and broad rolling top, is located within the site and is associated with the 'Plough Hill' settlement area. The 'hill' is crossed by PROWs with some characteristic long views to the south-west and should be kept free from development.

To the south-east of the site, the high land at 'Plough Hill' can be seen from existing public open space within Galley Common. Sensitive masterplanning to maintain this undeveloped view line will ensure that the character of the distinctive landscape setting of Galley Common is preserved. The central part of the site forms a localised valley, featuring a small field ditch which drains to the east. The low-lying land in the vicinity of the ditch will be most suitable for the creation of drainage ponds as part of a sustainable urban drainage scheme.

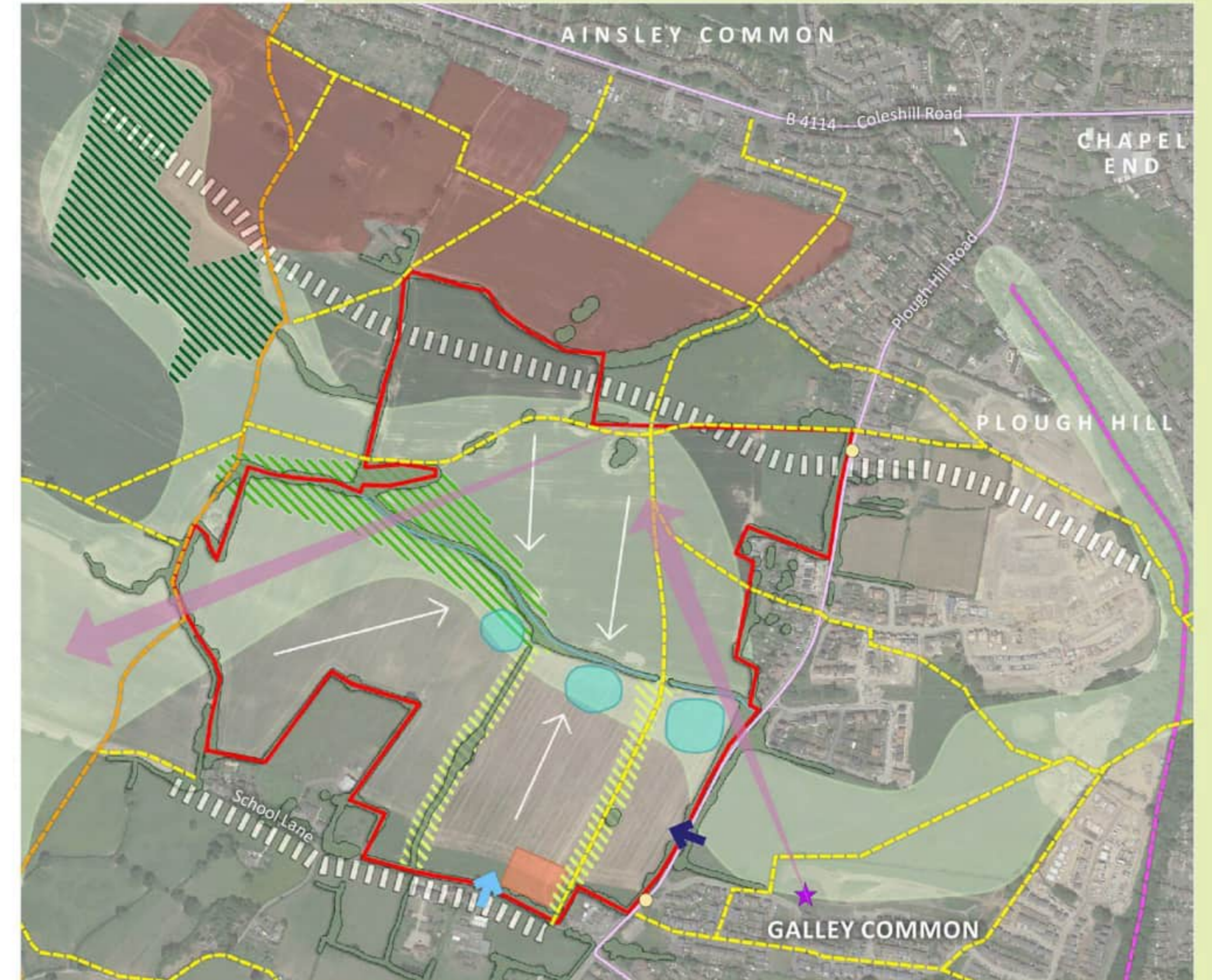
The site broadly comprises large scale agricultural fields with limited features of landscape/ecological value. Valued features include existing hedgerows, occasional trees, and a small field pond. Development would seek to retain valued features as part of a considered linked greenspace network. A 'Potential Local Wildlife Site' is located at the western part of the site. Several other existing Local Wildlife Sites and valued ecological areas occur in the wider context of the site. Development would be sensitive to the Potential Local Wildlife Site and would seek to maintain connectivity between wider Sites.

