

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No: QB-2019-000616

BETWEEN :

**(1) Nuneaton and Bedworth Borough Council
(2) Warwickshire County Council**

Claimants

– and –

**(1) Thomas Corcoran
(2)-(53) Other Named Defendants
(54) Persons Unknown Forming Unauthorised Encampments within the Borough of
Nuneaton and Bedworth**

Defendants

FIRST WITNESS STATEMENT OF SARAH MATILE

I, **Sarah Matile**, Planning Manager (Policy) at Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton CV11 5AA will say as follows:

1. I make this witness statement in support of the Claimants' application for the renewal of the injunction order of the Honourable Mr Justice Cotter dated 17 December 2024 for a further 12 months. I make this statement to explain to the Court the position with the First Claimant's supply balance of residential and permanent Gypsy and Traveller pitches in its administrative area.
2. The facts and matters set out by me in this witness statement are either known by me directly and are true or are known by me indirectly and are believed to the best of knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was produced following correspondence with Claimants' legal representatives.

3. There is exhibited to this statement a bundle of documents marked 'SM'. Where I refer to documents contained in that bundle I do so in the format **[SM/exhibit number]**.

The Local Plan

Assessed Need

4. The Council's Borough Plan was adopted on 11th June 2019 and covers the plan period 2011 – 2031. I exhibit a copy of the Borough Plan at **SM/1**. Policy DS4 – Overall development needs and Policy H3 – Gypsies and Travellers in the Borough Plan set out the need for at least at least 39 residential and 5 transit pitches by 2031/32. This need figure was based on the 2016 Gypsy, Traveller and Travelling Showperson Accommodation Assessment (GTTSAA). Policy H3 proceeds to set out criteria to be used to identify potential locations for residential and permanent pitches through a separate Gypsy and Travellers Site Allocations Development Plan Document (GTSA DPD).
5. The Council's GTSA DPD **SM/2** was adopted on 17th January 2024 and covers the plan period 2021 to 2037. At the point of adoption, the GTSA DPD superseded Policy H3 of the Borough Plan in its entirety. To support the production of the GTSA DPD, the Council commissioned an updated GTTSAA in 2021 **SM/3**.
6. The GTTSAA 2021 indicates by 2036/37, 20 new pitches will be required, comprising of 16 for people defined as Gypsies and Travellers and a further 4 for a cultural need. No transit pitches are required. For clarity, I reproduce GTSA DPD Table 1: Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37.

Table 1 – Plan Period Gypsy and Traveller pitch need 2021/22 to 2036/27

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Longer-term need		
<i>Over period 2026/7 to 2030/31 (B)</i>	4	3
<i>Over period 2031/32 to 2036/37(C)</i>	8	7
<i>Longer-term need TOTAL to 2036/37 (12 years) D=(B+C)</i>	12	10
NET SHORTFALL 2021/22 to 2036/37 (A+D) (11 years)	20	16

PPTS = Planning Policy for Traveller Sites (2015) within which the definition of gypsies and travellers is provide.

7. The Government’s Planning Policy for Traveller Sites (PPTS) was updated in 2024 to reflect the new definition of Gypsy and Travellers that had resulted from a development in case law. The definition now includes those who previously did not meet the 2015 definition and has therefore been expanded to capture a wider range of persons.

8. As demonstrated in Table 1 above, the Council’s GTTSAA included 4 pitches for those who did not meet the PPTS 2015 definition. Therefore, the need identified in the Council’s GTTSAA 2021 in facts reflects the PPTS 2024 definition in any event and fully addresses the need even after the PPTS 2024 revision.

9. The 2021 GTTSAA assumes that some of this provision for additional pitches can be found through turnover of an existing Warwickshire County Council (WCC) ran site at The Griff and by a combination of intensification and expansion of three existing sites. I reproduce GTSA DPD Table 2: Addressing Gypsy and Traveller pitch need below.

Table 2 – Addressing Gypsy and Traveller Pitch Need

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Anticipated minimum turnover on council site (B)	7	7
Potential intensification/expansion of existing sites (C)	6	6
Residual need 2021/22 to 2025/26 after turnover and potential intensification/expansion (D) = A-B-C	-5 Need met	-7 Need met
Longer-term need 2026/27 to 2036/37 (E)	12	10
Anticipated minimum turnover on council site (F)	15	15
Potential intensification/expansion of existing sites (G)	5	5
Residual need 2025/26 to 2036/37 after turnover (H) = E-F-G	-8 Need met	-10 Need met
Residual need 2021/22 to 2036/37 after turnover and potential pitch development considered (I) = D+H	-13 Need Met	-17 Need met
Summary	Cultural need	Of which: PPTS NEED
Plan period Authorised Pitch Shortfall (2021/22 to 2036/37) (J = A+E)	20	16
Anticipated minimum turnover on council site (K) = B+F	22	22
Potential intensification/expansion of existing sites (L)=C+G	11	11
Residual need 2021/22 to 2036/37 after turnover (M=J-K-L)	-13 Need met	-17 Need met

10. Therefore, as demonstrated above, and set out within paragraph 3.6 of the GTSA DPD, whilst turnover is one element of supply that can be relied upon to meet some forecast need within the Borough, it is not at the exclusion of allocation new pitches.

The 2021 GTTSAA identified 11 pitches that could be found in the Borough and this forms the basis of the minimum new pitches to provide, the remainder will be met through turnover. For clarity, the GTTSAA does not recommend additional provision for Travelling Showpeople and no change to Bargee Traveller numbers.

11. Strategic Policy GT1 – Overall Need of the GTSA DPD therefore sets out the following provision between 2021/22 and 2036/37:

- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025/26; and
- At least a further 5 permanent residential pitches beyond those required by 2025/26 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2036/37.

Location of Sites

12. Policy GT3 – Site Allocations within GTSA DPD allocates three sites which in total will provide up to 15 permanent pitches, which is in excess of the requirements in Policy GT1 for at least 11 permanent pitches to accommodate Gypsies and Travellers. These sites comprise of:

- GTSA1 – Sunrise Cottage for three additional pitches
- GTSA2 – The Old Nursery for five to six new pitches
- GTSA3 – Winter Oak for six additional pitches

13. Further, Policy GT4 – Site Safeguarding identifies the travelling showpeople site at Spinney Lane / Whittleford Road as a site to be safeguarded by use for Travelling Showpeople.

14. Therefore, at present, through the GTSA DPD, there is provision for in excess of minimum need of 11 residential pitches in the borough for gypsies and travellers by 2036/37 and the existing travelling showpeople site in Nuneaton has been safeguarded from alternative uses.

Update to the GTTSAA 2021

15. The GTTSAA is required to be updated every 5 years, therefore an update will be required by December 2026. The Council is in the process of commissioning consultants to undertake this update.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: *Sarah Matile*

Sarah Matile

Date: 16 October 2025

Statement on behalf of the Claimant
Sarah Matile – First Statement
Exhibits ‘SM1-SM3’
Dated: 16 October 2025

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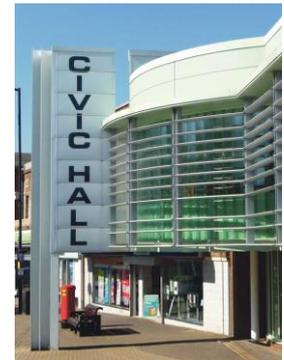
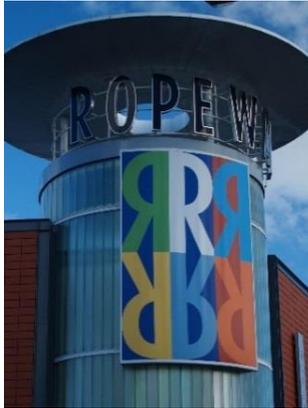
Defendants

Exhibit ‘SM1’

Nuneaton & Bedworth Borough Council

Borough Plan

2011-2031



Borough Plan: 2011 – 2031
Adopted 11th June 2019
Nuneaton and Bedworth Borough Council

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1. Introduction

What is the Borough Plan?

- 1.1 The Nuneaton and Bedworth Borough Plan will play a key role in shaping the future of the borough up to 2031. It will influence what development will take place, how much and where within the borough it will be located. The Plan considers a wide range of economic, social and environmental matters that together will enable the achievement of cohesive and sustainable communities. The Plan outlines a spatial vision and strategic objectives for the area, along with a strategy and policies to enable its delivery. Measures to monitor progress in achieving the aspirations of the Plan are also identified. Once adopted the Borough Plan will replace the Local Plan 2006.

Context for the Borough Plan

- 1.2 The content of the Borough Plan has been informed by a number of documents, as is required by Government.

National Planning Policy Framework and National Planning Practice Guidance

- 1.3 The National Planning Policy Framework (NPPF) sets out Government policy on planning matters, seeks to create sustainable communities, and foster sustainable development. The policies in the NPPF provide the national framework within which local policy should be prepared. The Planning Practice Guidance provides among other things, direction in preparing evidence to inform the Borough Plan. Details of both the NPPF and Planning Practice Guidance can be found at <https://www.gov.uk/guidance/national-planning-policy-framework> and <https://www.gov.uk/government/collections/planning-practice-guidance>.

Sustainable Community Plan

- 1.4 The Borough Plan is a delivery document for the Nuneaton and Bedworth Sustainable Community Plan. The policies within the Borough Plan therefore need to enable delivery of the aims of the Sustainable Community Plan, which are to make the borough stronger, safer and more sustainable. The Sustainable Community Plan can be viewed on the council's website at www.nuneatonandbedworth.gov.uk.

Evidence

- 1.5 In preparing the Borough Plan a number of studies have been undertaken to provide a robust and credible evidence base. This is to ensure all policies and decisions within the Borough Plan are based on sound information. The evidence takes two main forms:

- Research and facts

- Evidence from local communities and others with an interest in the future of the Borough
- 1.6 To view the evidence base and responses from previous consultations visit www.nuneatonandbedworth.gov.uk/boroughplan
- 1.7 A number of background papers have also been prepared to show how national policy, studies and previous consultations have been taken into account to develop the policies.

Strategic Environmental Assessment and Sustainability Appraisal

- 1.8 To ensure the Borough Plan is effective in meeting the needs of future generations in a sustainable manner, a Strategic Environmental Assessment and a Sustainability Appraisal have been undertaken alongside the development of the Borough Plan. This will ensure that the Plan positively contributes to the economic, social and environmental considerations of the borough. The outcomes of this work during each stage of the process have been presented in separate reports which are available via the council's website.

Infrastructure Delivery Plan

- 1.9 The Infrastructure Delivery Plan sits alongside the Borough Plan. It provides information about the infrastructure that needs to be delivered to support the policies and growth targets set in the Borough Plan. It outlines the sources of funding for projects and those who will be responsible for the delivery of the infrastructure.

Duty to cooperate

- 1.10 Introduced through the Localism Act 2011, the duty to cooperate is a legal requirement of the plan making process. The NPPF states that, "public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities, such as the provision of new housing and infrastructure". The council is positively engaging with all the relevant bodies during the plan making process. During the examination in public, an independent inspector will make a judgement on whether the duty has been successfully fulfilled.

Consultation

- 1.11 The process of preparing the Borough Plan is broken down into a number of stages.

Issues and Options: June - August 2009

- 1.12 The council consulted on a document that outlined the issues facing the borough and presented a range of options to address them. This included a broad range of locations for the direction of future growth.

Preferred Options: July - August 2013

- 1.13 The council consulted on the Preferred Options document which set out the council's preferred approach to addressing the strategic issues facing the borough. This included specific locations and sites to address the future development needs and planning policies.

Submission: November - December 2015

- 1.14 The council consulted on the Submission version of the Borough Plan which took account of responses from the previous consultation along with updated evidence studies and government guidance.

Publication: January - March 2017

- 1.15 The council consulted on the Publication version of the Borough Plan, which was the version the council wished to adopt as its final policy.

Main Modifications: September – December 2018

- 1.16 The council consulted on the Main Modifications proposed for the Borough Plan, which were identified by the Inspector examining the Borough Plan.

2. Local context

- 2.1 Nuneaton and Bedworth is most famous for being the birthplace of the author George Eliot (Mary Ann Evans). It is one of five boroughs/districts within Warwickshire. It is the smallest in size, at 7,895 ha, but has the second largest population at 125,200¹. Nuneaton and Bedworth Borough is the most densely populated area of the county with 1,592 persons per sq km, compared to the Warwickshire average of 277². Largely urban in character, the borough has two market towns - Nuneaton and Bedworth, as well as the large village of Bulkington to the east of Bedworth. Several smaller settlements are located in the south of the borough between Bedworth and Coventry.
- 2.2 The borough is located between Coventry and Hinckley, and benefits from good road links. Nuneaton and Bedworth are both easily accessible from the M6, which gives access to the M1, M5, M42 and the M69. The A5 runs along the northern boundary of the borough, and the A444, A4254 and the B4114 are the major routes within the borough. Birmingham International Airport and East Midlands Airport are also within easy reach.
- 2.3 Nuneaton is also well connected by the rail network. The West Coast Main Line provides links to Birmingham and London, while the Birmingham to Leicester line links Nuneaton and Hinckley. A branch line links Nuneaton to Coventry via Bedworth. As part of the NUCKLE north-south rail project, facilities at Bedworth Station have been improved and a new station has been created at Bermuda, with frequencies of services increased from hourly to half hourly³.
- 2.4 Historically, industries in the borough included coal mining, other extractive industries and heavy engineering. The borough still has a high proportion of employees working in manufacturing compared to the UK average⁴. Other significant employment sectors are wholesale and retail trade; health and social work; and transport, storage and communication⁵. In terms of the business base of the borough's local economy, this is made up of a mixture of small and medium-sized firms along with a number of global and national company headquarters⁶.
- 2.5 Most employment is concentrated on a number of industrial estates. The main sites are at Attleborough Fields, Bayton Road, Bermuda and Prologis Park, but smaller estates are located across the borough. The town centres of Nuneaton and Bedworth also provide a significant number of jobs.

¹ Office for National Statistics (2011). *Census 2011*.

² Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2014/2015*.

³ NUCKLE: refers to a three phase rail improvement scheme between Nuneaton and Leamington, and is an acronym of Nuneaton, Coventry, Kenilworth and Leamington.

⁴ Office for National Statistics (2016). *Employee Jobs (2015)*.

⁵ Office for National Statistics (2016). *Employee Jobs (2015)*.

⁶ Office for National Statistics (2016). *UK Business Counts (2016)*.

- 2.6 Nuneaton Town Centre is the main retail and commercial centre serving the whole borough as well as further afield, whereas Bedworth Town Centre serves a more local role. Nuneaton Town Centre includes the Ropewalk and Abbeygate shopping centres, the borough's main library, council offices and railway station. Bedworth Town Centre has a large superstore, independent shops and branches of high street stores, a library, emergency services, the Civic Hall and Bedworth Arts Centre. In addition to the town centres are a number of district and local centres supporting smaller neighbourhoods.
- 2.7 Bermuda Park to the south of Nuneaton provides a multiplex cinema, bowling alley and other leisure facilities. In terms of sports facilities, The Pingles Leisure Centre and Etone Sports Centre are noteworthy facilities, both located in Nuneaton. Bedworth also has a leisure centre, and a number of local facilities and sports pitches which provide places for sport and exercise. Other key community facilities include the George Eliot Hospital and North Warwickshire and Hinckley College.
- 2.8 There are over 500 ha of accessible green space in the borough. Notable parks in the borough include Riversley Park, Miners Welfare Park and Whittleford Park, all of which are destination parks, serving the whole borough. A number of smaller community and local parks also serve the open space needs of local communities.
- 2.9 The borough contains the only European designated site (Special Area of Conservation) in Warwickshire at Ensor's Pool. This and Griff Quarry are both Sites of Special Scientific Interest (SSSI). There are also locally designated wildlife sites and areas of ancient woodland. Additionally, 3 local nature reserves are located at Ensor's Pool, Galley Common and Bedworth Sloughs.
- 2.10 Historic legacies of the coal mining industry are present within the borough, and include the Coventry and Ashby de-la-Zouch canals. These form green links and wildlife corridors along with the disused Nuneaton Ashby Railway (Weddington Walk) through the centre, east and north of the Borough.
- 2.11 The River Anker, Harrow Brook, Wem Brook, Breach Brook, River Sowe and Change Brook act as the main rivers flowing through the borough.
- 2.12 Located in the borough is Arbury Hall, a Grade I listed building with grounds which are classified as Grade II* registered park and gardens. The Arbury Estate also contains a number of other listed buildings and structures. Overall, the borough contains 91 listed buildings and has 5 conservation areas which are located in Abbey, Nuneaton Town Centre, Bedworth Town Centre, Bulkington Village and at Hawkesbury Junction. There are also 2 scheduled monuments, one at the Moated Site at Exhall Hall and the other at Nuneaton Priory.
- 2.13 Nuneaton and Bedworth has the highest levels of deprivation across Warwickshire and ranks as the 111th most deprived local authority district nationally (out of 326)⁷. Within Nuneaton and Bedworth there is also a divide

⁷ Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2015/16*.

between the east and west, with the most deprived areas located in the west. Six Super Output Areas within Nuneaton and Bedworth are in the top 10 % most deprived nationally⁸. Bar Pool is the most deprived, placing it in the top 2 % deprived Super Output Areas in England⁹.

- 2.14 A number of economic, social and environmental factors mean that Nuneaton and Bedworth lags behind other locations in Warwickshire in key indicators which contribute to a high quality of life¹⁰. Specific areas where the borough falls behind the Warwickshire average include deprivation; crime rates; GCSE attainment; young people not in employment, education or training; and life expectancy¹¹. This has resulted in a significant gap separating Nuneaton and Bedworth from the rest of the county.
- 2.15 Work to address deprivation has taken place in Camp Hill, involving the physical and socio-economic regeneration of the area. Regeneration schemes have led to the upgrading of some of the existing housing stock, as well as the provision of new housing to replace those that were demolished. Other developments in the area include leisure, commercial, retail and industrial facilities, including the redevelopment of the Midland Quarry for housing and industry.

⁸ Warwickshire Observatory (2016). *Indices of Multiple Deprivation 2015*.

⁹ Warwickshire Observatory (2016). *Indices of Multiple Deprivation 2015*.

¹⁰ Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2015/16*.

¹¹ Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2015/16*.

3. Issues facing the borough

Background

3.1 This section summarises the key issues and challenges within the borough. The Borough Plan aims to address these issues in order to achieve its vision for Nuneaton and Bedworth by 2031.

Issues associated with the local economy

3.2 The following issues have been identified:

- The population and the number of households is growing, and this is projected to continue¹².
- The economy is based on a declining manufacturing base and distribution related work¹³. There are fewer knowledge based employment opportunities. If this does not change there will be fewer jobs in the future and more people will have to look for work outside the borough.
- A large number of residents commute out of the borough each day to work in Coventry, Leicestershire and elsewhere in Warwickshire¹⁴.
- There is a large gap between the north and south of Warwickshire in terms of levels of deprivation and unemployment¹⁵. Within the borough there is also a divide between the east and west, with the most deprived areas located in the west.
- Household earnings are the lowest in Warwickshire, and there is a considerable number of working age residents claiming benefits¹⁶. This contributes significantly to poverty and deprivation.
- Access to some employment sites such as Bermuda Industrial Estate, Attleborough Fields, Prologis and other employment sites outside the borough is difficult without a car.
- Car ownership in the borough is the lowest in Warwickshire¹⁷. Improvements in public transport along the north-south corridor are required to improve accessibility to job opportunities.
- Some residents have a poor skills base. Educational attainment is the lowest in the county at both key stage 2 and 4 levels¹⁸, and 28 % of those of working age have no qualifications at all¹⁹.
- There is a need to tackle low aspirations in parts of the borough as this can limit educational achievement and contribute to low wages, deprivation and a dependency on benefits.

¹² Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2015/16*.

¹³ Office for National Statistics (2016). *Employee Jobs (2015)*.

¹⁴ GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

¹⁵ Warwickshire Observatory (2015). *Quality of Life in Warwickshire: Full Report 2014/15*.

¹⁶ Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2015/16*.

¹⁷ Warwickshire Observatory (2014). *Quality of Life in Warwickshire 2013/14*.

¹⁸ Warwickshire Observatory (2016). *Quality of Life in Warwickshire. Key Messages 2015/16*.

¹⁹ Warwickshire Observatory (2014). *Quality of Life in Warwickshire 2013/14*.

- Whilst improving due to the opening of Ropewalk Shopping Centre, the quality and diversity of retail provision in Nuneaton is limited. The town has a strong market but how it will remain attractive and competitive in the future is an issue.
- Nuneaton does not have a strong evening or night time economy. Pubs and bars are mostly directed at the young. There is also a poor perception of public safety²⁰ and limited transport provision after 6pm.
- Office provision in Nuneaton is limited and basic, and is reducing economic opportunities in the town centre. There are also few residential properties in the town centre which affects the town's diversity and vibrancy.
- Bedworth Town Centre struggles to compete for retail trade, and its office sector is small. This is due to its proximity to the larger centres of Coventry and Nuneaton. The town centre has little residential or leisure provision other than the Civic Hall, and therefore the evening economy is weak. The ways in which Bedworth can best compliment Nuneaton in the future needs to be addressed.
- The quality, popularity and variety of retail provision offered at local and district centres varies greatly.
- Despite property prices being the cheapest in Warwickshire, home ownership levels have been declining across Warwickshire²¹.
- Traffic congestion is high across the borough and Nuneaton has experienced the highest rate of traffic growth across Warwickshire²². Particular problems occur on the A444, The Long Shoot (A47), Lutterworth Road (B4114), Camp Hill / Tuttle Hill (B4114) and Coventry Road (B4109).

Issues associated with the local community

3.3 The following issues have been identified:

- The current housing stock is predominately semi-detached and terraced.
- The mix of housing tenure, types and sizes for different parts of the borough is uneven.
- Population and household projections suggest an on-going need for family accommodation²³.
- There is a need to cater for an increasing number of young people and older people living on their own. There is a particular need for housing options to enable older people to live independently²⁴.
- The areas around Bulkington and the south-west of the borough are not well served by green corridors. This reduces biodiversity and opportunities for leisure activities in these areas.

²⁰ Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2015/16*.

²¹ Warwickshire Observatory (2015). *Quality of Life in Warwickshire: Full Report 2014/15*.

²² Warwickshire County Council (2011). *Warwickshire Local Transport Plan 2011-2026*.

²³ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Executive Summary*.

²⁴ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Executive Summary*.

- Access to some leisure facilities is restricted for people without a car. Public transport to Bermuda Park, for instance, is limited and there are no public footpaths along the A444.
- Life expectancy is the lowest in Warwickshire and lower than the national average²⁵. There are notable variations across the borough with those living in the most deprived areas having the lowest life expectancy²⁶. Links can be made to poor health, lack of physical activity and obesity, all of which are high in the borough.
- Investment is required to bring more properties in line with the Decent Homes Standard²⁷.
- Improvements to provide more walking and cycling networks, cycle parking facilities, pedestrian priority areas and crossing facilities along with the need to address issues such as the frequency, reliability, integration and cost of public transport is required to facilitate benefits to the environment and health.
- Air quality in some parts of the borough is poor²⁸. Air Quality Management Areas (AQMAs) are designated at the Leicester Road Gyratory and at Central Avenue / Midland Road in Nuneaton. Other areas are also being monitored for their nitrogen dioxide levels.
- Previous development has not always been well designed. Too much development in the past has failed to positively contribute to the character of the area or to local distinctiveness.
- Fear of crime and actual crime is the highest in Warwickshire²⁹. The borough also has the highest levels of anti-social behaviour³⁰.

Issues associated with the local environment

3.4 The following issues have been identified:

- Extreme weather events, such as those experienced in Warwickshire in 1998, 1999, 2005, 2007, 2008 and 2012, are becoming more frequent.
- Future growth will need to be accommodated outside the existing urban area and therefore potentially impact on sensitive landscapes and biodiversity.
- The legacy of coal mining, quarrying and heavy engineering has had a negative impact on the landscape. The borough has over 100 ha of derelict land and more than 3000 potentially contaminated sites.
- There are a limited number of historic buildings of national importance but many others are important to local history.

²⁵ Warwickshire Observatory (2016). *Quality of Life in Warwickshire: Key Messages 2015/16*.

²⁶ Warwickshire Observatory (2015). *Quality of Life in Warwickshire: Full Report 2014/15*.

²⁷ Nuneaton and Bedworth Borough Council (2010). *Nuneaton and Bedworth Housing Strategy 2010-15*.

²⁸ Warwickshire Observatory (2014). *Quality of Life in Warwickshire 2013/14*.

²⁹ Warwickshire Observatory (2015). *Quality of Life in Warwickshire: Full Report 2014/15*.

³⁰ Warwickshire Observatory (2015). *Quality of Life in Warwickshire: Full Report 2014/15*.

- Some built heritage has suffered from poor quality modification and a lack of maintenance and repair. 2 listed buildings are on English Heritage's Buildings at Risk Register³¹.

³¹ Historic England (2017). Search the Heritage at Risk Register. Available from <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>

4. Vision and objectives

Vision

- 4.1 By 2031, Nuneaton and Bedworth Borough will be a place where there are opportunities for sustainable economic growth with diverse job prospects, healthy and safe communities, and an integrated infrastructure network. Businesses will want to invest in the borough as a result of the outcomes of policies in the Plan, which will include creating an attractive environment.

Objectives

Objective 1

- 4.2 To use economically driven growth in a way that will help regenerate the borough and raise its profile as a more attractive place to live, but particularly to work and invest in.

Objective 2

- 4.3 To seek employment opportunities that will support the diversification of the borough's economy and improve job opportunities for residents. In particular:

- Maintain and improve existing employment sites. Key sites include:
 - Attleborough Fields
 - Bayton Road
 - Bermuda
 - Prologis Park
- Provide additional employment land that is attractive to investors in the following locations:
 - Faultlands, Gipsy Lane
 - Wilsons Lane
 - Prologis Extension
 - Coventry Road
 - Longford Road
 - Bowling Green Lane
- Enable growth in a diverse range of sectors, particularly focusing on the following:
 - Business services
 - Construction
 - Distribution and retail
 - Health
 - Transport and communications

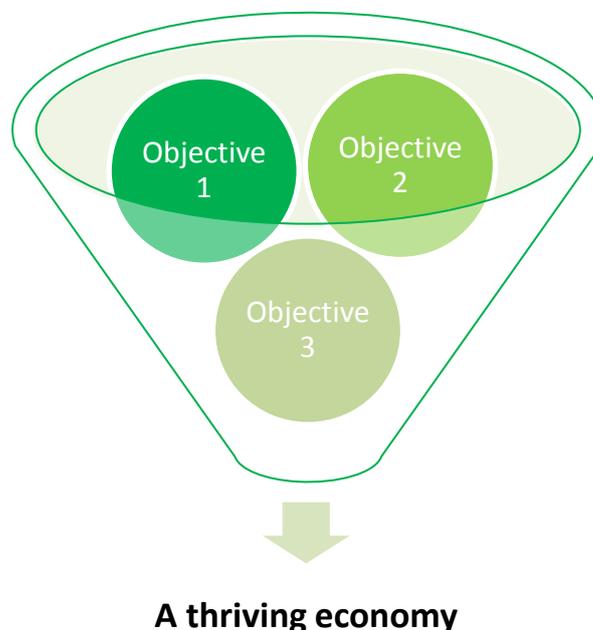
- Engineering

- Encourage offices and other high value employment generators in Nuneaton and Bedworth town centres.
- Use growth to promote training and educational facilities which will improve the skills of the current and future labour market.
- Improve accessibility via public transport to job opportunities in the borough and in nearby towns such as Coventry, Hinckley, Leicester and Atherstone.

Objective 3

4.4 To continue to develop and diversify Nuneaton and Bedworth town centres so they each have a distinctive and individual role in serving the borough which is supported by lower order centres in a retail hierarchy. In particular:

- Maintain Nuneaton Town Centre as the primary centre for shopping, leisure and business activity in the borough, and to enable it to remain competitive at a sub-regional level.
- Encourage new housing and leisure uses in Bedworth Town Centre to complement and support its focus for day-to-day shopping and commercial activity.
- Ensure local needs are met through local and district centres.



Objective 4

- 4.5 To provide the size, type and mix of housing that meets the specific needs of the borough. In particular:
- Aspirational housing that will attract residents who can make a significant investment in the development of businesses in the area.
 - Affordable housing of different tenures to meet identified housing need.
 - Housing options to meet the needs of the increasing number of older people in the borough.
 - Providing smaller properties in Nuneaton, family housing in Bedworth and supporting the private rented sector across the borough.
 - Continued regeneration and investment in areas where there is poor housing stock to improve energy efficiency, reduce fuel poverty and to bring empty properties back into use.
 - Adequate provision to meet the identified needs of Gypsies and Travellers.

Objective 5

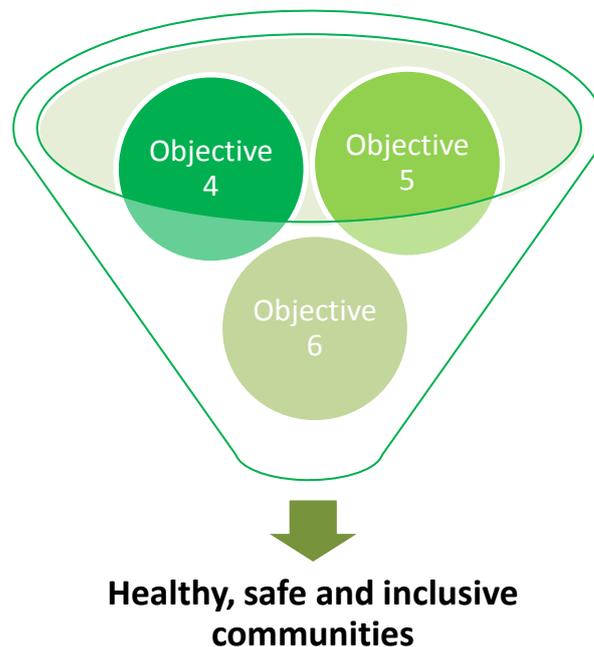
- 4.6 To ensure that all new development and investment contributes to a significant improvement in infrastructure and facilities that serve the borough. In particular:
- A step change in public transport provision along a north-south corridor to link Nuneaton and Bedworth to Atherstone and Hinckley in the north, and Coventry, Warwick and Leamington in the south.
 - Improved access to existing facilities, particularly the borough's two town centres and major leisure and community facilities (e.g. Bermuda, George Eliot Hospital, the colleges and Pingles and Bedworth leisure centres).
 - Retention and improvement of local shopping, health and other community facilities.
 - New development that integrates the required infrastructure and service provision to support it, and where appropriate, includes improvements to existing infrastructure and services. This includes:
 - A northern distributor road
 - Connectivity improvements
 - Education provision
 - Emergency services provision
 - Sport and leisure improvements
 - Sustainability measures

- A green infrastructure network of high quality, well connected, multi-functional open spaces, corridors and links that deliver benefits to the landscape, wildlife and the public.

Objective 6

4.7 To create healthy, safe and strong communities by:

- Creating and improving networks that increase opportunities to walk and cycle to a range of facilities.
- Enabling access to a range of high quality open spaces.
- Enabling participation in active sport by building on the strengths of the borough's leisure centres and other local facilities.
- Reducing crime and antisocial behaviour through a multi-faceted approach, using actions such as good design, raising aspirations and providing opportunities for the young alongside the necessary infrastructure provision.
- Creating well planned and integrated communities that foster cohesion and accessibility for all.



Objective 7

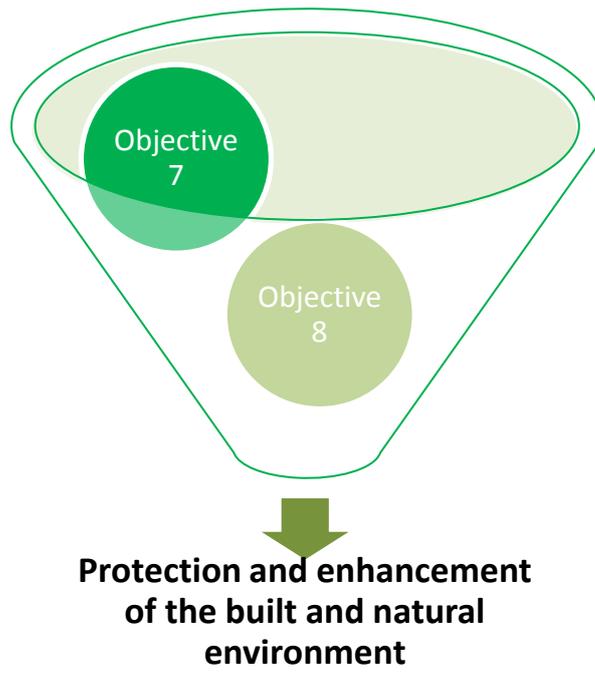
4.8 To ensure that new development enhances and improves the natural environment, which includes biodiversity, geodiversity and landscape. This will have secondary benefits of improving the quality and appearance of the existing urban area. In particular:

- Important open spaces such as Riversley Park, Miners Welfare Park, Whittleford Park and community and local parks are protected and enhanced. Landscape character, historic, geological and natural features are protected and enhanced.
- Derelict, contaminated and untidy sites are brought back into beneficial use.
 - Minimise the negative impact of development and make improvements where possible to air quality in Air Quality Management Areas and at locations where air quality objectives would be breached.
- Maximise opportunities to use the River Anker, Wem Brook, Coventry Canal and Ashby Canal as attractive focal points for open space and new development, where there is no negative impact on the green network or the water quality.
- Infill development positively responds to local character and does not result in town cramming.
 - High quality and sustainable design and construction in line with design standards.

Objective 8

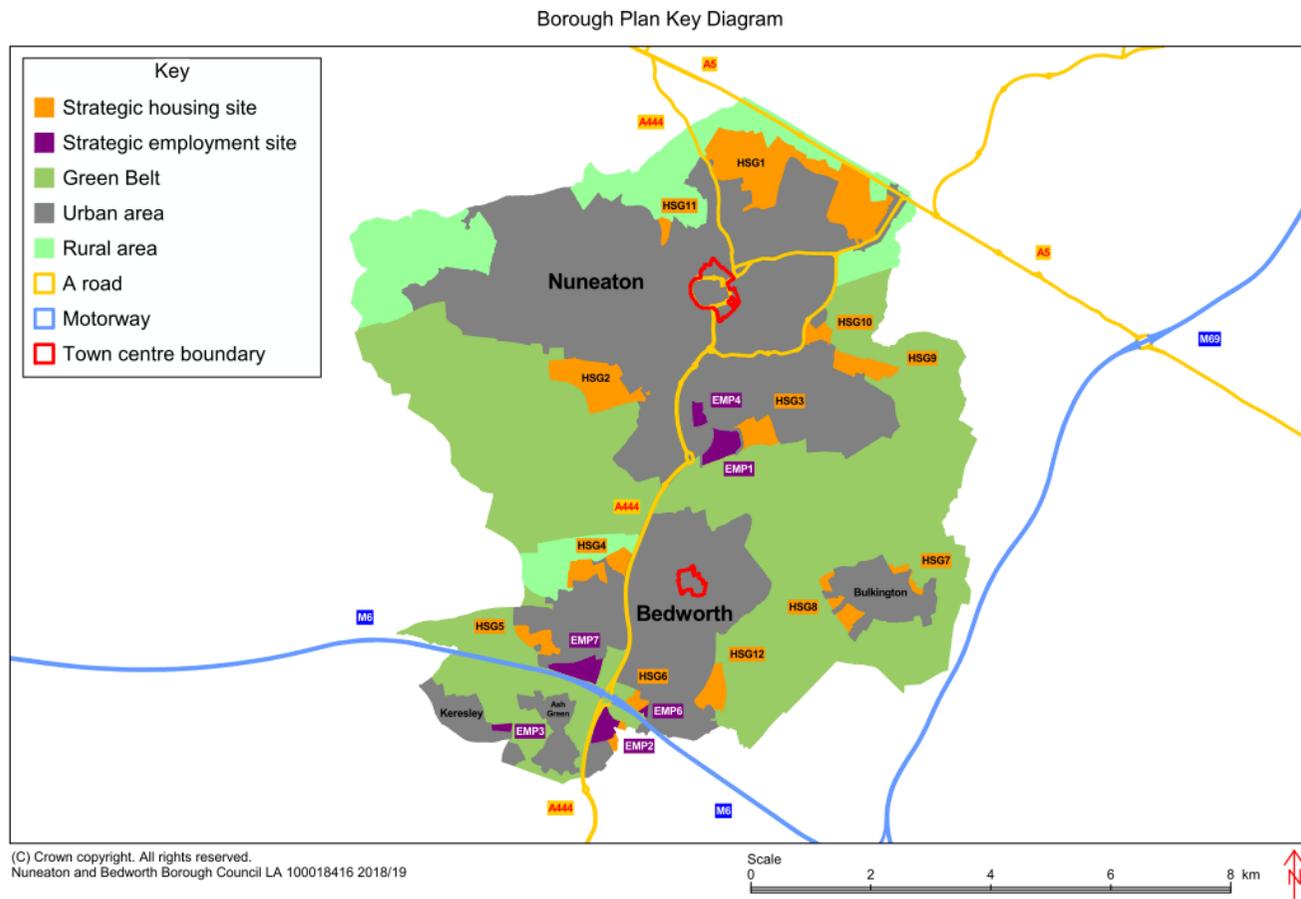
4.9 To address climate change and encourage sustainability in all new development. In particular:

- Avoid where possible sites that are at risk of flooding now or in the future.
- Utilising appropriate sustainable urban drainage systems for flood or surface water attenuation and using water sustainably.
- Protect and enhance the borough's ecological and geological networks, in particular priority habitats and species, and minimising impacts on biodiversity and geodiversity.
- Maximise energy efficiency and the use of renewable energy, particularly those with greatest potential in the borough. For example, combined heat and power district energy, biomass energy, ground source heat pumps, solar photovoltaics and solar thermal, along with any future renewable or low carbon technology that may become more suitable for the borough during the plan period.
- Ensure development proportionately contributes to development of the wider cycling and walking networks serving development in order to encourage green travel.



5. Key diagram

5.1 The overall strategy for managing development in the Borough during the plan period is illustrated in the key diagram below.



6. Development strategy

- 6.1 The following policies set out the development strategy and general principles for the growth of the borough through to 2031. The policies will enable the delivery of the overarching vision and objectives for the area.

Policy DS1 – Presumption in favour of sustainable development

When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will always work proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Borough Plan (and where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the council will grant permission unless material considerations indicate otherwise – taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or specific policies in the Framework that indicate development should be restricted.

- 6.2 The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles. These roles should not be undertaken in isolation, because they are mutually dependent. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- 6.3 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.
- 6.4 Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's

quality of life. The policies in this plan deliver the NPPF's core planning principles for local circumstances.

Policy DS2 – Settlement hierarchy and roles

The role and function of each of the Borough's settlements is:

1. Nuneaton has the primary role for employment, housing, town centre, leisure and service provision.
2. Bedworth has the secondary role for employment, housing, town centre, leisure and service provision.
3. Bulkington has the tertiary role for housing, shopping, leisure and local services. Bulkington is served by a district centre.
4. 'Northern fringe' of Coventry. This includes Keresley and Ash Green / Neal's Green. These areas have supporting roles for housing, shopping and local services. Ash Green is served by a local centre.

Most development will be directed to Nuneaton as the primary town. Other development will be directed to, or adjacent to, other settlements, at a scale that reflects the role and function of the settlement and its order in the hierarchy, as well as the settlement's ability to accommodate change.

- 6.5 Patterns of growth should be focused in locations which are or can be made sustainable, and which make full use of public transport, walking and cycling.
- 6.6 A settlement hierarchy study of Nuneaton and Bedworth proposes a settlement hierarchy³² for the borough. The order of the hierarchy is set out within the policy. This was based on an analysis of the size of each settlement in the area, accessibility to a range of services and facilities, as well as public transport provision. The report places Nuneaton at the top of the hierarchy as the most sustainable settlement in the borough.
- 6.7 It is also necessary to consider the wider context in which the borough is located. Of particular relevance is the close proximity of other settlements outside the borough boundary. In the south of the borough there is the city of Coventry and in the north of the borough the A5 corridor and its surrounding settlements.
- 6.8 The main spatial areas of Nuneaton, Bedworth, Bulkington and the northern Coventry fringe are the most sustainable locations for growth. The locations for growth enable them to connect to, and utilise, the existing infrastructure in these areas. Objectives 1 and 2 aim to drive economic growth and diversify the borough's economy to enable the business base to become more competitive,

³² Nuneaton and Bedworth Borough Council (2011). *Accessibility and Settlement Hierarchy Study 2011*.

and less exposed to economic shocks that may affect specific sectors. The borough has a history of high out-commuting, it is therefore vital that employment land is allocated through the planning process. The geographic spread of housing and employment development contributes to the viability and vitality of the borough's economy and housing choices. It also contributes to economic growth in deprived areas, as well as potentially rationalising and enhancing public transport corridors. Furthermore, the delivery of new development under the allocations will deliver critical masses of development to enable significant development contributions towards community and transport infrastructure. The plan aims to deliver the wider aspirations of the sub-region, including the aspirations set out in the Coventry and Warwickshire Local Enterprise Partnership (CWLEP) Strategic Economic Plan (2016). The council's Economic Development Strategy and action plan will also help to deliver the council's and the CWLEP's economic vision for the borough and wider sub-region. The Economic Development Strategy has a key focus on fostering an environment for advanced manufacturing, professional services, research and development, and small and medium enterprises.

Borough Plan objectives

6.9 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 3
- Objective 4

Evidence base

6.10 The evidence base related to this policy is as follows:

- Nuneaton and Bedworth Borough Council (2011). *Accessibility and Settlement Hierarchy Study 2011*.

Delivery mechanisms

6.11 The delivery mechanisms for this policy are as follows:

- Delivery of urban sites for employment and housing.
- Delivery of strategic sites for employment and housing.
- Delivery of the Town Centre Area Action Plans for Nuneaton and Bedworth.
- Delivery of new district centres.
- The Economic Development Strategy and action plan will include a work programme to assist in the delivery of strategic employment sites and town centre projects, as well as proactively attracting investment.

Monitoring

6.12 The indicators and targets that will be monitored for this policy are outlined in Table 1.

Monitoring ref	Indicator	Target
DS2a	Employment land	Scale of development in settlements proportional to position in settlement hierarchy
DS2b	Retail	Scale of development proportional to retail hierarchy
DS2c	Leisure floor space	Scale of development in settlements proportional to position in settlement hierarchy
DS2d	Housing completions by settlement	Scale of development in settlements proportional to position in settlement hierarchy

Table 1: Indicators and targets to be monitored for Policy DS2

Policy DS3 – Development principles

All new development will be sustainable and of a high quality, fully supported by infrastructure provision, as well as environmental mitigation and enhancement, as required in the policies contained within this Plan.

