

Mr Ian Powell  
Director – Regeneration and Public Protection  
Nuneaton and Bedworth Borough Council  
Coton Road  
Nuneaton CV11 5AA

Our ref: MJ/MP  
23 August 2013

Dear Mr Powell

**RE: Response to Nuneaton and Bedworth Borough Plan Consultation**

I write in my capacity as Member of Parliament for the part of Nuneaton and Bedworth Borough which falls within the Nuneaton Parliamentary constituency.

You may be aware that I attended the Council's cabinet meeting on Wednesday 22<sup>nd</sup> May 2013 and addressed that meeting in regard the Borough Plan consultation item. At that meeting I demonstrated my opposition to the proposals.

Since the consultation was released my view has not changed. I firmly believe that the plan and consultation, in its current form, are both flawed.

As Cllr Bill Shepherd pointed out in his verbal address to the same cabinet meeting, the preferred option, in terms of land allocation for consultation, was decided in a Labour Party Group meeting rather than in the very loosely termed 'Working Party', supposedly constituted by the Cabinet to formulate a proposal to put to the public.

I have great sympathy with the Council's officers who seem to have been instructed by elected Members on the basis of political will rather than evidence. I make this comment because, based on the final Borough Plan document, in many places it seems incoherent. Little regard seems to have been attached to the evidential base being referred to in the plan, and there are a number of areas of contradiction between the evidence referred to and the plan itself.

Since the plan was released to the public, I have been very aware at the lack of public knowledge over both the process and the proposals. Many local people wanting to respond to the consultation have also been confused by the online consultation response forms.

In my view, people were also not adequately told that they could respond to the consultation in an alternative form to the online system.

I also hold concerns over the timing of the consultation, which has been held during the busiest period for holidays, when many people may not see media publications due to being away.

I also do not believe that the method of informing the public was adequate, as the Council's 'in-touch' magazine (the main channel of communication) is not universally read by all residents because of its generic nature. I firmly believe that a proposal of such magnitude should have been articulated more widely.

A bespoke letter to households would have been more effective. I am surprised to note that not even the Community Forums were used as a vehicle of communication, bearing in mind the part played by the Forums in the previous 2009 'Core Strategy' process, which is being used in the evidence base for the current Borough Plan.

The consultation document is also misleading in part. For example, Whitestone Ward is stated as being 'not subject to development', yet there is a clear secondary impact on that Ward from the proposed Golf Drive link road.

There are also inaccuracies in the document. In section one of the documents, the statement was made that the Government's Regional Spatial Strategy (RSS) was in the process of being abolished. In fact, when this document was released to Cabinet on the 22<sup>nd</sup> May the RSS had been abolished for some weeks.

In the section including local centres there is no mention of the local centre at Copsewood Avenue. Whilst these are minor errors, it does lead one to question what other omissions or errors may be apparent.

There are also a number of omissions from the document that would be fundamental to the formation of the plan being consulted on. For example, residents surely deserve to know what the target is for Gypsies and Travellers and what the target for affordable homes will be. A narrative of the implementation for any provision for Gypsies and Traveller sites and affordable homes should be made to inform people in the areas that will be subject to development.

The plan refers to this work as 'to follow'. How can the public be expected to understand what is being proposed if fundamental components are omitted from the consultation?

Section 4 of the document quotes an evidence base for the rationale behind the plan. However, that evidence base in terms of the 2009 proposals and consultation seem to have been ignored. The clear public preference in the 2009 consultation was the 'Small Urban Extensions' option – this seems to have been completely ignored.

I am also concerned that the growth target in section 4 was decided in an arbitrary fashion by the Council's Cabinet without any consultation or reference to the public. The public will be pleased that the RSS target of 10,800 houses has been abolished but need to know how and why the 7,900 target was decided.

The strategic sites policy seems to bear little or no correlation to the evidence base put forward.

The reference to Green Belt policy seems ad-hoc and without a proper evidence base. There are 19.61ha of commercial sites which may be suitable for development over the life of the plan, but this is omitted. By not prioritising brownfield development, it seems to contradict the National Planning Policy Framework (NPPF).

Moving on to the tangible concerns of my constituents, I have spoken to many constituents and received several hundred contacts from people in Arbury, Attleborough, St Nicolas, Weddington and Whitestone Wards. They all raise considerable concerns about the plan.

The most pressing concerns for residents seem to surround the issues of proportionality of the proposed development and the provision of infrastructure.

On the issue of proportionality, the residents in these Wards feel that the potential impact of the new development and proposed infrastructure is disproportionate and will adversely impact the quality of lives of the settled community.

There is a concern as to why the view of the public in the 2009 consultation has been ignored. There is also concern around why the various land options for development have not been put to the public as they were in 2009.

With regard to infrastructure, the concerns can be broken down into issues relating to roads, flooding, drainage and sewerage provision, education, health care provision and employment.

### **Road infrastructure**

There is considerable concern at the inadequacy of the road infrastructure in Nuneaton town centre and its capacity to cope with such a large block of development on the north side of Nuneaton.

I have met with highways planners at Warwickshire County Council and was told that they advised NBBC against mass scale development on the north of Nuneaton during the 2009 Core Strategy process.