Figure 12

Constraints and opportunities plan

### Key

- Retained open view
- Housing Allocation H10 (North Warwickshire Local Plan 2021)
- Existing vegetation
- Existing green infrastructure and biodiversity connectivity within the site and the locality
- Localised ridge line
- Land slopes down towards the brook
- Existing local wildlife site
- Existing brook
- Existing bus route
- Existing bus stop
- Existing public right of way
- Existing national route
- Existing cycle route
- Existing LEAP
- Potential primary vehicle access point
- Potential secondary vehicle access point
- Potential location for SUDs - low points
- Potential school expansion
- Potential local wildlife site
- Potential green corridor to be retained through the site



# Galley Common, Nuneaton Development Statement

## SECTION 5.0 VISION AND ILLUSTRATIVE MASTERPLAN

### Key Design Concepts

The concepts which underpin the masterplan vision respond directly to the characteristics of the site. Four key concepts can be identified:

**Concept 1:** Retain and protect existing valued features: trees, hedgerows, ponds and watercourses, and Potential Local Wildlife Site.

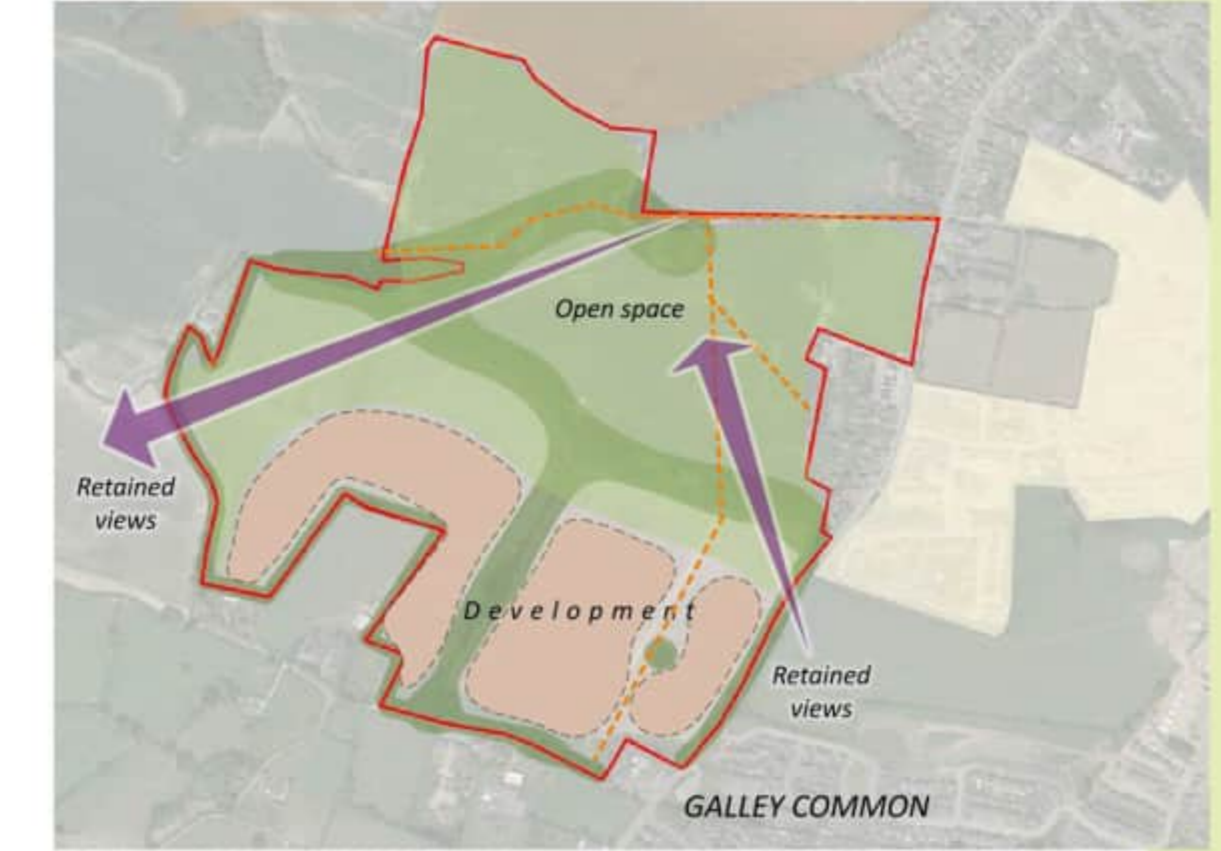
**Concept 2:** Concentrate development on land adjacent to Galley Common which has limited visibility in the wider landscape. Retain high open land with existing Public Rights of Way and long outward views.