New development within the settlement boundaries, as shown on the proposals map, will be acceptable subject to there being a positive impact on amenity, the surrounding environment and local infrastructure.

New unallocated development outside the settlement boundaries, as shown on the proposals map, is limited to agriculture, forestry, leisure and other uses that can be demonstrated to require a location outside of the settlement boundaries.

Borough Plan objectives

6.13 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 3
- Objective 4

Evidence base

6.14 The evidence base related to this policy is as follows:

- Nuneaton and Bedworth Borough Council (2016). *Strategic Housing Land Availability Assessment*.

Delivery mechanisms

6.15 The delivery mechanisms for this policy are as follows:

- Set up and monitor a phasing and delivery strategy to ensure a 5 year supply and delivery of the housing target for the plan period.
- Work in partnership with landowners and agents.

Monitoring

6.16 The indicators and targets that will be monitored for this policy are outlined in Table 2.

Monitoring ref	Indicator	Target
DS3a	Development outside defined settlement boundaries	Zero new unallocated development (except those considered acceptable in the policy) outside development boundaries

Table 2. Indicators and targets to be monitored for Policy DS3

Policy DS4 – Overall development needs

The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2011 and 2031:

- At least 14,060 homes
- At least 107.8 ha of employment land
- At least 39 residential pitches and 5 transit pitches to accommodate Gypsies and Travellers

Housing requirements

6.17 The Preferred Options document identified a housing target of 7,900 dwellings, however, in 2013 this figure was superseded by the findings of a Joint Strategic Housing Market Assessment (SHMA) for Coventry and Warwickshire which informed the development of a housing target of 9,900 dwellings. This has been further superseded by an update to the SHMA to

take account of new population projections, which generates an objectively assessed need of 10,040 dwellings for the borough from 2011 to 2031.

- 6.18 An updated report was undertaken in 2016 to analyse key data from the 2014-based Office for National Statistics Sub-National Population Projections (SNPP) and Department for Communities and Local Government (2014-based) household projections with regard to housing need in the Coventry and Warwickshire housing market area. The analysis built on information in the September 2015 Updated Assessment of Housing Need (UAoHN) which used 2012-based projection data to underpin a number of demographic and economic scenarios – ultimately leading to conclusions about housing needs across the housing market area.
- 6.19 The 2016 report concluded that overall, when considered on the same basis as the UAoHN, the objectively assessed need in the housing market area should be for 4,237 dwellings per annum (2011-31) – this is 35 fewer than was shown in the UAoHN. This updated analysis, taking account of more recent published data, does not suggest any fundamental differences from the analysis and conclusions as set out in the UAoHN of September 2015. Whilst some figures for individual local authorities changed slightly³³, the report concluded that, at the housing market area level the assessed level of need in the UAoHN (and linked to 2012-based data) remains sound. It was therefore decided as a sub-region to stick with the target figures from the 2015 UAoHN.
- 6.20 The National Planning Policy Framework (NPPF) requires the housing needs of the housing market area to be met in full. There is insufficient brownfield land available in the borough to accommodate the borough's housing needs in full. It is therefore necessary to allocate development on greenfield sites. The allocated strategic sites along with sites in the urban area address the need that has not been met by completions since 2011, and commitments from existing permissions. 'Policy DS5 – Residential allocations' directs dwellings to strategic and non-strategic allocations, some of which are within the existing urban areas of the borough.
- 6.21 The council must also consider the needs of Coventry City Council, as it has stated that it is unable to meet the objectively assessed need for the city within its boundaries, and so some redistribution within the housing market area is necessary to ensure housing needs are met. The Warwickshire authorities accept that Coventry City Council is unable to accommodate its full housing need. Each council therefore co-operated to establish a revised distribution of housing which ensures that the overall need (4,408 dwellings

³³ JG Consulting (2016). *Coventry-Warwickshire Housing Market Area: 2014-based Subnational Population and Household Projections*. Nuneaton and Bedworth decreased from 10,040 to 9,400. However, Coventry increased from 42,400 to 47,320.

per annum³⁴) across the housing market area will be met in full. The total objectively assessed need for the borough for 2011 to 2031 is 10,040 dwellings (502 per annum). The 502 dwellings per annum is made up of three components: demographic based need (423 dwellings), supporting economic growth (73 dwellings) and improving affordability (6 dwellings)³⁵. As part of the redistribution of housing, the borough has agreed to take an additional 4,020 dwellings³⁶ and has signed a memorandum of understanding with the other authorities.

6.22 The delivery of the housing development needs are broken down through the following means (base date 1st April 2018):

- Strategic allocations, excluding HSG1: 5,582³⁷
- Non-strategic site allocations: 926
- Site completions, including HSG1: 2,382³⁸
- Sites with planning permission, excluding HSG1: 2,148³⁹
- Sites with planning permission on HSG1: 939
- Remainder of HSG1: 2,823
- Windfall sites: 247⁴⁰

Housing trajectory

6.23 The Council will regularly review the housing trajectory. In assessing the delivery of housing, the Plan has utilised a stepped trajectory. For the period 2011-2018 this has comprised the objectively assessed need for the borough of 502 dwellings per annum. From 2018-2031 this will increase to 812 dwellings per annum to take into account the 4,020 shortfall from the Housing Market Area. This means that for the period 2011-2018 there has been a backlog of 1,132 dwellings, and as the borough has consistently under-delivered against its target, it is considered to be a 20% authority, i.e. it needs to apply a 20% buffer for choice and competition. The site allocations which are currently in Green Belt are unlikely to be considered before adoption of the Plan, and will not begin to yield completions until 2020/21, therefore the

³⁴ Memorandum of Understanding relating to the planned distribution of housing within the Coventry & Warwickshire Housing Market Area (HMA) (Coventry, Warwickshire and Hinckley & Bosworth Joint Committee, 2015) p2, paragraph 3. Coventry, Warwickshire and Hinckley & Bosworth Joint Committee (2015). *Memorandum of Understanding relating to the planned distribution of housing within the Coventry & Warwickshire Housing Market Area (HMA)*.

³⁵ GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.

³⁶ Memorandum of Understanding relating to the planned distribution of housing within the Coventry & Warwickshire Housing Market Area (HMA) (Coventry, Warwickshire and Hinckley & Bosworth Joint Committee, 2015) p2, paragraph 3. Coventry, Warwickshire and Hinckley & Bosworth Joint Committee (2015).

³⁷ Excludes HSG1 to avoid double counting.

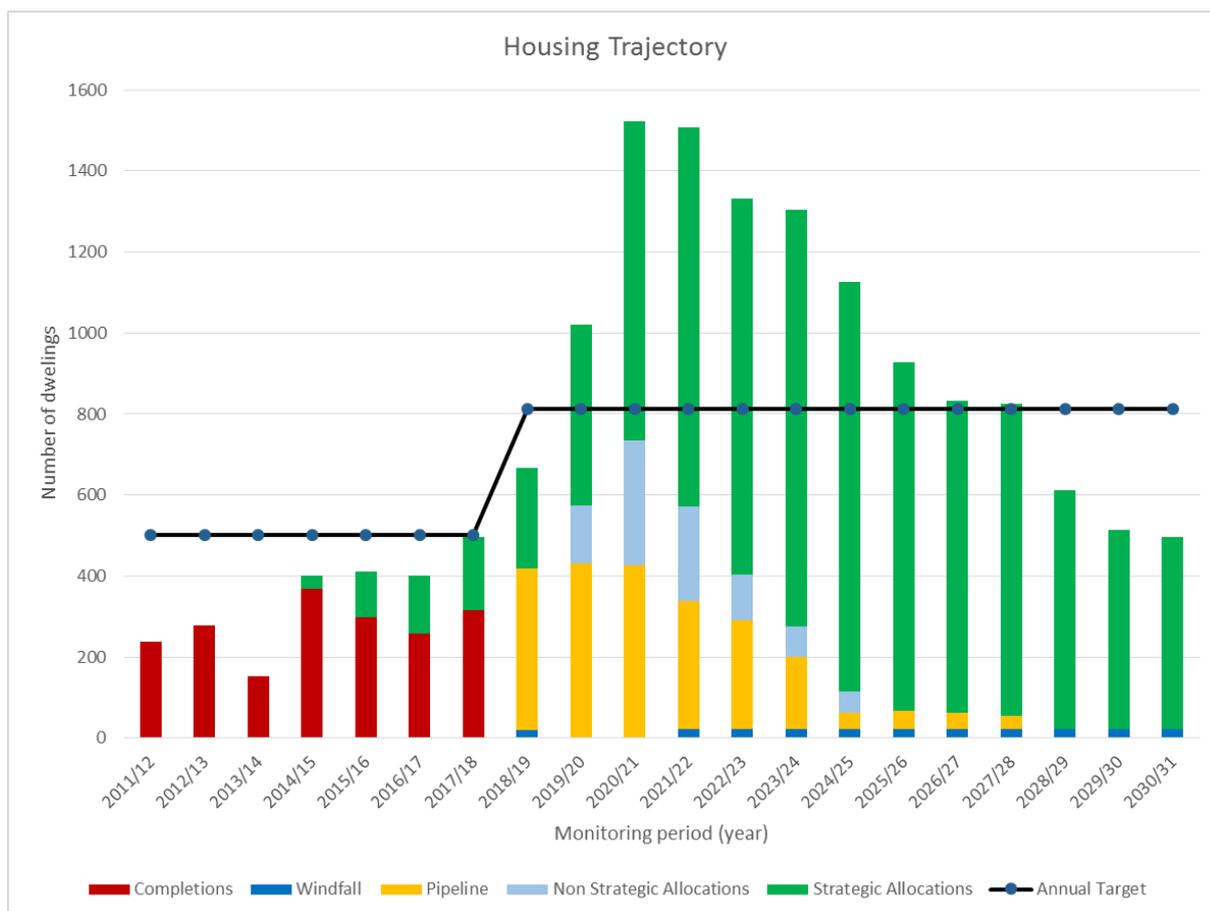
³⁸ Includes HSG1 to avoid double counting.

³⁹ Excludes HSG1 to avoid double counting. Does not include 10% non-implementation rate for small sites.

⁴⁰ Windfall sites only include year's 2021-2031 to avoid double counting.

delivery significantly increases after this point. The above housing trajectory shows the timeline for the delivery of housing across the plan period.

- 6.24 The trajectory identifies that 12,454 dwellings will be developed by 2031, in addition to the 2,382 which were built from April 2011 to March 2018. Consequently, it is projected that 14,836 dwellings will be developed over the Plan period. This is more than the identified requirement of 14,060 dwellings by 776 dwellings. This additional provision in supply will provide a degree of flexibility in the unforeseen event that some of the identified sites do not come forward as predicted.
- 6.25 The NPPF requires that the council maintains a five year supply of housing sites. At adoption of the Plan for the five years 2018 to 2023, based on the projected completions in the trajectory, there is a 5.5 years supply (with a 20% buffer) utilising the Liverpool method, which deals with the shortfall over the remainder of the Plan period. This approach is justified given the Plan seeks to secure a sustainable pattern of development which includes sizeable urban extensions to Nuneaton, which is the primary and most sustainable settlement, and this will take time to reach full delivery. Additionally, it has been necessary through the plan-making process to demonstrate the exceptional circumstances to alter the Green Belt boundary at various locations. Accordingly, sites that are dependent on Green Belt alternations will only come forward post Plan adoption. Nonetheless, the trajectory results in a significant step-change in delivery. This will be regularly monitored in accordance with the housing delivery test to inform a timely review of the Plan.



Employment land

6.26 In November 2011 the council set a housing development target of 7,900 and a jobs growth target of 1.5 % (equating to 75 ha of employment land^{41, 42, 43, 44}) as the basis for undertaking work on the Borough Plan. This followed a decision to review the development targets for the borough after the abolition of the Regional Spatial Strategy. To identify a more localised set of targets, Oxford Economics were commissioned to develop an input-output based econometric model, that would enable different levels of jobs growth to be tested and the implications of that growth (in terms of job creation, unemployment, commuting patterns, population change and housing requirements) to be assessed. In very simple terms, the model works by identifying the number of jobs required to achieve a target level of growth. The jobs are then apportioned to different sectors in line with national trends, local specialisms and future aspirations. Consideration is then given to who will take up the jobs – residents, commuters or migrants moving into the area. The estimated impacts on the housing market are then assessed.

⁴¹ Inclusive of a 20 ha buffer

⁴² Oxford Economics (2011). *Nuneaton & Bedworth Forecast Model (NBFM) report*.

⁴³ Oxford Economics (2011). *Nuneaton & Bedworth Forecast Model (NBFM): Technical annex*.

⁴⁴ Nuneaton and Bedworth Borough Council (2013). *Scale of growth background paper*.

- 6.27 The housing and employment targets were consulted on during the summer of 2013 as part of the consultation on the Borough Plan Preferred Options.
- 6.28 In November 2013, a SHMA for the Coventry and Warwickshire housing market area was completed. This identified an objectively assessed need of 9,900 for Nuneaton and Bedworth for the period 2011-2031. For the sub-region as a whole the figure was 76,000. The study was reviewed in September 2014 following the release of the Office for National Statistics SNPP. This identified a housing market area need of 80,080. For Nuneaton and Bedworth the figure identified was 8,440, however through the Shadow Economic Prosperity Board, which was endorsed by the Council on 4th February 2015, it was agreed that the distribution identified in the November 2013 study should be used as the basis for plan making within the sub-region.
- 6.29 As part of the process of demonstrating a balanced link between the amount of housing planned for and the amount of employment land that is allocated, the economic land growth target was reviewed following the completion of the SHMA. Using the housing target of 9,900 dwellings in the SHMA generated a comparable jobs growth target of 0.7 %, which equates to the allocation of 52 ha of employment land. The 52 ha includes an additional 21 ha that was added to take account of land being removed from the existing employment land portfolio.
- 6.30 When subtracting the existing completions and commitments that have occurred from 2011, the Council needed to allocate a further 31 ha. The allocation:
- Offered a wider employment land portfolio for businesses/developers to invest in, which will assist in meeting the council's economic objectives.
 - Aligns with the Planning Practice Guidance in that the basis for employment land allocations should not simply focus on employment forecasts and should take account of qualitative information. Feedback during the commercial engagement of the Employment Land Review (2014) emphasised the need for a large employment land target.
 - Took account of the Sub-Regional Employment Land Study which recommends releasing land on a phased basis in order to assist with meeting Coventry and Warwickshire's Strategic Economic Plan requirements.
- 6.31 Following consultation on the Submission version of the Borough Plan in 2015, the council completed an update to the Employment Land Review, which indicated the total employment land need for the period 2011-2031 is 87.4 ha⁴⁵.

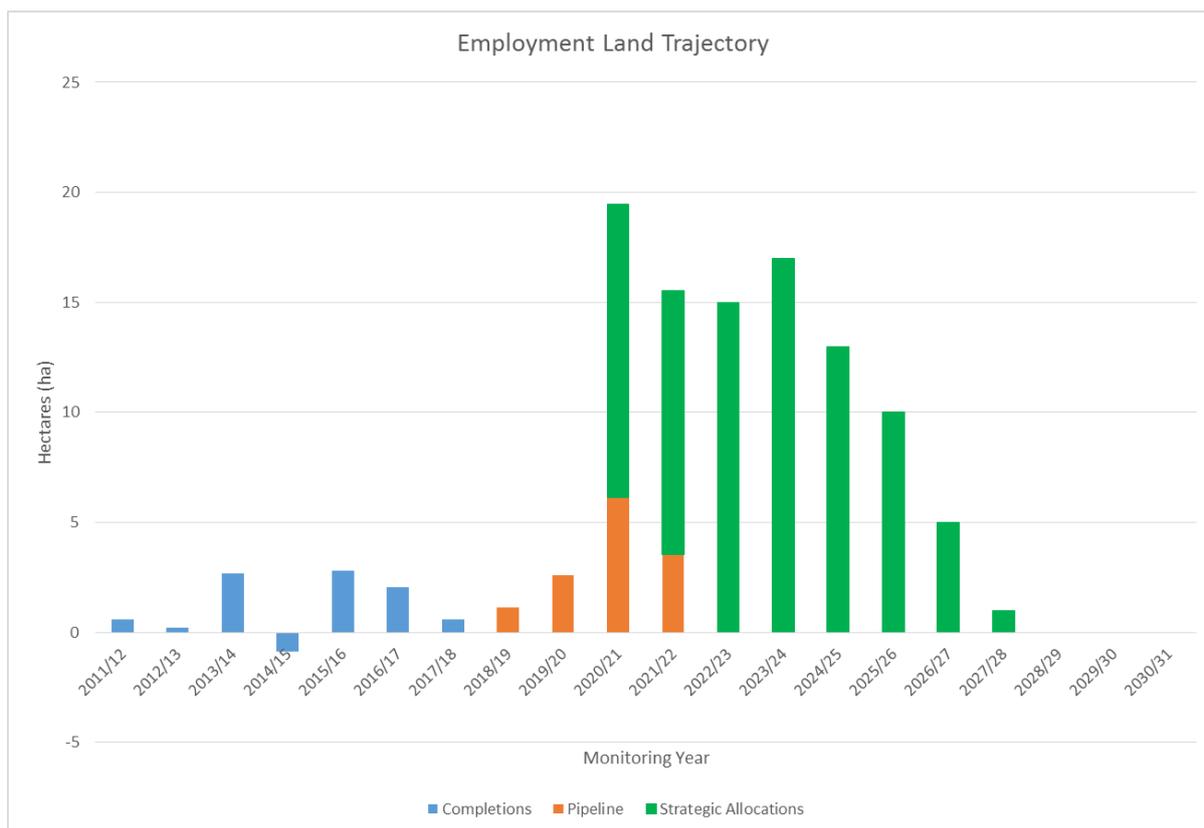
⁴⁵ GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

6.32 The Coventry, Warwickshire and Hinckley & Bosworth Joint Committee considered and agreed an Employment Land Memorandum of Understanding (ELMOU) on the 21st July 2016. The purpose of the ELMOU is to ensure that the employment land needs of Coventry and Warwickshire can be met in full, in line with national policy and the Duty to Cooperate. The need for the ELMOU was generated by a shortfall of 241 ha of employment land provision within Coventry. The process for redistributing the shortfall is outlined in the ELMOU background report⁴⁶. The application of the redistribution methodology leads to an additional employment land requirement of 26 ha for Nuneaton and Bedworth. This is in addition to the 87 ha of employment land to meet the borough's own needs, giving a total of 113 ha. Based on evidence gathered to inform the Plan, the borough is able to accommodate 107.8 ha of employment land during the plan period.

Employment trajectory

6.33 The council will regularly review the employment trajectory. The trajectory shows that it will be necessary for development to take a staggered approach in terms of delivery. The site allocations which are currently in Green Belt are unlikely to be considered before adoption of the Plan, therefore, the delivery significantly increases after this point. The following trajectory shows the timeline for the delivery of employment across the plan period.

⁴⁶ Coventry, Warwickshire and Hinckley & Bosworth Joint Committee (2016). *Memorandum of Understanding relating to Employment Land Requirements and Distribution within Coventry & Warwickshire*.



Gypsies and Travellers

6.34 Under the 2004 Housing Act, the council is required to produce an assessment of the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople, and then identify and plan for the provision of permanent and transit sites to meet those needs.

6.35 The 2016 Gypsy, Traveller and Travelling Showperson Accommodation Assessment shows a need to find an overall requirement for 39 permanent pitches for the period up to 2031/32 and a need for 5 transit pitches over the next 5 years to 2020/2021⁴⁷.

Borough Plan objectives

6.36 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 4

⁴⁷ Arc4 (2016). *Nuneaton and Bedworth Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2016*.

Evidence base

6.37 The evidence base related to this policy is as follows:

- Arc4 (2016). *Nuneaton and Bedworth Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2016*.
- DTZ (2013). *Town Centre Office Requirements*.
- GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment*.
- GL Hearn (2014). *2012-based Sub-National Population Projections & Economic Forecasts: Implication for Housing Need in Coventry & Warwickshire*.
- GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.
- GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.
- JG Consulting (2016). *Coventry-Warwickshire Housing Market Area: 2014-based Subnational Population and Household Projections*.
- Nuneaton and Bedworth Borough Council (2013). *Scale of growth background paper*.
- Nuneaton and Bedworth Borough Council (2016). *Strategic Housing Land Availability Assessment (SHLAA)*
- Oxford Economics (2011). *Nuneaton & Bedworth Forecast Model (NBFM) report*.
- Oxford Economics (2011). *Nuneaton & Bedworth Forecast Model (NBFM): Technical annex*.
- Scullion, L., Wilson Brown, J. and Brown, P. (2013). *Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: North Warwickshire and Nuneaton and Bedworth*.
- Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.

Delivery mechanisms

6.38 The delivery mechanisms for this policy are as follows:

- The Economic Development Strategy will include a work programme to assist in the delivery of strategic employment sites and town centre projects as well as proactively attracting investment.
- Gypsy and Traveller Site Allocations Plan.
- Set up and monitor a phasing and delivery strategy to ensure a 5 year supply and delivery of the housing target for the plan period.
- Work in partnership with landowners and agents.

Monitoring

6.39 The indicators and targets that will be monitored for this policy are outlined in Table 3.

Monitoring ref	Indicator	Target
DS4a	Housing completions	14,060 dwelling completions
DS4b	Development of employment land	107.8 ha of land is developed for employment uses
DS4c	Gypsy and Traveller accommodation	39 residential pitches and 5 transit pitches provided
DS4d	Housing land supply	Continuous five year land supply of housing

Table 3: Indicators and targets to be monitored for Policy DS4

Policy DS5 – Residential allocations

The following sites will be allocated for residential development and associated infrastructure uses as shown on the proposals map (strategic sites) and in Appendix A (non-strategic sites).

Strategic sites

Site reference	Site name	Dwellings
HSG1	North of Nuneaton	4,419
HSG2	Arbury	1,525
HSG3	Gipsy Lane	575
HSG4	Woodlands	689
HSG5	Hospital Lane	398
HSG6	School Lane	220
HSG7	East of Bulkington	196
HSG8	West of Bulkington	495
HSG9	Land at Golf Drive	621
HSG10	Attleborough Fields	360
HSG11	Tuttle Hill	200
HSG12	Former Hawkesbury Golf Course	380
EMP2	Wilson's Lane	73

Non-strategic sites

Site reference	Site name	Dwellings
NUN015	Land at Donnithorne Avenue, Nuneaton	28
NUN043	Stockingford Sports and Social Club and Bungalow, Nuneaton	67
NUN047/NUN051	King Edward Road, Nuneaton	71

NUN060	Pine Tree Road, Bedworth	22
NUN065	New Inn Public House, Bulkington	30
NUN075	Rear of Park Road flats, Bedworth	17
NUN174	Charity Docks, land rear of Furnace Road / Beechwood Road, Bedworth	66
NUN181	Land off Stockley Road, Hawkesbury	80
NUN191	St Mary's Road Depot, Nuneaton	143
NUN239	Armson Road, Bedworth	19
NUN242	Hawkesbury Pump House, Heritage Drive, Hawkesbury	13
NUN245	21 Church Road, Nuneaton	22
NUN258	14-16 The Square, Attleborough, Nuneaton	11
NUN263	Land rear of Aldi, Park Road, Bedworth	13
NUN286/NUN317	Land rear of Burbages Lane, Ash Green	127
NUN305	Land at Bucks Hill, Nuneaton	71
NUN318	Land rear of Marston House Farm, Nuneaton Road, Bulkington	43
NUN323	Acacia Crescent, Bedworth	13
NUN348	Vale View opposite number 84, Nuneaton	27
NUN350	Disused garage site, Raveloe Drive, Nuneaton	12
NUN352	Former play area, Cheveral Road, Bedworth	13
NUN356	The Elizabeth Centre, Bedworth	18

Some of the non-strategic housing sites have biodiversity and heritage issues, including the setting of the Coventry Canal, which will need mitigating, or in exceptional circumstances, compensating, as part of any development proposal.

Borough Plan objectives

6.40 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 4

Evidence base

6.41 The evidence base related to this policy is as follows:

- GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report.*
- GL Hearn (2014). *2012-based Sub-National Population Projections & Economic Forecasts: Implications for Housing Need in Coventry & Warwickshire.*
- GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA.*
- JG Consulting (2016). *Coventry-Warwickshire Housing Market Area: 2014-based Subnational Population and Household Projections.*
- Nuneaton and Bedworth Borough Council (2016). *Strategic Housing Land Availability Assessment (SHLAA)*

Delivery mechanisms

6.42 The delivery mechanisms for this policy are as follows:

- Set up and monitor a phasing and delivery strategy to ensure a 5 year supply and delivery of the housing target for the plan period.
- Work in partnership with landowners and agents.

Monitoring

6.43 The indicators and targets that will be monitored for this policy are outlined in Table 4.

Monitoring ref	Indicator	Target
DS5a	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report	All dwellings completed

Table 4: Indicators and targets to be monitored for Policy DS5

Policy DS6 – Employment allocations

The following sites will be allocated for employment development and associated infrastructure as shown on the proposals map.

Site reference	Site name	Hectares
EMP1	Faultlands	26
EMP2	Wilson's Lane	18
EMP3	Prologis Extension	5.3
EMP4	Coventry Road	9
EMP6	Longford Road	2
EMP7	Bowling Green Lane	26

The wider Bermuda Park area, south of Nuneaton, including EMP1 and EMP4, is an employment location of regional significance for inward and local investment.

Borough Plan objectives

6.44 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 4

Evidence base

6.45 The evidence base related to this policy is as follows:

- Coventry & Warwickshire Local Enterprise Partnership (2018). *Updated Strategic Economic Plan*.
- GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.
- GL Hearn (2014). *2012-based Sub-National Population Projections & Economic Forecasts: Implications for Housing Need in Coventry & Warwickshire*.
- GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.
- GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council*.
- JG Consulting (2016). *Coventry-Warwickshire Housing Market Area: 2014-based Subnational Population and Household Projections*.
- Nuneaton and Bedworth Borough Council (2016). *Economic Development Strategy*.
- Nuneaton and Bedworth Borough Council (2016). *Economic Development Strategy: Action Plan 2016*.

Delivery mechanisms

6.46 The delivery mechanisms for this policy are as follows:

- The Economic Development Strategy will include a work programme to assist in the delivery of strategic employment sites and town centre projects, as well as proactively attracting investment.
- Work in partnership with landowners and agents.

Monitoring

6.47 The indicators and targets that will be monitored for this policy are outlined in Table 5.

Monitoring ref	Indicator	Target
DS6a	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report	107.8 ha of land is developed for employment uses

Table 5: Indicators and targets to be monitored for Policy DS6

Policy DS7 - Green Belt

Land removed from the Green Belt

The following strategic sites include land which is removed from the Green Belt:

- HSG2 - Arbury
- HSG3 - Gipsy Lane
- HSG5 - Hospital Lane
- HSG6/EMP6 - School Lane / Longford Road
- HSG7 - East of Bulkington
- HSG8 - West of Bulkington
- HSG9 - Land at Golf Drive
- HSG12 - Former Hawkesbury Golf Course
- EMP1 - Faultlands (including identified amendments to surrounding land)
- EMP2 - Wilsons Lane
- EMP3 - Prologis Extension
- EMP4 - Coventry Road (including identified amendments to surrounding land)
- EMP7 - Bowling Green Lane
- NUN181 - Stockley Road
- NUN286/NUN317 - Burbages Lane

Development in the remaining Green Belt

To ensure the remaining Green Belt across the borough continues to serve its fundamental aim and purpose, and maintains its essential characteristics, it will be

protected by restricting development to only that which is considered by national planning policy as not inappropriate Green Belt development, except where very special circumstances can be demonstrated.

Proposals on previously developed sites in the Green Belt will be restricted to the limited infilling and redevelopment of previously developed land, and will be assessed in accordance with national planning policy.

Any development proposals considered not inappropriate for locating within the Green Belt should demonstrate how their plans will retain the five key purposes of the Green Belt.

Opportunities to enhance the beneficial use of the Green Belt will be approved, including opportunities to provide access, provide outdoor sport and recreation, retain and enhance landscapes, provide visual amenity and biodiversity, or to improve damaged or derelict land.

6.48 Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt which was established in 1975 and covers almost 1500 sq m, surrounding the Black Country, Coventry, Birmingham and Solihull. The Borough contains large amounts of Green Belt land, most of which is located to the south of Nuneaton, and also surrounds the main areas of Bedworth, Bulkington and Ash Green.

6.49 Nationally, the government attaches great importance to the Green Belt, which serves the main goal of preventing urban sprawl and keeping land permanently open.

6.50 The five key purposes of Green Belts are:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another
- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Alterations to the Green Belt boundary

6.51 National policy requires local authorities to plan for enough sustainable development in order to meet the needs of the area. The 2016 Strategic Housing Land Availability Assessment (SHLAA) has shown that the borough is unable to meet the development needs identified by the 2015 Strategic

Housing Market Area without releasing suitable parcels of land from the Green Belt boundary⁴⁸.

- 6.52 Alterations to the Green Belt boundary are only approved in exceptional circumstances, and must be done during the local plan making process.
- 6.53 In reviewing land to be released from the Green Belt for development, the exceptional circumstances should be weighed up against any potential adverse effects on the overall integrity of the Green Belt, according to an assessment of the whole of the Green Belt based around the five purposes.
- 6.54 The Joint Green Belt Study (2015) was undertaken to assess parcels of land on the edge of the Green Belt boundary and the contribution they currently make to the Green Belt and the five purposes⁴⁹.
- 6.55 The findings of this study helped the council to identify parcels of land which may be suitable for release from the Green Belt and fully assess the impact of doing so, in order to identify the most sustainable pattern of development.
- 6.56 The relatively poor performance of a parcel of land against Green Belt purposes is not in itself an exceptional circumstance to justify release of land from the Green Belt. The score of each parcel against the Green Belt purposes has not been considered in isolation, and various other factors have been considered in selecting the most sustainable pattern of development, such as biodiversity value, landscape character and infrastructure constraints.
- 6.57 'Policy DS7 – Employment allocations' lists the strategic sites which include land removed from the Green Belt. The pattern of development resulting from the removal of these parcels from the Green Belt is effectively a smoothing out of the current urban edge, and would be well contained by existing significant features as well as landscape features which all contribute to a defensible boundary. The development is not considered to be urban sprawl.
- 6.58 Where relevant, site specific policies have been developed to minimise harm to the remaining and surrounding Green Belt land.
- 6.59 Additional sites may be required to be removed from the Green Belt to provide pitches for Gypsy and Travellers in order to meet the identified pitch requirements. This will be addressed in the subsequent Gypsy & Traveller Development Plan Document.

⁴⁸ Nuneaton and Bedworth Borough Council (2016). *Strategic Housing Land Availability Assessment (SHLAA)*.

⁴⁹ LUC (2015). *Joint Green Belt Study*.

Development in the remaining Green Belt

- 6.60 Inappropriate development is harmful to the Green Belt and should not be considered except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 6.61 Types of development that may be deemed not inappropriate within the Green Belt include those which are considered essential to:
- Agriculture and forestry.
 - Cemeteries.
 - Outdoor recreation and outdoor sport.
 - Extensions or alterations to buildings that would not result in disproportionate additions to the original building.
 - The replacement of a building, provided that the new building is for the same use, is not materially larger than the one that it replaces, and will have no greater impact on the openness of the Green Belt.

Borough Plan objectives

- 6.62 This policy delivers the following Borough Plan objectives:
- Objective 7
 - Objective 8

Evidence base

- 6.63 The evidence base related to this policy is as follows:
- LUC (2015). *Joint Green Belt Study*.
 - Nuneaton and Bedworth Borough Council (2016). *Strategic Housing Land Availability Assessment (SHLAA)*.

Delivery mechanisms

- 6.64 The delivery mechanisms for this policy are as follows:
- The Green Belt policy will provide a framework against which planning applications will be determined.
 - Where relevant, site specific policies have been developed for the strategic sites which include land being released from the Green Belt in order to minimise harm to remaining Green Belt land.

Monitoring

6.65 The indicators and targets that will be monitored for this policy are outlined in Table 6.

Monitoring ref	Indicator	Target
DS7a	Number of applications granted planning permission in Green Belt land although considered inappropriate development	Zero

Table 6: Indicators and targets to be monitored for Policy DS7

Policy DS8 – Monitoring of housing delivery

The council will monitor the delivery of housing and publish progress against the trajectory. Where it is apparent that delivery rates are falling short of what was anticipated, then the council will take the necessary action to address any shortfall. Such action may include (but are not limited to):

- Working with developers and site promoters, particularly of the two largest strategic sites, to review the requirements and phasing of infrastructure provision, where such re-phasing would assist with viability.
- Working with developers, site promoters and other interested parties to help unlock potential sources of funding for identified infrastructure, or;
 - considering the use of compulsory purchase powers to help address known land acquisition issue; or
 - bringing forward additional sites where it can be demonstrated that such sites will assist with delivery to address short-term needs.

Where additional housing sites need to be brought forward, initial priority will be given to sustainable sites, including town centre redevelopment opportunities in Nuneaton and edge of settlement sites, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Policy DS9 – Review

The Plan will be reviewed (either wholly or partly) prior to the end of the Plan period in the event of one or more of the following circumstances:

- Through the Duty to Co-operate, it is necessary to accommodate the development needs of another authority within the borough, and these development needs cannot be accommodated within the Borough Plan's existing strategy.
- Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed.
- Any other reason that would render the Plan, or part of it, significantly out of date.

In any event, the council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before the 31st March 2023 to assess whether a whole or partial review of the Plan is required.

- 6.66 The council acknowledges that there could be changes to Local Plan guidance and regulations which may see the need for an early review of this Plan, or that such a review could be required because of planning circumstances in the Coventry and Warwickshire Housing Market Area.

7. Strategic allocations

- 7.1 Policies have been developed for each of the strategic site allocations to outline the specific requirements at each site. A core policy also outlines the requirements which apply to all strategic site allocations.
- 7.2 The site specific policies establish a strategic context for planning applications and set a baseline position in terms of assessing future schemes which will contain more detailed proposals.
- 7.3 They also ensure that development is brought forward in a strategic and comprehensive manner. Alternative solutions and land use arrangements may come forward as part of the planning application process, but these should explain the reasons for any significant differences in approach.
- 7.4 The site specific policies establish the following matters for each site:
- Land uses
 - Development principles
 - Infrastructure delivery
 - Form of development
- 7.5 The work undertaken to prepare the strategic policies has identified the key infrastructure and amenity requirements for each of the sites, and the outcomes of this have been summarised within the policies. The infrastructure provision has been informed by discussions with key stakeholders and service providers such as Warwickshire County Council Education and Highway departments, Nuneaton and Bedworth Borough Council and the North Warwickshire NHS Clinical Commissioning Group. The Infrastructure Delivery Plan sets out details on these on-site items.
- 7.6 Detailed site concept plans for each of the strategic site allocations will be created and adopted within a supplementary planning document to sit alongside the Borough Plan.

Policy SA1 – Development principles on strategic sites

Proposals on all strategic sites will meet the following requirements:

1. Landscape features should be incorporated into the scheme design and areas of open space, rather than separate areas of isolated green space.
2. Retain and enhance existing internal hedgerow trees, hedgerows and specimen trees if species rich, or where they form a key link in a significant habitat corridor, or run along a key green infrastructure pedestrian/cycle route.
3. Appropriate siting of built form to create variation, and use of varied materials to further breakup the mass of development in views.

4. Existing high quality biodiversity features must be retained and enhanced, including financial contributions for long term management.
5. Designated potential local wildlife sites within the site boundary of an allocation will be surveyed for their ecological importance.
6. Areas of high distinctiveness (value 6) should be retained and enhanced⁵⁰ along with other habitat retention, creation and enhancement required to achieve a net biodiversity gain.
7. Existing public right of ways must be incorporated into green/open space networks wherever possible.
8. Doors and windows to housing should overlook all streets and public spaces in order to provide natural surveillance.
9. On sites where ridge and furrow is present, green spaces should be positioned so as to retain these areas wherever possible.
10. Where applicable, further investigation into archaeological remains may need to be undertaken at application stage, and the mitigations required to avoid harm should be set out.
11. Community, sport, physical activity, play and open space facilities should relate well to each other and to existing areas, and the new facilities and spaces should be safe, convenient, accessible, well designed, easy to maintain, and function well.

Where any of the requirements of this policy or those in the site specific policies are deemed unviable, an independent viability assessment must be submitted with the planning application.

Landscape and open space

- 7.7 The development of each of the strategic allocations will seek to incorporate existing landscape features into areas of open space where possible. Retention of existing boundary woodland, trees and hedgerows will form a base to enhance site landscape buffers, where proposed.
- 7.8 Existing features, green spaces for landscaping and informal open space will be incorporated into each of the proposed housing allocations. The usable green space will be located to provide areas of either community parks or local parks, linked by a network of footpath and cycle routes.

Edge treatments

- 7.9 Existing boundary hedgerows will be retained and strengthened. These trees and hedgerows will form an integrated part of scheme design rather than separate areas of isolated green space. The boundary of each site will be designed to form a defensible boundary.

⁵⁰ As set out in Nuneaton and Bedworth Borough Council Ecology and Geodiversity Assessment (EGA) Borough Plan Publication Version (Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull, Warwickshire Wildlife Trust and Ecological Services Warwickshire County Council, 2016)

Biodiversity

- 7.10 Existing high quality biodiversity features will be retained and enhanced as part of the overall development of each of the strategic sites, including financial contributions for long term management. Development proposals being brought forward on each of the strategic allocations will be accompanied by an ecological assessment that will confirm how each site will deliver net biodiversity gains.
- 7.11 The development of each of the strategic allocations will seek to create areas of greenspace to enhance existing habitats on the site. Sustainable drainage system features, where required to mitigate higher risk of surface water flooding, should also be utilised as potential wildlife habitat.

Footpaths and cycleways

- 7.12 Opportunities should be pursued to enhance and develop new footpath and cycleway links as part of new housing and mixed use development, in order to improve connectivity between the site and the local area. An internal network of paths will be required linking key destinations and entrance points, and contributions will be required to the cycle network linking to the site, in accordance with Warwickshire County Council's Cycle Network Development Plan for the borough.

Movement and highway access, including wider road improvements

- 7.13 The Strategic Transport Assessment prepared by Warwickshire County Council is a high level strategic document which considers the potential impacts of all proposed strategic housing and employment allocations within the borough until 2031. This assessment sets out a number of strategic road improvements for each of the strategic allocations and/or the local area.
- 7.14 The submission of a transport assessment will be required as part of any planning application to develop each of the strategic allocations. The transport assessment will also identify what measures will be taken to deal with the anticipated transport impacts of the scheme, and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.
- 7.15 Any transport improvements/upgrades required by the strategic transport assessment or transport assessment will be secured by planning condition attached to the grant of any planning permission and subsequent planning obligation. The development of each of the strategic allocations may also be expected to contribute financially towards wider road improvement schemes proposed within the borough during the development plan period, in order to ensure that the local highway network is able to accommodate all strategic housing and employment sites.

Surface water drainage and flooding

7.16 Environment Agency mapping has indicated that parts of the strategic allocations, usually following existing field drainage ditches, have a higher potential risk from surface water flooding. In order to ensure that the development of these sites remains at low risk of flooding and does not increase the risk of flooding elsewhere, the development of each of the strategic allocations will include a comprehensive sustainable drainage system scheme.

Community, sports and physical activity facilities

7.17 The provision of new facilities or the enhancement of existing facilities will be brought forward as part of each of the strategic allocations.

7.18 These facilities will include, but are not limited to, local centres, community halls, sports and physical activity facilities, play provision and open space provision within the council's Open Space Strategy.

7.19 Sport, physical activity, play and open space facilities should relate well to each other and to existing areas, and the new facilities and spaces should be safe, convenient, accessible, well designed, easy to maintain, and function well.

7.20 The sports and physical activity facilities identified in the housing site specific policies as requiring contributions have all been justified through relevant strategies, have been costed, and contributions from each housing site have been calculated. Details of the justification for the sports facilities, their costs and Community Infrastructure regulation compliance is provided in the Infrastructure Delivery Plan.

7.21 If it is unviable to provide facilities on site, then financial contributions to enhance or expand existing local facilities will be sought.

Education requirements

7.22 Nuneaton and Bedworth Borough has a two tier education system of primary and secondary schools. Educational requirements have been based on sufficient school provision being available to meet the overall housing numbers proposed with the strategic housing allocations.

7.23 New school provision will be met either by the expansion of existing school facilities or the development of new facilities on the strategic sites. The developers of each of the strategic allocations are encouraged to engage in dialogue early with the local education authority in order to determine what level of financial contributions are required towards school expansions to address the demand for school places.

Safety and security

7.24 Design has a crucial role in delivering a safe and secure environment in residential areas. Natural surveillance should be provided in the form of doors

and windows to housing overlooking streets and public spaces, with the creation of an environment which is legible to residents and visitors alike. Existing and proposed footpaths shall be clear and legible to promote their active use.

Noise and air quality

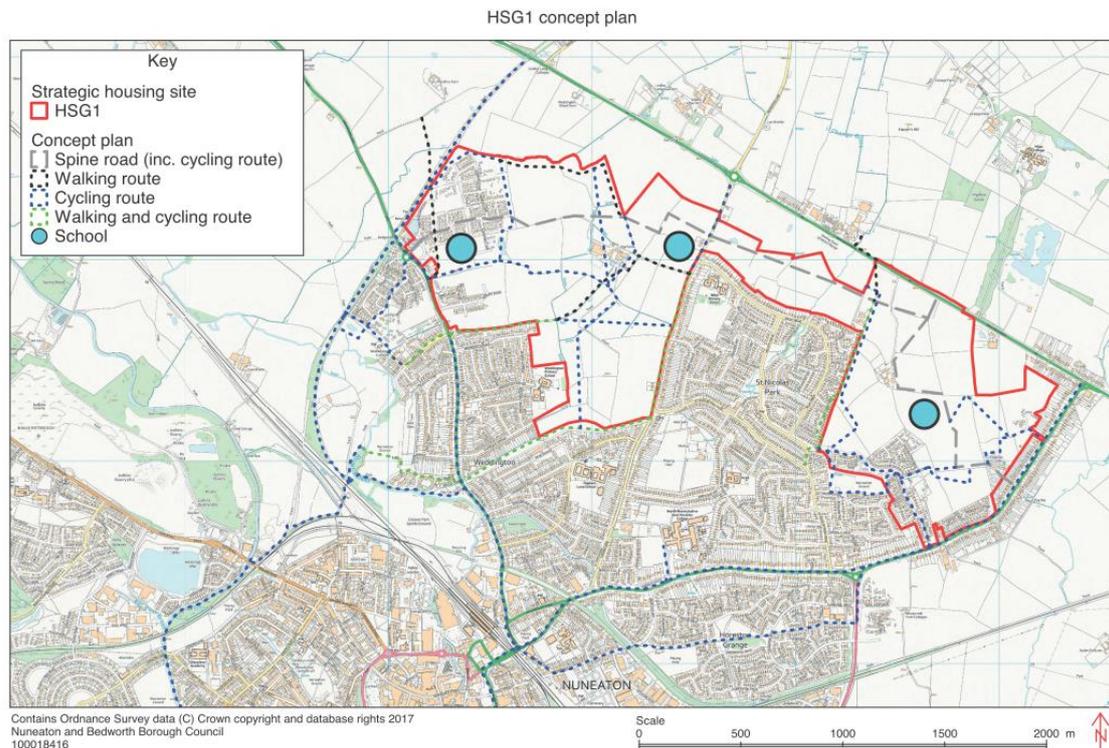
7.25 The development of each of the strategic allocations will need to take account of potential noise from neighbouring uses and road traffic noise. The precise nature of noise mitigation measures on each site will be established through the undertaking of a noise impact assessment.