With only one bridge from the town centre taking traffic over the West Coast Mainline railway this plan will exacerbate the current environmental impact on the air quality management area on the Leicester Road gyratory. The people in this area are already suffering from high levels of pollution which will increase considerably if this plan is given the go ahead.

There is also much concern over the adequacy of the A444 and A47 and the ability of these already overburdened roads to cope with such disproportionate development.

The new roads contained in the plan are also causing considerable uncertainty amongst residents. The road planned between Golf Drive and the Eastboro Way threatens to connect a

major arterial road (the Eastboro Way) to what has, over the last 50 years, become an estate road at Golf Drive.

There is also a fear that the link road may be a Trojan horse to develop out the fields either side of the proposed link road in the future.

This proposed link road and the additional traffic on Golf Drive and the adjoining estate roads will cause enormous misery to a very settled community. Furthermore, the impact on the Lutterworth Road, Bulkington Lane and Gipsy Lane will make what are already traffic black spots at peak times even more unbearable to residents.

Moreover, the proposals for new development at Gipsy Lane are being proposed without a substantive solution to address the capacity and danger of the current section of Gipsy Lane between the Marston Lane junction and the Coventry Road junction. The extra traffic from new development on the north of Nuneaton will make an already overburdened and very dangerous section of road worse.

The Golf Drive/Eastboro Way link road will also place a far heavier burden on an already busy section of road on the A47 Long Shoot. There is also already a significant volume of traffic from the Eastboro Way which cuts through the estate road of St Nicolas Park Drive to access the A5 at the Higham Lane junction. This rat-run through St Nicolas Park Drive will also be made significantly worse by this proposal.

The link roads proposed at Arbury and Bermuda Park are causing considerable concern. The residents of Bermuda Park and Walsingham Drive are already concerned about the current safety of Walsingham Drive, which will be worsened considerably should such a link into Arbury now be made.

Furthermore, the consultation does not clarify if this proposal would link Walsingham Drive with Heath End Road. If this is the intention, this would no doubt have a very negative effect on Bermuda Park. Moreover, the areas served by Heath End Road would be badly impacted, particularly if heavy goods traffic can access the proposed road.

There is considerable concern about the proposed link road between the A444 (Bedworth bypass) and Arbury. Firstly, it is not obvious from the plan as to where this road will connect. On the plan, it terminates before it reaches another existing road. I believe that this needs some clarity.

The proposed road would no doubt incur substantial cost. There is a fear that the proposed residential development may not sustain the cost of a new road and the proposed development may just therefore be connected to Walsingham Drive or even Atholl Crescent. Both solutions are unacceptable to the settled community.

## **Flooding, Drainage and Sewerage**

On the north side of Nuneaton there have been considerable flooding issues in recent years in the Wards of St Nicolas and Weddington. There is huge concern in these communities that the scale of new development being proposed will make this situation worse.

The Council also seems to be increasing the risk of flooding from new development by refusing to accept balancing lakes on new developments. Balancing lakes and ponds are the preferred method of flood relief of the Environment Agency.

Furthermore, there are many successful examples in Nuneaton where balancing lakes with new developments have been successful in mitigating flooding issues. The Borough Council's position therefore seems perverse.

The scale of development in Arbury, Attleborough, St Nicolas and Weddington Wards is also creating massive concern over whether the existing drains and sewers will be sufficient to cope with this scale of development in just three locations.

## **Education**

I have serious concerns over whether the massing of the development will be conducive to the ability to deliver sufficient and sustainable local education provision in the areas subject to proposed development.

Given the substantial cost of other proposed infrastructure in the plan, the provision of education places may be difficult to deliver from the S106 and community infrastructure levies from the proposed developments. Due to the mass of development in these three areas concerned, it will be difficult to provide the school places from the current schools which are already at capacity. Where will the funding to develop any new schools required be secured from?

## **Healthcare Provision**

In Nuneaton, we currently have very good access to primary and secondary care. The plan does not discuss what discussions or strategy there is to accommodate the additional health care needs of the new residents that the plan will create. I have particular concern that there is a substantive discussion about access to General Practitioners which is currently very good, but could deteriorate should this plan be implemented in such a disproportionate fashion.

## **Employment**

The provision of new employment is important in the context of our area. I welcome proposals for employment land; however, it does not seem to dovetail with the massing effect of the residential developments proposed. This will create unnecessary traffic congestion. The MIRA Technology

Park development is a very welcome thing for Nuneaton, however the level of people employed on that site which will reside in Nuneaton, is in my view, hugely exaggerated.

In conclusion, the plan being consulted on is, in my view, flawed on many levels. The plan takes little account of the stated evidence base and the previous views of the public.

I can only suggest that a further, more coherent, proposal is made by the Council. This proposal should give the public options available to be consulted on and take into full account the views expressed by residents in the 2009 consultation process. This process is necessary; however, it should be as expeditious as possible to avoid further speculative planning applications.

The significant level of public concern over this proposal is such that it is difficult to see that the Council would get the level of buy in from the public required to maintain a strong level of cohesion within our communities.

Yours sincerely

**Marcus Jones MP**