**Concept 3:** Use tree lined streets and landscaping at the development fringe to break up roofscape in views from the Public Right of Way network to the north.

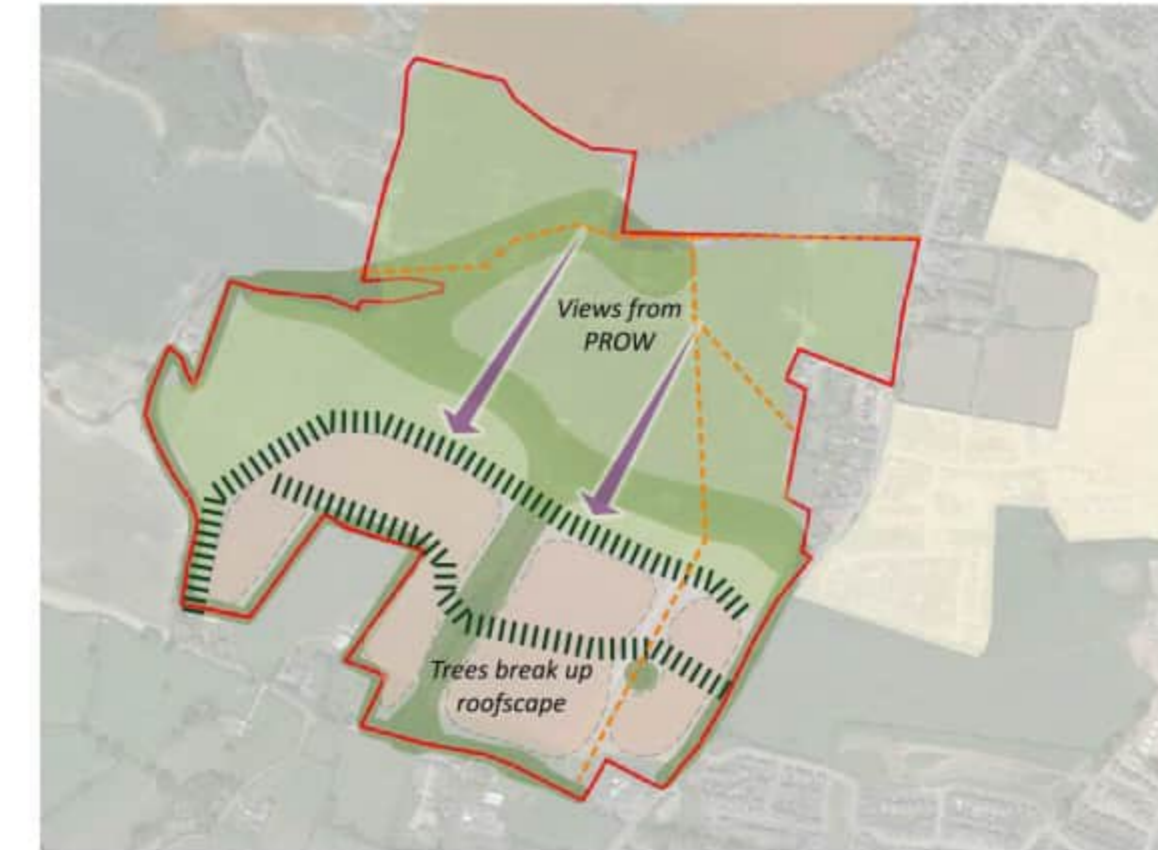
**Concept 4:** Use variation of development density to complement the urban grain of Galley Common and to create a strong sense of character and identity to the proposed development.