7.26 If required, suitable noise mitigation could be incorporated into any proposed informal open space or landscape buffer.

Housing densities

7.27 The dwelling numbers for each site are based on an overall net density of 28 dwellings per hectare of the developable land on each site. Some of the site specific policies have noted where alternative densities would be suitable.

Policy HSG1 – North of Nuneaton



Strategic housing site HSG1 will be developed for a mix of residential, schools, local centres and community uses.

Key development principles

1. Provision of at least 4,419 dwellings in a mix of dwelling types and sizes.
2. Potential on-site GP surgery or financial contribution to new GP or expanded surgery in north Nuneaton area.
3. Provision of a district centre and a local centre including community facilities.
4. Provision of 2 form entry primary school (approximately 210 pupils) and funding including provision for early years.
5. Financial contribution towards and provision of a new secondary school located off Higham Lane, with community use sports provision to include 6 grassed football pitches for youth/junior provision with changing facilities, full-sized floodlit artificial grassed pitch, indoor 6 court sports hall, changing facilities, and indoor health and fitness facility with minimum of 100 station gym and dance studio.
6. Accessible cycling routes to the school site from housing development, with secure cycle storage facilities for community use.
7. Provision of land and contribution to a new community park in the western part of the site.

8. Provision of land and contribution to a new community park in the eastern part of the site, created by the expansion of the existing play and open space area off Buttermere Avenue.
9. Provision of land and contribution to a new community park in the southern part of the site incorporating the Change Brook Open Space.
10. Provision of land and contribution to new allotments in the eastern and western part of the site.
11. Financial contribution towards appropriate management and maintenance of play and open space.
12. Financial contribution towards the upgrading of play facilities at the Change Brook Open Space.
13. Financial contributions towards sport and physical activity.
14. Provision of a strategic access road / spine road through the site, with integrated footway and cycleway provision, provided in order to secure a sustainable pattern of development across the strategic site.
15. Provision of on-site bus infrastructure and contribution to secure diversion of local bus services in order to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.
16. Transport improvements/upgrades required along Higham Lane, The Long Shoot and Weddington Road as a result of the development.
17. Financial contributions towards Borough-wide strategic highway infrastructure works identified within the Nuneaton area.
18. Contribution to local sewage network improvements in order to improve biological treatment capacity to accommodate the development.

Form of development

19. Incorporate the Change Brook and existing public right of way (N29) within the green/open space network.
20. Local informal public open space along the northern edge of the development along with appropriate landscape treatment. Dwellings should address the open space from the south.
21. Development restricted along the western edge of the strategic site to retain undeveloped land which falls within the setting of the listed church.
22. Use lower densities and 1-2 storey dwellings toward the northern edge of development with a maximum height of 3 stories located toward the existing urban edge.
23. Average density of 35 dwellings per ha with lower densities concentrated toward the new urban edge.
24. Retain visual presence of historic farmsteads (particularly from urban edge) and where possible retain a buffer of fields in order to preserve the isolated character.
25. A historic building appraisal will need to be undertaken where development will affect a historic farmstead.
26. Green spaces should reflect the irregular field patterns and boundaries.
27. Enhance the National Cycle Route 52 / Weddington Country Walk local wildlife site with regards to access, ecological function and historic setting.
28. There is strong east-west connective along various hedgerows within the proposed area, and these should be retained and enhanced in order to form green infrastructure corridors throughout the site.

29. Protected species surveys will be required, with their habitat requirements retained, as well as their connectivity enhanced within any development layout.
30. Development will be required to come forward in accordance with the concept plan.

7.28 Strategic housing allocation HSG1 is a sustainable and deliverable urban extension to Nuneaton. The site covers approximately 200 ha, adjoining the northern edge of the Weddington and St Nicolas Park residential areas of Nuneaton.

7.29 The site will deliver 4,419 new dwellings in a mix of sizes and tenures. The site is in multiple ownership, and a number of planning approvals for new houses have been granted for plots accessed off Weddington Road in the west and The Long Shoot in the east. The policy seeks to ensure that the development of future parcels of land, the subject of individual applications, will be brought forward in an integrated manner in order to deliver wider community and infrastructure benefits for existing and future residents in the north Nuneaton area.

7.30 The allocation will be delivered on a phased basis across the plan period.

Transport and access

7.31 A new distributor link road through the allocation will be provided to include primary access points on Weddington Road, The Long Shoot and Higham Lane. This should be delivered in line with the indicative route shown on the concept plan. The start and end points have already been provided as part of extant planning permissions in these areas. The Strategic Transport Assessment assumed that this link will be fully operational by 2027. It is not included in full in the 2022 assessment as the level of development completed in this area as defined in the Borough Plan trajectory is less likely to trigger the necessity for the full link road. New bus infrastructure will also be required. The width of the main distributor road within the development site must be sufficient to cater for two-way bus movement, in order to allow effective penetration of the site. The distributor road should ensure that:

- all households within the individual developments are within 400 m of a bus stop;
- a highway link connects all the separate developments to each other and also the adjoining local highway network, and;
- the minimum width of road is 6.75 m to effectively cater for bus turn movements in order to complement flexible bus routing options.

7.32 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG1 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG1 is expected to contribute financially towards the

Nuneaton area road improvement schemes set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

- 7.33 A new junction will be formed with the A5 through the development at Callendar Farm.

School provision

- 7.34 A key aspect of the allocation will be the delivery of new amenity facilities, including school provision to meet the educational needs of future residents and existing residents in the north Nuneaton area. This will include a new secondary school located off Higham Lane on land owned by Warwickshire County Council.

District centres

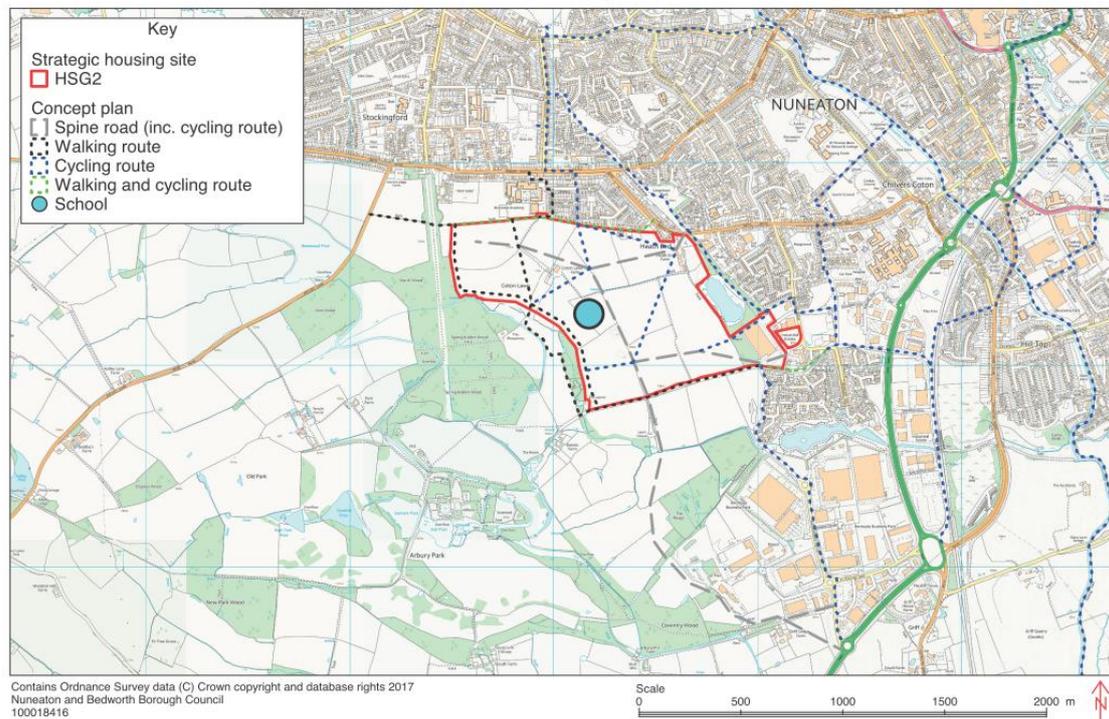
- 7.35 The nearest district centres to HSG1 are at Abbey Green and Horeston Grange, located approximately 1.5 km and 800 m respectively, at their closest points. The proposed allocation will bring forward a district centre in the east of the site and a local centre in the west of the site. The centres will provide important local services/facilities (including GP provision) for residents and, in turn, reduce the need to travel.

Open space and green infrastructure

- 7.36 The residential development proposed on HSG1 will be integrated with informal open space that either forms an extension to existing areas or consists of new community parks. Green linkages and paths between the areas of open space and the public right of way network will be incorporated within, and through, the residential areas.

Policy HSG2 – Arbury

HSG2 concept plan



Strategic housing site HSG2 will be developed for a mix of residential, schools and community uses.

Key development principles

1. Provision of at least 1,525 dwellings in a mix of dwelling types and sizes.
2. Financial contribution to local NHS Clinical Commissioning Group.
3. Provision of a local centre, including community facilities.
4. Community park (including the proposed strategic play area) to be provided forming an open space and habitat corridor linking Ensor's Pool and the local wildlife sites to the south, as well as appropriate management and maintenance arrangements.
5. Provision of a distributor link road through the site with integrated footway/cycleway provision in accordance with the concept plan. The distributor link road will need to secure a connection that links the site to the A444.
6. Provision of a 1 form entry primary school and funding, including provision for early years.
7. Provision of footway/cycleway linkages to the existing footway/cycleway network, including linkage to Bermuda Park Station, enhancement of Harefield Lane to reach the Bermuda Village area to the east, as well as contributions towards links to the north and east, mapped in the Cycle Network Development Plan.

8. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
9. Financial contributions towards borough-wide strategic highway infrastructure works identified within the A444 corridor.
10. Contribution to local sewage network improvements in order to improve biological treatment capacity to accommodate the development.
11. Provision of allotment site extension and facilities.
12. Financial contributions towards sport and physical activity.
13. Asset management plan for The Arbury Estate which includes measures to be taken and commitments to the repair and maintenance of the Park Farmhouse and the Tea House.

Form of development

14. Provision of a landscape buffer on the southern and western edge of the site.
15. Improvements to the urban edge through and use of a woodland planting belt in order to screen the urban edge. New woodland should be buffered on its eastern side by open space, which the existing houses should face.
16. Utilise woodland planting elsewhere within the new development, with particular consideration given to views from Centenary Way and the existing residential urban edge.
17. Broadleaved woodland should have a minimum buffer of 30 m of appropriate habitat in order to safeguard their integrity from imposed health and safe management (tree fall), garden floral escapes and garden refuse tipping.
18. Incorporate Centenary Way and watercourses within the open space framework.
19. An average density of 35 dwellings per ha is considered appropriate within this parcel. Higher density housing should be concentrated toward the current urban edge.
20. Use a maximum building height of two stories, with the aim of screening views of the urban edge entirely behind woodland.
21. Development should be of a height and density which can be screened by the existing planting within and around the registered park and gardens.
22. Any lighting should not exceed the height of the development and should be designed with regards to minimising light pollution.
23. Ensor's Pool should have a minimum buffer zone of 100 m as well as any appropriate mitigation measures in order to ensure that the hydrological pathways to the pool are not compromised.
24. Create a significant area of grassland habitat between Ensor's Pool and Bermuda Clay Pits in order to strengthen a south-north national flow around the west of Nuneaton.
25. All ponds within the development should be subject to a local wildlife site survey in co-ordination with great crested newts, white-clawed crayfish and

water vole surveys. Additionally, protected species surveys for bats, hedgehog, lizards and grass snake, plus surveys for birds and important invertebrates as well as plants should be undertaken.

26. Areas of high distinctiveness (values 4 to 6) should be retained.
27. Enhancements to the footpath along Harefield Lane towards Seeswood Pool.
28. Creation of a footpath link to Ensor's Pool from Harefield Lane.
29. Access to any development within the strategic site should avoid approaching the site from the north. No access should be taken from North Drive, and designs should avoid introducing new approaches parallel to North Drive which would detract from its prominence.
30. As part of any design proposals, suitable measures should be specified to protect Spring Kidden and North Woods ancient woodlands from any significant impact.
31. Development will be required to come forward in accordance with the concept plan.
32. Development proposals must submit a comprehensive masterplan for the site.

7.37 Strategic housing site HSG2 (Arbury) is located on the southwestern boundary of Nuneaton, and forms part of the Arbury Estate. The strategic site covers approximately 86 ha, and is bordered by residential buildings to the north and east, with undeveloped areas of the Arbury Estate and park to the west and south.

7.38 The site will deliver approximately 1,525 new dwellings in a mix of sizes and tenures. The site is in a single ownership and is expected to be delivered through an over-arching outline permission.

7.39 The allocation will be delivered on a phased basis across the plan period, and will commence within the first 5 years after adoption.

Landscape and open space

7.40 Any development will be of a height and density which can be screened by the existing planting within and around the registered park and gardens. The existing trees and hedgerows will be retained in order to screen views to and from the strategic site, and where necessary enhanced. The use of green corridors and low rise residential development may help to minimise the visual impact of any change within the strategic site.

7.41 Development will be restricted to the northern and eastern boundaries in order to minimise light and noise pollution, as well as to maintain an undeveloped landscape buffer of land between the registered park and gardens and residential edge.

- 7.42 New development will be designed to provide an enhanced informal amenity/open space adjacent to the Ensor's Pool special area of conservation (Appendix I). New footway/cycleway linkage will be provided through the site to the existing footway/cycleway network, including to the Bermuda Village area to the east, via Harefield Lane.

Historic environment

- 7.43 Any development should take the opportunity to secure an asset management plan for The Arbury Estate which includes measures to be taken and commitments to the repair and maintenance of Park Farmhouse and the Tea House, both Grade II* listed buildings included on the heritage at risk register. Alternatively a listed building heritage partnership agreement could be agreed in relation to the building. Any heritage partnership agreement would not replace a requirement to prepare an asset management plan for The Arbury Estate with measures to be taken and commitments to the repair and maintenance of Park Farmhouse and the Tea House, unless the heritage partnership agreement would do the same.
- 7.44 Arbury Hall registered park and gardens is located to the west of the strategic site, with the western boundary of the strategic site located between approximately 60 m at its closest point and 600 m at its furthest point from the eastern boundary of the registered landscape. This park and garden forms the focus of the Arbury Hall Estate which includes numerous listed buildings. Ensor's Pool special area of conservation adjoins the eastern boundary.

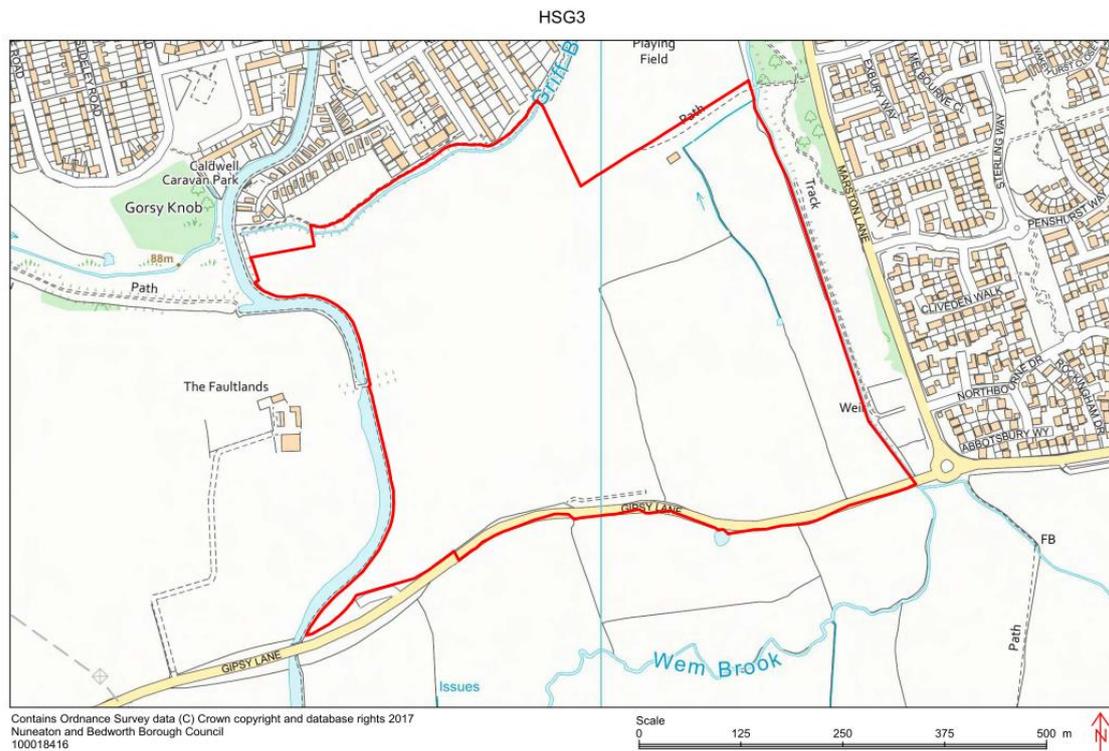
Transport and access

- 7.45 A new distributor link road through the allocation will be provided to include primary access points on Heath End Road, Hazell Way and Walsingham Drive. New bus infrastructure will also be required. No access will be taken from North Drive, and detailed site layouts will avoid introducing new approaches parallel to North Drive which would detract from its prominence.
- 7.46 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG2 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG2 is expected to contribute financially towards the A444 corridor road improvement schemes set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Flooding

- 7.47 Developers should consider reservoir flooding during the planning stage, using the Environment Agency's reservoir inundation mapping. Where possible, developers should consider using areas at possible risk as public open space.

Policy HSG3 – Gipsy Lane



Strategic housing site HSG3 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of at least 575 dwellings in a mix of dwelling types and sizes.
2. Financial contribution to local NHS Clinical Commissioning Group.
3. Provision of a local centre including a community hall, or financial contribution.
4. Play and open space (including the proposed strategic play area) and younger children's play area to be provided, as well as appropriate management and maintenance arrangements.
5. Financial contribution to Warwickshire County Council towards the provision by Warwickshire County Council of a 1 form entry primary school either on-site or the equivalent additional school places off-site.
6. Any transport improvements/upgrades required along Gipsy Lane as a result of the development, and to the Gipsy Lane / Coventry Road junction, which would be required prior to construction / first occupation. Any improvements to the alignment of Gipsy Lane should take account of existing valued highway trees.

7. Financial contribution towards provision of a cycle path linking to Bermuda Park Station.
8. Provision of footway/cycleway linkages to the existing footways/cycleways alongside the north bank of Griff Brook.
9. Provision of cyclepaths running north to south and east to west across the development, as well as parallel to Gipsy Lane. The layout and position of internal cyclepaths to the site boundaries should be capable of making effective connections to the cycle network provision within EMP1 and on to Bermuda Park.
10. Enhancements to canal towpath and a provision for the crossing of the canal to facilitate cycle usage. Development proposals will investigate suitability of using the Turnover Bridge and, if appropriate, financial contributions will be sought for its delivery. Where demonstrated that this would not be technically feasible, alternative bridge provision that respects the heritage asset of the canal will be secured.
11. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services, in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
12. Financial contribution towards the provision of footway/cycleway linkages from the eastern site boundary to the Wem Brook Trail (including crossings of Wem Brook).
13. Financial contributions towards borough-wide strategic highway infrastructure works identified within the A444 corridor.
14. Financial contribution towards delivery of an area wide green infrastructure supplementary planning document (or equivalent) that promotes species movement along identified green corridors.
15. Financial contribution towards the road improvement schemes in the A444 Corridor as set out in the Transport Modelling Report.

Form of development

16. Density of between 35 to 40 dwellings per ha with lower densities concentrated along the new urban edges.
17. Maximum building height of two stories, with two and a half to three stories used in selected locations away from the urban edge.
18. Enhance and maintain open space corridors through new landscape buffers located along Griff Brook, Wem Brook and Coventry Canal in order to create an attractive setting for new housing.
19. A small landscape buffer to be provided along the southern edge of the site to include informal and structure planting to screen the proposed development from Gipsy Lane and protect local views from the surrounding area.
20. Woodland tree planting to reflect the pattern of irregular shaped woodland copses in the landscape to further soften the impact of new urban edges.
21. Creation of footpath/cycleway inside the roadside and hedgerow network in order to provide a traffic free route and increase habitat connectivity.

22. New development should address the canal. Effects of the development on the adjoining section of the Coventry Canal and associated habitats within the Griff Brook and Wem Brook should be incorporated in the construction management plan.

- 7.48 Strategic housing site HSG3 covers 27.24 ha to the north of Gipsy Lane, located in the southern edge of Nuneaton, approximately 1 km to the north of Bedworth. The site consists of a large arable field, with hedgerow boundaries and some existing tree planting on site. The Griff Brook and Wem Brook are located on the northern and eastern boundaries respectively. The Coventry Canal is located on the western boundary. The northern and eastern part of the site are located within flood zones 2 and 3.
- 7.49 The site will deliver approximately 575 new dwellings in a mix of sizes and tenures as part of a sustainable and deliverable extension to the Attleborough area of Nuneaton. The site is in a single ownership and is expected to be delivered through an overarching outline permission.
- 7.50 The allocation will be delivered on a phased basis across the plan period, and commence within the first 5 years after adoption.

Provision of district centre

- 7.51 Attleborough District Centre is located 1.9 km to the northeast of the site, which provides day-to-day shopping and services to meet the local needs of residents. A new local centre, including a community hall, will be provided as part of the proposed development in order to reduce the need to travel.

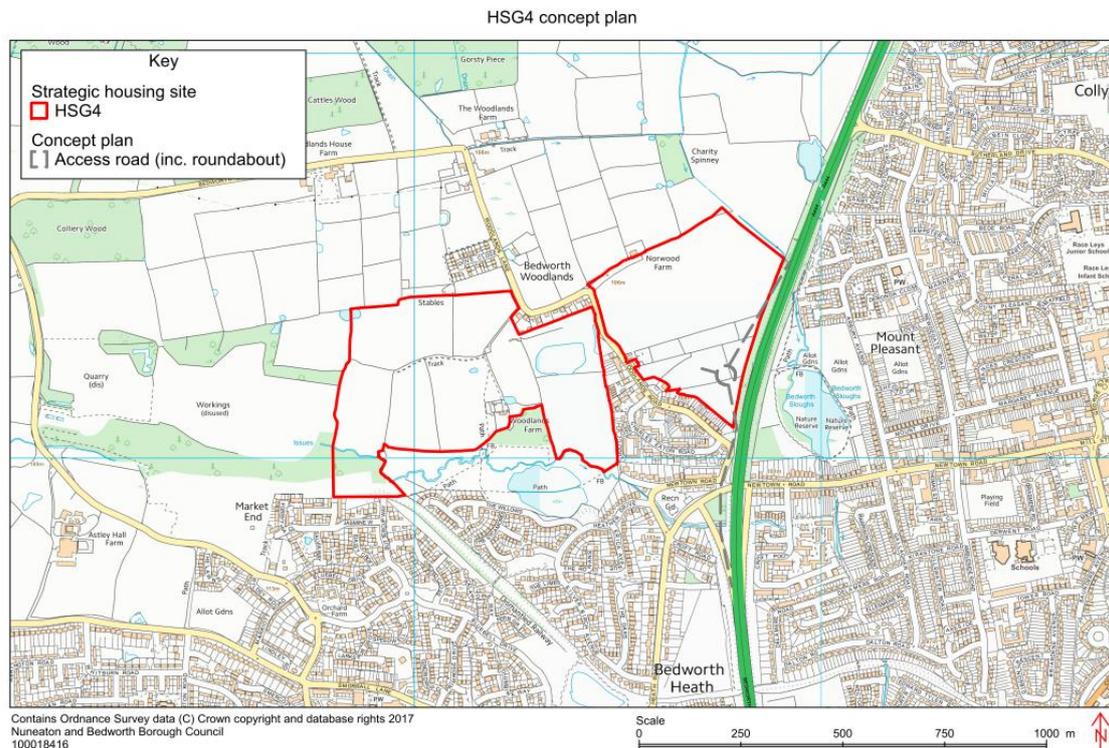
Transport

- 7.52 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG3 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG3 is expected to contribute financially towards the A444 corridor road improvement schemes set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Flooding

- 7.53 Broad scale modelling shows this site to be at risk from the Coventry Canal, should a breach occur. Developers should be aware that any site that is at or below canal bank level may be subject to canal flooding, and this should be taken into account when building resilience into low-level properties. Due to the potentially numerous locations for failure scenarios, the canal mapping is considered indicative only, and will need to be reviewed and updated as part of any detailed site specific flood risk assessment.

Policy HSG4 – Woodlands



Strategic housing site HSG4 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of approximately 689 dwellings in a mix of dwelling types and sizes.
2. Provision of a local centre including community facilities.
3. Potential on-site GP surgery or financial contribution to new GP or expanded surgery in western Bedworth area (Goodyers End, Newdigate, Bedworth Woodlands).
4. Play and open space to be provided in central position linking together existing local wildlife sites with appropriate management and maintenance arrangements.
5. Provision of on-site park and play facilities.
6. Financial contribution towards the upgrading of play facilities at the park on Heath Road / Newtown Road, and financial contribution towards facilities at Miners Welfare Park in Bedworth, a destination park within the council's Open Space Strategy.
7. New 1 form entry primary school.

8. Financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry.
9. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
10. Transport improvements/upgrades required along Woodlands Lane, Woodlands Road, Bedworth Lane, Newtown Road, Heath Lane and surrounding streets as a result of the development.
11. Financial contributions towards borough-wide strategic highway infrastructure works identified within the Bedworth area.
12. Provision of a footway/cycleway on the site, linking through to the cycle path adjacent to the former mineral railway line to Newdigate Colliery.
13. Financial contribution towards provision of footway/cycleway leading to Bedworth Town Centre, running parallel to the former mineral railway line to Newdigate Colliery, and then utilising the further connection via Rectory Drive.
14. Potential local sewage network improvements in order to improve biological treatment capacity to accommodate the development.
15. Financial contributions towards sport and physical activity.

Form of development

16. Retain the character of Bedworth Lane and Woodlands Lane through the retention of adjacent hedgerows and hedgerow trees.
17. Maintain a corridor of open space for the public right of way with appropriate tree and hedgerow planting.
18. Retain The Nook and Flash Meadows local wildlife sites and additional wooded area between The Nook local wildlife site and Woodlands Farm.
19. Where possible retain areas of high quality ridge and furrow through careful siting of green space.
20. Enhance the existing ditch system with riparian vegetation and wetland species, as well as incorporate other wetland features as part of any landscape framework.
21. Re-establish network of green infrastructure, including pockets of woodland that resemble field patterns to the west.
22. Carefully design any highways access from Woodlands Road in order to minimise the effects on the overall rural wooded character of the road.
23. The development should incorporate screening along its northern edge so as to preserve the rural prospect from both South Farm and Arbury Mill.
24. Low-rise residential development should be located in highly visible areas of the site.
25. Protection of existing ecological network and nationally scarce grassland habitats. All offsetting/mitigation contributions should be within or related to the site.

26. Development will be required to come forward in accordance with the concept plan.

7.54 Strategic housing allocation HSG4 is a sustainable and deliverable urban extension to Bedworth. The site is located on the north-western edge of Bedworth, north of the Bedworth Heath area of the town.

7.55 The site will deliver approximately 689 new dwellings in a mix of sizes and tenures. The site is in three separate ownerships, but all landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site infrastructure requirements.

7.56 A high pressure gas pipeline and overhead power line both run through HSG4. Housing layouts need to take into consideration potential stand-offs and easements associated with the high pressure gas pipeline running southwest to northeast through the site. Early discussions with National Grid are essential in informing any detailed housing layout.

7.57 The allocation will be delivered on a phased basis across the plan period, and will commence within the first 5 years after adoption.

School provision

7.58 The educational requirements for HSG4 are for a new primary school in the east of the site. At secondary level, financial contributions are anticipated in order to expand existing secondary provision up to an additional 3.5 form entry. The contribution would be part of a pool including HSG4, HSG5, HSG6 and HSG8, where pupils are expected to attend local secondary schools in the Bedworth / Ash Green area.

Open space

7.59 On-site open space will be limited, but a financial contribution will be sought towards the upgrading of play facilities at the park on Heath Road / Newtown Road, as well as financial contribution towards facilities at Miners Welfare Park in Bedworth.

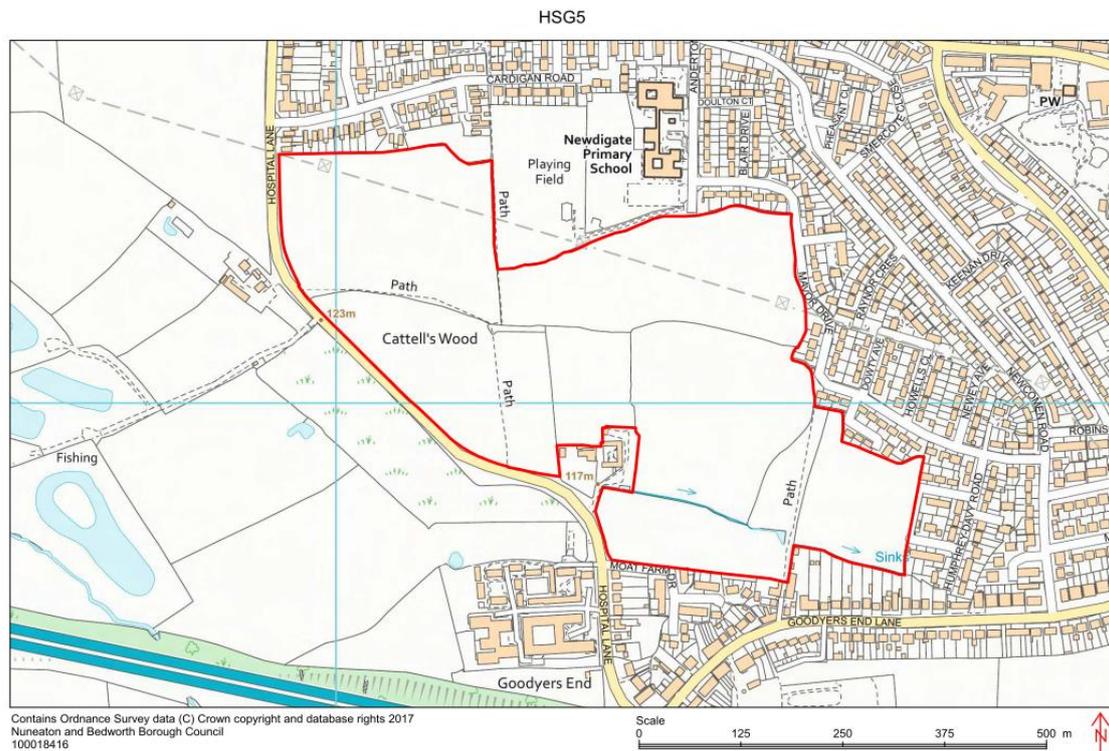
Provision of local centre

7.60 Bedworth Town Centre is 1 km to the east of HSG4, and provides a number of local retail facilities. A new local centre will be developed in the western half of the site in order to serve existing and future residents, reducing the need to travel.

Transport and access

- 7.61 Primary access for vehicles will be provided via a new access from the site to Newtown Road with an A444 northbound slip and associated improvements to the existing highway network. Other vehicular access points are available from Woodlands Road and Woodlands Lane. Secondary access points may be required from Judd Close and Buttercup Way. The access strategy is informed by a specific transport assessment for HSG4 prepared in May 2018, which updates the Strategic Transport Assessment modelling work. The access to the A444 will result in a loss of some of the ridge and furrow in this location, which has medium heritage significance, and whilst this is regrettable, it is necessary to enable the development of this site. There are extensive areas of ridge and furrow in this area, and where possible developers will be encouraged to incorporate this within open space. Alternative locations for such an access would also have an effect on the landscape of the area.
- 7.62 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG4 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG4 is expected to contribute financially towards road improvement schemes in the Bedworth area as set out in the transport modelling report, either via planning obligation or Community Infrastructure Levy provision.

Policy HSG5 – Hospital Lane



Strategic housing site HSG5 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of at least 398 dwellings in a mix of dwelling types and sizes.
2. Potential on-site GP surgery or financial contribution to new GP or expanded surgery in western Bedworth area (Goodyers End, Newdigate, Bedworth Woodlands).
3. Provision of outdoor green gym, as well as older and younger equipped children's play facilities.
4. Play and open space to be provided with appropriate management and maintenance arrangements.
5. Financial contribution towards the upgrading of the existing sports pitches at Anderton Road and facilities at Newdigate Recreation Ground and Miners Welfare Park
6. Allocation of land on site for expansion of Newdigate Primary School to increase capacity to a 2 form entry school.
7. Financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry.

8. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services in order to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.
9. Any transport improvements/upgrades required along Hospital Lane, Smorrall Lane, Goodyers End Lane and surrounding streets as a result of the development.
10. Financial contributions towards borough-wide strategic highway infrastructure works identified within the Bedworth area.
11. Provision of a footway/cycleway network through the site and contributions to the wider cyclepath network, including links towards Bedworth Town Centre
12. Financial contribution towards the expansion of the police's Safer Neighbourhood Team, in line with requirements within the council's Infrastructure Delivery Schedule.
13. Provision of new district centre.
14. Local sewage network improvements in order to improve capacity to accommodate the development.
15. Provision of wayleave for electricity pylons, which should consist of a corridor of open space between existing and new housing.
16. Financial contributions towards sport and physical activity.

Form of development

17. A density of 40 dwellings per ha has been deemed appropriate for this site, given its generally low visual prominence and existing urban context.
18. Maximum building height of 2 stories, given the nature of existing built form.
19. Ensure new high quality houses face onto the northern side of Hospital Lane in order to form an attractive urban edge to southwest Bedworth.
20. A buffer of fields should be preserved so as to retain the isolated character of Moat Farm on Hospital Lane.
21. The layout of the development should be designed to reflect the irregular field patterns and boundaries.
22. Provision of landscaping to the northern side of Hospital Lane in order to soften and limit views of the new urban edge.
23. Hospital Field local wildlife site (rejected) should be considered as a biodiversity offset site for restoration as a community woodland or local nature reserve.
24. Incorporate a wildlife area for Newdigate Primary School at the southern end of the playing field which runs alongside a public footpath.

7.63 Strategic housing allocation HSG5 is a sustainable and deliverable extension to Goodyers End, on the western edge of Bedworth. The site covers 22.4 ha and is defined to the west by Hospital Lane, and residential properties to the south,

east and north. Newdigate Primary School and Anderton Road Playing Fields are also located to the north of the site.

- 7.64 The site will deliver approximately 398 new dwellings in a mix of sizes and tenures. The site is in a single ownership and is expected to be delivered through an overarching outline permission.
- 7.65 The allocation will be delivered on a phased basis across the plan period, and commence within the first 5 years after adoption.
- 7.66 An overhead power line runs through the northern part of the site. It is proposed that informal open space and the district centre are located in this area. Early discussions with National Grid are essential in informing any detailed layout to ensure that the appropriate wayleave is retained.

District centre

- 7.67 The nearest local centre in Goodyers End is on Smorrall Lane, approximately 950 m at the closest point, to the site. A new district centre will be developed in the north-eastern corner of the site to serve existing and future residents of Goodyers End, and reduce the need to travel.

School provision

- 7.68 Land adjacent to the existing Newdigate Primary School boundary will be retained to accommodate expansion of the primary school premises.
- 7.69 At secondary level, financial contributions are anticipated in order to expand existing secondary provision up to an additional 3.5 form entry. The contribution would be part of a pool including HSG4, HSG5, HSG6 and HSG8, where pupils are expected to attend local secondary schools in the Bedworth / Ash Green area.

Footpaths and cycle routes

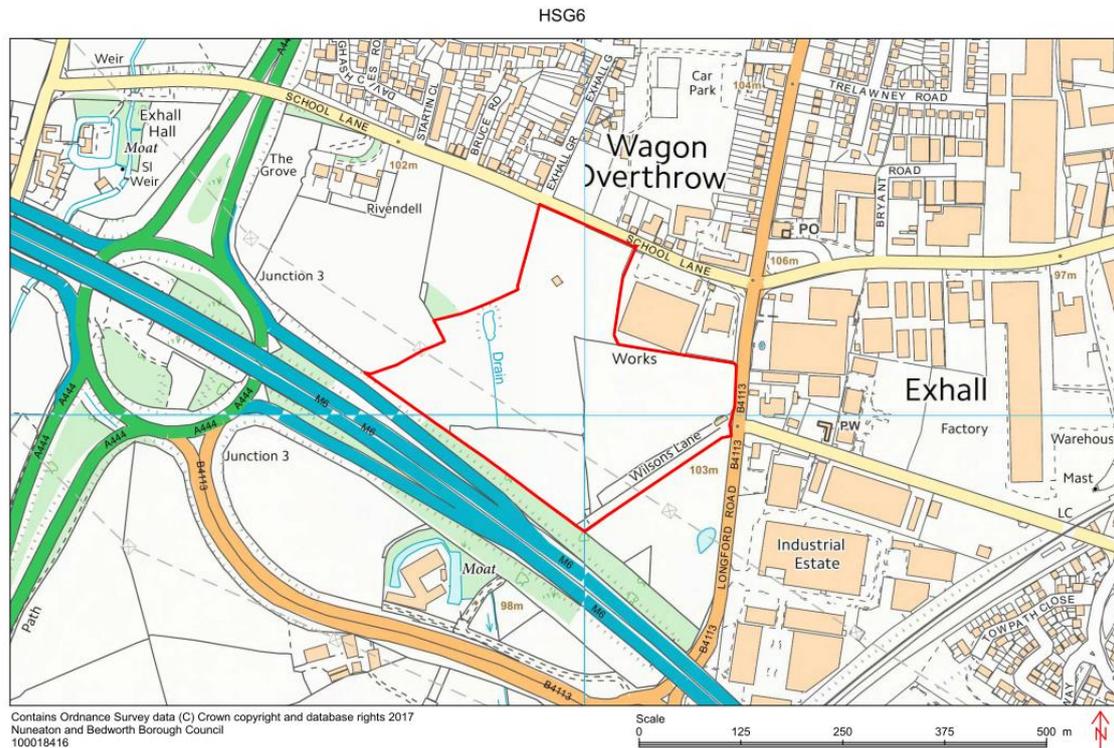
- 7.70 Two north-south footpaths and an east-west footpaths run across the site, linking in with nearby residential streets. The existing footpaths will be retained and integrated into the site via the provision of a footway/cycleway network through the site, linking Hospital Lane and Goodyers End Lane with Mavor Drive, Anderton Road and the existing/expanded recreation ground. There will also need to be a contribution towards a cycle path link towards Bedworth Town Centre, and to schools in the vicinity.

Transport and access

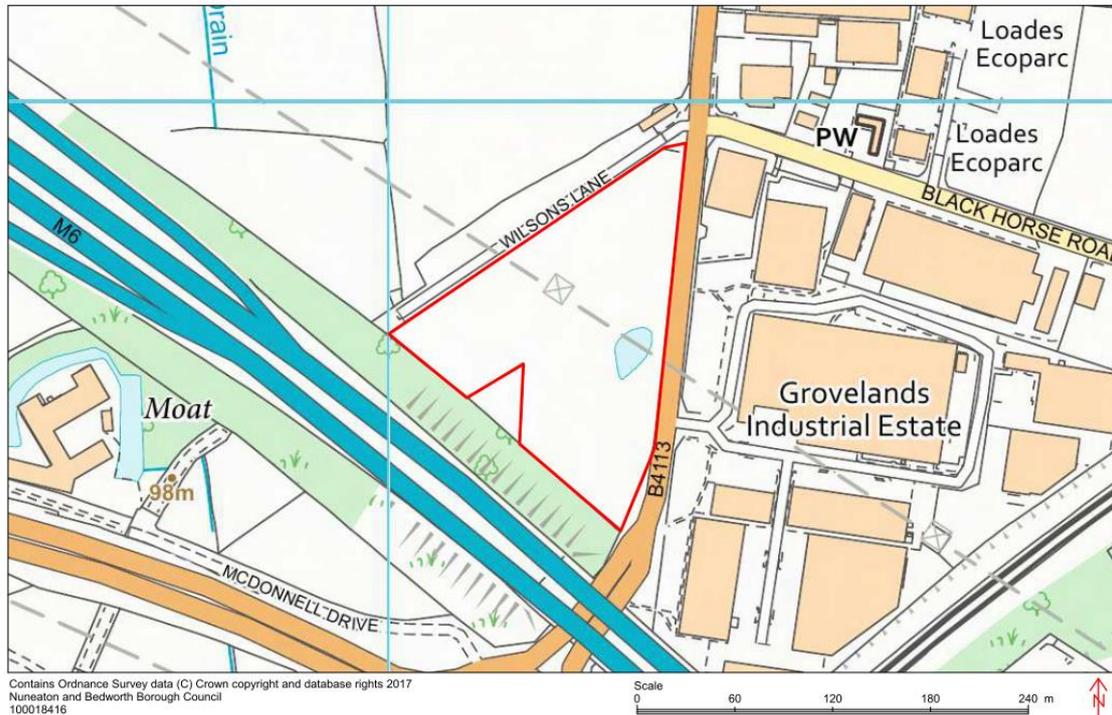
- 7.71 Primary access for vehicles will be provided from Hospital Lane, with additional secondary vehicular access possible from Mavor Drive, Maynard Avenue and Jeffrey Close. Contributions towards associated improvements to Hospital Lane, Smorrall Lane, Goodyers End Lane and bus infrastructure will be sought.