1. Visual design evolution  
Retain and protect existing valued features: trees, hedgerows, ponds, watercourses and potential local nature.



2. Visual design evolution.  
Concentrate development on land adjacent to Galley Common which has limited visibility in the wider landscape. Retain high open land with existing Public Rights of Way and long outward views.



3. Visual design evolution.  
Use tree lined streets and landscaping at the development fringe to soften the development edge and break up roofscape in views from the Public Right of Way network to the north.



4. Visual design evolution.  
Use variation of development density to complement the urban grain of Galley Common and to create a strong sense of character and identity to the proposed development.



# Galley Common, Nuneaton Development Statement

## SECTION 5.0 VISION AND ILLUSTRATIVE MASTERPLAN



### Illustrative masterplan

ASL has developed an illustrative masterplan for land at Galley Common which is sensitive to the opportunities and constraints of the site. The resulting vision will deliver a comprehensively planned and high-quality residential extension to the existing settlement area.

The masterplan is landscape-led, ensuring in the first instance, that a multi-functional greenspace network is planned and shaped to respond sensitively to the valued landscape features and characteristics of the site.

Existing hedgerows, trees and ponds will be retained across the site as part of a connected 'green' network. These features will add a sense of maturity and character to the development. Open space will be provided at the low-lying central part of the site to maximise opportunities for sustainable drainage ponds, and an expansive, publicly accessible area of ecological enhancement will be created in the northern part of the site, providing recreation, visual amenity and ecology benefits.

Proposed housing parcels are designed to sit appropriately within this multi-functional greenspace network. New housing is located in the southern portion of the site, close to the existing settlement and benefiting from attractive views over landscape corridors and the distinctive landform of 'Plough Hill'. The housing area will feature informal tree planting at the interface with the northern open space and a central tree lined street running east-west across the site which will soften the urban edge and will assist in breaking up the roofscape in views towards the new housing from the north.

It is anticipated that new homes will comprise a mix of 2-5 bedroom properties. These will include an appropriately selected mix of detached, semi-detached and terraced units at between 1 - 2.5 storeys in height. Properties with lower ridge heights will be included, as required, where new housing is located on higher land along School Lane which interfaces with the wider rural setting. New homes will primarily be constructed of red brick or light render, with grey or red roof tiles to complement existing local housing materials.

The main vehicular access to the site will be taken from Plough Hill Road. A second controlled emergency vehicle access, also from Plough Hill Road, will be located further north. This route will also serve as a pedestrian/cycle link to maximise connectivity to Plough Hill Road and beyond. Within the site a central tree-lined street will provide access to all parts of the site. The route will be aligned to frame views towards existing landscape features and focal green spaces, resulting in a characterful route with a distinct sense of place. A series of secondary roads and private drives will be provided extending beyond the central street.

The illustrative masterplan demonstrates how the site can be sensitively developed to provide approximately 220 new homes within Parcel A, and the potential to deliver a further 200 units within Parcel B as part of a further phase of development if there is an identified need for additional homes in the Borough.



Existing properties on Plough Hill Road



Recently constructed residential development to the east of the site

Figure 13

Illustrative Masterplan

### Key

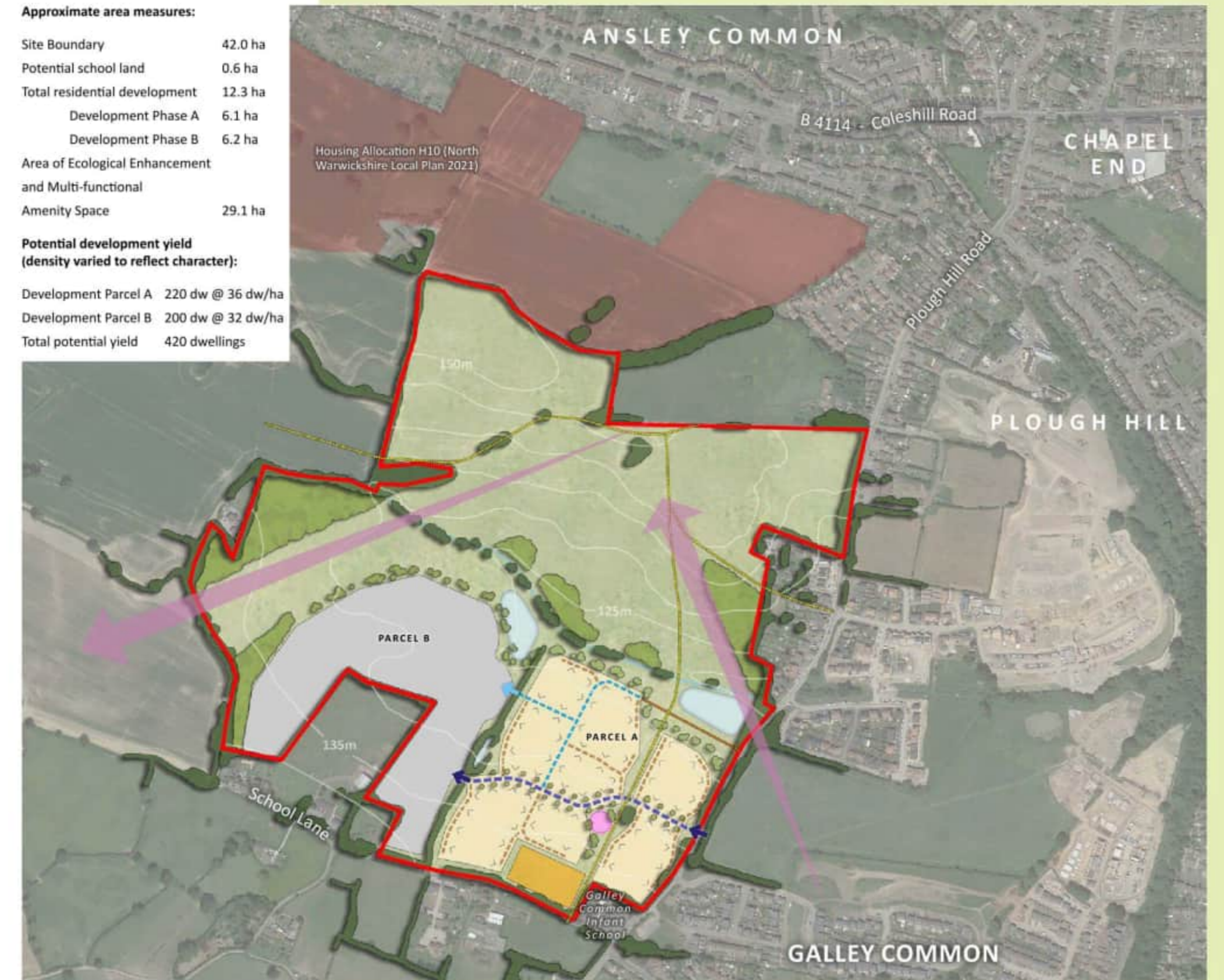
- Site boundary
- Existing trees / woodland
- Existing Public Right of Way
- Existing brook
- Potential primary vehicle access
- Potential secondary vehicle access
- Primary road
- Secondary road
- Indicative road network
- Proposed pedestrian / cycle / emergency link
- Residential development
- Residential frontages
- Proposed vegetation
- Wetlands / SuDs
- Play area
- New school pitch or space for expansion / parking
- Retained view

### Approximate area measures:

Site Boundary	42.0 ha
Potential school land	0.6 ha
Total residential development	12.3 ha
Development Phase A	6.1 ha
Development Phase B	6.2 ha
Area of Ecological Enhancement and Multi-functional	
Amenity Space	29.1 ha

### Potential development yield (density varied to reflect character):

Development Parcel A	220 dw @ 36 dw/ha
Development Parcel B	200 dw @ 32 dw/ha
Total potential yield	420 dwellings



## Section 6.0

# Summary and key benefits

The land at Galley Common offers an opportunity to bring forward a deliverable site early in the Plan Period that will deliver a range of economic, social and environmental benefits on a site that will significantly contribute to meeting the needs of NBBC.