7.72 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG5 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG5 is expected to contribute financially towards road improvement schemes in the Bedworth area as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Policy HSG6 and EMP6 – School Lane / Longford Road



EMP6



Strategic site HSG6/EMP6 will be developed for a mix of residential and employment uses.

Key development principles

1. Provision of at least 220 dwellings in a mix of dwelling types and sizes.
2. Provision of approximately 2 ha of the employment land.

HSG6

The strategic housing site shall deliver the following infrastructure and facilities.

3. Transport improvements and upgrades required along School Lane and Longford Lane.
4. Financial contribution to local NHS Clinical Commissioning Group.
5. Provision of formal and informal open space linking Heckley Recreation Ground, the central ponds and habitat, and the provision of the associated landscape buffer along the southern edge of the site, together with enhancements to existing hedgerows on the site.
6. Financial contribution and provision of new cycle path link to the existing Heckley Fields Recreation Ground, provision of a younger children's play facility in the center of the site, and financial contributions to Heckley

Recreation Ground as the community park, and Miners Welfare Park as the destination park, serving the new residents.

7. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
8. Financial contribution towards primary education at local schools in order to meet anticipated demand for school places.
9. Financial contribution towards secondary level education in order to expand existing secondary provision in the area.
10. Financial contributions towards borough-wide strategic highway infrastructure works identified within the Bedworth area.
11. Financial contribution towards Sustrans cycle route along Longford Road / Coventry Road.
12. Financial contribution towards the management and enhancement of the retained biodiversity areas.
13. Suitable sewage connection to the existing foul drainage network.
14. Financial contributions towards sport and physical activity.

Form of development

15. Retention and enhancement of the existing ponds on site.
16. The site will require protected species surveys including for great crested newts and reptiles.
17. The potential local wildlife site at Wilsons Lane should be surveyed for its ecological importance.
18. An average density of 50 dwellings per ha is considered appropriate given the predominantly urban character of the surrounding area.
19. Residential building heights of two to three stories is considered appropriate at this site.
20. The existing public right of way should be extended into the wider landscape framework and open space.
21. Where used, green spaces should be positioned so as to retain areas of ridge and furrow, as well as the existing trees on the site.

Wayleave

22. The wayleave for the electricity pylons should be used to create a high quality green corridor, contributing to landscape character, views and biodiversity. Alternatively, parking and storage areas associated with employment use could be accommodated within the wayleave.

EMP6

The strategic employment site shall deliver the following infrastructure and facilities:

23. Transport improvements / new junction onto Longford Road and associated upgrades.
24. Financial contributions towards borough-wide strategic highway infrastructure works within the Bedworth area.
25. Financial contribution towards Sustrans cycle route along Longford Road / Coventry Road.
26. Appropriate financial contribution towards proposed informal open space for management and maintenance arrangements.
27. Suitable sewage connection to the existing foul drainage network.

7.73 The strategic site comprises two parts, HSG6 to the west, and EMP6 to the east. HSG6 comprises 16.5 ha of pasture farmland and EMP6 comprises 2 ha of unmanaged, poor, semi-improved grassland, including a small pond used for small-scale coarse fishing. The site is located in the south of the Nuneaton and Bedworth Borough area, and bounded by the M6 to the south and School Lane to the north.

7.74 The site will deliver approximately 388 new dwellings, in a mix of sizes and tenures, as well as 2 ha of employment land. The site is in four separate ownerships, but all landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site infrastructure requirements.

7.75 The allocation will be delivered on a phased basis across the plan period, and will commence within the first 5 years after adoption.

7.76 Residential development will be focussed in the north and central part of the site, with landscaping / informal open space in the south. A 400 kv overhead power line runs across the southern part of the site, including three pylons parallel with the M6. Scheme layouts need to take into consideration potential stand-offs and easements associated with the overhead power line, and early discussions with National Grid are essential in informing any detailed layout, but it is proposed that informal open space is provided in a linear area adjacent to the M6, and either side of the power line.

Footpaths and cycle routes

7.77 The existing pedestrian access to public footpath B26 will be retained and enhanced by a new pedestrian access to Heckley Fields. Contributions towards associated improvements to School Lane, Longford Road and bus infrastructure will be sought.

7.78 The existing public right of ways on the site will be maintained and extended to link the residential areas with the new open space area in the south. The retention of the existing footpath will retain the connectivity of routes surrounding the site. Sustrans has a long term ambition to provide an enhanced cycle route along Coventry/Longford Road, and the proposed development will

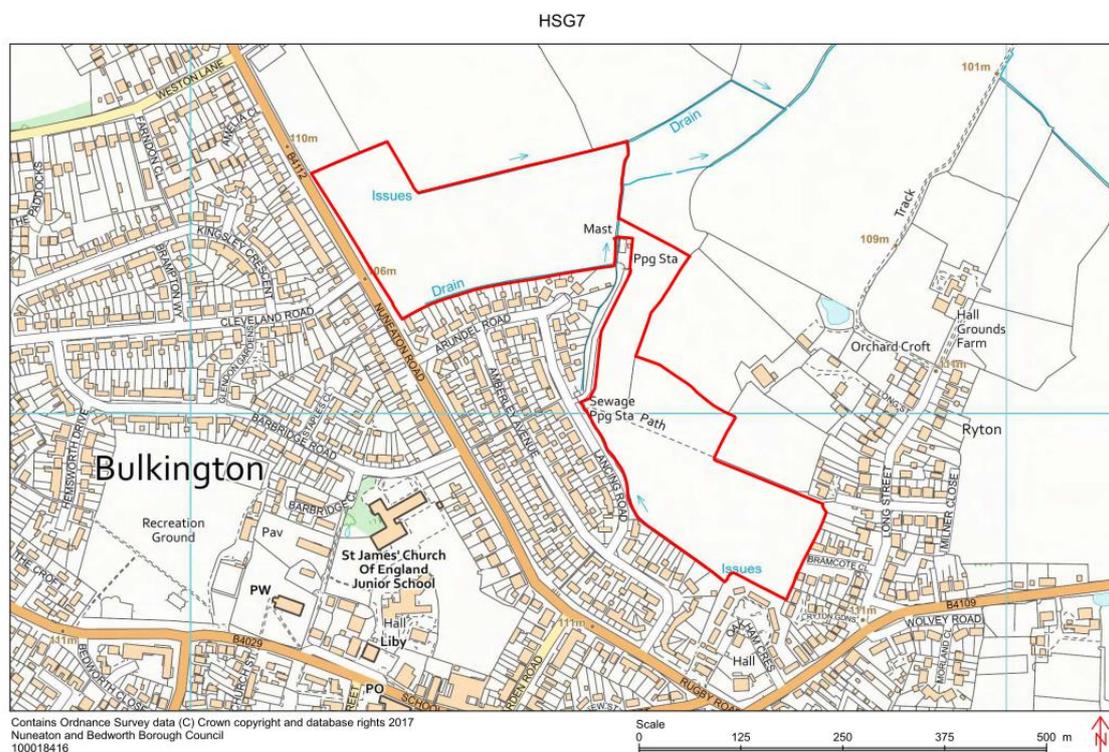
contribute to the delivery of this cycle route. The development will also contribute to improvements to the existing formal play area facilities at Heckley Fields to the north of School Lane. Pedestrian access between Heckley Fields and the site will also be required.

Transport and access

7.79 Access to the residential areas will be via two new access points on School Lane. It has been agreed with the highways authority that separate access points will be created for the proposed employment and residential uses on the site. All HGV parking and serving areas associated with the employment uses on the site will be accessed via either a new entrance or the existing Wilson Lane access on the B4113 Longford Road. The final junction solution will be agreed following the completion of a transport assessment.

7.80 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG6 and EMP6 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG6 and EMP6 is expected to contribute financially towards road improvement schemes in the Bedworth area as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Policy HSG7 – East of Bulkington



Strategic housing site HSG7 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of at least 196 dwellings in a mix of dwelling types and sizes.
2. Play and open space, including younger children's play, to be provided with appropriate management and maintenance arrangements.
3. Financial contribution towards the upgrading of sports facilities and teenage play provision at Bulkington Recreation Ground and financial contribution towards facilities at Miners Welfare Park in Bedworth.
4. Financial contribution towards primary education at Arden Forest Infant and St James Academy Junior schools in order to meet anticipated demand for school places.
5. Financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry.
6. Bus infrastructure improvements adjacent to HSG7 with a potential contribution to secure diversion of frequent local bus services in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
7. Any transport improvements/upgrades required along Nuneaton Road, Lancing Road, Bramcote Close and surrounding streets affected as a result of the development. The main access points are likely to be from Nuneaton Road and Lancing Road.
8. Financial contributions towards highways infrastructure identified in the Strategic Transport Assessment for Bulkington.
9. Provision of footpaths/cycleways through the open space on the site, including linking the existing public footpath on the southern parcel of the site with the northern parcel, and through the development area to Nuneaton Road.
10. Financial contributions towards the development of a dedicated cycle path along the B4029 between Bulkington Village Centre and Bedworth, and towards links to Bulkington Village Centre and Nuneaton.
11. Potential local sewage network improvements in order to improve capacity to accommodate the development, subject to discussions with Severn Trent Water.
12. Financial contributions towards sport and physical activity.
13. Financial contribution toward community facilities.
14. Financial contribution for primary medical care to be given to NHS Warwickshire North Clinical Commissioning Group or successor body.

Form of development

15. Maintain and enhance vegetated boundaries that front onto the wider rural area (to be maintained as Green Belt defensible boundaries).

16. Provide an open space corridor incorporating the public right of way with specimen trees and small groups of trees interspersed amongst grassed areas and wildflower meadows.
17. Provide street trees to the internal road network.
18. Enhancement of the brook which follows the south-western boundary.

7.81 Strategic housing allocation HSG7 is a sustainable and deliverable extension on the eastern edge of Bulkington. The strategic land allocation covers 10.29 ha. The site will deliver approximately 196 new dwellings in a mix of sizes and tenures. The site is in a single ownership and is expected to be delivered through an overarching outline permission.

7.82 The allocation will be delivered on a phased basis across the plan period, and commence within the first 5 years after adoption.

7.83 Residential development will be focussed in the northern and southern part of the site, with formal and informal open space in the centre. A landscape belt will run along the northern edges of HSG7.

Footpaths and cycle routes

7.84 Footpath/cycleway access is proposed through the informal open space, in order to create a green route linking the northern and southern parcels. This route will run from the existing public footpath, through the informal open space, and into the northern parcel of HSG7. The route will continue to Nuneaton Road as part of the housing development in order to improve connectivity through the site.

7.85 HSG7 is expected to contribute financially towards the development of a dedicated cycle path along the B4029 Bedworth Road between Bulkington and Bedworth, as well as towards Bulkington Centre and Nuneaton. This will encourage new residents of HSG7 to access Bulkington District Centre, Bedworth Town Centre and Nicholas Chamberlaine School via alternative car-free modes of transportation.

School provision

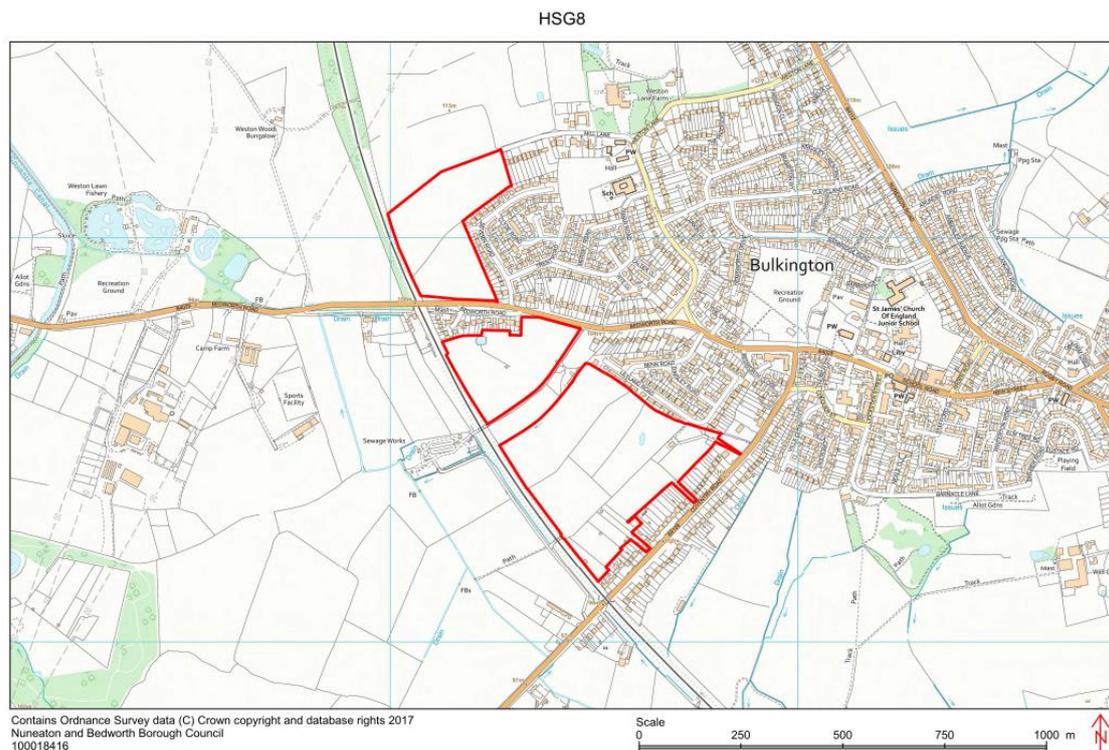
7.86 Educational contributions will be sought to ensure that the expansion and reorganisation of both Arden Forest Infant and St James Academy Junior schools are appropriate to meet demand in tandem with the proposed strategic housing site to the west of Bulkington (HSG8). At secondary level financial contributions are anticipated in order to expand existing secondary provision up to an additional 3.5 form entry. The contribution would be part of a pool including HSG4, HSG5, HSG6 and HSG8, where pupils are expected to attend local secondary schools in the Bedworth / Ash Green area.

Transport and access

7.87 Primary access for vehicles will be provided from Nuneaton Road for the northern parcel of the site. The southern parcel of HSG7 has two potential access points from Lancing Road and Bramcote Road. Contributions towards highway improvements and bus infrastructure will be sought.

7.88 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG7 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG7 is expected to contribute financially towards road improvement schemes in the Bedworth area as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Policy HSG8 – West of Bulkington



Strategic housing site HSG8 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of at least 495 dwellings in a mix of dwelling types and sizes.
2. Provision of under 12s children's play facilities on central parcel of site.

3. Play and open space to be provided with appropriate management and maintenance arrangements.
4. Financial contribution towards the upgrading of sports facilities and teenage play provision at Bulkington Recreation Ground, as well as financial contribution towards facilities at Miners Welfare Park in Bedworth, a destination park within the council's Open Space Strategy.
5. Provision of community allotments on northern parcel of HSG8.
6. Financial contribution and/or on-site land swap with Arden Forest Infant and St James Academy Junior schools in order to meet anticipated demand for school places.
7. Financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry.
8. Bus infrastructure improvements within or adjacent to HSG8, with a potential contribution to secure diversion of frequent local bus services to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.
9. Any transport improvements/upgrades required along Bedworth Road, Coventry Road and surrounding streets as a result of the development.
10. Financial contributions towards highways infrastructure identified in the Strategic Transport Assessment for Bulkington.
11. Provision of a footway/cycleway network through the open space on the site, linking Coventry Road with Bedworth Road and up to Severn Road and Mill Lane.
12. A toucan crossing on Bedworth Road between the northern and central parcels of HSG8.
13. Financial contributions towards the development of a dedicated cycle path along the B4029 between Bulkington and Bedworth
14. Potential local sewage network improvements to improve capacity to accommodate the development, subject to discussions with Severn Trent Water.
15. Financial contributions towards sport and physical activity.
16. Financial contribution towards community facilities.
17. Financial contribution for primary medical care to be given to NHS Warwickshire North Clinical Commissioning Group or successor body.

Form of development

18. Landscape buffer along Bedworth Road to enhance the character and approach into the village from the west.
19. Development along Bedworth Road should mirror the existing landscape treatment and scale of development, and should be designed so as to frame views towards the church and refrain from dense planting which may limit views towards the church.

20. Creation of substantial hedgerow with hedgerow trees along northern, western and southern boundary (to be maintained as a Green Belt defensible boundary).
21. Enhancement of linear woodland along the railway line.
22. Conserve and enhance the pattern of small and medium sized fields bounded by intact hedgerows where possible.
23. Retain and enhance field ponds through incorporating into a network of interconnected open spaces and undertake related protected species surveys including for great crested newts.
24. Creation of a green corridor along public right of way N41 as part of an interconnected network of open spaces.
25. All site boundaries should be enhanced through new planting of woodland copses and trees whilst maintaining adequate distances from housing, and all veteran hedgerows should be retained and surveyed prior to development. Species rich hedgerows should be incorporated within areas of open space.
26. Site will require a concept framework to ensure the parcels that make up the site come forward in a comprehensive manner and cohesive manner. Development proposals should be in accordance with the concept plan, including access arrangements.
27. The northern parcel will require a strategic green edge to the north of the boundary to provide a defensible boundary. This area should include open space and the proposed allotments.

7.89 Strategic housing allocation HSG8 is a sustainable and deliverable extension on the western edge of Bulkington. The site covers 25.1 ha and is effectively split into three parcels.

7.90 The site will deliver approximately 495 new dwellings in a mix of sizes and tenures. The site is in multiple ownership but all landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site infrastructure requirements.

7.91 The allocation will be delivered on a phased basis across the plan period, and commence within the first 5 years after adoption.

Open spaces

7.92 Formal and informal public open space will be concentrated along the western edge of HSG8, and along the northern edges of the central and northern parcels of the site. These spaces would contain new combined pedestrian and cycle routes in order to create green routes for pedestrians, cyclists and wildlife. Under 12s play space is proposed at the northern end of the central parcel. New allotment space is proposed adjacent to Mill Lane on the northern parcel of the site.

Footpaths and cycle routes

- 7.93 Linkages between the central and southern parcels should be explored to ensure a comprehensive and integrated redevelopment of the strategic housing site, and to provide permeability through the development, however, this involves third party land not included in the allocation.
- 7.94 In order to improve connectivity, a 3 m wide combined footpath and cycleway will be provided from within the areas of open space, in order to create new car-free green routes through the site. The routes will link Coventry Road with Bedworth Road, and will run up towards Mill Lane and Severn Road. A new toucan crossing on Bedworth Road will allow pedestrians and cyclists to cross Bedworth Road between the northern and central parcels of HSG8.
- 7.95 HSG8 is expected to contribute financially towards the development of a dedicated cycle path along the B4029 Bedworth Road between Bulkington and Bedworth. This will encourage new residents of HSG8 to access Bulkington District Centre, Bedworth Town Centre and Nicholas Chamberlaine School via alternative car-free modes of transportation.
- 7.96 Off-site works include upgrading the existing sports facilities and teenage play provision at Bulkington Recreation Ground and improvement of facilities at Miners Welfare Park in Bedworth.

School provision

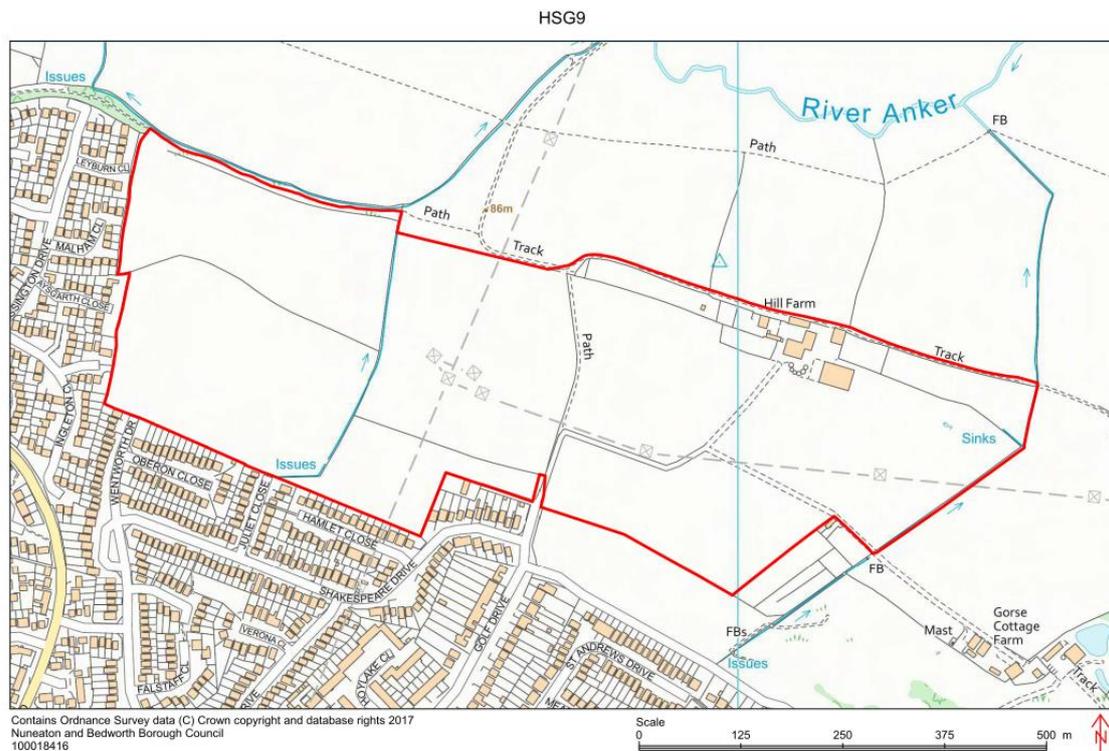
- 7.97 Educational contributions will be sought to ensure that the expansion and reorganisation of both Arden Forest Infant and St James Academy Junior schools are appropriate in order to meet demand in tandem with the proposed strategic housing site to the west of Bulkington (HSG8). At secondary level, financial contributions are anticipated in order to expand existing secondary provision up to an additional 3.5 form entry. The contribution would be part of a pool including HSG4, HSG5, HSG6 and HSG8, where pupils are expected to attend local secondary schools in the Bedworth / Ash Green area.

Transport and access

- 7.98 Primary access for vehicles will be provided from Bedworth Road for the northern and central parcels of the site. The southern parcel of HSG8 has two potential access points from Coventry Road. Additional secondary vehicular accesses are possible from Leyland Road (southern parcel), Severn Road and Mill Lane (both northern parcels). Contributions towards highway improvements and bus infrastructure will be sought.
- 7.99 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG8 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG8 is expected to contribute financially towards road improvement schemes in the Bedworth area as set out in the transport

modelling report either via planning obligation or Community Infrastructure Levy provision.

Policy HSG9 – Golf Drive



Strategic housing site HSG9 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of approximately 621 dwellings in a mix of dwelling types and sizes.
2. Provision of new on-site GP surgery and/or financial contribution to local NHS Clinical Commissioning Group.
3. Financial contribution towards diverting existing frequent local bus services into the development, and provision of bus infrastructure within the development site.
4. Provision of new local centre, including a new community hall, or financial contributions.
5. Play and open space (including the proposed strategic play area and community park) to be provided, and appropriate management and

maintenance arrangements along with a contribution to Riversley Park destination park.

6. Financial contribution to Warwickshire County Council towards the provision by Warwickshire County Council for the expansion of primary and secondary school places.
7. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services, in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators, including evening and weekend services.
8. Financial contributions towards borough-wide strategic highway infrastructure works identified within the A4254 corridor, including the B4114 Lutterworth Road corridor.
9. Financial contribution towards the provision of footway/cycleway linkage from the community park through the site, and linking to the cycle path leading to the town centre and Bermuda Park.
10. Provision of wayleave for electricity pylons.
11. Financial contributions towards sport and physical activity.

Form of development

12. Provision of landscape buffer to north and east boundaries, including specimen trees and woodland copses to field corners.
13. Provision of intermittent specimen tree planting within the street scene and private gardens.
14. A buffer to protect the setting of the Hill Farmhouse Grade II listed building which will include landscaping and screening to soften the views to and from the listed building.
15. Maintain the connections across the site by retaining and enhancing the existing footpath network and their associated hedgerows.
16. Site will require a concept framework to ensure the parcels that make up the site come forward in a comprehensive and cohesive manner. Development proposals should be in accordance with the concept plan, including access arrangements.

7.100 Strategic housing allocation HSG9 is a sustainable and deliverable eastern extension to the Attleborough area of Nuneaton. The site extends to 32.75 ha and is located off Golf Drive. The allocation comprises nine irregular shaped arable fields, and extends to include Grade II listed Hill Farmhouse in the north east corner of the site.

7.101 The site will deliver approximately 621 new dwellings in a mix of sizes and tenures. The site is in two ownerships but all landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site infrastructure requirements.

7.102 The allocation will be delivered on a phased basis across the plan period, and will commence within the first 5 years after adoption.

Wayleave

7.103 Four electricity pylons are located within the central area of the site, with overhead powerlines crossing the site in a north–south direction from Golf Drive, leading to the northern boundary of the site. Additional overhead powerlines cross the site from the eastern boundary to the centre of the site. Site layouts need to take into consideration potential stand-offs and easements. Early discussions with National Grid are essential to confirm the uses that may be appropriate within the wayleave area.

Historic assessment

7.104 At the planning application stage, a full, detailed heritage assessment should be undertaken to identify the extent of the setting and impact on the significance of the Grade II listed Hill Farmhouse heritage asset. This will inform detailed design for the north-eastern corner of the site. The retention of hedgerows both within and surrounding the site will contribute towards preserving the limited rural context of the Hill Farmhouse listed building.

Landscape and open space

7.105 The western and southern boundary of the site is bordered by existing residential development, with arable farm land located to the north and east of the site. The proposed residential development will abut existing residential areas, with new landscape areas focussed on the eastern and northern boundaries, in order to create a defined green edge to the urban areas. These will also contribute towards the defensible boundary of the site.

7.106 Informal public open space will be focussed in the north of the site at the junction of existing public right of ways. The existing public right of way leading from Golf Drive will be retained in order to increase connectivity through the site to the adjacent agricultural areas. The creation of a new footpath / cycle route will be incorporated as part of the landscape buffer along the northern boundary of the site in order to increase connectivity between the community park to the northwest as well as the area of new informal open space.

School provision

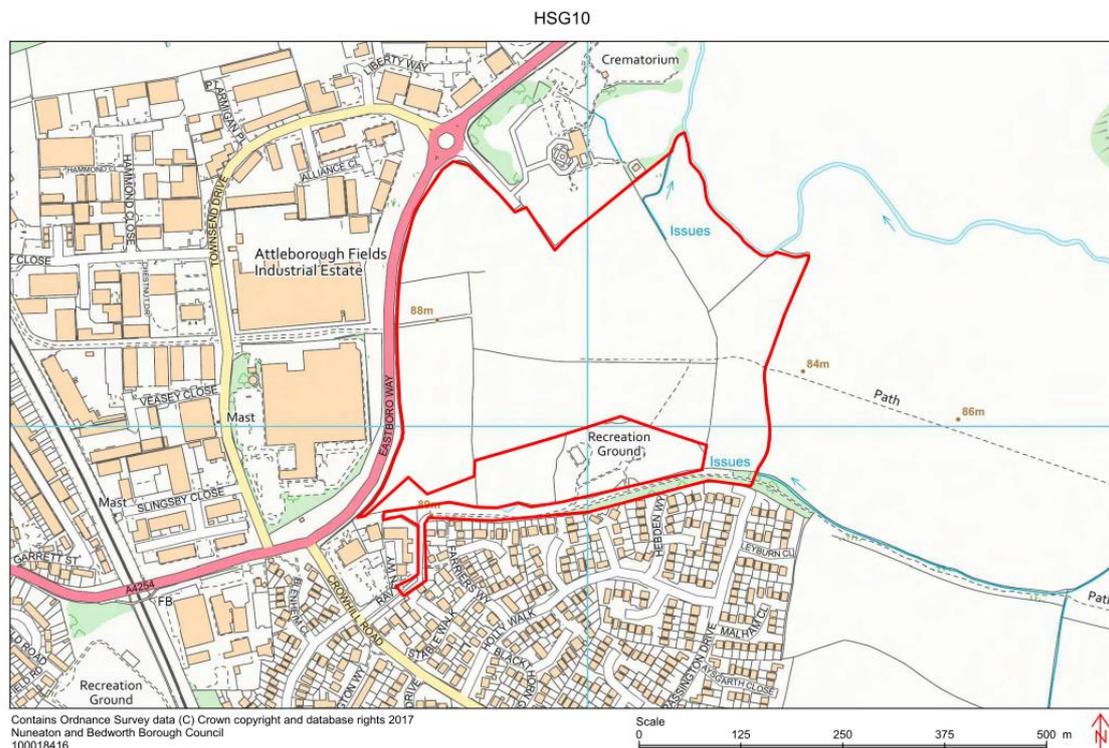
7.107 Educational contributions will be required to ensure the expansion and reorganisation of both primary and secondary school provision. Developers are encouraged to engage in dialogue early with the local education authority to determine what level of financial contributions are required towards school expansions to address the demand for school places.

Transport

7.108 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG9 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG9 is expected to contribute financially towards road improvement schemes in the A4254 corridor as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

7.109 The primary access to the site will be from Golf Drive and Wentworth Drive along the southern boundary, with secondary access being provided from Juliet Close on the southern boundary, and Leyburn Close and Aysgarth Close on the site's western boundary. No access point is to be provided from the site's northern and eastern boundary, or along the southern boundary to the east of Golf Drive. Further opportunities for pedestrian and cycle connections will be introduced from secondary access points. Contributions towards highway improvements and bus infrastructure will be sought.

Policy HSG10 – Attleborough Fields



Strategic housing site HSG10 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of at least 360 dwellings in a mix of dwelling types and sizes.
2. Financial contribution to local NHS Clinical Commissioning Group.
3. Financial contribution to Warwickshire County Council towards the provision for the expansion of primary and secondary school places.
4. Financial contribution towards the enhancement and provision of footway/cycleway linkages to the existing public open space adjacent to the southern boundary and along the Crowhill bridle path corridor along Eastboro Way.
5. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
6. Provision of new access in south-west corner of site for emergency vehicle access only.
7. Financial contributions towards borough-wide strategic highway infrastructure works identified within the A4254 corridor.
8. Financial contributions towards sport and physical activity.

Form of development

9. Landscaping and biodiversity habitat corridor to be provided on the eastern edge of the site adjacent to the River Anker, including financial contributions towards appropriate management and maintenance arrangements.
10. Public right of ways in the site should be incorporated within green space corridors.
11. New street tree planting across the site.
12. Planting of new woodlands copses and hedgerow trees next to existing field boundaries.
13. Public open space in the eastern part of the site to include both formal amenity areas, as well as informal habitat areas.

7.110 Strategic housing allocation HSG10 is a sustainable and deliverable extension to the Attleborough area of Nuneaton. The site comprises 32.75 ha of open land in agricultural use. The north-eastern part of the site is located in the floodplain of the River Anker where new built development is restricted.

7.111 The site will deliver approximately 360 new dwellings in a mix of sizes and tenures. The site is in a single ownership and is expected to be delivered through an overarching outline permission.

7.112 The allocation will be delivered on a phased basis across the plan period, and will commence within the first 5 years after adoption.

School provision

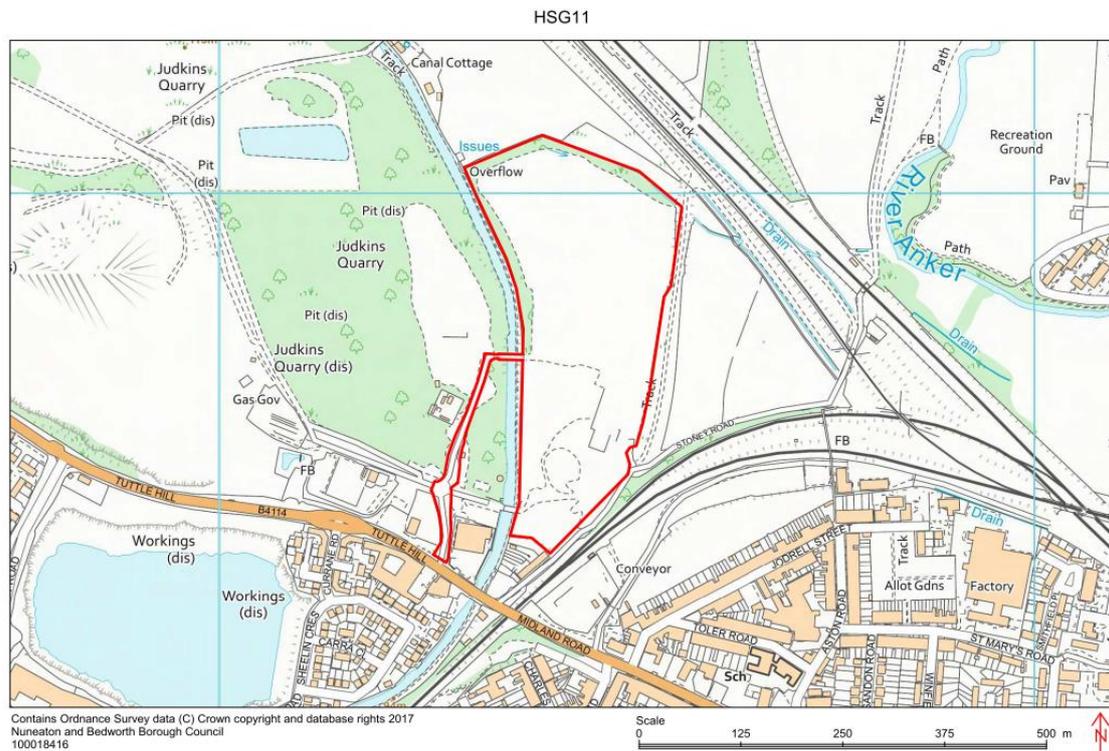
7.113 Educational contributions will be required to ensure the expansion and reorganisation of both primary and secondary school provision. The developers of HSG10 are encouraged to engage in dialogue early with the local education authority in order to determine what level of financial contributions are required towards school expansions to address the demand for school places.

Transport and access

7.114 The primary access to the site will be from the existing entrance road to the north of the site. The entrance road, which also serves the adjacent Heart of England Crematorium, forms a roundabout junction with Eastboro Way (A4254) approximately 130 m to the north of the site. A secondary access for emergency vehicles only, will be provided in the south-west corner of the site. Contributions towards highway improvements and bus infrastructure will be sought.

7.115 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG10 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG9 is expected to contribute financially towards road improvement schemes in the A4254 corridor as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Policy HSG11 – Tuttle Hill



Strategic housing site HSG11 will be developed for a mix of residential uses.

Key development principles

1. Provision of at least 200 dwellings in a mix of dwelling types and sizes.
2. Financial contribution to local NHS Clinical Commissioning Group.
3. Financial contribution to off-site play and open space at Sandon Park / Stanley Road, and to Whittleford Park, as well as appropriate management and maintenance arrangements and provision of on-site play area for under 12s.
4. Financial contribution to Warwickshire County Council towards primary and secondary school places.
5. New bridge across the canal, together with direct access between the site and the canal towpath.
6. Provision of a new access onto Tuttle Hill, as well as improvements to the existing access in order to provide segregation between proposed and existing uses.
7. Financial contributions towards a full specification cycle path along Stoney Road using the railway underbridge to link to the NCN52 and Sandon Park / Weddington Meadows play and open space.

8. Financial contributions towards borough-wide strategic highway infrastructure works identified within the Nuneaton area.
9. Financial contribution towards local bus services, including new bus infrastructure if required, based on dialogue with Warwickshire County Council and bus operators.
10. Financial contributions towards sport and physical activity.

Form of development

11. Retain and enhance the wooded character of Coventry Canal, including new planting close to the industrial areas through taller hedgerows and linear woodland. New woodland should be linear and along field margins, reducing the prominence of the development from the wider landscape to the north.
12. Retain views towards the man made mound (Mount Judd) as a feature and landmark within the landscape.
13. Development should use the canal as the key reference and focal point to the design, and should take the opportunity of improving the setting of the canal, which should include better public access and interpretation.
14. Retention and enhancement of green infrastructure along the canal and disused railway corridors.
15. Protected species surveys will be required at the site.
16. Retain and enhance biodiversity on the remaining quarry site as a publically accessible area (where safe to do so).
17. Enhance accessibility and the structural condition of heritage assets along Coventry Canal. New housing should address the canal. A detailed construction management plan should be implemented to reduce the effects of the development on the Coventry Canal.
18. Enhancements to canal towpath.

7.116 Strategic housing allocation HSG11 is a sustainable and deliverable housing allocation in the Camp Hill area of Nuneaton. The site comprises previously disturbed former mining land associated with the adjacent Judkins Quarry. The developable area of the site is to the east of the Coventry Canal, which is screened by woodland along both sides. The land to the west of the canal includes part of the designated Judkins Quarry local wildlife site, which supports a number of valuable habitats and species including great crested newts. The land to the east of the canal is of less ecological value and has the greater potential for development.

7.117 HSG11 is approximately 350 m away from Abbey Green district centre. The district centre has facilities to meet day-to-day local needs including retail shops; public house; health facilities; cafes; hairdressers; and, hot food takeaways. Nuneaton Town Centre is approximately 800 m to the south-east of the site, which offers a wider range of retail, commercial and recreational uses.

- 7.118 The site will deliver approximately 200 new dwellings in a mix of sizes and tenures. The site is in two ownerships but all landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based sharing the cost of off-site and on-site infrastructure requirements.
- 7.119 The allocation will be delivered on a phased basis across the plan period, and will commence within the first 5 years after adoption.
- 7.120 The development of the land to the east of the canal for residential uses should be undertaken in a comprehensive and co-ordinated basis, that will also contribute to the retention and enhancement of the established biodiversity area to the west of the canal.

Transport and access

- 7.121 The principle access to the site will be via the existing quarry entrance onto Tuttle Hill located to the west of the canal. Following discussions with the highways authority, a secondary access onto Tuttle Hill will also be required to provide segregation between proposed and existing uses. Access to the land to the east of the canal will be via the existing quarry land only, and will require the construction of a new link bridge over the canal. The opportunity for this bridge to form a green link across the site and linking to existing public right of ways should be considered.
- 7.122 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG11 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of HSG11 is expected to contribute financially towards the Nuneaton area road improvement schemes set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Canal improvements

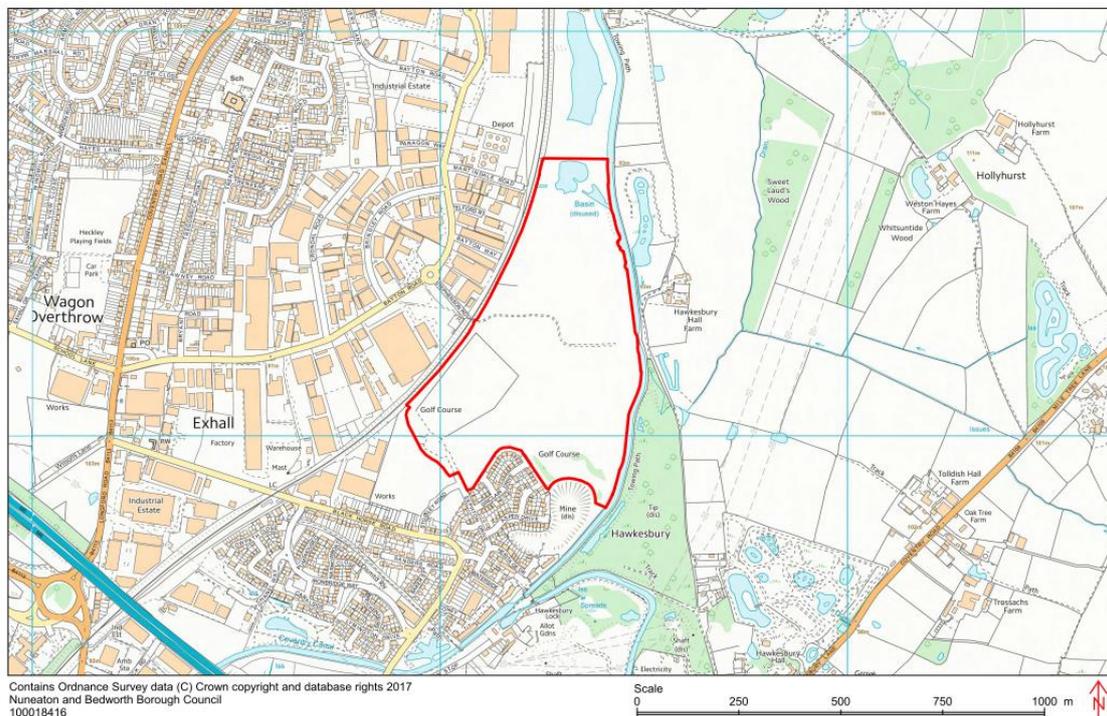
- 7.123 The development of the site will take the opportunity of improving the setting of the canal, including better public access and interpretation. The canal offers the opportunity to become part of green infrastructure for the strategic site and a sustainable transport route with an existing towpath, which should be upgraded to encourage access.

Flooding

- 7.124 Developers should be aware that any site that is at or below canal bank level may be subject to canal flooding, and this should be taken into account when building resilience into low level properties. Due to the potentially numerous locations for failure scenarios, a detailed site specific investigation will be needed to determine possible flood risk implications to the site

Policy HSG12 – Former Hawkesbury Golf Course

HSG12



Strategic housing site HSG12 will be developed for a mix of residential, canal marina and community facilities.

Key development principles

1. Provision of at least 380 dwellings in a mix of dwelling types and sizes.
2. Provision of a canal marina of up to 75 berths.
3. Provision of a community building.
4. Financial contributions to Warwickshire County Council towards the provision of the expansion of primary and secondary school places.
5. Provision of public open space, including a public park around the existing and proposed pools.
6. Accessible cycle routes and footpaths to neighbouring facilities, including schools.
7. Provision of allotments.
8. Financial contributions towards appropriate management and maintenance of the public open space.
9. Financial contribution towards sport and physical activity.
10. Financial contribution towards bus services in the area, based on dialogue with Warwickshire County Council and bus operators.
11. Transport improvements/upgrades to local and wider strategic highway infrastructure.

Form of development

12. Retention of the valuable existing natural landscape, ponds and trees.
13. Dwellings should address areas of open space both formal and informal, as well as the canal, where appropriate.
14. Protected species are likely to be found on site, and surveys will be required, with any habitat requirements retained and connectivity enhanced within any development layout.
15. Development shall not occur within the prescribed easements around mine shafts on the site.