The site is in a highly accessible location on the western urban edge of Nuneaton, which is the primary town in the Borough's settlement hierarchy. The development of the site offers the potential to provide the type and quality of homes and community infrastructure that will support the growth aspirations of NBBC during the next Plan period. This section provides a summary of the deliverability of the site and an assessment of the key benefits that allocating the site for development would bring to Galley Common and the Borough.



# Galley Common, Nuneaton Development Statement

## SECTION 6.0 SUMMARY AND KEY BENEFITS



### A Deliverable Site

The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

ASL is fully committed to the site and considers that it could be brought forward immediately on adoption of the Local Plan to meet the housing and employment needs of the Borough.

In summary the site is:

- **Available** – ASL has control over the entire site and has considerable experience of successfully promoting sites through the Local Plan process, working closely with experienced housebuilders to deliver sites immediately after allocation.

- **Suitable** - the site is entirely suitable for a residential development for the following reasons:

- It offers a highly accessible and sustainable location for development with excellent accessibility to Nuneaton, and can be brought forward early in the Plan Period following any allocation.

- The site would contribute to a sustainable pattern of development and become a logical extension to emerging patterns of development in Nuneaton's west. The development of the site would support the synergy between jobs and homes and assist in the creation of mixed sustainable communities that serve Nuneaton as the primary town in the Borough's settlement hierarchy.

- It would form a natural extension to the built-up area of Nuneaton, forming a logical extension to recent developments in the Galley Common area, with strong visual and physical boundaries.

- There are no initial environmental or technical constraints that are considered to prevent the development of the site, subject to suitable mitigation and a sensitive approach to design.

- It can deliver satisfactory vehicular access and has excellent access to the strategic highway network via the A5.

- **Achievable** – the illustrative masterplan demonstrates how the site responds to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led, deliverable masterplan. An assessment of the site constraints illustrates that the delivery of the entire site is achievable, and a professional team of technical experts has been retained to support the detailed design of the site moving forward. Where any potential constraints have been identified, ASL has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers. ASL has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales; as well as the cost factors associated with the site including site preparation costs, site constraints and the provision of community and other infrastructure. ASL can confirm that the development of the site is economically viable and achievable in accordance with the NPPF.

### Key Benefits

The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of NBBC. The delivery of the site will provide significant benefits to the Borough, Nuneaton and to Galley Common. These are summarised as follows:

#### ECONOMIC BENEFITS

The development of the site and the illustrative masterplan will have significant economic benefits, both from its construction and occupation. Key economic benefits include:

- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA. The development is estimated to generate a total construction cost of £55m which could support 730 jobs (Parcels A & B) during the construction phase of the development;
- Providing long term occupation / operational benefits including new resident expenditure, attracting new and high earning residents to NBBC, generating flow on and supported jobs and, overall, generating increased economic output in the Borough; and,

- Generating significant Council Tax revenue for the Local Authority, with a development of 374 homes generating over £700,000 per annum (Parcel A and B) in revenue for the Borough per annum.

#### SOCIAL BENEFITS

The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees and families;
- Providing viable and deliverable affordable homes to help meet the Borough's identified affordable housing need. The site will provide, at a minimum, a policy compliant level of affordable housing;
- Providing self-build and custom build plots that meet the requirements of residents on the Council's custom build register;
- Delivering multifunctional open spaces, amenity spaces and green infrastructure within the wider site to benefit existing and future residents – creating a "green heart" that will serve emerging developments in Ansley Common, Plough Hill and Galley Common; and
- Land to expand the existing Galley Common Infant School to ensure that there is school capacity for future generations (or to support an alternative community facility where a need is identified by the school or the Council).

#### ENVIRONMENTAL BENEFITS

Owing to the dominance of low-value intensively managed arable land across the site, the development of the site has the potential to significantly uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. Additionally, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:

- A considerable uplift in terms of the biodiversity value of the site through Biodiversity Net Gain as part of a wide area of ecological enhancement in the northern part of the site. The site will create new habitats for a range of species and provide an uplift in biodiversity that is well in excess of Government targets;
- The provision of multi-functional green infrastructure and open space that will benefit existing residents and create new green corridors through the site, that will enhance habitats, biodiversity and the landscape;
- The protection and enhancement of existing features of the site that add value, including mature trees and hedgerows to the west of the site.





ainscough strategic land

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