7.125 Strategic housing allocation HSG12 is a sustainable and deliverable urban extension to Bedworth. The site covers 29 ha to the south-east of Bedworth, and runs alongside the Coventry Canal.

7.126 The site will deliver at least 380 dwellings in a mix of sizes and tenures. Due to the site's location adjacent to the Coventry Canal, it will also deliver a canal marina of up to 75 berths.

7.127 The site is within a single ownership, and is expected to be delivered by an overarching planning permission.

Footpaths and cycleways

7.128 There are public footpaths which cross the site, which should be maintained, enhanced and integrated into the site. An upgrade and completion of the National Cycle Network Route 52 will be provided through the site, with connections to the wider cycle network.

Canal marina

7.129 The site sits alongside the Coventry Canal, and a marina of up to 75 berths will form a focal point of the development. Residential development will be designed so as to complement the marina.

Landscape and open space

7.130 The northern portion of the site will be utilised as open space. Valuable existing natural landscape, ponds and trees will be retained. This will include the existing pools on the site. Existing public footpaths and rights of way across this portion of the site will remain, and will be enhanced to ensure public access to the land.

School provision

7.131 Educational contributions will be required to ensure the expansion and reorganisation of both primary and secondary provision. Developers are encouraged to engage in early dialogue with the local education authority to determine what level of financial contributions are required towards school expansion, in order to address demand for school places.

Sport and physical activity

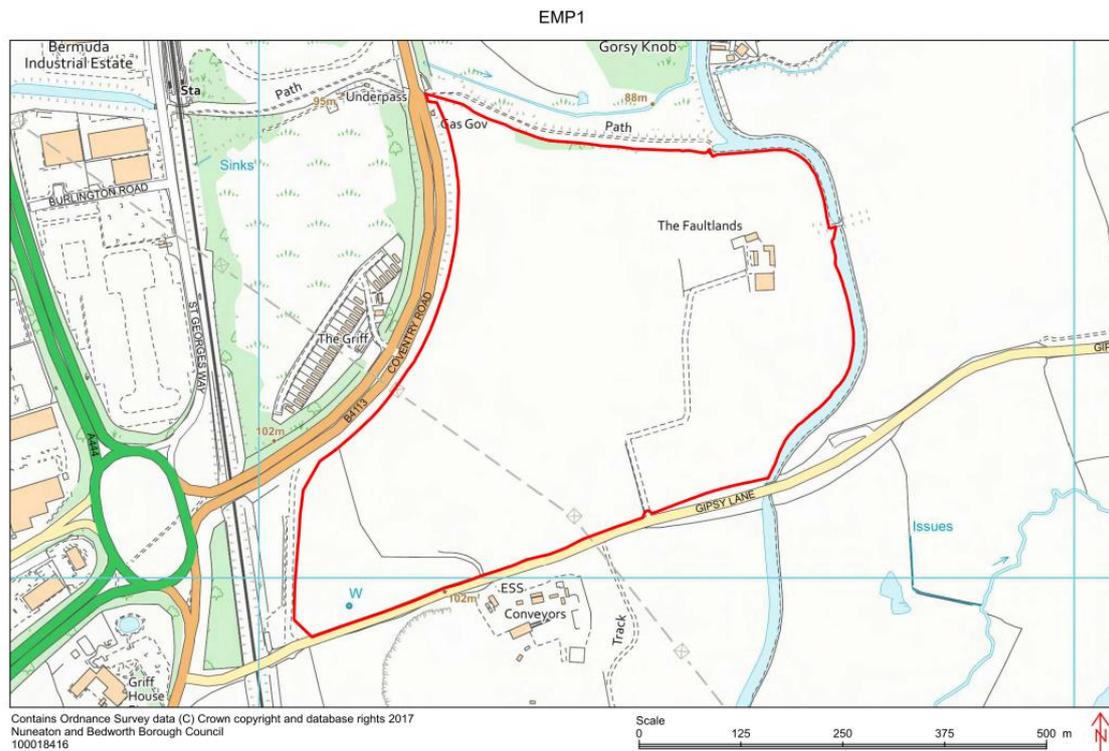
7.132 Developers are encouraged to engage in dialogue with the borough council to determine what level of contributions are required towards improvements to sport and physical activity.

Transport

7.133 The site will require two points of access from the strategic road network, and will be accessed from Blackhorse Road.

7.134 Financial contributions towards strategic highway improvements and bus infrastructure will be sought recognising that the implications for the wider highway network will involve consideration of relevant junctions within the wider B4113 Longford Road corridor. This will require dialogue with Warwickshire County Council and Coventry City Council as the relevant authorities responsible for the corridor.

Policy EMP1 – Faultlands



Strategic employment site EMP1 will be developed for employment uses comprising use classes B1, B2 and B8.

Key development principles

1. Provision of approximately 26 ha of employment land.
2. Any proportionate transport improvements/upgrades required along Gipsy Lane as a result of the development, and to the Gipsy Lane / Coventry Road junction.
3. A proportionate financial contribution towards the creation of a cycle path leading to the Bermuda Park Station, including a toucan crossing on Coventry Road and creation within the site of a cycle path linking from the canal turnover bridge to Coventry Road.
4. A proportionate contribution toward enhancement of the canal towpath, and provision for the crossing of the canal to facilitate cycle usage, including investigation of the suitability of using the turnover bridge. If it is not technically feasible to use the turnover bridge, alternative bridge provision will be secured. Additionally, creation of cycle path within development.
5. Provision of footway/cycleway links to the existing footway/cycleway alongside the north bank of Griff Brook.

6. Upgrades to the existing bus stops on the edge of the site to include covered bus shelters and seating.
7. A proportionate financial developer contribution towards Gipsy Lane canal bridge strengthening / widening works, in order to enhance local bus service accessibility to the employment site from Griff Roundabout, Coventry Road, etc.
8. A proportionate financial contribution towards the road improvement schemes in the A444 corridor as set out in the transport modelling report.
9. New access should be provided from B4113 (Coventry Road).
10. A proportionate financial contribution towards delivery of an area-wide green infrastructure supplementary planning document (or equivalent), that promotes species movement along identified green corridors.

Form of development

11. Development should be set back from the northern boundary of the site to allow for a landscape buffer and ecological mitigation for Griff Hollows local wildlife site.
12. Development should be set back from the Coventry Canal corridor to the east of the site to allow for a landscape buffer and ecological mitigation. This should include tree and shrub planting in order to limit the effects on the canal-side views along Centenary Way.
13. Development should be set back appropriately from the Gipsy Lane boundary, with existing hedgerows and hedgerow trees retained and enhanced.
14. Opportunities to improve walking access to the Griff Arm of the Coventry Canal should be considered.
15. New development should address the canal. Effects of the development on the adjoining section of the Coventry Canal and associated habitats within the Griff and Wem Brooks should be incorporated in the construction management plan.

7.135 Strategic employment site EMP1 will contribute to meeting the strategic employment needs of the borough, as well as the job creation objectives of the Borough Plan. The site is located to the north of Gipsy Lane, situated on the southern edge of Nuneaton, approximately 1 km to the north of Bedworth. The site consists of arable land with associated agricultural buildings and farm house. An overhead power line crosses the central part of the site.

7.136 The site comprises 26 ha, and will deliver employment uses including parking and servicing areas. The final net figure will be determined by the design and layout of the site.

7.137 The allocation will be delivered within the first 5 years after adoption.

Site of Special Scientific Interest (SSSI)

7.138 The south-western part of the site is defined as part of the Griff Hill Quarry Site of Special Scientific Interest (SSSI). Natural England has confirmed that the ecological interest in this part of the SSSI has been removed and thus they have no objection to the employment site coming forward.

Historic environment

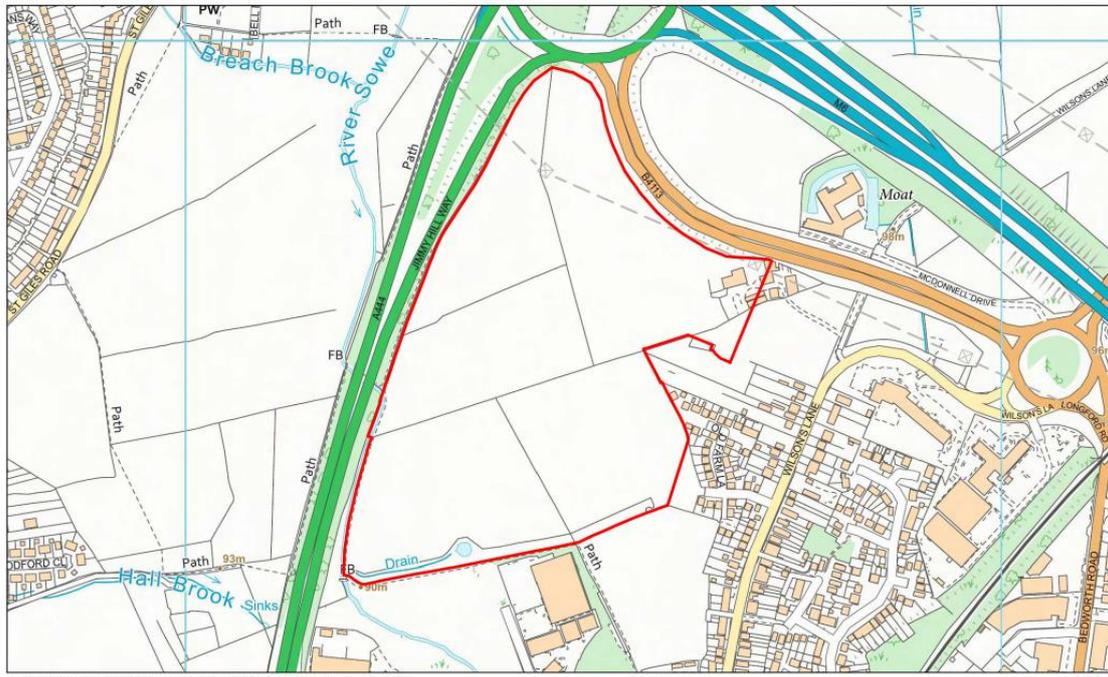
7.139 Further investigation may be required to establish the heritage significance of Faultlands Farm and its associated field barn through a historic building assessment. In pursuing opportunities to improve access to Coventry Canal, steps could also be taken in partnership with the Canal and River Trust to create a heritage walk along the canal to link to the areas association with the writer George Eliot.

Transport and access

7.140 The transport modelling report commissioned by Warwickshire County Council sets out a number of strategic road improvements in close proximity to EMP1 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of EMP1 is expected to contribute financially towards the road improvement schemes in the A444 corridor as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Policy EMP2 – Wilsons Lane

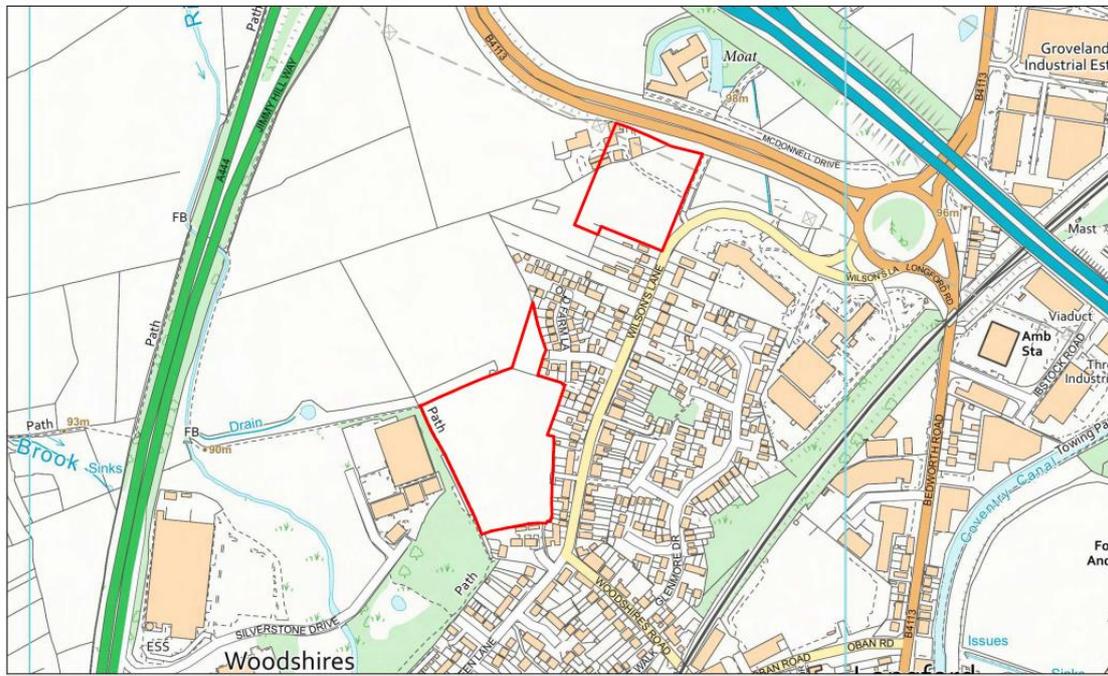
EMP2 employment area



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100018416



EMP2 housing area



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100018416



Strategic employment site EMP2 will be developed for employment, comprising use classes B1, B2 and B8, as well as residential uses.

Key development principles

1. Provision of approximately 18 ha of employment land.
2. Provision of approximately 73 dwellings in a mix of dwelling types and sizes.

Employment

The strategic employment site will deliver the following infrastructure and facilities:

3. Any transport improvements / new junctions and upgrades required along Phoenix Way.
4. Financial contribution towards the management and enhancement of the wildlife areas to the south of the site.
5. Developer contribution towards diverting existing frequent local bus service(s) into the employment site in order to enhance accessibility for local residents.
6. Developer contribution to secure provision of bus infrastructure at prominent locations within the employment site in order to complement the point above.

Housing

The strategic housing site will deliver the following infrastructure and facilities:

7. Transport improvements and upgrades required along Wilsons Lane, including the junction with the A444, and appropriate provision for pedestrians and cyclists.
8. Play and open space to be provided with appropriate management and maintenance arrangement, or a financial contribution towards the upgrading of local play/sports facilities.
9. Financial contribution towards primary education at local schools in order to meet anticipated demand for school places.
10. Financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry.
11. Financial contributions towards borough-wide strategic highway infrastructure works.
12. Potential local sewage network improvements in order to improve capacity to accommodate the development, subject to discussions with Severn Trent Water.
13. Contribution towards the delivery of Sustrans' proposal to provide an enhanced cycle route along Coventry/Longford Road.

14. Financial contribution for primary medical care to be given to NHS Warwickshire North Clinical Commissioning Group or successor body.

Form of development

15. Locate larger B2 and B8 uses to west of the landscape corridor on the lower ground, with smaller scale development on the more visible higher ground next to the housing site EMP2 and existing residential development on Wilsons Lane.
16. Retain areas of ridge and furrow within open spaces.
17. For the housing sites, provide appropriate tree planting in the street scene and rear gardens to help the development integrate into the landscape.
18. Maintain an appropriate landscape buffer to western and northern boundaries.
19. Provide an appropriate landscape treatment to the eastern boundary of the site with a mix of open ground, shrubs and trees in order to provide a mix of open and filtered views westwards across the River Sowe valley.
20. Retain the section of public right of way routed through the middle of the site within a landscape corridor (with appropriate tree & shrub planting and open ground) and maintain views from the public right of way towards the western side of the River Sowe Valley.
21. Provide ecological enhancements and maintenance to the River Sowe and its floodplain in the south-west corner of the site, as well as a vehicular access route to Sowe Meadows local wildlife site to allow maintenance of the site's wildflower meadows.
22. Retain and strengthen the central hedgerow in order to maintain an east-west network of green infrastructure.
23. Provide a wayleave for the electricity pylons through the site.

7.141 Strategic site EMP2 will contribute to meeting the strategic employment needs of the borough, job creation objectives of the Borough Plan and the delivery of new homes in a mixed use allocation. The strategic allocation is located in the south of the Nuneaton and Bedworth Borough area to the south-east of the M6 and A444 junction. An overhead power line runs in a west-east direction across the northern part of the site.

7.142 The site is bounded by residential development to the east and industrial uses to the south-east. The land to the south known as Sowe Meadows is owned by Nuneaton and Bedworth Borough Council and managed as a designated local wildlife site.

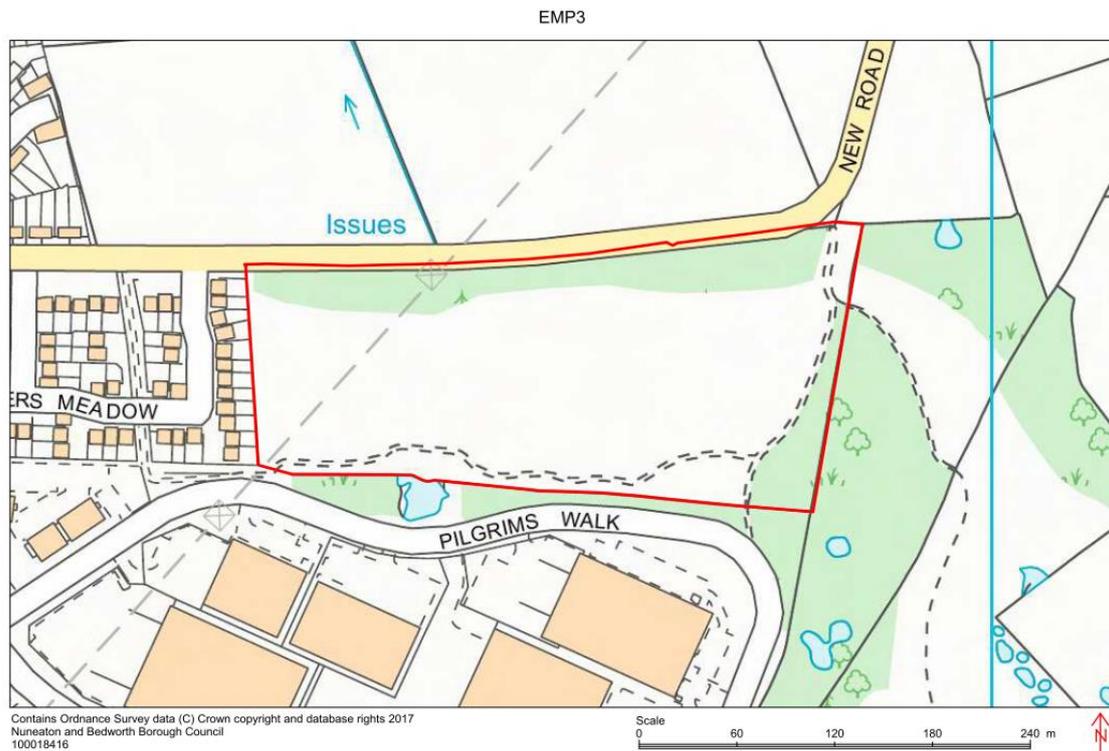
7.143 The site is 23 ha and will deliver a local growth point including approximately 73 dwellings and 18 ha of employment uses over the plan period, with integrated landscaping, open space and drainage mitigation. The final net figure will be determined by the design and layout of the site.

- 7.144 Residential development will be focussed in the north-eastern and south-eastern parts of the site, adjacent to the existing residential areas. The remainder of the site will be brought forward for employment uses.
- 7.145 Ancillary B1 (a) office uses should be focused in the eastern part of the site, adjacent to the existing and proposed residential properties. B2 and B8 uses will be focussed in the western part of the site. Scheme layouts need to take into consideration potential stand-offs and easements associated with the overhead power line, and early discussions with National Grid are essential in informing any detailed layout, but it is considered that parking and storage areas will be provided in the vicinity of the power line.

Transport and access

- 7.146 It has been agreed with the highways authority that separate access points will be created for the proposed employment and residential uses on the site. All HGV parking and servicing areas associated with the employment uses on the site will be accessed via a new entrance onto the B4113. The final junction solution will be agreed following the completion of a transport assessment.
- 7.147 Access to the residential areas will be via two new access points onto Wilsons Lane. The existing pedestrian access to public footpaths B23 and B25 will be retained. Contributions towards associated improvements to Wilsons Lane, the B4113 and bus infrastructure will be sought.
- 7.148 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to EMP2 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of EMP2 is expected to contribute financially towards road improvement schemes in the Bedworth area as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

Policy EMP3 – Prologis extension



Key development principles

1. Provision of approximately 5.3 ha of employment land for B1, B2 and B8 uses.
2. Provision of habitat creation and enhancements to:
 - a. Enhance the favourable conservation status of the local population of great crested newts (a European protected species); and
 - b. Ensure that there is no net loss of biodiversity.
3. Crushed stone public footway from Pilgrims Walk to New Road / country park, running along the eastern side of the site.
4. New car park for the country park and access off New Road to serve the car park, constructed in crushed stone / grasscrete or other suitable material to be agreed in conjunction with the council, who will manage and maintain the car park.

Form of development

5. Retention/enhancement of landscape screening to the northern and southern boundaries (plantation woodland), and eastern boundary (hedgerow).
6. Provision of new landscape screening on the western boundary and enhancements to existing structural planting on the site.

7. Habitat creation, enhancement, and subsequent sympathetic management, along the northern, western and southern boundaries to maintain and increase suitable breeding and terrestrial habitat for great crested newts, and to provide sustainable habitat connectivity with Prologis Country Park (local wildlife site) to the east/south-east:
 - a. Retention of existing waterbody (southern boundary) and creation of new waterbodies;
 - b. New hibernacula;
 - c. Management of retained grassland; and
 - d. Access roads to have appropriate connective measures for amphibians to allow their safe passage along the southern boundary.
8. Retention of existing surfaced path the New Road.
9. Retention of mown footpath link from Pilgrims Walk (at south-west corner of site) to existing surfaced path linking to New Road and the country park (at north-east corner of site).
10. Vehicular access to be provided from Pilgrims Walk.
11. Building height to be restricted to 15 m to ridge closest to the western boundary.
12. Suitable sewage connection to the existing foul drainage network.
13. Provision of an integrated surface water management scheme.

7.149 Strategic employment site EMP3 comprises an extension to an existing employment park, and will contribute to meeting the strategic employment needs of the borough and job creation objectives of the Borough Plan. The site is located to the north of Plot H at Prologis Park, and its southern boundary borders Pilgrims Walk, which also serve Plot H. It mainly comprises poor semi-improved grassland, together with plantation woodland along the northern and southern boundaries, including a pond to the south.

7.150 The site will deliver approximately 5.3 ha (gross) for employment uses, including access, parking, servicing and landscaping/habitat enhancement. The final net figure will be determined by the design and layout of the site. The final scheme layout will need to provide a wayleave for the overhead power lines.

Biodiversity

7.151 Land to the east/south-east of the site is subject to a non-statutory local wildlife site designation (Prologis Country Park local wildlife site). A key feature of the local wildlife site is the meta-population of great crested newts (a European protected species) that it supports, which the on-going management of the country park has specific objectives for.

7.152 The EMP3 site itself includes a small pond which supports breeding great crested newts, and to ensure that the favourable conservation status of the local great crested newt population is maintained, the site will require on-site mitigation and additional off-site mitigation in the adjacent country park.

7.153 Beyond the mitigation measures for great crested newts, development of EMP3 will result in an overall loss of habitat, but much of this will be poor semi-improved grassland of low biodiversity distinctiveness. However, to ensure that

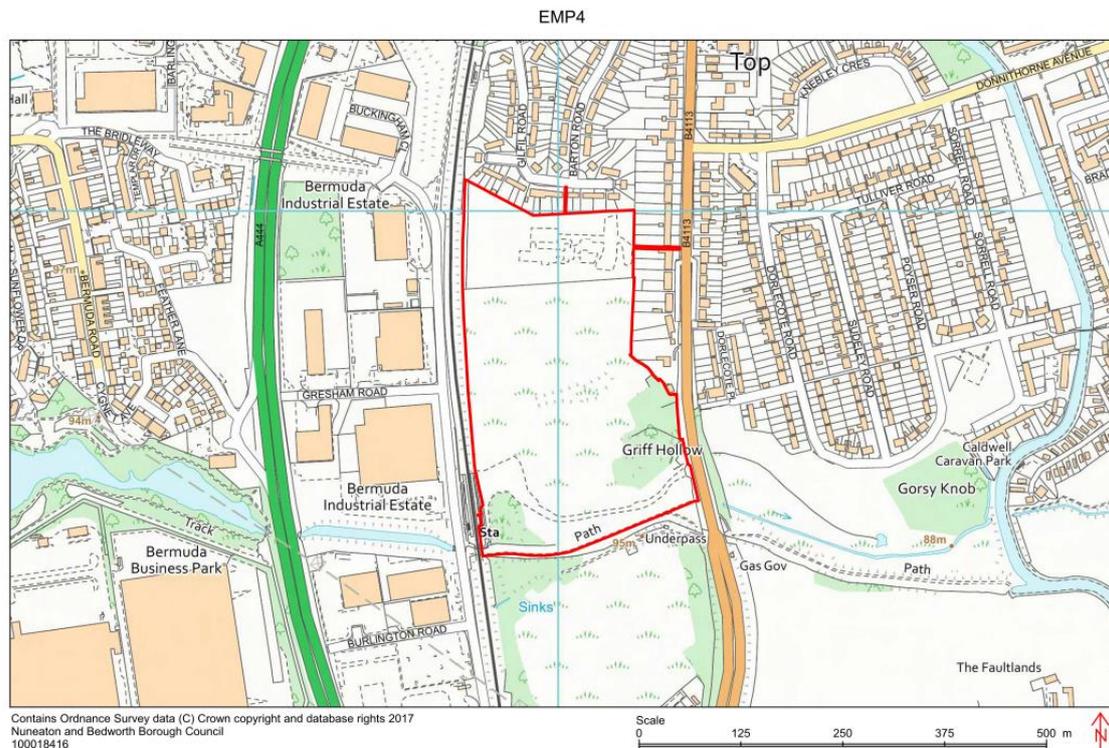
there is no net loss of biodiversity, the proposed development will be subject to a Warwickshire Biodiversity Impact Assessment to identify the level of compensatory habitat creation/enhancement that will be required either within the Prologis Country Park, or at another appropriate off-site location.

Transport and access

7.154 Access to the site will be via the existing road infrastructure within Prologis Park (Winding House Lane / Central Boulevard) with access points taken from Pilgrims Walk. Existing footpath routes will be retained. There is potential for separate access points for HGVs and cars, however this needs to take existing landscape and ecological constraints into account. A secondary vehicular access off New Road to the north will serve a proposed car park for the country park and will not be accessible to the wider employment site.

7.155 The Transport Modelling Report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to EMP3 to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of EMP3 is expected to contribute financially towards the A444 corridor road and Bedworth area improvement schemes set out in the Transport Modelling Report, either via planning obligation or CIL provision.

Policy EMP4 – Coventry Road



Strategic employment site EMP4 will be developed for employment uses comprising use classes B1, B2 and B8.

Key development principles

1. Provision of approximately 9 ha of employment land.
2. Upgrade of existing access onto Coventry Road (B4113).
3. Financial contributions towards borough-wide strategic highway infrastructure works identified within the A444 corridor.
4. Financial contribution towards the delivery of biodiversity enhancement on land to the south of Centenary Way (Griff Hollows local wildlife site), as well as biodiversity offsetting.
5. Financial contribution towards the reopening of the culverted Griff Brook.
6. Financial contribution towards delivery of an area wide green infrastructure supplementary planning document (or equivalent) that promotes species movement along identified green corridors.
7. Suitable sewage connection to the existing foul drainage network.
8. Creation of cycle path link between Bermuda Station and Coventry Road, as well as contribution to crossing of Coventry Road.

Form of development

9. Provision of landscape screening along the northern, eastern, western and southern boundaries.
10. Broadleaved woodland should be retained and restored where possible.
11. Smaller scale (and height) development (similar scale to the adjacent Bermuda Industrial Estate) will be located nearer to the residential edge to the north and east.
12. Shorter side or gable end of building form to front onto Centenary Way in order to reduce perceived effects of scale and massing of any proposed development on any retained public open space.
13. Use of colour gradation on elevations from darker colours to base, and lighter colours nearer to rooflines in order to better integrate development into the landscape.
14. Maintain an open corridor to the south of the site accommodating Centenary Way, with appropriate tree and shrub planting in order to limit effects to views along this public right of way.
15. Opportunities to improve the heritage features of the area and their link to the work of George Eliot should be pursued where possible.
16. Areas of high distinctiveness should look to be preserved to form part of a network of natural habitats. Habitat connectivity to the south should be maintained to allow connections to the wider local wildlife site, including along the southern boundary of the site.

7.156 Strategic employment site EMP4 will contribute to meeting the strategic employment needs of the borough, as well as the job creation objectives of the Borough Plan. The site is located on the south-eastern edge of the Hill Top area of Nuneaton and comprises derelict land formally in use as the Griff granite quarry.

7.157 Land directly to the south of EMP4 was part of the Griff granite quarry and was extensively quarried throughout the late nineteenth and early twentieth centuries. The site is now restored and designated as the Griff Hollows local wildlife site. The Centenary Way long distance footpath crosses the south of the site. Griff Brook runs, in culvert, parallel with Centenary Way.

7.158 The site will deliver approximately 9 ha gross (8.6 ha net) for employment uses, including parking and servicing areas. The site is in two ownerships but all landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site infrastructure requirements. The final net figure will be determined by the design and layout of the site.

7.159 The allocation will be delivered within the first 5 years after adoption.

Local wildlife site and biodiversity

7.160 Land to the south of the developable area of EMP4 forms part of the Griff Hollows local wildlife site. The site is being brought forward for development in combination with on and off-site ecological mitigation as well as wider biodiversity enhancement. This will result in the enhancement of the habitat connectivity of the Griff Hollows local wildlife site, and will create wider linkages to Bermuda Balancing Lake local wildlife site and Coventry Canal. A key element of this will be the reopening of the culvert to enable mammals to connect along ecological corridors. The Griff Hollows local wildlife site should be re-surveyed, and this should include the water vole survey project being undertaken by Warwickshire Wildlife Trust.

Transport

7.161 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to EMP4 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of EMP4 is expected to contribute financially towards the A444 corridor road improvement schemes set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

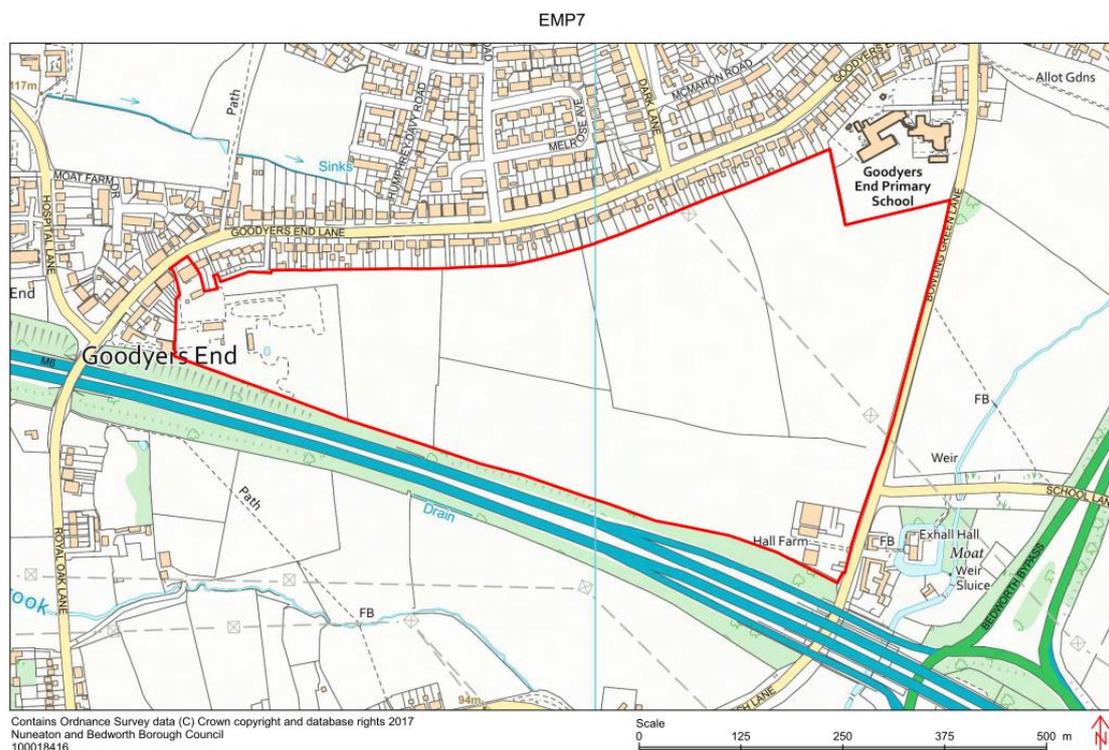
Historic environment

7.162 EMP4 and its surrounding area is associated with the works of the writer George Eliot. Development of EMP4 provides an opportunity to improve this

association and establish connections of the Griff Hollow area to the former section of the canal branch. This could be achieved via the following:

- Re-establishing the canal branch through the site and linking to the remaining portion to the east.
- Selection of appropriate planting as demonstrated in historic photos and George Eliot's description of Red Deep in *The Mill on the Floss*.
- Connecting the site to the wider landscape through the use of a heritage/literary trail.
- Establishing a walking route between the proposed George Eliot Visitor Centre at Griff Hotel and Griff Hollow.

Policy EMP7 – Bowling Green Lane



Strategic employment site EMP7 will be developed for employment uses comprising use classes B1, B2 and B8.

Key development principles

1. Provision of approximately 26 ha of employment land.
2. Provision of a new junction onto Bowling Green Lane at the School Lane junction, with associated traffic lights and any transport improvements / new junctions and upgrades required along Bowling Green Lane and School Lane (in conjunction with both the development of HSG6 and either by

agreement with the landowner or securing the transfer of the land to the highway authority to facilitate the use of highway powers for land outside of the HSG6 allocation. The developer will be expected to submit for agreement a HGV routing strategy which will show HGVs accessing/egressing the site from the School Lane direction and avoiding the local schools on Bowling Green Lane, Ash Green Lane and Wheelwright Lane.).

3. Financial contributions towards borough-wide strategic highway infrastructure works identified within the Bedworth area and provision of a cycle network within the site, including contributions to links beyond the site to residential areas and toward Bedworth Town Centre.
4. Developer contribution towards local bus service(s) to serve the employment site in order to enhance accessibility for local residents.
5. Developer contribution to secure provision of bus infrastructure to complement the point above.
6. Suitable sewage connection to the existing foul drainage network.

Form of development

7. Provision of landscape buffer along northern boundary (minimum width of 15 m) and western boundary.
8. Ecological enhancements to existing boundary on southern and eastern edges of the site.
9. Provision of enhanced buffer in the south-eastern corner to protect the setting of the Exhall Hall scheduled monument and listed buildings, as well as ensuring that the scale of development does not detract from the prominence and importance of the listed buildings.
10. Retention of the public right of way within a landscape enhancement area either side of the route in order to form a strategic landscaping area through the centre of the site.
11. Protected species assessment of areas of tall ruderal around field gate.
12. Provision of landscape screening consisting of small groups of specimen trees interspersed amongst grassed areas and wildflower meadows.
13. Scale and massing of building form around northern edge of site should be reduced due to proximity to residential properties.
14. Orientate buildings in north to south direction so shorter elevation faces north and south in order to limit visual effects.

7.163 Strategic employment allocation EMP7 will contribute to meeting the strategic employment needs of the borough, as well as the job creation objectives of the Borough Plan. The site is located on the south-western edge of Goodyers End. The allocation is triangular in shape and defined by Bowling Green Lane to the east, Goodyers End Lane to the north and the M6 to the south. The land slopes gradually from north to south. A public right of way links Bowling Green Lane with Goodyers End Lane, following the site's southern boundary

before crossing the site in a north-westerly direction. A 400 kv overhead line crosses the north-eastern part of the site in a north-west to south-east direction.

7.164 The site comprises 26 ha of open land, and will deliver a minimum of 24 ha for net employment uses, including parking and servicing areas. The site is in a single ownership and is expected to be delivered through an overarching outline permission. The final net figure will be determined by the design and layout of the site.

7.165 The allocation will be delivered within the first 5 years after adoption.

Transport and access

7.166 Primary access for vehicles to the site will be provided from a new signalised junction on Bowling Green Lane, together with any upgrades required along Bowling Green Lane and School Lane (in conjunction with HSG6). Should a secondary access be required, this should be served from Goodyers End Lane, and should be limited to provide access for emergency vehicles, car parking, and cycle and pedestrian linkages. All HGV parking and serving areas are to be served from the primary access point leading from Bowling Green Lane.

7.167 The transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to EMP7 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of EMP7 is expected to contribute financially towards the corridor road improvement schemes in the Bedworth area as set out in the transport modelling report either via planning obligation or Community Infrastructure Levy provision.

8. Housing

- 8.1 The following policies set out the requirements for housing provision, including meeting the needs for Gypsies and Travellers.

Policy H1 – Range and mix of housing

General market housing

Development is required to provide a mix of housing types, sizes and tenures based on the need and demand identified in the most up-to-date Strategic Housing Market Assessment (SHMA), as well as the characteristics of the surrounding area.

Homes for older people

Development of extra care housing, residential care homes and other housing options which allow older people to stay in their own homes will be approved where a local need can be demonstrated.

Other specialised housing

Development proposals for specialised housing will be approved where a local need can be demonstrated.

- 8.2 The National Planning Policy Framework (NPPF) indicates that the council should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. It should identify the size, type, tenure and range required by the local population over the plan period.
- 8.3 This policy gives guidance on the size and type of dwellings for general market housing, the housing needs of the older population and the population with specific needs.

General market housing

- 8.4 A range of types and sizes of housing are needed to redress imbalances of specific types and sizes in order to meet the needs of changing household structure and to meet the aspirations for the borough.
- 8.5 The SHMA makes recommendations about the size of dwellings for market and affordable housing, taking account of a range of factors that influence demand including demographic changes and market factors. The SHMA is regularly updated in order to respond to these changes, and as such no specific targets have been set within this policy.

- 8.6 'Policy H2 - Affordable housing' sets out the approach for the type and size of affordable housing. In terms of market housing, the focus is to provide two and three bedroom properties, but it is acknowledged that in the market sector households are able to buy or rent property of any size subject to what they can afford. Development proposals should have regard to the housing mix recommendations in the most up to date version of the SHMA.
- 8.7 The business community have raised concerns about the lack of 'executive' or 'aspirational' homes in the borough, and the impact that this has on attracting potential business investors to the area. This is reflected in the low number of properties in higher council tax bands in the borough. Such housing will be considered favourably, provided that the mix of housing is within the ranges indicated in the SHMA.
- 8.8 Developers will also need to consider the character of the local area surrounding the site in terms of the types and sizes of new housing.

Older people

- 8.9 The number of older people both in absolute numbers and as a proportion of the population is increasing significantly, and is expected to continue to do so. The 2015 SHMA shows that between 2011 and 2031, the population aged 60-74 is expected to increase by 23.7 %, with the population aged 75 and over expected to increase by 87.7 %.⁵¹ There is also expected to be significant increases of people with dementia (98 %) and mobility problems (78 %) by 2031⁵².
- 8.10 It is important to provide appropriate local housing options for an increasingly older population who may have poor health. Maintaining independence and giving people the choice to remain in their own homes is a national and local aim. Many will want to remain in their existing homes, but others may want to downsize to general market housing, or to supported specialist housing such as sheltered housing, extra care housing or residential care.
- 8.11 There has been a move away from sheltered housing and residential care towards extra-care housing, and as such the provision of specialist housing going forward should reflect this⁵³. Extra care housing is safe, secure, well designed and attractive self-contained accommodation for older people aged 55 and over who require varying levels of care and support, designed to enable them to live independently in a home environment.
- 8.12 The 2013 SHMA gives an indicative assessment of specialist housing needs for 2011 to 2031. It shows that the borough will need to make provision for a total of 2,231 extra care housing units, of which 550 will need to be affordable. This equates to 112 per annum, made up of 84 market extra care housing units and

⁵¹ GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.

⁵² GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.

⁵³ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.

28 affordable housing units per year⁵⁴. 'Policy H2 - Affordable housing' sets out the requirement for affordable housing provision and will apply to extra care housing.

8.13 As set out in 'Policy TC3 – Hierarchy of centres', homes for older people should be located in close proximity to town centres and key services such as hospitals, and should have access to the public transport network.

People with a disability

8.14 Data from the 2011 Census indicates that the borough has the highest proportion (26.8 %) of households across Coventry and Warwickshire with one or more persons with a long term health problem or disability⁵⁵. It is recognised that the level of people with health or disability problems is closely linked to the level of the older population. 'Policy BE3 - Sustainable design' addresses the need for housing which is wheelchair accessible.

Black and Minority Ethnic, lone parent and young person's households

8.15 The 2013 SHMA suggests that there are some groups within the population who are disadvantaged to some degree in accessing housing. These include Black and Minority Ethnic (BME) households, which are more likely to be overcrowded and living in rented accommodation (in part related to younger age structures in BME communities), low income lone-parent households and young people⁵⁶. These issues will be addressed through the provision of new suitably sized housing and through the Housing Strategy.

Students

8.16 There are limited numbers of all student households in the borough. No specific provision is therefore made for student housing.

Self and custom built housing

8.17 In line with the Self-Build and Custom Housebuilding Act 2015, the council will maintain a register of sites suitable for self and custom built housing which will be published on the council's website. This will include the details of small sites ideal for 1 to 4 plots, however the suitability of these sites for development will not have been assessed.

Borough Plan objectives

8.18 This policy delivers the following Borough Plan objectives:

- Objective 4

⁵⁴ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.

⁵⁵ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.

⁵⁶ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.

Evidence base

8.19 The evidence base related to this policy is as follows:

- GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment*.
- GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.

Delivery mechanisms

8.20 The delivery mechanisms for this policy are as follows:

- Work with the council's Housing team to identify a suitable mix of dwelling types and sizes for individual sites.
- Work with the council's Housing team to update the Housing Strategy.
- Work with the council's Housing team, Warwickshire County Council and other service providers to identify specific needs for the older population, vulnerable adults, and young people with disabilities.
- Maintain a register of suitable sites for those interested in self and custom built homes.

Monitoring

8.21 The indicators and targets that will be monitored for this policy are outlined in Table 7.

Monitoring ref	Indicator	Target
H1a	Number of bedrooms in new dwelling completions	Completions in line with percentages set out in the most recent SHMA
H1b	Extra care housing completions	112 extra care housing completions per year

Table 7: Indicators and targets to be monitored for Policy H1

Policy H2 – Affordable housing

The council will seek to negotiate 25 % affordable housing where residential development proposals consist of 15 dwellings or more, and for two units where residential development proposals consist of between 11 to 14 dwellings, irrespective of any demolitions.

The tenure split and affordable housing mix sought will be based upon evidence provided by the council's Housing Register and the Strategic Housing Market Assessment (SHMA), which will be regularly updated.

All development proposals are required to provide affordable housing on-site which is well integrated within the proposed development, unless off-site provision can be robustly justified.

Where developers consider applying the affordable housing policy is unviable, or where it is considered that a different mix would better suit local needs and site specific circumstances, a viability statement must be included with the planning application stating the reasons.

Proposals which boost affordable housing delivery will be considered constructively in line with any updates to national policy, including Starter Homes exception sites, and will be exempt from meeting the affordable housing requirements.

Proposals must consider how they accord with the Affordable Housing supplementary planning document.

- 8.22 The SHMA assesses the Coventry and Warwickshire housing market area and outlines the affordable housing requirements for the borough.
- 8.23 The 2015 SHMA shows that whilst private market housing and rents across the housing market area are generally lowest in Nuneaton and Bedworth (and Coventry) there is still a significant affordable housing need in the borough⁵⁷.
- 8.24 In addition, six of the eight super output areas in Warwickshire ranked within the top 10 % most deprived nationally are located in Nuneaton and Bedworth⁵⁸. Such high levels of disadvantage are reflected by the level of demand for council owned housing in the borough, which in April 2016 had a register of 2,929 applicants.

Proportion of affordable housing

- 8.25 The 2015 SHMA identifies a range of affordable need percentages according to different projection scenarios⁵⁹. The 2016 Affordable Housing Background Paper by GL Hearn states that 25 % affordable housing provision would be appropriate subject to viability⁶⁰. Work undertaken by Dixon Searle Partnerships has identified that an affordable housing target of 25 % is viable on developments of 15 dwellings or more. Where the calculation would result in a fraction of a dwelling the number will be rounded up. Dixon Searle Partnerships also identified that a target of 20 % affordable housing could be applied on developments of 11 to 14 dwellings⁶¹. Given local circumstances, rather than a percentage, the council will negotiate for two units on all of these sites.

⁵⁷ GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.

⁵⁸ Warwickshire Observatory (2015). *Indices of Multiple Deprivation 2015: Briefing Note*.

⁵⁹ GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.

⁶⁰ GL Hearn (2016). *Affordable Housing Background Paper: Nuneaton and Bedworth Borough Council, Final Report*.

⁶¹ Dixon Searle Partnership (2016). *Local Plan Viability Assessment – Update: Final Report*.

8.26 In accordance with the written ministerial statement released in November 2014, and subsequent Court of Appeal decision in May 2016, affordable housing contributions are not sought from developments of 10 dwellings or less.

Tenure split

8.27 To keep this policy up-to-date and flexible, the current targets for tenure split, as well as affordable housing mix, have been outlined in the supporting text rather than the policy itself. These targets may change over time to reflect new evidence and any changes in government policy regarding alternative affordable housing options.

8.28 There are three types of affordable housing tenures: intermediate, social rent and affordable rent. The 2015 SHMA groups together social and affordable rent for the purposes of drawing conclusions as both tenure types are likely to be provided by registered providers (or the council) with some degree of subsidy, and will be targeted at the same groups of households⁶². The SHMA has determined the appropriate levels of each type to satisfy demand in the borough, and proposes the following tenure breakdown⁶³:

- Intermediate: 48 %
- Social/affordable rent: 52 %

Affordable housing mix

8.29 With regards to affordable housing sizes for Nuneaton and Bedworth, the 2013 SHMA identified the highest long-term need is for 1 bed properties, followed by 2 bed properties, then 3 bed properties and, with least demand, 4 or more bed properties⁶⁴. The 2013 SHMA recommends the following mix: 1 bedroom 40-45 %, 2 bedroom 25-30 %, 3 bedroom 20-25 %, 4 plus bedroom 5-10 %⁶⁵. However, the consultants are cautious about these figures, and state that the figures should be considered alongside information from the council's housing register and the stock turnover of existing properties.

On-site provision

8.30 The National Planning Policy Framework (NPPF) promotes the creation of mixed and balanced communities, and to enable this considers the provision of affordable housing is best met on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.

⁶² GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*

⁶³ GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.

⁶⁴ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.

⁶⁵ GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment: Final Report*.

- 8.31 The council's Sustainable Community Plan identifies affordable housing as a high priority⁶⁶, and to achieve this improvements as well as alternatives to the delivery of affordable housing will be required. Whilst the provision of affordable housing on-site is the council's preferred delivery mechanism, alternative delivery mechanisms may therefore be acceptable, where it can be robustly justified, and providing such alternatives can reasonably be expected to contribute to the creation of successful mixed communities.
- 8.32 In such cases the council and the developer may jointly agree either one or a combination of the following:
- An alternative site to be provided by the developer for the provision of affordable housing.
 - A financial contribution from the developer to the council to be used in connection with the development of affordable housing. The financial contribution will broadly be the equivalent value of providing the affordable homes on-site.

Starter Homes

- 8.33 In February 2015 the Government launched its Starter Homes programme to help meet the housing needs of young first time buyers. Starter Homes exception sites include industrial or commercial land which is currently under-used or unviable, and has not currently been identified for residential development.
- 8.34 Proposals on exception sites will be exempt from providing affordable housing and Section 106 affordable housing contributions. In return they are required to provide Starter Homes, which will be sold to first time buyers under the age of 40, at a discount of at least 20 % of the market price.
- 8.35 The Government has set up a new design advisory panel to develop exemplar designs for Starter Homes. Proposals for Starter Homes should have regard to this advice.
- 8.36 A national consultation is currently underway on whether the Starter Homes programme may be rolled out for all developments over 10 dwellings or 0.5 or more hectares, and to provide a blanket target of 20 % of dwellings as Starter Homes.

Government consultation on changes to the NPPF

- 8.37 In December 2015 the Government launched a consultation of proposed changes to the NPPF, which includes changes to the definition of affordable housing. The proposed changes would mean that the definition of affordable housing would include a wider range of products to support people in achieving home ownership.

⁶⁶ Nuneaton and Bedworth Borough Council (2007). *Shaping our future...: Sustainable Community Plan 2007-2021 for Nuneaton and Bedworth*.

8.38 The council has sought to ensure this policy will remain flexible if the proposed changes are brought into effect, however the policy may be revised in the future if substantial changes are required.

Affordable housing supplementary planning document

8.39 Detailed issues to help interpret the affordable housing policy will be set out in an updated supplementary planning document. This will include guidance on:

- The design and location of affordable housing on site.
- The provision of affordable housing that is not on site.
- The use of Section 106 agreements and/or the Community Infrastructure Levy.
- The provision of Starter Homes and any further changes made to the NPPF regarding affordable housing.

Borough Plan objectives

8.40 This policy delivers the following Borough Plan objectives:

- Objective 4

Evidence base

8.41 The evidence base related to this policy is as follows:

- Dixon Searle Partnership (2016). *Local Plan Viability Assessment – Update: Final Report*.
- GL Hearn (2013). *Coventry & Warwickshire Joint Strategic Housing Market Assessment*.
- GL Hearn (2014). *2012-based Sub-National Population Projections & Economic Forecasts: Implications for Housing Need in Coventry & Warwickshire*.
- GL Hearn (2015). *Updated Assessment of Housing Need: Coventry-Warwickshire HMA*.
- GL Hearn (2016). *Affordable Housing Background Paper: Nuneaton and Bedworth Borough Council*.
- Nuneaton and Bedworth Borough Council (2007). *Shaping our future... Sustainable Community Plan 2007 – 2021 for Nuneaton and Bedworth*.

Delivery mechanisms

8.42 The delivery mechanisms for this policy are as follows:

- Prepare a supplementary planning document on affordable housing.
- Work with the council's Housing team to seek to negotiate with developers for suitable tenure, types and sizes of affordable housing that are viable and meet current local need.

Monitoring

8.43 The indicators and targets that will be monitored for this policy are outlined in Table 8.

Monitoring ref	Indicator	Target
H2a	Developments of 11 to 14 dwellings and 15+ dwellings where 2 units and 25 % respectively of affordable housing is negotiated	100 %
H2b	Intermediate affordable housing completions	Percentage of intermediate dwellings per annum as outlined in SHMA
H2c	Social or affordable rented housing completions	Percentage of social or affordable rented dwellings per annum as outlined in SHMA

Table 8: Indicators and targets to be monitored for Policy H2

Policy H3 – Gypsies and Travellers

The following criteria will be used to identify suitable strategic sites for at least 39 residential and 5 transit pitches to be taken forward in a Gypsy and Travellers Site Allocations document for the period 2016/2017 to 2031/2032:

1. The number of pitches or plots is relative to the size and scale of the site.
2. The number of pitches or plots is relative to the size and density of the surrounding settled community.
3. The site is not located in areas of high flood risk.
4. The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets.
5. The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected.
6. The site has suitable access to the highway network.
7. The site is located where air or noise pollution will not affect the health and well-being of site residents, and neighbouring uses will not be affected by air or noise pollution as a result of the Gypsy and Traveller development.
8. The site is accessible to town and district centres, local services and facilities such as schools and health facilities, fresh food and employment, by walking, cycling and public transport, in line with 'Policy TC3 - Hierarchy of centres', or it can be demonstrated that the site is sustainable in other ways.

9. The site has suitable connection to the foul sewage system, or can demonstrate that connection is unviable and alternative arrangements can be made, in consultation with Severn Trent.

The above criteria will also be used in determining any future planning applications for Gypsy and Traveller sites.

- 8.44 The council has a duty under the Housing Act 2004 to assess the accommodation needs of Gypsies and Travellers and to demonstrate how that need will be met.
- 8.45 The Government's Planning Policy for Traveller Sites (2012) aims to ensure fair and equal treatment for Gypsies and Travellers in a way that enables their traditional and nomadic way of life, while respecting the interests of the settled community.
- 8.46 The 2016 Gypsy, Traveller and Travelling Showperson Accommodation Assessment shows a need for 39 permanent pitches for the period up to 2031/32, and 5 transit pitches over the next 5 years to 2020/2021⁶⁷.
- 8.47 This policy recognises the need to plan for additional sites for Gypsies and Travellers. It sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations document. The criteria are based on those used to select the strategic housing allocations. The criteria will also be used for determining planning applications in the interim period before the Gypsy and Traveller Site Allocations document is adopted. The Gypsy and Traveller Site Allocations document will follow on from the Borough Plan in a separate document, and will identify specific sites to meet the pitch requirements identified above. This policy will also be used to determine applications on unallocated sites prior to and after the Gypsy and Traveller Site Allocations document is adopted.

Borough Plan objectives

- 8.48 This policy delivers the following Borough Plan objectives:
- Objective 4

Evidence base

- 8.49 The evidence base related to this policy is as follows:
- Arc4 (2016). *Nuneaton and Bedworth Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2016*.

⁶⁷ Arc4 (2016). *Nuneaton and Bedworth Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2016*.

Delivery mechanisms

8.50 The delivery mechanisms for this policy are as follows:

- Prepare a Gypsy and Traveller Site Allocations document to identify sites for permanent residential and transit pitches.

Monitoring

8.51 The indicators and targets that will be monitored for this policy are outlined in Table 9.

Monitoring ref	Indicator	Target
H3a	Gypsy and traveler accommodation	39 residential pitches and 5 transit pitches provided
H3b	Unauthorised pitches	None
H3c	Unauthorised encampments	None
H3d	Adoption of the Gypsy and Traveller Site Allocations document in accordance with the latest Local Development Scheme	Refer to Local Development Scheme

Table 9: Indicators and targets to be monitored for Policy H3

9. Employment

9.1 The following policies outline the requirements for employment growth and proposals.

Policy E1 – Nature of employment growth

Applications for economic uses, focusing particularly on use classes B1(b), B2 and B8, on the strategic employment sites and the portfolio of existing employment sites will be approved subject to them satisfactorily meeting the policies in the plan. Applications which can demonstrate the following will be considered favourably:

1. Inward investment development, providing high quality and high density employment opportunities.
2. Employment sectors in line with those prioritised in the Economic Development Strategy, which include:
 - a. Advanced manufacturing
 - b. Professional services
 - c. Research and development
3. The generation of permanent jobs that will help diversify the local economy.
4. Employment and training schemes to maximise local employment opportunities and help address skill deficits in the local population.

B1(a) office proposals in the first instance should be directed to Nuneaton and Bedworth town centres. Ancillary B1(a) office proposals outside of these town centres, but within an employment site will be approved.

Where applications for non B use class proposals are put forward the following should be addressed:

1. Level of economic development being generated (economic development uses cover a wide spectrum of areas, but excludes housing). It should be noted that in the first instance main town centre uses should be directed to the town centres in line with 'Policy TC3 – Hierarchy of centres'.
2. Impact on neighbouring uses.

Applications which include proposals for education establishments that provide training opportunities to assist in up-skilling will be approved.

Proposals that promote appropriately located tourism activities to attract and sustain visitor numbers will be supported.

9.2 The type of growth that will deliver employment development is also significant for the Borough Plan. The borough currently has high levels of out-

commuting⁶⁸, an over dependency on manufacturing and distribution, as well as a low skills base⁶⁹. One of the council's objectives is to diversify the borough's economy in order to enable the business base to become more competitive, and less exposed to economic shocks that may affect specific sectors. The council will therefore seek growth in sectors where the borough currently has strengths, and in sectors where there is expected to be growth during the plan period, based on evidence. The council will also seek to attract wider investment through the Economic Development Strategy.

9.3 An on-going issue for the borough is its skills base⁷⁰, although there has been a level of improvement. The policy therefore seeks to support the development of education establishments in order to assist with the continual improvement by ensuring facilities are in place during the plan period.

Borough Plan objectives

9.4 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 7

Evidence base

9.5 The evidence base related to this policy is as follows:

- DTZ (2013). *Town Centre Office Requirements*.
- GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council: Final Report*.
- GVA Grimley (2010). *Nuneaton & Bedworth Borough Employment Land Review – Final Report*.
- Nuneaton and Bedworth Borough Council (2014). *Employment Land Review 2014*.

Delivery mechanisms

9.6 The delivery mechanisms for this policy are as follows:

- Economic Development Strategy, inclusive of:
 - Reviewing the promotion of suitable employment and associated actions, e.g. the marketing of the sites.
 - Actively working with partner organisations that can assist in attracting new businesses.

⁶⁸ GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

⁶⁹ GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

⁷⁰ GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

Monitoring

9.7 The indicators and targets that will be monitored for this policy are outlined in Table 10.

Monitoring ref	Indicator	Target
E1a	The number of applications granted in line with the Economic Development Strategy	Zero applications being in conflict with the Economic Development Strategy
E1b	The number of applications granted for non-economic development uses on strategic employment sites	Zero
E1c	<p>Jobs growth within the Borough by:</p> <ul style="list-style-type: none"> • Use of national statistics to track the numbers employed. However, it should be noted that the data is out of date by around 2 years, and can be inconsistent, as Government has recently changed the data source which is only published once a year. • Carrying out primary research / data collection to estimate job creation. This includes outputs from activities (i.e. from Warwickshire County Council Inward Investment Team), outputs from completions of developments (using 	Jobs growth over the plan period to be in line with 'Policy DS4 - Overall development needs'

Monitoring ref	Indicator	Target
	<p>industry accepted assumptions relating to numbers of jobs per sq m of development), and information from the press such as the advertisement of job vacancies.</p> <ul style="list-style-type: none"> • Commissioning work to get more regular and up-to-date data, benchmarked against other areas. 	

Table 10: Indicators and targets to be monitored for Policy E1

Policy E2 – Existing employment estates

The redevelopment, and/or expansion of existing employment sites listed in Table 11 (as shown on the policies map) for B use class employment purposes will be approved. This table will be subject to review annually to take account of monitoring, which will be reported in the Authority Monitoring Report.

Where existing sites become vacant or are unlikely to serve a role for employment, the council will work in partnership to secure an appropriate alternative re-use. The partnership working will be driven by the council's Economic Development Strategy.

The sites listed in Table 12 and shown in Appendix E (as well as on the policies map) will not be protected from non-economic development type proposals. These sites are considered acceptable for alternative uses during the plan period. The council's Economic Development Strategy will assist in the determination of alternative uses.

Proposals on employment sites for non-employment uses must demonstrate how they meet the following tests:

- A. Is the site allocated for employment land?
- B. Is there an adequate supply of allocated employment sites of sufficient quality in the locality (the relevant settlement within the borough) to cater for a range of business requirements?
- C. Is the site capable of being serviced by a catchment population of sufficient size?
- D. Is there evidence of active marketing?
- E. Could employment redevelopment be brought forward, taking account of site characteristics (including physical factors, accessibility and neighbouring uses)

and would redevelopment be viable? If employment redevelopment is not viable, could mixed use redevelopment be brought forward?

F. If firms are likely to be displaced through redevelopment, is there a supply of alternative suitable accommodation in the locality to help support local businesses and jobs? Would this promote or hinder sustainable communities and travel patterns?

9.8 To support existing businesses located in the borough, it is important to protect and enhance existing employment estates. The Employment Land Review 2014 updated the assessment of the suitability and sustainability of the existing employment estates. This review updated the 2010 Employment Land Review, and helped to identify that some estates were of high quality, some were in need of investment and some would be better used for alternative purposes.

9.9 As part of the 2016 Employment Land Study, GL Hearn visited the existing sites of over 10 ha to consider their performance and commercial attractiveness⁷¹. Those assessed as high quality estates or in need of investment are identified as existing employment estates on the proposals map, and are listed in Table 11. These sites will be given protection against non-economic type development. Estates identified as not being suitable for future employment purposes, listed in Table 12, will not be protected⁷².

Site reference Employment Land Review 2010	Site name	Size of site (ha)
E1-E2	Pool Road	8.12
E7	Weddington Terrace	3.03
E8	Oaston Road	0.9
E9	Whitacre Road	9.39
E10	Attleborough Fields	31.66
E11	Hemdale Business Park	5.06
E13-E14	Trident Business Park	2.34
E15-E18	Caldwell & Shepperton	10.71
E19	Marston Jabbett	2.56
E20-E21	Bayton Road Industrial Estate	72.33
E22	Grovelands	7.22
E25	The Moorings	3.64
E28	Gallagher Business Park	9.88
E29	Prologis Park	16.16
E30-E32	Bermuda Business Park	88.22
E31	Eliot Business Park	6.18
E34	Tenlons Road	4.14

⁷¹ GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

⁷² GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

Site reference Employment Land Review 2010	Site name	Size of site (ha)
E35	Haunchwood Park	6
E37	Justice Centre	0.97
E40	Hope Aldridge Business Centre	0.23
E42	Ashbrook Court	1.96
	Total	290.70

Table 11: Portfolio of existing employment estates

Site reference Employment Land Review 2010	Site name	Size of site (ha)
E3	Midland Road Network Rail	2.22
E4	Aston Industrial Estate	0.58
E5	Bath Road	0.57
E6	St Mary's Road	1.76
E12	Seymour Road	1.11
E23	Black Horse Road	2.24
E24	School Lane	1.08
E26	Black Horse Road	0.23
E27	Hawkesbury Lock	0.28
E33	Hazell Way	8.6
E36	King Edward Road	0.73
E38	Anker Street	0.41
E39	Newtown Road, Bedworth	0.39
E41	Weddington Road	0.68
E43	Tuttle Hill	0.54
	Total	21.42

Table 12: Employment estates suitable for alternative uses

- 9.10 A detailed assessment of each estate listed in Table 11 and Table 12 will be conducted through the Economic Development Strategy, and there will be annual monitoring of their status. During the life of the Borough Plan it is expected that approximately 20 ha⁷³ of employment land could be lost as a consequence of this policy. This has, therefore, been added to the allocation of the new employment land target.
- 9.11 The National Planning Policy Framework (NPPF) defines economic development as “development, including those within the B use classes, public and community uses and main town centre uses (but excluding

⁷³ GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report*.

housing development)”⁷⁴. The NPPF also states that policies should be flexible to accommodate new sectors that emerge during a plan period⁷⁵. Consequently, the policy allows for alternative uses that generate economic development. However, to assist in the determination of this, a number of criteria have been added which will assist in ensuring the estates maintain their employment integrity.

- 9.12 In relation to proposals on employment sites for non-employment uses, the assumption is that allocated sites are protected. When considering if the site is capable of being serviced by a catchment population of sufficient size, regard should be had to what the balance between population and employment in the relevant area is. In addition, account should be taken of what the impact of employment loss on commuting patterns might be, as well as whether there would be a detrimental impact on the local economy from loss of the employment land.
- 9.13 When considering evidence of active marketing of employment sites proposed for non-employment sites, we would recommend a requirement for active marketing for two years. In addition, how the size and quality of space matches local demand should be demonstrated, taking account of market conditions and expected future trends.

Borough Plan objectives

9.14 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2

Evidence base

9.15 The evidence base related to this policy is as follows:

- Ben Cave Associates (2014). *Health Impact Assessment – Nuneaton and Bedworth Borough Plan*.
- GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council: Final Report*.
- GVA Grimley (2010). *Nuneaton & Bedworth Borough Employment Land Review – Final Report*.
- Nuneaton and Bedworth Borough Council (2014). *Employment Land Review 2014*.
- Warwickshire County Council (2013). *Nuneaton and Bedworth Borough Council Employment Land Accessibility Review*.

Delivery mechanisms

9.16 The delivery mechanisms for this policy are as follows:

⁷⁴ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

⁷⁵ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

- Component of the council's Economic Development Strategy to cover:
 - Facilitation of improvement of existing employment estates in need of investment.
 - Assessment of sites in Table 12 for suitable alternative uses, and development of action plan to facilitate their re-use.
 - Five-yearly review of the council's Employment Land Review, inclusive of business survey on issues affecting existing estates.

Monitoring

9.17 The indicators and targets that will be monitored for this policy are outlined in Table 13.

Monitoring ref	Indicator	Target
E2a	<p>Monitor the loss of employment land to alternative uses and report annually through the Authority Monitoring Report. The indicator will be assessing:</p> <ul style="list-style-type: none"> • Amount of appropriate economic development on estates (this would be in conformity with policy) • Development approved which results in non-conformity with policy 	<p>Qualitative monitoring will be undertaken through the Authority Monitoring Report. Consequently the analysis of this monitoring within the Authority Monitoring Report will determine the impact and effectiveness of the policy.</p>
E2b	<p>Monitoring of any new employment estates which should be protected from alternative uses – this will be reported through the Authority Monitoring Report</p>	<p>There is no specific threshold determining what a new estate should be, however anything below 0.4 ha will not be considered a sufficient size for a new employment estate. The Authority Monitoring Report will report anything above this threshold and include analysis regarding the proposal.</p>
E2c	<p>Annual monitoring of losses to employment sites that are not to be protected. This will include a review of whether they are</p>	<p>All sites should be developed in line with Economic Development Strategy recommendations</p>

Monitoring ref	Indicator	Target
	redeveloped in line with alternatives identified in the Economic Development Strategy.	
E2d	Monitor the supply and delivery of employment uses and report annually through the Authority Monitoring Report	103.6 ha of employment land over plan period

Table 13: Indicators and targets to be monitored for Policy E2

10. Town centres

10.1 These policies outline the requirements in and around Nuneaton and Bedworth town centres.

Policy TC1 – Town centre requirements

New office, retail and leisure floor space requirements will be provided as set out below.

- 15,000 sq m of offices
- 13,470 sq m - 16,460 sq m of comparison
- 1,750 sq m - 3,580 sq m of convenience
- 2,666 sq m - 3,065 sq m of cafés, restaurants and bars

These requirements will be split between Nuneaton and Bedworth town centres as follows:

Nuneaton Town Centre

Requirement	Floor space range (sq m)
Offices	13,000-14,000
Comparison	11,420-13,950
Convenience	910-2,500
Cafés, restaurants and bars	2,324-2,672

Bedworth Town Centre

Requirement	Floor space range (sq m)
Offices	1,000-2,000
Comparison	1,570-1,925
Convenience	460-540
Cafés, restaurants and bars	324-393

Town centre requirements

10.2 The National Planning Policy Framework (NPPF) states that planning policies should be positive and promote competitive town centre environments, as well as setting out policies for the management and growth of town centres over the plan period⁷⁶. As the previous town centre growth figures proposed in the Borough Plan were based on the Regional Spatial Strategy, it was necessary to assess whether these figures were still appropriate for the borough. The council commissioned an update to the previous town centre and retail studies in order

⁷⁶ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

to gain an up-to-date view of the borough's requirements. The retail and leisure update was undertaken by Strategic Perspectives and the office update by DTZ.

- 10.3 The retail and leisure study provided a strategic assessment of the quantitative and qualitative need for new retail (comparison⁷⁷ and convenience⁷⁸ goods) floor space and commercial leisure uses in the borough, including its two main centres, Nuneaton and Bedworth. The update helps to provide, "adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area" over the plan period⁷⁹. The assessment of the economic capacity for new retail floor space within the borough takes account of the different population projections by Experian and Oxford Economics, as well as the overall trading performance of existing retail floor space and stores at the base year of 2013.
- 10.4 The study provides borough-wide figures, as well as forecast capacity for Nuneaton and Bedworth town centres. As two different population projections were used, along with considerations as to whether stores in the borough were overtrading or not, a range of figures have been set out for convenience and comparison floor space. The figures provided for the café, restaurant and bars capacity are indicative figures⁸⁰ rather than a target level that needs to be achieved.
- 10.5 The forecast need should be directed to Nuneaton and Bedworth town centres first, in order to help increase competition and choice, as well as stimulate their daytime and evening economy⁸¹. However, meeting the forecasted need is dependent on the level of market demand and confidence in the centres. For other leisure activities in the borough, it is likely that existing facilities will absorb the demand from a growing population, and that any forecast capacity will be dependent on the level of market interest and demand. If demand does exist, leisure uses should be directed to the town centres in order to strengthen the daytime and evening economy by increasing footfall, linked trips and spend. This would also stimulate market interest from other operators seeking space in the town centre.
- 10.6 The Town Centre Office Requirements study provides an updated estimate of the likely future office space requirements in the borough's main town centres, taking account of market demand and supply dynamics. The report concluded that the previous target of 30,000 sq m⁸² is unlikely to be required within the

⁷⁷ Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.

⁷⁸ Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.

⁷⁹ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

⁸⁰ Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.

⁸¹ Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.

⁸² DTZ (2013). *Town Centre Office Requirements*.

plan period. It also suggests that little new office floor space will be realised in the early part of the plan period. The report recommends a figure of 15,000 sq m⁸³ of office floor space in order that the target for the Borough Plan remains aspirational, but more realistic, by taking account of the current economic climate and current impediments to delivery.

Borough Plan objectives

10.7 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 3
- Objective 5
- Objective 6
- Objective 8

Evidence base

10.8 The evidence base related to this policy is as follows:

- DTZ (2013). *Town Centre Office Requirements*.
- Roger Tym & Partners (2011). *Nuneaton & Bedworth Borough Council Town Centres Study*.
- Strategic Perspectives (2011). *Convenience Goods Retail Study*.
- Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.

Delivery mechanisms

10.9 The delivery mechanisms for this policy are as follows:

- Prepare a Town Centres Area Action Plan in order to identify sites for development; identify specific requirements such as the design and infrastructure requirements; and address the evening and night-time economy.
- Partnership working with developers and landowners to ensure delivery of the proposals in line with the Area Action Plan.
- Monitoring of the health of the town centres.
- Delivery of aspirations through the Economic Development Strategy.

Monitoring

10.10 The indicators and targets that will be monitored for this policy are outlined in Table 14.

⁸³ DTZ (2013). *Town Centre Office Requirements*.

Monitoring ref	Indicator	Target
TC1a	Additional floor space for town centre uses	Increase in A1, A2, B1(a), and D2 floor space in Nuneaton and Bedworth town centres
TC1b	Additional floor space for town centre offices	15,000 sq m of office floor space: <ul style="list-style-type: none"> • Nuneaton: 13,000 sq m - 14,000 sq m • Bedworth: 1,000 sq m - 2,000 sq m
TC1c	Additional floor space for comparison retail	13,470 sq m - 16,460 sq m of comparison floor space: <ul style="list-style-type: none"> • Nuneaton: 11,420 sq m - 13,950 sq m • Bedworth: 1,570 sq m - 1,925 sq m
TC1d	Additional floor space for convenience retail	1,750sq m - 3,580 sq m of convenience floor space: <ul style="list-style-type: none"> • Nuneaton: 910 sq m - 2,500 sq m • Bedworth 460 sq m - 540 sq m
TC1e	Additional floor space café, restaurant and bars	2,666 sq m - 3,065 sq m of café, restaurant and bar floor space: <ul style="list-style-type: none"> • Nuneaton: 2,324 sq m - 2,672 sq m • Bedworth: 324 sq m - 393 sq m

Table 14: Indicators and targets to be monitored for Policy TC1

Policy TC2 – Nature of town centre growth

Development principles

Development within Nuneaton and Bedworth town centres will be expected to create a more accessible, well-connected and well-designed centre, with particular emphasis on linkages by walking, cycling and public transport. Developments relating to the evening and night time-leisure offer should demonstrate how they will create a safe and secure town centre environment.

Within the town centre, appropriate enhancements will be promoted and sought to build upon existing green infrastructure assets and tackle climate change impacts, including urban heat island concerns. These enhancements will complement

existing natural and historic assets that help define the town centres' sense of place and overall brand and identity.

Primary and secondary frontages

The town centre boundaries and primary and secondary shopping frontages of the town centres are to be protected as defined in Appendix C and Appendix D. The aim in defining boundaries and frontages will be to retain the predominance of town centre uses within these centres.

Proposals for shops (use class A1) will be approved within the defined primary and secondary shopping frontages. Other retail uses (use classes A2-A5) will be permitted within the town centre where they do not undermine or adversely impact, either individually or cumulatively, the vitality, viability, character of the area and overall vision for the town centres. Proposals for the loss of retail uses (A1-A5) to non-retail uses on the ground level in the defined primary shopping frontage will not be permitted.

Within the defined secondary shopping frontage, proposals for other main town centre uses will be permitted where they do not undermine the vitality, viability and character of the area, and that they are not contrary to the vision of the town centres.

Proposals that promote appropriately located tourism and heritage activities to attract and sustain visitor numbers will be supported.

Proposals should be in line with proposals within the Town Centres Area Action Plan and the aspirations of the Transforming Nuneaton initiative.

- 10.11 Town centres are recognised by the National Planning Policy Framework (NPPF) as the heart of communities and the Framework seeks to support their viability and vitality⁸⁴. Planning policies should be positive, promote competitive town centre environments and encourage economic activity. Policies should be set for the management and growth of centres over the plan period. The town centre boundaries and primary shopping areas should be defined along with the extent of primary and secondary frontages. It is important that needs for retail, leisure, office and other main town centre uses are met in full, and are not compromised by limited site availability.
- 10.12 The NPPF states that applications for main town centre uses that are not in an existing centre should follow a sequential test⁸⁵. This means that town centre uses should in the first instance be directed to locations within the town centre boundary, before locations at the edge of the centre, and only if suitable sites are not available, should out of centre sites be considered. In addition, for sites outside the town centre boundary, an impact assessment on proposals over 2,500 sq m is required⁸⁶. The Borough Plan does not need to repeat

⁸⁴ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

⁸⁵ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

⁸⁶ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

these requirements. The policy identifies the town centre boundaries, and in so doing, assists in carrying out any sequential and impact assessments by identifying the locations of centres, and appropriate uses in these centres.

10.13 The Retail & Leisure Study Update (2014) and the Town Centre Office Requirements (2013) update and supersede the Town Centres Study (2001) and the Convenience Goods Retail Study (2011). The studies provide a strategic assessment of the quantitative and qualitative need for new retail (comparison and convenience goods) floor space, commercial leisure use and office space, in order to help maximise the potential of the borough's main town centres. They give recommendations that reduce the figures provided from previous studies to more realistic but still aspirational figures, in line with paragraph 154 of the NPPF.

Borough Plan objectives

10.14 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 3
- Objective 5
- Objective 6
- Objective 8

Evidence base

10.15 The evidence base related to this policy is as follows:

- DTZ (2013). *Town Centre Office Requirements*.
- Roger Tym and Partners (2011). *Nuneaton & Bedworth Borough Council Town Centres Study*.
- Strategic Perspectives (2011). *Convenience Goods Retail Study*.
- Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.

Delivery mechanisms

10.16 The delivery mechanisms for this policy are as follows:

- Prepare a Town Centres Area Action Plan in order to identify sites for development; identify specific requirements such as the design and infrastructure requirements; and address the evening and night time economy.
- Partnership working with developers and landowners to ensure delivery of the proposals in line with the Area Action Plan.
- Monitoring of the health of the town centres.
- Delivery of aspirations through the Economic Development Strategy.

Monitoring

10.17 The indicators and targets that will be monitored for this policy are outlined in Table 15.

Monitoring ref	Indicator	Target
TC2a	Relevant planning permissions inside and outside of identified centres	Increase town centre uses given permission in defined centres and reduce town centre uses given permission outside defined centres
TC2b	The net gain and losses of commercial floor space	Minimise the loss of retail units to non-retail uses within the defined district centre boundaries
TC2c	The diversity of uses (e.g. retail, leisure and services offer)	Maintain a good mixture of uses in the town centres
TC2d	Retailer representation and demand	Increase the amount of national retailers present in the town centres
TC2e	Commercial property indicators (such as prime zone A rents)	Increase the number of prime zone A rents
TC2f	Changes in vacancy levels	Maintain a low rate of vacant retail premises in all centres
TC2g	Accessibility and parking provision	Maintain availability of parking provision and improve provision for sustainable transport
TC2h	The quality of the town centre environments	Maintain the current standards of the town centres and seek to improve where necessary
TC2i	Town centre footfall	Increase town centre footfall in both centres

Table 15: Indicators and targets to be monitored for Policy TC2

Policy TC3 – Hierarchy of centres

The hierarchy set out in Table 16 should be used to undertake any sequential assessments for town centre uses.

Any new residential development should be within:

1. 1,200 m walking distance of a district or local centre (existing centre's threshold can be outside the borough's administrative boundaries); and
2. 8 minutes motor vehicle drive time to a district centre. Applications must demonstrate this on the basis of:
 - a. Post development impact
 - b. During peak drive time

Where new residential development is proposed and the above thresholds are not met, the application should include the provision of a new district/local centre.

Development within district or local centres will be considered acceptable in principle, subject to the following:

1. The function, vitality and viability is maintained or improved.
2. Contributes positively to the range of services on offer.
3. Does not harm the amenities of local residents.
4. Does not result in the loss of ground floor retail/commercial floor space to residential use.

Type of centre	Name of centre	Function	Appropriate uses
Principal town	Nuneaton	Principal focus for shopping, leisure and business activity in the Borough	<ul style="list-style-type: none"> • Retail A1-A5 • Office • Leisure • Entertainment • Hotels • Restaurants / eating establishments • Residential (in areas that conform with flood risk requirements) <p>See 'Policy TC1 – Town centre requirements' and 'Policy TC2 – Nature of town centre growth' for more detail.</p>
Town centre	Bedworth	Contribute to the main shopping facilities of the borough. Specifically the town centre should provide day-to-day shopping and	<ul style="list-style-type: none"> • Retail A1-A5 • Office • Leisure • Entertainment • Residential • Restaurants / eating establishments

Type of centre	Name of centre	Function	Appropriate uses
		commercial activity for Bedworth, as well as the immediate surroundings.	See 'Policy TC1 – Town centre requirements' and 'Policy TC2 – Nature of town centre growth' for more detail.
District centre	<ul style="list-style-type: none"> • Abbey Green • Attleborough • Bulkington • Camp Hill – Copper Beech Road • Horeston Grange • Queens Road 	Provide for the day-to-day shopping and service needs of local people.	<ul style="list-style-type: none"> • Hairdressers • Newsagents • Small supermarkets • Post offices • Banks • Building societies • Laundrettes • Libraries • Restaurants / eating establishments
Local centre	<ul style="list-style-type: none"> • Arbury Road • Bulkington Road • Chapel End • Church Road North • Church Road South • Coventry Road / School Lane • Crow Hill • Kingswood Road • Lutterworth Road • Newtown Road • Nuneaton Road • Pine Tree Road • Smorrall Lane • St Nicolas Park Drive • Tomkinson Road / Croft Road 	Provide for the day-to-day top-up shopping needs of local people on a smaller scale than a district centre.	<ul style="list-style-type: none"> • Hairdressers • Newsagents • Small convenience store • Sub-post offices

Type of centre	Name of centre	Function	Appropriate uses
	<ul style="list-style-type: none"> Weddington Road (corner of Brook Lane) Weddington Road (between Shanklin Drive and Kingsbridge Road) Weddington Terrace 		

Table 16: Hierarchy of centres

10.18 The National Planning Policy Framework (NPPF) recognises centres as the heart of communities, and seeks to support their viability and vitality. It says that there should be a defined network and hierarchy of centres that is resilient to possible future economic changes, provides customer choice and a diverse retail offer⁸⁷.

10.19 The Retail & Leisure Study Update (2014) assists in identifying Nuneaton as the primary shopping centre in the borough. However, Bedworth is also a very important part of the retail hierarchy in the area. The study does identify differences in the number of facilities and units within each centre. Consequently the hierarchy differentiates the two centres based on the evidence.

10.20 The Local Shopping Study (2012) identifies an existing network of 6 district centres and 18 local centres within the borough, as well as numerous neighbourhood centres and stand-alone shops. The provision of easily accessible shops and services such as convenience stores, pharmacies and post offices play an important role in meeting the day-to-day shopping needs of residents.

10.21 In relation to the NPPF, applications for town centre uses are required to follow a sequential approach. This means that town centres uses are first directed to locations within the town centre boundary, before locations at the edge of the centre and then to other centres such as district centres. In addition, for sites outside the town centre boundary, an impact assessment on proposals over 2,500 sq m is required⁸⁸. The Borough Plan does not need to repeat these requirements. The policy identifies the hierarchy, and in so doing, assists in carrying out any sequential and impact assessments by identifying the locations of centres and appropriate uses within them.

10.22 Work has been carried out to assess where there are deficiencies in retail provision and identifying appropriate distances to district centres. This work has fed into the needs for each of the strategic sites and helped to shape the

⁸⁷ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

⁸⁸ Department for Communities and Local Government (2012). *National Planning Policy Framework*.

policy. The Local Transport Plan 2011 - 2026 identifies a walking threshold of 1,200 m⁸⁹ to something other than a town centre or school. This threshold has been applied to the policy in respect of accessing local centres. In relation to district centres, it is considered acceptable to drive to these, and an 8 minute drive time has been applied⁹⁰.

10.23 Applications within district or local centres that include the following will be considered favourably:

- Provision of healthy eating establishments.
- Environment improvement, such as street furniture, signage, street tree planting and sustainable transport management.
- Improvements to sustainable transport links.

10.24 The boundaries of the district and local centres are set out in Appendix F and Appendix G.

Borough Plan objectives

10.25 This policy delivers the following Borough Plan objectives:

- Objective 2
- Objective 3

Evidence base

10.26 The evidence base related to this policy is as follows:

- Nuneaton and Bedworth Borough Council (2011). *Local Shopping Study*.
- Nuneaton and Bedworth Borough Council (2012). *Local and District Centres Study*.
- Peter Brett Associated (2013). *Nuneaton and Bedworth District Centre Accessibility Assessments*.
- Roger Tym & Partners (2011). *Town Centres Study*.
- Strategic Perspectives (2011). *Convenience Goods Retail Study*.
- Strategic Perspectives (2014). *Retail & Leisure Study Update 2013*.
- Warwickshire County Council (2011) *Warwickshire Local Transport Plan 2011 – 2026*.

Delivery mechanisms

10.27 The delivery mechanisms for this policy are as follows:

- Supplementary planning document Planning for a Healthier Area – Nuneaton and Bedworth.
- Identification of existing district and local centres on the proposals map.

⁸⁹ Warwickshire County Council (2011). *Warwickshire Local Transport Plan 2011 – 2026*.

⁹⁰ Department for Transport (2011). *Accessibility Statistics 2011*.

Monitoring

10.28 The indicators and targets that will be monitored for this policy are outlined in Table 17.

Monitoring ref	Indicator	Target
TC3a	Health of district and local centres. Bi-annual review of the local centres study to cover: <ul style="list-style-type: none"> • Health check of centres (this includes district and local centres) • Site assessment of any new district or local centres 	District and local centres remain healthy in terms of their function, viability and vitality
TC3b	Delivery of new district and local centres	New district or local centres as set out in the strategic site policies

Table 17: Indicators and targets to be monitored for Policy TC3

11. Healthy, safe and inclusive communities

11.1 The following policies set out the requirements that contribute to creating healthy, safe and inclusive communities.

Policy HS1 – Ensuring the delivery of infrastructure

Development will be required to provide infrastructure appropriate to the scale and context of the site in order to mitigate any impacts of the development, and address the needs associated with the development. Where this is considered unviable, the applicant should provide clear evidence to demonstrate this.

Infrastructure delivery should be suitably phased with the associated development, and where appropriate, arrangement should be made for subsequent maintenance. Applications which co-locate new facilities will be approved, subject to agreement with appropriate service delivery partners.

The delivery of infrastructure provision and/or improvement will be secured through the use of planning obligations/agreements (e.g. Community Infrastructure Levy, Section 106 and Section 278) and/or conditions.

The council's Infrastructure Delivery Plan identifies the key infrastructure requirements associated with the Borough Plan, and planning proposals should have regard to this.

- 11.2 Ensuring infrastructure provision keeps pace with new development is a key component of delivering the Borough Plan. It is important that growth meets the needs of existing and future communities. Where possible, the proposed growth seeks to take advantage of existing infrastructure provision. This is important because it will assist in ensuring the proposed strategic sites are viable and as sustainable as they can be.
- 11.3 New development will create pressures on existing infrastructure which will therefore need to be upgraded. The provision of new infrastructure will also be needed to bring development sites forward.
- 11.4 Infrastructure provision also helps to mitigate any negative impacts the development may have on the borough's ability to improve the following:
- Educational attainment
 - Accessibility to services and jobs
 - Health and well-being of its communities
 - Community safety and emergency services
 - Heritage and the natural environment

- Biodiversity
- Flood risk mitigation
- Telecommunication and broadband provision

11.5 The council has an established Infrastructure Delivery Plan Group. This group provides support and advice regarding appropriate infrastructure planning as part of the development of the Borough Plan. The group has provided feedback in relation to the development of the strategic sites, and this has helped to inform the evidence collected for the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be updated annually, and the council will continue to work with infrastructure service delivery partners. This will enable flexibility to meet any changes in needs over time.

11.6 This policy identifies generic infrastructure considerations. A number of other policies in the Plan refer to specific infrastructure requirements and the delivery mechanisms used to deliver them, such as CIL and/or planning obligations. The infrastructure requirements for each of the strategic sites are outlined in the site specific policies.

Borough Plan objectives

11.7 This policy delivers the following Borough Plan objectives:

- Objective 5
- Objective 6
- Objective 8

Evidence base

11.8 The evidence base related to this policy is as follows:

- Nuneaton and Bedworth Borough Council (2017). *Infrastructure Delivery Plan*.

Delivery mechanisms

11.9 The delivery mechanisms for this policy are as follows:

- Annual update of Infrastructure Delivery Plan.
- Development of Community Infrastructure Levy (subject to viability study).
- Use of planning obligations/agreements to bring in funds for infrastructure.
- Continue co-ordinating Infrastructure Delivery Plan Group.
- Continued engagement with infrastructure service delivery partners and other partnership working, e.g. membership of the A5 group.
- Identification of infrastructure requirements for strategic sites set out within the Infrastructure Delivery Plan.

- Maintenance of infrastructure provided on-site or built/improved as part of the development will be achieved through adoption by a public body, with appropriate maintenance payments or other secure arrangements.

Monitoring

11.10 The indicators and targets that will be monitored for this policy are outlined in Table 18.

Monitoring ref	Indicator	Target
HS1a	Delivery of infrastructure set out within Infrastructure Delivery Plan	Where infrastructure on strategic sites is not being delivered in line with the Infrastructure Delivery Plan, this will trigger a review with appropriate service delivery partners
HS1b	Applications granted in line with advice of infrastructure service delivery partners	Where applications are granted contrary to advice of infrastructure service delivery partners, it is expected that suitable planning justification is provided by the council. Where advice from partners leads to mitigation, this is considered positive.
HS1c	Monitoring of planning obligations/agreements that are: <ul style="list-style-type: none"> • Agreed • Implemented • Amended 	Qualitative monitoring of this indicator will take place in the Authority Monitoring Report. The purpose is to enable an understanding as to how well the council is performing in terms of the obligations/agreements.

Table 18: Indicators and targets to be monitored for Policy HS1

Policy HS2 – Strategic accessibility and sustainable transport

Transport proposals in line with those identified in the Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan, Warwickshire County Council Local Transport Plan 2011 - 2026 and Warwickshire County Council Cycle Network Development Plan will be approved.

Where a development is likely to have transport implications, planning applications are required to clearly demonstrate how the following issues are addressed:

1. How the development ensures adequate accessibility in relation to all principal modes of transport.
2. Whether the development identifies suitable demand management measures.
3. The impact on air quality and measures proposed to ensure impact is not exacerbated. The council would support measures such as the provision and integration of infrastructure which may help to deal with the issues of air quality, such as electric vehicle charging points.
4. The connectivity of the development to strategic facilities.
5. How the development delivers sustainable transport options in a safe way that link to the wider transport network.
6. Whether the proposal will meet acceptable levels of impact on existing highways networks and the mitigation measures required to meet this acceptable level.

Proposals should target a 15 % modal shift to non-car based uses by including provisions which promote more sustainable transport options.

The council supports the provision and integration of emerging and future intelligent mobility infrastructure that may help to deal with the issue of air quality, such as including electric vehicle charging points. Proposals must consider how they accord with the Transport Demand Management Matters and Air Quality supplementary planning documents.

Proposals should be in accordance with the Movement for Growth strategy of Transport for West Midlands, the West Midlands Metropolitan Transport Emissions Framework, as well as associated policies.

- 11.11 Nuneaton and Bedworth is subject to high levels of congestion, particularly during peak times. This includes the A5, which forms part of the strategic road network, and is an important corridor of movement and growth to the north and east of the borough. Accessibility to some industrial estates without a car (such as Bermuda) can also be difficult. Improvements to increase the use of sustainable transport modes are therefore important for economic growth, as well as for social and environmental reasons. This is supported by aspirations at a national and sub-regional level.

- 11.12 Proposals outlined in the Warwickshire Local Transport Plan 2011 - 2026 and the Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan have been incorporated into the Infrastructure Delivery Plan.
- 11.13 The West Midlands Metropolitan Transport Emissions Framework and its associated policies set out transport's role in tackling air quality issues for the wider region, which in combination with the policies in the Borough Plan, will further help air quality.
- 11.14 The council is part of the A5 Transport Partnership Group regarding strategic objectives for the A5 corridor. This group comprises of officers representing councils along the route of the A5 between Gailey, Staffordshire and Weedon, Northamptonshire.
- 11.15 The council also works with the Getting West Nuneaton Moving: Bermuda Connection scheme, which is focused on tackling congestion in and around west Nuneaton by creating a direct link between west Nuneaton and the Griff roundabout⁹¹.
- 11.16 Warwickshire County Council is responsible for planning improvements to the strategic cycle network across Warwickshire. The Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study and Open Space Strategy: 2011 - 2021 identify further potential green links that should be pursued through the Borough Plan. This is considered in more detail in 'Policy NE1 - Green infrastructure'.
- 11.17 In developing the evidence for the Borough Plan, strategic level transport assessments have been undertaken. The assessments highlight the transport implications of bringing forward the strategic allocations. The 2016 Strategic Transport Assessment: Borough Plan Review, Modelling Report identifies that the strategic site allocations should adopt a 15 % modal shift target⁹². Without a 15 % modal shift the transport network is unlikely to operate to a satisfactory level⁹³.

Planning applications

- 11.18 Paragraphs 32, 35 and 36 of the National Planning Policy Framework (NPPF) set out requirements at the planning application stage for all proposals that will generate significant amounts of movement. This includes the requirement for a transport statement / transport assessment, as well as a travel plan document.
- 11.19 Planning applications will also be required to demonstrate how the proposals address the issues outlined in the policy. In relation to issue 1., the proposal

⁹¹ Warwickshire County Council (2017). Bermuda Connection. Available from <http://www.warwickshire.gov.uk/bermudaconnection>

⁹² Warwickshire County Council (2016). *Nuneaton and Bedworth Borough Council Strategic Transport Assessment: Borough Plan Review Modelling Report*.

⁹³ Warwickshire County Council (2016). *Nuneaton and Bedworth Borough Council Strategic Transport Assessment: Borough Plan Review Modelling Report*.

should make best use of existing transport networks. For issue 2., demand management measures should include adequate car parking. In relation to 4., some examples of key strategic facilities include town centres and local shopping, education and health facilities.

- 11.20 The NPPF makes reference to local areas setting car parking standards. Further work is required to identify appropriate car parking standards across the borough, and these will be identified within the subsequent supplementary planning document Transport Demand Management Matters. The development of a separate supplementary planning document is considered more flexible to allow for changes in parking requirements.

Borough Plan objectives

11.21 This policy delivers the following Borough Plan objectives:

- Objective 5
- Objective 8

Evidence base

11.22 The evidence base related to this policy is as follows:

- A5 Transport Liaison Group (2012). *A Strategy for the A5: A449 Gailey (Staffordshire) to A45 Weedon (Northamptonshire)*.
- Air Quality Consultants (2017). *Air Quality Assessment: Development Associated with the Borough Plan, Nuneaton and Bedworth*.
- Coventry & Warwickshire Local Enterprise Partnership (2016). *Updated Strategic Economic Plan*.
- Warwickshire County Council (2011). *Strategic Transport Assessment*.
- Warwickshire County Council (2011). *Warwickshire Local Transport Plan 2011 – 2026*.
- Warwickshire County Council (2015). *Nuneaton & Bedworth Borough Council Strategic Transport Assessment Modelling Report*.
- Warwickshire County Council (2016). *Nuneaton and Bedworth Borough Council Strategic Transport Assessment: Borough Plan Review Modelling Report*.

Delivery mechanisms

11.23 The delivery mechanisms for this policy are as follows:

- Supplementary planning document Transport Demand Management Matters to cover:
 - Standards for car parking
 - Sustainable transport standards and considerations, e.g. cycle parking requirements, safety and accessibility.
- Nuneaton town centre transport study, to be led by Warwickshire County Council.

- Nuneaton and Bedworth Borough Plan Sustainable Transport Strategy to be led by Warwickshire County Council.
- Actively work with Warwickshire County Council, Highways England, Network Rail and transport operators in the development of any new projects that will result in better connectivity, as well as being involved in any bids for funding.
- Actively work with the borough's cycling forum to inform and influence delivery and prioritisation.
- Continue membership of groups such as the A5 Transport Partnership.
- Air quality action plans
- Supplementary planning document on air quality

Monitoring

11.24 The indicators and targets that will be monitored for this policy are outlined in Table 19.

Monitoring ref	Indicator	Target
HS2a	Applications in conformity/non-conformity with Warwickshire County Council and/or Highways England advice: monitor the number of applications granted which are not mitigated against, following objection on transport grounds by either Warwickshire County Council and/or Highways England.	It is expected that applications will not be granted contrary to Warwickshire County Council and/or Highways England advice.
HS2b	Monitor number of applications granted which result in a negative outcome when assessed against the criteria set out in the policy	Qualitative assessment of this indicator will take place in the Authority Monitoring Report. It is expected that the policy will be conformed with, however analysis of individual circumstances on each application will be required to understand whether criteria were conformed with.

Monitoring ref	Indicator	Target
HS2c	Conformity with supplementary planning document Transport Demand Management Matters	Qualitative assessment of this indicator will take place in the Authority Monitoring Report. It is expected that the supplementary planning document will be conformed with, however analysis of individual circumstances on each application will be required to understand whether the supplementary planning document was conformed with.

Table 19: Indicators and targets to be monitored for Policy HS2

Policy HS3 – Telecommunications and broadband connectivity

Broadband

Development must facilitate and contribute towards the provision of broadband infrastructure in order to enable the delivery of broadband services across the borough.

Telecommunications proposals

Proposals for telecommunications development will be permitted provided that the following criteria are met:

1. The siting and appearance of the proposed apparatus and associated structures must seek to minimise impact on the visual amenity, character or appearance of the surrounding area.
2. If on a building, apparatus and associated structures should be sited and designed in order to minimise impact to the external appearance of the host building.
3. If proposing a new mast, evidence must be provided that demonstrates that mast or site sharing is not feasible, and the possibility of erecting apparatus on existing buildings or other appropriate structures has been explored.
4. If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. Full details of all new landscaping, screening and the retention of any trees or vegetation on the site should be provided.

5. Proposals must include details of a satisfactory scheme to return the site to its former or improved condition once operations have ceased and any apparatus is no longer required. The applicant should expect that the local planning authority will request that a bond be provided under a planning obligation in order to cover the cost of decommissioning and/or restoration of the site.
6. Proposals should adhere to Government advice on the health effects of radio waves, and consider the effects of the proposals on the amenity of local residents.

11.25 Telecommunications is defined as the infrastructure needed to provide fixed and mobile telephone, broadband and digital services.

11.26 Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The council is keen to facilitate appropriate expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing, as well as siting equipment on existing tall structures and buildings.

11.27 Paragraphs 44 and 45 of the National Planning Policy Framework (NPPF) contain detailed planning application requirements associated with communications infrastructure. It is expected that all planning applications will consider the requirements of the NPPF, as well as those within this policy.

11.28 The decommissioning of telecommunications apparatus is often an after-thought, but it is critical that this apparatus is taken down responsibly. Conditions will be applied to planning consents for telecommunications development, requiring that the land be restored when the operation of the telecommunications apparatus has expired. Full restoration may require the removal of all apparatus and ancillary structures, as well as restoration of appropriate vegetation, depending on the nature of the site.

Broadband connectivity

11.29 The Coventry, Solihull and Warwickshire (CSW) broadband project, of which the council is a member, is funded by Central Government and local authority money, and aims to achieve 98 % coverage at superfast broadband speeds across the area, in line with Government and European connectivity targets⁹⁴.

11.30 The CSW broadband project is promoting that new development should install Fibre to the Premise (FTTP) technology to future proof the delivery of broadband. FTTP technology can be more costly and disruptive to retrofit,

⁹⁴ Coventry City Council, Solihull Metropolitan Borough Council and Warwickshire County Council (2017). Coventry, Solihull, Warwickshire Superfast Broadband. Available from <https://www.cswbroadband.org.uk/>

particularly in new developments where newly laid roads would have to be taken up upon completion of the whole site. The fitting of FTTP technology is therefore most effective when implemented on new developments during the initial construction phase, alongside wider utilities provision or highways construction.

11.31 In February 2016 an agreement was made between BT and the National Housebuilders Federation where BT will provide on-site infrastructure free of charge, and will in some circumstances subsidise access to the fibre spine which provides superfast broadband. Consequently the cost to developers would be minimal on a pence per metre basis. FTTP technology also allows the end user to choose their internet service provider, bringing cost savings to the public through effective competition.

11.32 All new major development, both residential and non-residential, will therefore be required to facilitate and contribute to the provision of broadband infrastructure in order to enable the delivery of broadband services across the borough, giving particular attention to the inclusion of FTTP. If a developer is of the view that this would be unviable, an independent viability assessment should be submitted with the application.

Borough Plan objectives

11.33 This policy delivers the following Borough Plan objectives

- Objective 5

Evidence base

11.34 The evidence base related to this policy is as follows:

- Coventry City Council, Solihull Metropolitan Borough Council and Warwickshire County Council (2017). Coventry, Solihull, Warwickshire Superfast Broadband. Available from <http://www.cswbroadband.org.uk/>

Delivery mechanisms

11.35 The delivery mechanisms for this policy are as follows:

- Use of planning obligations/agreements to deliver telecommunication infrastructure requirements in new developments.
- Delivery of the CSW broadband project.

Monitoring

11.36 The indicators and targets that will be monitored for this policy are outlined in Table 20.

Monitoring ref	Indicator	Target
HS3a	The number of new telecommunications developments permitted in conformity / not in conformity with the policy	It is expected that applications approved for telecommunications will be in line with this policy. Where this does not occur, detailed analysis will need to be undertaken to ascertain whether the policy is effective.

Table 20: Indicators and targets to be monitored for Policy HS3

Policy HS4 – Retaining community facilities

Proposals for development which would lead to the loss of community facilities will only be permitted where:

- adequate alternative facilities and services are available locally; or
- access to locally alternative facilities is enhanced; or
- replacement facilities are proposed nearby; or
- it can be demonstrated that there is no longer a demand for the use, the use is no longer viable/appropriate, and that there is a greater benefit to the area resulting from the proposed use.

11.37 This policy seeks to ensure existing facilities are not detrimentally impacted upon as part of any development proposals. The provision of new facilities will primarily be delivered through the Infrastructure Delivery Plan and ‘Policy HS1 - Ensuring delivery of infrastructure provision’.

11.38 Community facilities have an important role within the local community, contributing towards community cohesion, health and well-being, delivering sport and physical activity, as well as the sustainability of a local area. The loss of existing community facilities will be resisted to ensure that suitable provision remains spread across the borough. Examples of community facilities are listed below, however it should be noted that this list is not exhaustive:

- Sports centres and multi-use halls
- Allotments
- Public houses
- Health facilities
- Places of worship
- Cultural facilities
- Schools
- Green spaces / parks
- Play areas
- Community centres
- Local shops

11.39 There is already some protection afforded to community facilities if they are designated as an asset of community value, through the community right process. This allows defined community groups to ask the council to list certain assets as being of community value. This is designed to give communities an opportunity to take control of the assets and facilities important to them.

11.40 If an asset is listed and then comes up for sale, the right could give communities who would like to take ownership of the asset a total of six months to put together a bid to buy it (including a six week cut-off for an initial proposal to be put forward).

11.41 The following organisations are eligible to nominate assets:

- Properly-designated Neighbourhood Forum
- Parish Council
- Unincorporated body

11.42 An asset of community value can be any land or building which does not fall into the categories below:

- Residence together with land connected with that residence, as defined in the regulations.
- Land in respect of which a site licence is required under Part 1 of the Caravan Sites and Control of Development Act 1960.
- Operational land as defined in section 263 of the Town and Country Planning Act 1990(c).

11.43 Once an asset is listed, the owner cannot then dispose of it without:

- letting the local authority know that they intend to sell the asset, or grant a lease of more than 25 years;
- waiting until the end of a six week interim moratorium period if the local authority does not receive a request from a community interest group to be treated as a potential bidder; or
- waiting until the end of a six month full moratorium period if the local authority receives a request from a community interest group to be treated as a potential bidder.

11.44 Please note that once the above has been carried out, the owner does not then have to sell the asset to the community interest group.

Borough Plan objectives

11.45 This policy delivers the following Borough Plan objectives:

- Objective 5
- Objective 8

Evidence base

11.46 The evidence base related to this policy is as follows:

- Nuneaton and Bedworth Borough Council (2013). *Local Hierarchy Study*
- Nuneaton and Bedworth Borough Council (2011). *Accessibility and Settlement Hierarchy Study 2011*.
- Nuneaton and Bedworth Borough Council (2016). *Sport, Recreation and Community Facilities Strategy: 2016-2031*.

Delivery mechanisms

11.47 The delivery mechanisms for this policy are as follows:

- Actively work with Warwickshire County Council in assessing the impact of community facility losses.
- Work with partners on the Infrastructure Delivery Plan Group in identifying any community facility requirements, and identify these in the Infrastructure Delivery Plan.
- Work with community and voluntary action groups.

Monitoring

11.48 The indicators and targets that will be monitored for this policy are outlined in Table 21.

Monitoring ref	Indicator	Target
HS4a	Loss of community facilities	Applications granted which result in the loss of community facilities will need to be assessed in consultation with Warwickshire County Council. The impact of the loss(es) will determine the effectiveness of the policy.

Table 21: Indicators and targets to be monitored for Policy HS4

Policy HS5 – Health

All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:

- Health Impact Assessment where significant impacts on health and wellbeing would arise from that proposal, or

- Health Impact Assessment Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.

All Health Impact Assessments shall be undertaken in accordance with the council's Health Impact Assessment supplementary planning document.

Where a development has significant negative or positive impacts on health and wellbeing, the council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other contributions secured via planning obligations or CIL.

- 11.49 Health and well-being are key issues at the national and local level. Alcohol abuse and obesity are particular health concerns for the borough⁹⁵. Health is not simply about access to medical facilities, it is also about lifestyle. Physical activity can also play an important part of health and well-being. This element is dealt with through 'Policy HS6 – Sport and exercise'. This policy focuses on elements of health that are not picked up elsewhere in the Plan.
- 11.50 The policy stipulates a Health Impact Assessment requirement for applications which meet the threshold for an Environmental Impact Assessment. Using the Environmental Impact Assessment as a trigger for a Health Impact Assessment is considered an appropriate threshold because it is extremely likely that the application will impact health. Planning applications not requiring an Environmental Impact Assessment are likely to create impacts on health, however identifying an appropriate scale of application is challenging. Ultimately the impact is likely to vary even for applications of similar use classes. Consequently, the policy recommends a screening process be undertaken by the applicant to assist in determining the need for a Health Impact Assessment. The submitted Health Impact Assessment will be assessed by Warwickshire Public Health during the determination period.
- 11.51 The development of a supplementary planning document will assist in determining how a Health Impact Assessment should be undertaken, as well as the criteria that should be included as part of any assessment. This will also build upon the current Health Impacts Toolkit being developed by Birmingham City Council, and which is expected to be rolled out across the West Midlands Combined Authority (WMCA) area. The development of this toolkit to date has involved partnership working with representatives from the development industry and Public Health England. Once launched it is expected to carry with it an associated accreditation support by Public Health England. In the event that this toolkit is not rolled out across the WMCA or the toolkit is shown to be inappropriate for a specific development proposal, the Health Impact Assessment supplementary planning document will provide guidance as to alternative toolkits that will support health

⁹⁵ Ben Cave Associates (2014). *Health Impact Assessment – Nuneaton and Bedworth Borough Plan*.

considerations in new developments across the borough. Over time there may be a need to update criteria in light of new health evidence.

Borough Plan objectives

11.52 This policy delivers the following Borough Plan objectives:

- Objective 8

Evidence base

11.53 The evidence base related to this policy is as follows:

- Ben Cave Associates (2014). *Health Impact Assessment – Nuneaton and Bedworth Borough Council*.

Delivery mechanisms

11.54 The delivery mechanisms for this policy are as follows:

- Agreement with Warwickshire Public Health to be developed regarding assessment of Health Impact Assessment.
- Supplementary planning document entitled Planning for a healthier area – Nuneaton and Bedworth
- Continue partnership arrangements with healthcare providers and Warwickshire Police.

Monitoring

11.55 The indicators and targets that will be monitored for this policy are outlined in Table 22.

Monitoring ref	Indicator	Target
HS5a	Monitor the number of applications granted contrary to the Health Impact Assessment recommendations	Zero
HS5b	Monitor number of planning obligations received associated with health matters	Monitoring analysis will compare the overall monetary requirements identified in the Infrastructure Delivery Plan against what the council receives

Table 22: Indicators and targets to be monitored for Policy HS5

Policy HS6 – Sport and exercise

Proposals which assist in creating a healthy environment across the borough through the use of sports, leisure and recreation facilities and/or opportunities to exercise will be approved.

New developments, and in particular strategic housing sites, will be required to plan from the outset for the integrated planning of a healthy environment for its communities. This includes the provision and maintenance for sport, physical activity, and community facilities, as well as green infrastructure, open space, allotments, and walking and cycling routes in line with policies NE1 – Green infrastructure and NE2 – Open space. They should relate well to each other and to existing areas, and the new facilities and spaces should be safe, convenient, accessible and functional.

Where justified on-site, strategic housing sites will need to provide the land for the facility at no cost, in a suitable location. Where the site-specific policies identify the need for a strategic facility to be located in particular strategic housing sites, then developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site. Where provision is justified, but not on-site, then an off-site contribution will be required. This will need to fund the facility and the land required for the facility.

In ensuring the timely delivery of infrastructure requirements, development proposals must demonstrate that full regard has been paid to the Infrastructure Delivery Plan and all other policies and relevant strategies, including the Playing Pitch Strategy; Sport, Recreation and Community Facilities Strategy; Open Space Strategy; Green Infrastructure Strategy and Allotment Strategy. The on-site provision, maintenance and management of sports and recreation facilities provided will be secured through planning obligation, as they will be needed to make the development acceptable in planning terms.

The scale, design and specification of facilities sought will be calculated and provided based on provision standards, facility specifications and needs, and costs as set out in relevant strategies. Additionally, the facilities will need to meet the Regulation 122 Tests set out in The Community Infrastructure Levy Regulations 2010.

11.56 The sport, physical activity and healthy communities policies directly relate to the National Planning Policy Framework (NPPF) paragraphs 70, 73 and 156; noting that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- plan positively for the provision and use of shared space, community facilities such as sports venues to enhance the sustainability of communities and residential environments, and
- ensure an integrated approach to considering the location of housing, economic uses, and community facilities and services.

11.57 The council has undertaken studies to identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required, and to set strategic priorities for the area.

11.58 Paragraph 74 of the NPPF contains detailed planning application requirements associated with playing pitch losses. These are identified below:

11.59 “Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

11.60 The policy does not repeat these requirements; however, it is expected that applications take account of this policy and the wider NPPF requirements.

Maintenance

11.61 Where there is provision of new on-site sports and recreation facilities these will also require contributions for maintenance. This also applies to open space, green infrastructure, playing fields and allotments. Open space and other green infrastructure will be funded for 20 years. Developments which have facilities that can reasonably be expected to fund their own maintenance will not pay for the maintenance of these facilities. This includes facilities within leisure/sports centres (swimming pools, sports halls, gyms, studios), artificial grass pitches, tennis, facilities in community halls and cycle tracks. The current sports facilities priorities listed in the Infrastructure Delivery Plan (2017) at Table 18 Financial contributions for physical activity will not require contributions for maintenance. If future facilities do require maintenance, contributions for these will be funded for 20 years.

11.62 The requirement for the maintenance of on-site facilities will be based on the whole strategic housing site area, so the co-operation of landowners/developers/house builders is required to ensure this cost is fairly met.

Borough Plan objectives

11.63 This policy delivers the following Borough Plan objectives:

- Objective 5
- Objective 6
- Objective 7
- Objective 8

Evidence base

11.64 In addition to the policies above, the evidence base related to and directly informing this policy is as follows:

- Jones Plus Limited (2007). *Nuneaton and Bedworth Borough Council: Open Space Assessment*.
- Knight, Kavanagh & Page (2016). *Nuneaton and Bedworth Borough Council Playing Pitch Strategy Assessment Report*.
- Knight, Kavanagh & Page (2016). *Nuneaton and Bedworth Playing Pitch Strategy & Action Plan: 2016-2031*.
- Land Use Consultants (2009). *Nuneaton and Bedworth Green Infrastructure Plan: Final Report*.
- Land Use Consultants (2011). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study*.
- Nuneaton and Bedworth Borough Council (2011). *Open Space Strategy: 2011 – 2021*.
- Nuneaton and Bedworth Borough Council (2012). *Sport, Active Recreation and Wellbeing Strategy: 2012 – 2017*.
- Nuneaton & Bedworth Borough Council (2013). *Allotment Strategy: 2012 – 2022*.
- Nuneaton and Bedworth Borough Council (2016). *Sport, Recreation and Community Facilities Strategy: 2016-2031*.
- Warwickshire Museum and Natural Environment (2013). *Warwickshire, Coventry & Solihull Sub-Regional Green Infrastructure Strategy*.

Delivery mechanisms

11.65 The delivery mechanisms for this policy are as follows:

- Continue to work with the Sports Development and Parks and Countryside teams, seeking their advice on planning applications and the updating of policies and strategies.
- Identification through all stages of the planning application process on all strategic housing sites of the on-site and off-site requirements for sport, recreation, physical activity, community facilities, green infrastructure, open space, allotments, and walking and cycling.
- Delivery of relevant strategies including: Open Space Strategy: 2011 - 2021; Playing Pitch Strategy & Action Plan: 2016 - 2031; Sport, Recreation and Community Facilities Strategy: 2016-2031; Green Infrastructure Plan; and Allotment Strategy: 2012 - 2022.
- Ongoing input into, and updating of, the Infrastructure Delivery Plan.

Monitoring

11.66 The indicators and targets that will be monitored for this policy are outlined in Table 23.

Monitoring ref	Indicator	Target
HS6a	Monitor the number of planning obligations received associated with sport and exercise matters	Monitoring analysis will compare the overall monetary requirements identified in the Infrastructure Delivery Plan against what the council receives
HS6b	Loss and gain of playing pitches	As identified within the Playing Pitch Strategy
HS6c	Loss of open space	No net loss of open spaces, destination parks, community parks, playing pitches, parks or allotments to development
HS6d	Improvements to open space	Improvements in the total numbers of residents with adequate access to the different forms of open space provision as well as improvements in the quality of the open spaces
HS6e	Monitor the amount of planning obligations contributions secured, and the on-site provision of relevant facilities	Increase in the resources secured for, and the provision of, relevant facilities.

Table 23: Indicators and targets to be monitored for Policy HS6

Policy HS7 – Creating a healthier food environment

To limit development of environments that encourage obesity, A5 uses (hot-food take-aways) should be directed to town centres as set out in Policy TC3 – Hierarchy of centres. Outside of Nuneaton and Bedworth town centres, A5 use proposals will be permitted providing:

- The proposal is not within a 400 m radius of the principal point of access to an existing secondary school or sixth form college. This will not apply when the buffer zone overlaps with a town or local centre.
- The proposal does not jeopardise the provision of an essential local service.
- The proposal does not increase the number of units under the A5 use class to over 20% of the centre's total usage.

- Customer visits by car would not unacceptable impact on existing or proposed public transport provision, traffic movements, road or pedestrian safety.
- A sequential assessment is provided which demonstrates that there are no other sequentially preferable sites.

Proposals should be in accordance with the supplementary planning document 'Planning for a healthier area – Nuneaton and Bedworth'.

11.67 A Health Impact Assessment was undertaken at the Preferred Options stage of the plan, and recommended the Plan includes a restrictive policy regarding fast food outlets. Whilst there is evidence to suggest obesity levels may be higher in areas of high numbers of fast food outlets, there is no conclusive evidence of this relationship. However, the council aims to contribute to creating healthy environments where possible, and has therefore introduced criteria which must be adhered to for any future fast food proposals for A5 uses, both within and outside of town centres.

11.68 Implementing a 400 m fast food buffer around secondary schools has proven to be a successful measure where implemented in other local authorities. A 400 m buffer is chosen as this is thought to equate to a five minute walking time.

Borough Plan Objectives

11.69 This policy deliver the following Borough Plan objectives:

- Objective 8

Evidence base

11.70 The evidence base related to this policy is as follows:

- Ben Cave Associates (2014). *Health Impact Assessment – Nuneaton and Bedworth Borough Plan*.

Delivery mechanisms

11.71 The delivery mechanisms for this policy are as follows:

- Supplementary planning document 'Planning for a healthier area – Nuneaton and Bedworth'
- Planning applications for A5 uses will be determined based on the above criteria on 'Creating a healthier food environment'

Monitoring

11.72 The indicators and targets that will be monitored for this policy are outlined in Table 24.

Monitoring ref	Indicator	Target
HS7a	Monitor the number of applications for use class A5 within 400 m of the principal point of access of existing secondary schools and sixth form colleges, excluding applications falling in town, district or local centres	Zero
HS7b	Monitor the number of units under A5 use class as a percentage of each local and district centre	20% maximum

Table 24: Indicators and targets to be monitored for Policy HS7

12. Natural environment

12.1 The following policies focus on protecting, conserving and enhancing the natural environment.

Policy NE1 – Green infrastructure

The borough's green infrastructure assets will be created, protected, managed and enhanced.

New development proposals will create new, and enhance existing, green infrastructure assets.

Where development proposals have a watercourse classified as a main river within their boundary, as a minimum, developers should set back development 8 m from the top of the bank or landward toe of any flood defence. Greater widths may be appropriate where forming green infrastructure, open space or ecological corridors. Easements will also be sought on smaller watercourses where possible, to maintain ecological and green corridors.

To ensure connectivity and multi-functional benefits, development proposals will take account of the following zones and projects within the Green Infrastructure Plan:

1. Conserve, enhance and increase access to the diverse historic Forest of Arden landscape by:
 - a. Planting broadleaved trees and woodland to strengthen the landscape structure, to restore wildlife habitats and corridors, to conserve and enhance the landscape of Arbury Park, and to act as a buffer to Ensor's Pool.
 - b. Creating a country/community park at Arbury in order to increase access to nature, and to provide new habitat and corridors to link to Bermuda Lakes and the Coventry Canal.
2. Understand, access and enjoy the borough's industrial heritage and geology as part of a network of green spaces by:
 - a. Providing new routes to link Camp Hill to Hartshill Hayes Country Park, Coventry Canal and North Arden Heritage Trail long distance routes.
 - b. Conserve and enhance existing quarry sites and geological exposures in order to maintain the geological record and to conserve cultural heritage assets.
 - c. Conserve and enhance the open mosaic habitats associated with former quarry sites and increase access to nature at such locations.
 - d. Improve the Coventry Canal for people and wildlife by upgrading the towpath and links to the canal in order to give access for walking and cycling, restoring the canal vernacular and conserving and enhancing wildlife habitats.

3. Restore the town's relationship with its river valley corridor landscapes by:
 - a. Restoring the River Anker corridor as an important feature through Nuneaton Town Centre and Riversley Park, balancing amenity, access, wildlife and recreation objectives.
 - b. Seeking greater access to the River Anker corridor through the town centre for walking and cycling.
 - c. Improving wildlife habitats, particularly within the river channel.

4. Create spaces for people in town centres and microclimates to adapt to climate change by:
 - a. Planting trees within Nuneaton and Bedworth town centres to create urban cooling as well as visual connections to green spaces.
 - b. Restoring a strong landscape structure to development in the north of Nuneaton in order to create a sense of place, improve habitat connectivity, achieve urban greening, integrate development into its context and maintain separation between Nuneaton and Hinckley.

5. Create a linked network of signed strategic and local greenway routes for walking and cycling, connecting the green network of key green spaces, townscape and landscape by:
 - a. Strengthening the north-south links of the Coventry Canal and Wem Brook corridor by linking to Ashby Canal and Bulkington.
 - b. East-west cycle routes from Paul's Land via Wem Brook and Bermuda Station to Bermuda and Arbury.
 - c. Linking Bermuda and Arbury to Nuneaton Town Centre via Cat Gallows Bridge.
 - d. Linking Bermuda to Bedworth Town Centre and Bayton Road Industrial Estate.
 - e. Creating east-west links from Bedworth Heath to Bedworth Town Centre and Nicholas Chamberlaine Technology College.
 - f. Improving Weddington Walk by linking to Nuneaton Town Centre to the south, and MIRA to the north.
 - g. Improving links between strategic sites, town centres and key green spaces.
 - h. Delivering the strategic cycle network plans.

12.2 Green infrastructure is the living network of green spaces, water and other environmental features in both urban and rural areas. The Green Infrastructure Plan identifies the range of such features in the borough⁹⁶ as follows:

- Green links – right of ways, long distance paths, national cycle routes and river and canal network.
- Amenity green space – village greens, playing fields and sports pitches.
- Parks and gardens – open space hierarchy of local, community and destination parks, cemeteries and churchyards, and allotments.

⁹⁶ Land Use Consultants (2009). *Nuneaton and Bedworth Green Infrastructure Plan*.

- Natural and semi-natural green spaces – local and designated wildlife sites, local nature reserves, woodlands, quarries, disused railway lines, floodplains and productive farmland.
 - Cultural heritage – historic parks and gardens, scheduled monuments and historic landscapes.
- 12.3 There are multiple benefits of green infrastructure to residents, wildlife and the economy, for example in terms of health and well-being, connecting wildlife habitats, flood protection, carbon storage and presenting an attractive location are recognised at both national and local levels.
- 12.4 The National Planning Policy Framework points to a strategic need to plan positively to create, protect, enhance and manage networks of biodiversity and green infrastructure.
- 12.5 The Sub-Regional Green Infrastructure Strategy collates evidence about green infrastructure for Warwickshire, Coventry and Solihull⁹⁷. It focuses on landscape, biodiversity and accessibility to natural green space. The strategy's main messages are to identify for the sub-region:
- the main strategic areas of opportunity for strengthening landscape character;
 - biodiversity assets and strategic areas for reconnecting habitats; and
 - accessibility assets and deficiencies using Natural England's Accessible Natural Greenspace Standard and the Woodland Access Standards.
- 12.6 The Green Infrastructure Plan looks at the benefits and interlinkages of the multi-functions of green infrastructure for the borough. It analyses the functions - accessible green space, biodiversity, landscape character and distinctiveness, water quality, flooding, climate change, food, fuel, cultural heritage, health and well-being, and sustainable active travel. From this analysis, the Green Infrastructure Plan identifies key messages and landscape zones as a framework for projects for the long term planning of the borough's green infrastructure. The following landscape zones are identified:
- Forest of Arden landscape enhancement
 - Post-industrial and geological heritage
 - Urban waterways and wetlands
 - Urban greening
 - Strategic and local greenways and corridors
- 12.7 This policy translates the landscape zones into a framework of priorities for green infrastructure in order to support the existing community and new growth in the borough. Where applicable, the site specific policies will include measures to contribute to the delivery of the green infrastructure framework.

⁹⁷ Warwickshire Museum and Natural Environment (2013). *Warwickshire, Coventry & Solihull Sub-Regional Green Infrastructure Strategy*.

12.8 Warwickshire County Council is developing strategic cycle network plans for Nuneaton and Bedworth and for Nuneaton to Coventry. These will be an important consideration in terms of delivering a linked network of signed strategic and local greenway routes for walking and cycling.

Blue infrastructure

12.9 The water component of green infrastructure is often referred to as blue infrastructure, and the two can often be interlinked to provide additional benefits. Green spaces can be used to reduce flood risk by managing flood flows and creating flood storage areas. They can also be used to improve accessibility to watercourses, support regeneration and improve opportunities for leisure, economic activity and biodiversity. In addition, river corridors identified as functional floodplains should be protected, as they provide opportunities for the linkage of green infrastructure, can provide storage during a flood event and can also provide specialist habitat areas.

12.10 Where development proposals include a watercourse within their site boundary, providing an easement between the development edge and the watercourse can help contribute to the delivery of green corridors. An 8 m easement is typically used, and should be included in proposals wherever possible.

12.11 Blue infrastructure also includes sustainable drainage systems. 'Policy NE4 – Managing flood risk and water quality' states that sustainable drainage systems must be incorporated within all development in order to reduce surface water run-off, as well as provide biodiversity and water quality benefits. All development proposals and public realm improvements should consider the use of urban wetlands and street rain gardens as part of sustainable drainage schemes, particularly where there are known surface water flooding problems, or where wildlife habitat connectivity could be enhanced.

Borough Plan objectives

12.12 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 5
- Objective 6
- Objective 7
- Objective 8

Evidence base

12.13 The evidence base related to this policy is as follows:

- Land Use Consultants (2009). *Nuneaton and Bedworth Green Infrastructure Plan*.

- Land Use Consultants (2011). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study*.
- Nuneaton and Bedworth Borough Council (2011). *Open Space Strategy: 2011 – 2021*.
- Nuneaton and Bedworth Borough Council (2013). *Allotment Strategy: 2012 – 2022*.
- Warwickshire Museum and Natural Environment (2013). *Warwickshire, Coventry & Solihull Sub-Regional Green Infrastructure Strategy*.

Delivery mechanisms

12.14 The delivery mechanisms for this policy are as follows:

- Green infrastructure requirements and mitigation for strategic housing sites.
- Implementation of the following policies: HS2 - Sustainable transport, HS5 - Health, NE4 - Managing flood risk and water quality, NE3 - Biodiversity and geodiversity, NE5 - Landscape character, as well as site specific policies.
- Delivery of Open Space Strategy.
- Delivery of Green Infrastructure Plan.
- Delivery of Allotment Strategy.
- Delivery of the proposed strategic cycle network plans.

Monitoring

12.15 The indicators and targets that will be monitored for this policy are outlined in Table 25.

Monitoring ref	Indicator	Target
NE1a	Green infrastructure	Provision of green infrastructure to support development in line with green infrastructure framework
NE1b	Distance of strategic network cycle routes	Delivery towards strategic cycle network plans

Table 25: Indicators and targets to be monitored for Policy NE1

Policy NE2 – Open space

New development will create an improved green network of publically accessible and linked open spaces to support growth by:

1. Protecting and enhancing the hierarchy of open spaces which are made up of destination parks, community parks and local parks. This includes:

- a. Improving open spaces at Change Brook Close, Buttermere Recreation Ground, St Giles, Blackberry Lane and Anderton Road in order to create community parks.
 - b. Providing new community parks at Whitestone, The Long Shoot and Bulkington.
2. Creating new open spaces and links for the strategic housing sites.
 3. Improving access to nature where there is a deficit of space.
 4. Addressing open space through new provision or improving existing provision in line with standards set out in the Open Space Strategy.
 5. Providing new allotments or improving existing allotments in order to enable communities to grow food where deficiencies exist, in line with standards set out in the Allotment Strategy.
 6. Providing new or improving existing children's play facilities and facilities for young people in line with the standards in the Open Space Strategy.
 7. Providing new playing fields in line with the Playing Pitch Strategy.
 8. Creating a network of strategic and local walking and cycling routes in order to increase the connectivity of open spaces.

New open space can be used multi-functionally as flood storage where appropriate. Children's play or sports pitches will not be acceptable areas of flood storage.

- 12.16 The National Planning Policy Framework (NPPF) recognises that access to high quality open spaces as well as opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- 12.17 The NPPF also sets out criteria for the loss of existing open space, sports and recreational buildings and land, including playing fields. 'Policy HS4 – Retaining community facilities', sets out the local approach to the loss of such facilities. Where losses are proposed, the council will consider the criteria in the NPPF as well as relevant standards and assessments set out in the Open Space Strategy⁹⁸ and Playing Pitch Strategy⁹⁹ in terms of using 'Policy HS4 – Retaining community facilities'.
- 12.18 The Open Space Strategy defines a typology and hierarchy of sites and standards for the quantity, quality and accessibility of open space. The strategy identifies the areas where there is a surplus or deficit of open space in terms of quantity, quality and accessibility, as well as those open spaces to be given priority for improvement and investment in order to meet access and quality standards. The overall aim is to create a publically accessible green network of open spaces.
- 12.19 A key element of the Open Space Strategy is to ensure that all properties in the borough have access to a community park. This means that all residents

⁹⁸ Nuneaton and Bedworth Borough Council (2011). *Open Space Strategy: 2011 – 2021*.

⁹⁹ Knight, Kavanagh & Page (2016). *Nuneaton and Bedworth Playing Pitch Strategy & Action Plan: 2016-2031*.

will be within 600 m or 10-12 minutes walking distance of a community park. To achieve this aim, current deficiencies will be addressed by:

- Improving open spaces to create community parks at Change Brook Close, Buttermere Recreation Ground, St Giles, Blackberry Lane and Anderton Road.
- Providing new open space in Whitestone, The Long Shoot and Bulkington.
- Providing new community parks and/or improving existing community parks in order to meet the needs of residents of the strategic housing sites.

12.20 Proposed community parks will be removed from Green Belt as part of the related development proposals.

12.21 In terms of access to nature, the council will take account of the standards proposed by Natural England, the Accessible Natural Greenspace Standard and the Woodland Trust's Woodland Access Standard.

12.22 The Open Space Strategy recognises the need for children and young people to have access to play provision and teenage facilities to meet their needs. Quantity, quality and accessibility standards are linked to the hierarchy of open space standards.

12.23 The Allotment Strategy identifies areas where there are deficiencies of allotments and quantity, quality and accessibility standards¹⁰⁰. New allotments will be provided in line with the standards in the Allotment Strategy.

Borough Plan objectives

12.24 This policy delivers the following Borough Plan objectives:

- Objective 5
- Objective 6
- Objective 7
- Objective 8

Evidence base

12.25 The evidence base related to this policy is as follows:

- Jones Plus Limited (2007). *Nuneaton and Bedworth Borough Council: Open Space Assessment*.
- Knight, Kavanagh & Page (2016). *Nuneaton and Bedworth Borough Council Playing Pitch Strategy Assessment Report*.
- Knight, Kavanagh & Page (2016). *Nuneaton and Bedworth Playing Pitch Strategy & Action Plan: 2016-2031*.

¹⁰⁰ Nuneaton and Bedworth Borough Council (2013). *Allotment Strategy: 2012 – 2022*.

- Land Use Consultants (2009). *Nuneaton and Bedworth Green Infrastructure Plan*.
- Land Use Consultants (2011). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Study*.
- Nuneaton and Bedworth Borough Plan (2011). *Open Space Strategy: 2011 – 2021*.
- Nuneaton and Bedworth Borough Plan (2013). *Allotment Strategy: 2012 – 2022*.
- Warwickshire Museum and Natural Environment (2013). *Warwickshire, Coventry & Solihull Sub-Regional Green Infrastructure Strategy*.

Delivery mechanisms

12.26 The delivery mechanisms for this policy are as follows:

- Open space requirements for strategic housing sites.
- Delivery of Open Space Strategy.
- Delivery of Green Infrastructure Plan.
- Delivery of Allotment Strategy.

Monitoring

12.27 The indicators and targets that will be monitored for this policy are outlined in Table 26.

Monitoring ref	Indicator	Target
NE2a	Change to open space	No net loss of open spaces, made up of destination parks, community parks, neighbourhood parks or allotments, to development.

Table 26: Indicators and targets to be monitored for Policy NE2

Policy NE3 – Biodiversity and geodiversity

Development proposals will ensure ecological networks and services, and biodiversity and geological features are conserved, enhanced, restored and, where appropriate, created.

Ecological network

Sites on international, national and local levels considered significant to the ecological network, irreplaceable or providing a substantive contribution to nature conservation, will be protected from development. The level of protection sought for the site will be at an appropriate scale to the site's designation status, and the contribution it makes to the ecological network.

Fragmentation of habitats

Development proposals will ensure species are able to positively respond to the impacts of climate change by preventing the fragmentation of existing habitats. Links and habitats should be created where there are gaps to the ecological network of wildlife sites, stepping stones, wildlife and canal corridors, and green spaces, regardless of whether they are of international, national or local importance. The joining up of watercourses of all sizes can also contribute to providing natural linkages for ecological networks, and proposals should utilise opportunities to do this where possible.

Biodiversity offsetting

Biodiversity offsetting will be required as a last resort, once all available options in the mitigation hierarchy have been explored. Developers must use Warwickshire County Council's biodiversity offsetting metrics to quantify the impact, and to calculate an appropriate level of compensation to replace the lost habitat. If the habitat loss cannot be replaced on site, the replacement habitat should be provided in the borough in the following order:

- A biodiversity strategic location.
- A location adjoining and/or linking a biodiversity strategic location.
- A location that does not contribute to the offsetting strategy.

Geological diversity

Development proposals will avoid adversely impacting sites of geological interest and, where appropriate, conserve and enhance such features for the enjoyment of residents, and for reasons of advancing local geological education.

Ecological assessment

Development proposals affecting the ecological network and/or important geological features will be accompanied by a preliminary ecological assessment and/or, where relevant, a geological assessment.

Where the assessment indicates an adverse impact, the assessment must set out a mitigation strategy to halt and reverse the loss of biodiversity, and how it will create biodiversity net gains or, where relevant, how it will reduce its geological impact.

Any proposal that directly or indirectly impacts on a highly distinctive ecological site must show that less distinctive ecological sites have been considered first, and explain why those sites were not suitable. The assessment must demonstrate that the benefits of the development proposal will outweigh the immediate loss of biodiversity and/or geodiversity before development is permitted. The assessment must also demonstrate that the combination of proposed habitat retention, enhancement and any biodiversity offsetting, results in a net gain in biodiversity.

Special Areas of Conservation and Sites of Special Scientific Interest

Development that would adversely affect Special Areas of Conservation or cause significant harm to Sites of Special Scientific Interest will not normally be granted planning permission.

12.28 The National Planning Policy Framework (NPPF) provides opportunities to help redress biodiversity losses from new development, as it promotes the concept of biodiversity net gains. This creates a more holistic approach to the protection of the wider ecological network. The NPPF states that councils should plan positively to create, protect, enhance and manage networks of biodiversity. It also states that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is appropriate with their status, and gives appropriate weight to their importance and the contribution that they make to the wider ecological networks.

12.29 Sites which are awarded protection include:

- International sites (such as Special Areas of Conservation)
- National sites (such as Sites of Special Scientific Interest [SSSI])
- The Warwickshire, Coventry and Solihull Biodiversity Action Plan Priority Habitats & Species
- Local nature reserves
- Local wildlife sites and local geological sites
- Sites with a high distinctiveness score

12.30 The 2016 maps produced by the Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull¹⁰¹ and the Green Infrastructure Plan¹⁰² both show habitat provision, connectivity and access to nature are particularly poor on the east side of the borough, whilst to the west, provision is relatively good, but connectivity and access is also poor. Additionally, the borough only has a small number of statutory protected wildlife and geological sites (one Special Area of Conservation, two SSSIs and three local nature reserves).

12.31 A small element of the borough's ecological network consists of statutory designated sites, including Special Areas of Conservation, SSSIs and local nature reserves. One site, Ensor's Pool, is currently designated all three. The majority of the network is made up of non-statutory local wildlife sites and potential local wildlife sites, as well as priority habitats and species, woodland and ancient woodland, rivers and canals, and green corridors and stepping stones. In line with this, coherent physically connected habitat corridors and networks linking sites of higher ecological value are now recognised as essential. Additionally, non-statutory sites contribute to the greater good of

¹⁰¹ Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull (2015). *Grassland connectivity 2015, Hedgerow connectivity 2015, Local wildlife sites 2015, Phase 1 currency 2015, Phase 1 distinctiveness 2015, Phase 1 habitats 2015, Woodlands connectivity 2015.*

¹⁰² Land Use Consultants (2009). *Nuneaton and Bedworth Green Infrastructure Plan: Final Report.*

conserving biodiversity and geodiversity, and are viewed as an integral component of the ecological network.

12.32 To distinguish between habitats with greater ecological importance, both the Ecology and Geodiversity Assessment¹⁰³ and Sub-Regional Green Infrastructure Strategy¹⁰⁴ score habitats on their distinctiveness. High distinctiveness scores equate to areas of highest biodiversity, including all unimproved and semi-improved habitats. High distinctiveness will also incorporate statutory sites, local wildlife sites and the Biodiversity Action Plan habitats. The high distinctiveness category for linear habitats includes species-rich hedgerows.

Biodiversity offsetting

12.33 The mitigation hierarchy should be applied where relevant, which follows the order of avoid, minimise, restore and offset.

12.34 Where the potential to avoid, minimise and restore has been fully considered and is unavoidable, biodiversity offsetting will need to be applied prior to receiving planning permission. A biodiversity offsetting metrics has been prepared by the Department for Environment, Food and Rural Affairs (DEFRA) in order to calculate the value of biodiversity in monetary terms¹⁰⁵. Warwickshire County Council have modified the DEFRA metrics to take account of local considerations and provide advice to developers in making their calculations¹⁰⁶. Applying the metrics ensures that the losses resulting from development and the gains achieved through biodiversity offsetting are measured in the same way.

Borough Plan objectives

12.35 This policy delivers the following Borough Plan objectives:

- Objective 6

Evidence base

12.36 The evidence base related to this policy is as follows:

- Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull (2015). *Grassland connectivity 2015, Hedgerow connectivity 2015, Local wildlife sites 2015, Phase 1 currency 2015, Phase 1 distinctiveness 2015, Phase 1 habitats 2015, Woodlands connectivity 2015*.

¹⁰³ Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull et al. (2014). *Ecology and Geodiversity Assessment for Nuneaton and Bedworth Borough Council*.

¹⁰⁴ Warwickshire Museum and Natural Environment (2013). *Warwickshire, Coventry & Solihull Sub-Regional Green Infrastructure Strategy*.

¹⁰⁵ Natural England and Department for Environment, Food and Rural Affairs (2012). *Biodiversity Offsetting Pilots: Technical Paper: the metric for the biodiversity offsetting pilot in England*.

¹⁰⁶ Guidance and Excel documents available from <http://www.warwickshire.gov.uk/biodiversityoffsetting>

- Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull; Warwickshire Wildlife Trust; Warwickshire Biological Record Centre; Ecological Services, Warwickshire County Council (2014). *Ecology and Geodiversity Assessment for Nuneaton and Bedworth Borough Council*.
- Land Use Consultants (2009). *Nuneaton and Bedworth Green Infrastructure Plan*.
- Warwickshire Museum and Natural Environment (2013). *Warwickshire, Coventry & Solihull Sub-Regional Green Infrastructure Strategy*.

Delivery mechanisms

12.37 The delivery mechanisms for this policy are as follows:

- Work closely with the Habitat Biodiversity Audit Partnership, Natural England, Warwickshire Geological Conservation Group and Warwickshire Wildlife Trust, amongst others, to ensure that the borough's ecological, geological and landscape assets are conserved, restored and, where necessary, created.
- Delivery of the Green Infrastructure Plan and the Sub-Regional Green Infrastructure Strategy.

Monitoring

12.38 The indicators and targets that will be monitored for this policy are outlined in Table 27.

Monitoring ref	Indicator	Target
NE3a	Deterioration in SSSI, Special Area of Conservation and local wildlife sites	No deterioration; maintain at favourable status
NE3b	Development causing habitat net losses	Zero
NE3c	Development causing a loss of Local Biodiversity Action Plan habitats and species	Zero
NE3d	Planning permission granted on designated statutory sites and sites with high biodiversity distinctiveness	Zero
NE3e	Local wildlife sites in positive management	All local wildlife sites

NE3f	Increase or decrease in connectivity of ecological network. This could be monitored through planning applications and the Habitat Biodiversity Audit.	Year on year increase
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Table 27: Indicators and targets to be monitored for Policy NE3

Policy NE4 – Managing flood risk and water quality

Managing flood risk

New development should be prioritised to areas of lowest flood risk as defined by the Strategic Flood Risk Assessment: Level 2 and Environment Agency Flood Map for Planning, and must not increase flood risk elsewhere. A site specific flood risk assessment will be required to support planning applications in areas at risk of flooding, in order to demonstrate that the risk both within the site and to surrounding/downstream sites is not increased. Submitted flood risk assessments should refer to the recommendations of the Strategic Flood Risk Assessment: Level 2, the Humber and Severn Flood Risk Management Plans, and Warwickshire County Council’s Local Flood Risk Management Strategy.

New development proposals must account for climate change in their plans to ensure that the site will be safe over its lifetime.

A sequential approach to the layout of the development should be taken so that buildings and access routes are located in areas of lowest flood risk. Modification of ground levels / compensation works may be undertaken in order to reconfigure land located within flood zone 3a, however modifications to increase land available for development is not permitted.

For development located in areas at risk of fluvial flooding, mitigation measures should be provided up to the 1 in 100 year (1 % annual exceedance probability) plus climate change flood event. Safe access and egress must also be demonstrated. Finished floor levels in areas at risk of flooding should be set no lower than 600 mm above the 1 in 100 year (1 % annual exceedance probability) plus climate change flood level.

All new developments should contribute to creating space for water through use of blue and green infrastructure, and where relevant, restoring functional floodplains (flood zone 3b). New developments should also seek opportunities for river restoration and enhancement, e.g. de-culverting, removing structures and reinstating a natural, sinuous river channel. As a minimum all developments are required to provide an 8 m wide undeveloped buffer strip from main rivers (culverted or otherwise) to allow access for routine maintenance and emergency clearance.

Flood risk management schemes (flood defences)

Proposals for new developments should not detrimentally impact upon existing and planned flood risk management schemes. New developments that will benefit from existing flood risk management schemes will be required to contribute towards their ongoing maintenance, in line with the requirements of the Infrastructure Delivery Plan.

New developments that will benefit from existing flood risk management schemes will be required to contribute towards their ongoing maintenance, in line with the requirements of the IDP.

Land that is required for current and future flood management will be safeguarded from development.

Sustainable drainage systems

New development will be required to implement appropriate sustainable drainage system techniques in order to manage surface water run-off. For all sites, surface water discharge rates should be no greater than the equivalent site-specific greenfield run-off rate, unless otherwise agreed by the Lead Local Flood Authority (LLFA).

Surface water run-off should be managed as close to its source as possible, in line with the surface water drainage hierarchy, with surface water sewers being the last resort. Above ground storage should be considered in preference to below ground attenuation due to the additional benefits they offer, such as improved water quality, enhanced biodiversity and amenity/leisure value.

All redevelopment of brownfield sites should seek to remove existing connections to the public sewer for surface water drainage.

Details of the sustainable drainage systems proposed to be used, including operation and maintenance, must be agreed at the earliest possible stage with the LLFA.

Water quality

Development proposals will be required to protect and improve the quality of water bodies in and adjacent to the borough. Proposals will benefit the river network by restoring the functional floodplain and reinstating a natural meandering river channel where it has previously been lost. In doing so, development proposals should refer to the principles of the EU Water Framework Directive and the associated actions and objectives of the Humber and Severn River Basin Management Plans (RBMPs).

Management schemes supported by the RBMPs will be encouraged within development proposals, such as the use of tree planting to reduce soil run-off into watercourses, standing water bodies and groundwater.

Groundwater quality

Where source contamination is located on site, a groundwater risk assessment demonstrating that the development proposal and subsequent works required will not lead to deterioration in groundwater quality and quantity is required to accompany the planning application.

If a deterioration in groundwater quality cannot be avoided, there will be a presumption against the development proposal.

- 12.39 The National Planning Policy Framework (NPPF) promotes a sequential approach to identifying new land for development. This ensures that flood risk to people and property is avoided by selecting land at least risk of flooding from rivers and other sources. Site layout and design are recognised as ways to influence the risk and impact of flooding, and to provide resilience for climate change.
- 12.40 Climate change is a key threat in terms of flooding. It is expected that peak rainfall intensity and peak river flow will increase during the plan period. This will increase both the size of the flood zones associated with rivers, and the amount of flood experienced from other sources. The Strategic Flood Risk Assessment: Level 2 for Nuneaton and Bedworth updated previous flood zone maps to take into account climate change¹⁰⁷. The maps show that climate change will increase flood risk over time.
- 12.41 Monitoring of the chemical and ecological status of the water bodies in the Humber and Severn River basin districts indicates that improvements in water quality are needed to reach the environmental objectives that have been set across each of the districts¹⁰⁸.
- 12.42 This policy, and the legal obligations imposed by the Flood and Water Management Act 2010 and the EU Water Framework Directive will help to address flood issues, adapt to climate change and reverse the decline in the chemical and ecological status of water bodies.

Flood risk

- 12.43 Nuneaton and Bedworth Borough Council lies in the River Trent Catchment Flood Management Plan (CFMP), Upper Soar and Upper Anker sub-region where policy option 4 has been allocated¹⁰⁹. Policy 4 requires further action to sustain the current level of flood risk into the future (responding to the potential increases in risk from urban development, land use change and climate change). 'Policy NE4 – Managing flood risk and water quality' aims to support this aim of the River Trent CFMP by effective management of future development.

¹⁰⁷ JBA Consulting. (2016). *Nuneaton and Bedworth Borough Council Strategic Flood Risk Assessment – Level 2: Final update report*.

¹⁰⁸ Environment Agency (2015). *Humber & Severn River Basin District, River Basin Management Plans*.

¹⁰⁹ Environment Agency (2010). *River Trent Catchment Flood Management Plan*.

12.44 The River Trent CFMP and the Humber and Severn Flood Risk Management Plans indicate the following measures are required to reduce the risk of flooding:

- Directing development away from the floodplain.
- Slowing rates of run-off in the upstream catchment in order to reduce surface water flooding (particularly in Bedworth).
- Better understanding of the interaction between river and surface water flooding in order to help identify solutions in urban areas.
- Assessing long-term opportunities to move development away from the floodplain and create green river corridors.
- Taking into account future climate change and urban growth.
- Returning watercourses to a more natural state, increasing biodiversity and opening up green river corridors.
- Protecting and increasing the amount of Biodiversity Action Plan habitat in the catchment.
- Making more space for rivers through urban areas via blue corridors, i.e. restoring access for floodwater onto key strips of floodplain.

12.45 Nuneaton and Bedworth Borough Council's Level 1 and Level 2 Strategic Flood Risk Assessments are a borough-level assessment of potential flood risk from all sources. All proposals should have regard to the findings of these assessments.

12.46 Warwickshire County Council in their new role as Lead Local Flood Authority (LLFA) have published a Local Flood Risk Management Strategy. The strategy ranks Nuneaton as number 10 in the top 40 combined (historic and predictive) flood risk sites across Warwickshire through ordinary watercourses, surface water and sewer capacity. Bedworth is ranked as number 7, with the nature of flood risk listed as the main river area of Delamere Road (addressed by Environment Agency scheme) and surface water. Nuneaton Centre is ranked as number 24 with the main river, ordinary watercourse, surface water and sewer flooding all listed as the sources¹¹⁰.

12.47 The Water Cycle Study (2010) identified that there are no absolute barriers to development across Nuneaton and Bedworth. The study also highlights constraints regarding water resources, flood risk management, surface water management, wastewater infrastructure and water quality which would need to be addressed should development occur. The Water Cycle Study (2016) update assessed the constraints for each of the strategic site allocations, and where applicable, these have been addressed within the site specific policies.

12.48 Section 11 of the council's Infrastructure Delivery Plan (2017) outlines the infrastructure requirements across the borough regarding flooding and drainage, and states that "Where development does occur in areas of flood risk, financial contributions obtained from planning applications may be used to mitigate the risk associated with the development".

¹¹⁰ Warwickshire County Council (2016). *Local Flood Risk Management Strategy*.

Flood risk management schemes (flood defences)

12.49 The Strategic Flood Risk Assessment: Level 2 also assessed the borough's flood defences. Details of the flood defences, their standard of protection and condition were provided by the Environment Agency, and should be taken into consideration where development may compromise the condition and function of the flood defence.

Sustainable drainage systems

12.50 In accordance with the NPPF and the Flood and Water Management Act 2010, sustainable drainage systems are required to be implemented at all scales of development.

12.51 As of 15 April 2015, Warwickshire County Council are statutory consultees on major planning applications for surface water.

12.52 Surface water run-off should be managed at source at a discharge rate no greater than the equivalent greenfield rate for all return periods up to the 1 in 100 year (1% annual exceedance probability) flood event, plus climate change event. Where this is not possible, developers should contact the LLFA at the earliest convenience for advice on suitable surface water drainage techniques. The Warwickshire County Council standing advice design guide should be taken into consideration when designing sustainable drainage systems.

Water quality

12.53 RBMPs are prepared by the Environment Agency under the direction of the EU Water Framework Directive. The RBMPs indicate that the chemical and ecological status in relation to the quality of surface water bodies and groundwater quality are below current accepted standards. The RBMPs indicate that a number of measures are required to improve water quality, including:

- reducing the impact of diffuse pollution from rural and urban sources, including the use of sustainable drainage systems;
- remediating contaminated land; and
- improving and protecting habitats.

12.54 A key requirement of the EU Water Framework Directive is the management and prevention of deterioration of the environment as a result of growth and increased flows in the sewer network. This relates to continuous discharges of treated final effluent and storm related discharges from combined sewer overflows, storm tanks and pumping stations.

12.55 This highlights the importance for development proposals to use sewer networks as a last resort for surface water drainage. Development proposals

should therefore show consideration of the impacts the development may have on the sewer network.

12.56 The council will work in conjunction with Severn Trent with regards to water quality modelling in order to determine the potential for deterioration as a result of the growth and increased sewage discharges across the borough. Severn Trent will also consider the impact on concentrations in the rivers related to percentage deterioration, impact on current EU Water Framework Directive classifications, and potential for future EU Water Framework Directive failures.

Groundwater quality

12.57 Groundwater accounts for around a third of public water supply in England and Wales. Unfortunately it is also under threat from unsustainable levels of abstraction for drinking water, exceeding the rate at which rainfall can recharge aquifers. This in turn causes further problems, as lower groundwater levels can affect river flows, wetlands, and is seen as one of the causes for not achieving good ecological status in some rivers, lakes and estuaries. This policy, and the optional building regulations requirement of 'Policy BE3 – Sustainable design and construction' will contribute towards ensuring sustainable water supply and abstraction.

Borough Plan objectives

12.58 This policy delivers the following Borough Plan objectives:

- Objective 6
- Objective 7

Evidence base

12.59 The evidence base related to this policy is as follows:

- AECOM (2017). *Joint Warwickshire Partnership Water Cycle Study*.
- Halcrow Group Limited (2008). *Nuneaton & Bedworth Borough Council Strategic Flood Risk Assessment for Local Development Framework: Level 1, Volume 1 – FINAL*.
- Halcrow (2010). *Warwickshire sub-regional Water Cycle Study: Nuneaton & Bedworth Borough Council Final report*.
- JBA Consulting (2012). *Nuneaton and Bedworth Borough Council Strategic Flood Risk Assessment – Level 2: FINAL REPORT*.
- JBA Consulting (2016). *Nuneaton and Bedworth Borough Council Strategic Flood Risk Assessment – Level 2: FINAL UPDATED REPORT*.
- Warwickshire County Council (2016). *Local Flood Risk Management Strategy*.

Delivery mechanisms

12.60 The delivery mechanisms for this policy are as follows:

- Using the Strategic Flood Risk Assessment: Level 2 and Warwickshire County Council's Local Flood Risk Management Strategy to identify sites at least risk of flooding for development in the Borough Plan and other development plan documents.
- Developing new flood defences and sustainable drainage systems to allow development to take place.
- Delivery of projects set out in the Green Infrastructure Plan relating to flood alleviation.
- Review the Strategic Flood Risk Assessment on a five-yearly basis.

Monitoring

12.61 The indicators and targets that will be monitored for this policy are outlined in Table 28.

Monitoring ref	Indicator	Target
NE4a	The number of planning permissions granted contrary to the advice of the Environment Agency and Lead Local Flood Authority on grounds of flood risk	Zero
NE4b	The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to water quality	Zero
NE4c	The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to groundwater quality	Zero
NE4d	Number of developments including sustainable drainage systems	100 %

Table 28: Indicators and targets to be monitored for Policy NE4

Policy NE5 – Landscape character

Major development proposals must demonstrate how they will conserve, enhance, restore or create a sense of place, as well as respond positively to the landscape setting in which the development proposal is located. Developers must take account of the Land Use Designations Study and landscape guidelines when preparing their landscape strategy.

Key characteristics and distinctiveness

Major development proposals must demonstrate that they are in balance with the setting of the local landscape, respect the key characteristics and distinctiveness of that landscape, and in particular show how the proposal will:

1. Conserve or enhance important landmark views.
2. Conserve, enhance or create boundary features and field patterns.
3. Conserve and where necessary enhance the strength of character and landscape condition.

Landscape hierarchy

Major development proposals must take account of the landscape strategy set out in the Landscape Character Assessment. Outside of the strategic sites and urban area, developers must show they have sequentially considered development opportunities in areas of least landscape value first, prior to any development proposals being permitted in higher value landscape character areas. The areas of search will follow the landscape hierarchy in the order set out below:

1. Restore and create
2. Enhance and restore
3. Enhance
4. Conserve and enhance
5. Conserve

12.62 The National Planning Policy Framework says that valued landscapes should be protected and enhanced. Landscape planning policies should be informed by landscape character assessments in order to help determine the likely impacts new development proposals will have on the landscape, against which development proposals will be judged.

12.63 This policy will ensure that any suitable development will take account of landscape character and that the Land Use Designations Study will be used to determine decisions in this respect.

12.64 The Land Use Designations Study consists of several documents:

- Stage 1, Volume 1: Landscape Character Assessment (TEP, 2012) - This study assesses and describes the landscape character and quality of the borough, and establishes the landscape's sensitivity and capacity to accommodate change.
- Stage 1, Volume 2: Policy Recommendations (TEP, 2011) - This study assesses the merits of carrying over the 'Area of Restraint' and 'Countryside' designations from the Local Plan 2006 into the Borough Plan against a more flexible landscape character assessment approach to regulate new development.

- Stage 1, Volume 3: Site Analysis and Selection (TEP, 2011) - This study identifies the likely constraints to development, including reference to the landscape character assessment and the landscape's capacity to accommodate change.
- Stage 2: Individual Site Assessment (TEP, 2012) - This study involves an individual landscape and visual appraisal of potential development areas across the borough.

12.65 In 2016, TEP carried out site-specific landscape character assessments in order to assess the landscape character and mitigations required for the identified strategic sites, which have been identified in the site-specific policies. TEP also carried out townscape assessments for some of the identified non-strategic sites in order to inform their future development¹¹¹.

12.66 The landscape of Nuneaton and Bedworth is covered by 13 landscape character areas, none of which have national designation status. Only one of the landscape character areas, Arbury Parklands, is considered to have a high landscape quality. The concept of landscape character areas will help to identify and understand local landscapes in terms of their diversity, character, distinctiveness and sensitivity to change, as well as where landscapes need to be conserved, enhanced, restored or created.

Key characteristics

12.67 In the Land Use Designations Study, the 13 identified local landscape character areas each have their own set of key characteristics and key features¹¹². Some character areas have retained much of their characteristics and features, and have developed higher levels of strength of character, resulting in better landscape conditions. Other character areas have lost much of their key characteristics and features to development, intensive agricultural practices and other human activities. New development proposals therefore will need to take full account of the development guidelines set out in the Land Use Designations Study.

Landscape hierarchy

12.68 It is recognised that some areas in landscape terms are less able to adapt to accommodating development than others. This is reflected in the landscape strategies. Landscape character assessment assumes that all landscapes have the potential to accommodate development, provided it is in keeping with their key characteristics. However, changes which do not respect the landscape's key characteristics and features are likely to be detrimental to the local landscape character. Mitigation therefore is likely to be least achievable/sympathetic in high quality landscapes, and more achievable where the landscape character is of a lesser quality. For this reason, the council will take a more restrictive approach to development in the highest quality landscapes, and direct development to landscapes of lesser value.

¹¹¹ TEP (2017). *Nuneaton and Bedworth Landscape Capacity Study*.

¹¹² TEP (2012). *Nuneaton and Bedworth Landscape Character Assessment*.

12.69 The overall aim of a landscape character assessment, and ultimately the planning, design and management of landscapes, is to achieve sustainable landscapes that are visually diverse, culturally rich and provide potential biodiversity opportunities, as well as being able to meet social, economic and environmental needs. By conserving and creating landscape characteristics and features, landscape character assessment becomes less about restricting development and more about how development can fit into the landscape by creating a distinct sense of place.

Borough Plan objectives

12.70 This policy delivers the following Borough Plan objectives:

- Objective 6

Evidence base

12.71 The evidence base related to this policy is as follows:

- TEP (2011). *Nuneaton and Bedworth Land Use Designations Study, Volume 2: Policy Recommendations.*
- TEP (2011). *Nuneaton and Bedworth Land Use Designation Study, Volume 3: Site Analysis and Selection.*
- TEP (2012). *Nuneaton and Bedworth Landscape Character Assessment.*
- TEP (2012). *Nuneaton and Bedworth: Stage 2 – Individual Site Assessment.*
- TEP (2017). *Nuneaton and Bedworth Landscape Capacity Study.*

Delivery mechanisms

12.72 The delivery mechanisms for this policy are as follows:

- Work with developers, Historic England and Warwickshire County Council's Archaeological Information and Advice Team as well as others to ensure that landscape character is taken into account when planning and designing new development.
- Use the Land Use Designations Study as evidence to ensure that this policy is implemented.
- Maintaining a five year housing land supply will ensure the borough's valued landscapes will be protected.

Monitoring

12.73 The indicators and targets that will be monitored for this policy are outlined in Table 29.

Monitoring ref	Indicator	Target
NE5a	Development given planning permission in	Zero

	highly valued landscape areas	
NE5b	Maintain five year housing land supply	Maintain a minimum of five years housing land supply

Table 29: Indicators and targets to be monitored for Policy NE5

13. Built environment

13.1 These policies outline requirements relating to the built environment.

Policy BE1 – Contamination and land instability

Development proposals located on or adjacent to land which may have been subject to contamination and/or land instability will need to demonstrate the following:

1. That measures can be taken to effectively mitigate the impacts of land contamination and instability on public health, environmental quality, the built environment and general amenity.
2. That the development site is or will be made suitable for the proposed final use and will need to provide, as a minimum, the following documents with the planning application (often referred to as a preliminary risk assessment and/or desk study):
 - a. Detailed site history identifying contaminative uses and land instability.
 - b. The nature and extent of the contamination, land instability and the hazards and risks posed.

Development proposals should also demonstrate consideration of pollution prevention measures during construction.

13.2 The National Planning Policy Framework (NPPF) provides guidance on how to deal with land contamination and instability. It states that the planning system is the process by which areas of land contamination and instability will be effectively remediated in relation to its location and use. However, the responsibility for securing a safe development rests with the developer and/or landowner.

13.3 Nuneaton and Bedworth's long history of coal mining, quarrying and heavy engineering has left behind a legacy of land contamination and land instability hazardous to human health and safety. This is reflected in the identification of over 3,100 potentially contaminated sites across the borough, and a Coal Authority development high risk area that stretches across the borough from Hawkesbury/Bedworth/Bermuda/Stockingford/Whittleford / Nuneaton Common through to North Warwickshire¹¹³. Despite this there are no sites within the borough identified on the Contaminated Land Register, nor have any 'special sites' (highly toxic sites transferred to the Environment Agency for remediation) been identified in the borough.

¹¹³ Nuneaton and Bedworth Borough Council (2010). *Contaminated Land Strategy: Phase 2*.

Applying the precautionary principle

- 13.4 The possibility of contamination should be assumed by developers when considering planning applications in relation to all land subject to or adjacent to previous industrial use. The precautionary principle should especially be applied where land uses are particularly sensitive to contamination, for example, housing, schools, hospitals and children's play areas.

Risk assessment

- 13.5 Part IIA of the Environmental Protection Act 1990 states that the standard of remediation to be achieved through the granting of planning permission for new development (including permission for land remediation activities) is the removal of unacceptable risk and existing contaminant linkages, as well as to ensure the site is suitable for its new use. All receptors relevant to the site should be protected to an appropriate standard. It is essential therefore to ensure that the development of these sites leaves them safe and suitable for the new uses.
- 13.6 The need for the type and complexity of reports to accompany planning applications will depend on the specific site, and the level of contamination / land instability. This is particularly relevant where a planning condition is imposed prior to the granting of planning permission that requires a detailed remediation scheme.
- 13.7 Such a local policy is necessary to support the council's Development Management Team in continuing to require, where relevant, the submission of contaminated land / land instability and coal mining risk assessments in support of planning applications. This will ensure that the legacy of past contaminative uses, coal mining activity and any resulting issues of land instability are afforded due consideration as part of new development proposals.

Borough Plan objectives

- 13.8 This policy delivers the following Borough Plan objectives:

- Objective 6

Evidence base

- 13.9 The evidence base related to this policy is as follows:

- Nuneaton and Bedworth Borough Council (2010). *Contaminated Land Strategy: Phase 2*.

Delivery mechanisms

- 13.10 The delivery mechanisms for this policy are as follows:

- Work with Development Management, Environmental Health, the Environment Agency and the Coal Authority to identify contaminated sites and bring about remediation.

Monitoring

13.11 The indicators and targets that will be monitored for this policy are outlined in Table 30.

Monitoring ref	Indicator	Target
BE1a	Development of a potentially contaminated or unstable site	Remediation is suitable for new use and is no longer considered contaminated

Table 30: Indicators and targets to be monitored for Policy BE1

Policy BE2 – Renewable and low carbon energy

Schemes to introduce renewable and low carbon technologies will be approved, including biomass energy, ground source heat pumps, solar thermal and solar photovoltaic, combined heat and power, and district heating.

Development should connect to any existing community/district heating schemes where appropriate, and should also consider the viability of biomass heating, combined heat and power, and utilising surplus heat.

Wind Energy

Land within the borough is highly constrained and is not suitable for large scale wind energy.

Proposals for small scale wind energy will be approved where appropriate in conjunction with the below criteria.

1. No significant harm to the amenity of and safety of residential areas, particularly in relation to:
 - a. noise pollution, proximity and/or highway safety;
 - b. electromagnetic interference;
 - c. unacceptable shadow flicker; and
 - d. impacts on aviation.
2. Certified accreditation or similar evidence of the wind turbine meeting the RenewableUK Small Wind Turbine Performance and Safety Standard should be provided with the planning application prior to the granting of planning permission.
3. A decommissioning scheme is in place. The applicant should expect that the council will request that a bond be provided under a planning obligation to cover the cost of decommissioning and/or restoration of the site.

- 13.12 The National Planning Policy Framework states that the use and supply of renewable and low carbon energy should be increased through policies, in order to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts. The deployment of renewables will help tackle climate change by reducing emissions of carbon dioxide and help the country move towards a low carbon sustainable economy.
- 13.13 The EU Renewable Energy Directive (2009) committed the UK to source 15 % of its total energy from renewable sources by 2020, increasing its renewable energy uptake by 12 % from 2010. Furthermore, the UK's Climate Change Act 2008 provides the legal framework to reduce its greenhouse gas emissions by at least 80 % by 2050, compared to 1990 levels. Both of these legal requirements are a direct result of climate change and a fear that a five degree increase in global temperature will cause devastating impacts on global water supplies, food production, the economy, loss of life and a complete and unprecedented overturn in the way people live their lives.

Energy efficiency

- 13.14 National targets for energy efficiency and the progression towards zero carbon development are now being taken forward through the tightening of Building Regulations.
- 13.15 Through section 43 of the Deregulation Act, the Planning and Energy Act 2008 has been amended so that local planning authorities no longer have the power to request energy efficiency requirements over and above the Building Regulations.
- 13.16 Therefore in the absence of any higher optional requirements of Building Regulations regarding energy efficiency, development proposals are required to meet the energy efficiency requirements of Building Regulations.
- 13.17 If subsequent higher standards are introduced by Government, and there is a local evidenced need to meet them, the council will review the policy.

Residential and non-residential

- 13.18 The renewable and low carbon energy policy supports the use of a range of renewable, low, and zero carbon energy sources and technologies in order to reduce energy waste, reduce the borough's fuel poverty, proactively respond to climate change and contribute to the Government's commitment for the UK to reduce carbon emissions and increase the uptake of renewable energy.
- 13.19 Renewable and low carbon energy solutions include:

- Biomass energy
- Ground-source heat pumps
- Solar water heating
- Solar photovoltaics

- Combined heat and power / Combined cooling heat and power
- District heating network

13.20 The Feed-in Tariff and Renewable Heat Incentive are current Government schemes to encourage the use of renewable energy technologies. These incentives make the use of renewable and low carbon energy more viable.

13.21 A study conducted by Camco¹¹⁴ indicates that renewable energy and low carbon energy has the potential to deliver between 9.5 % and 12 % of Nuneaton and Bedworth's energy demand, summarised in the below table.

Energy type	GWh	Potential percentage of borough's energy demand met
Wind	20.8 - 36.6 %	1.3 - 2.3 %
Biomass	40.8 %	2.56 %
New build (mix of sources)	28.4 - 31.5 %	1.8 - 2.0 %
Existing built stock (mix of sources)	61.4 - 79.8 %	3.85 - 5.0 %

Table 31: Potential renewable and low carbon energy generation by 2026 (Camco, 2010)

13.22 By 2026, this could result in a reduction of carbon dioxide emissions of between 44.9 and 57.8 kt per year¹¹⁵.

13.23 The Camco study also states that large urban extensions, typically consisting of 1000 dwellings or more, offer the best and most viable opportunities to reduce carbon dioxide emissions with the ability to support communal biomass / combined heat and power energy systems¹¹⁶. Additionally, for most sites it is possible to achieve a 20 % reduction in total carbon (regulated and unregulated) emissions, using on-site renewable technologies such as photovoltaics, solar water heating and biomass boilers¹¹⁷, schemes which can be financially supported by the Feed-in Tariff and Renewable Heat Incentive.

13.24 Proposals for retrofitting of microgeneration technologies in existing developments will be approved, subject to a suitable assessment of the potential impacts to the local area.

13.25 Community led initiatives for renewable and low carbon energy schemes will be approved.

Small-scale wind turbine energy

13.26 The Camco study makes clear that large-scale wind energy development is significantly constrained in the borough. This is because land areas are

¹¹⁴ Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study*.

¹¹⁵ Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study*.

¹¹⁶ Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study*.

¹¹⁷ Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study*.

restricted due to the potential proximity of wind turbines to housing and other buildings (based on a 600 m buffer distance)¹¹⁸.

- 13.27 However, when considering proposals for wind turbines, the council will balance conflicting objectives, such as the need to increase renewable energy uptake against the need to protect attractive landscapes, heritage, nature conservation and local amenity. Whilst some of these issues may be reduced through mitigation, the overall impact might still be unacceptable. Consequently, any benefits arising from wind turbine proposals will be weighed against their potential harm.
- 13.28 In comparison to large-scale wind energy, small-scale wind energy development is far less imposing, being less visually intrusive and requiring less distance between wind turbines and buildings. This makes small-scale wind energy development a sustainable and appealing source of renewable energy in both the borough's urban and rural context. Consequently, the uptake of small-scale wind turbines will be promoted and encouraged to contribute to the overall renewable energy mix in the borough.
- 13.29 The RenewableUK Small Wind Turbine Standard provides an assured level of safety, power performance and acoustic noise measurements. The standard aims to provide consumers with a measure of confidence in small wind turbine products. The council will therefore insist on receiving evidence of compliance with this standard in advance of granting planning permission.
- 13.30 The decommissioning of wind turbines is often an afterthought, but it is critical that turbines are taken down responsibly. Conditions will be applied to planning consents for wind turbines requiring that the land be restored to its previous use when the operation of the wind turbines has expired (for example, after 25 years). Full restoration may require the removal of turbines, ancillary structures and restoration of appropriate vegetation, depending on the nature of the site.

Borough Plan objectives

13.31 This policy delivers the following Borough Plan objectives:

- Objective 6
- Objective 7

Evidence base

13.32 The evidence base related to this policy is as follows:

- Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study*.
- SQW (2011). *Renewable energy capacity study for the West Midlands: A final report to Telford & Wrekin Council*.

¹¹⁸ Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study*.

Delivery mechanisms

13.33 The delivery mechanisms for this policy are as follows:

- Work with developers on strategic sites to deliver renewable and low carbon energy.
- Use the Energy Toolkit to find the most viable carbon reduction solutions, and to ensure development proposals are compliant with the council's energy policies.

Monitoring

13.34 The indicators and targets that will be monitored for this policy are outlined in Table 32.

Monitoring ref	Indicator	Target
BE2a	Proposals for small wind turbines in conformity with criteria	100 %

Table 32: Indicators and targets to be monitored for Policy BE2

Policy BE3 – Sustainable design and construction

Development proposals must be:

1. Designed to a high standard.
2. Able to accommodate the changing needs of occupants.
3. Adaptable to, and minimise the impact of climate change.

Urban character

All development proposals must contribute to local distinctiveness and character by reflecting the positive attributes of the neighbouring area, respecting the sensitivity to change of the generic character types within each urban character area. Key characteristics to review include:

1. Current use of buildings
2. Ownership/tenure
3. Street layout
4. Patterns of development
5. Residential amenity
6. Plot size and arrangement
7. Built form

Residential

Major development proposals must provide a statement with their application showing how their proposal will:

1. Meet all the questions set out in the Buildings for Life 12 standard. Where it is not possible to positively meet all 12 questions, a statement of justification must be provided to explain why it is not possible, and what mitigation measures will take place to offset this.
2. Meet the optional Building Regulations requirement M4(2) for 'accessible and adaptable dwellings' for 35 % of the development proposal.
3. Install rainwater harvesting systems in the curtilage of all new buildings.
4. Integrate the principles of passive solar design.
5. Contribute to reducing crime and fear of crime by meeting the principles of Secured By Design.
6. Minimise the potential for pollution of air, soil, noise and light, and in particular not contribute to unacceptable levels of air pollution.

Where a developer considers meeting any of the above requirements is unviable or can demonstrate that they are not suited to local circumstances, an independent viability assessment must be submitted with the application.

Commercial

Major non-domestic development proposals must meet the Building Research Establishment's Environmental Assessment Method (BREEAM) very good standard for new construction projects, using the most up-to-date new construction version of BREEAM, where technically and financially feasible. Where assessment methods are changed or superseded, the appropriate replacement standards will be used.

Sustainable construction

Development must minimise or re-use waste generated during the construction phase. This should be done by using materials and construction techniques that generate the least waste and minimise emissions. Waste should be treated as a resource to be re-used, recycled or recovered, and should only be disposed of when all other options have been explored.

On-site management of waste will be preferred, unless the activities would result in unacceptable harm through impacts on the environment, transport or on neighbouring uses, or that management elsewhere would have wider sustainability benefits.

Supplementary planning documents

Detailed information to help developers comply with this policy will be set out in the Sustainable Design and Construction supplementary planning document.

- 13.35 The National Planning Policy Framework (NPPF) states that good design is indivisible from good planning, and should contribute to making places better for people. This includes individual buildings, public and private spaces, and wider area development schemes.
- 13.36 The Government's Housing Standards Review 2015 and subsequent Deregulation Bill 2015 introduce optional national technical housing standards for access, water efficiency and space which provide a higher standard than the minimum national building regulations. Local plans can request these optional requirements where there is a clearly evidenced need, and where their impact on viability has been considered.
- 13.37 There are a number of key issues in Nuneaton and Bedworth that would benefit from the sustainable design and construction of new development. These issues include:
- Existing Air Quality Management Areas
 - Low levels of car ownership
 - Poor health and lower life expectancy
 - High crime and perception of crime
 - High levels of fuel poverty
- 13.38 This policy will help to address these issues by ensuring development is of a high quality; minimises the release of air pollutants into the atmosphere; is not unreasonably noisy or otherwise obtrusive; is accessible to local shops, services and public transportation; meets the existing or future circumstances of residents, workers and visitors; is safe; is energy and water efficient; and is equipped to adapt to climate change.

Adaptable housing

- 13.39 The council believes that people should have the opportunity to stay in their family homes for as long as possible. Making homes adaptable for changing and unforeseen circumstances provides families and individuals with the choice of allowing them to stay in their existing home, and reduces the burden of excessively high building costs to meet such needs or having to relocate.
- 13.40 35.4 % of Nuneaton and Bedworth Borough's households have at least one resident with a long-term limiting illness or disability compared with 29.8 % for Warwickshire, 35.3 % for the West Midlands, and 32.7 % for England¹¹⁹. By requesting 35 % of new development to meet the optional higher building regulations standard for access requirements, this policy therefore ensures that adaptable homes will be available for young families, older people and individuals with a temporary or permanent physical impairment, providing people with choice, flexibility and independence, as well as promoting high quality and thoughtful housing design for the general population.

¹¹⁹ Office for National Statistics (2011). *2011 Census*.

Water efficiency

- 13.41 The NPPF states that local authorities should take water supply and demand into full account in their strategies and local plans. The Warwickshire sub-regional Water Cycle Study (2010) predicted a supply-demand deficit within the study area, and recommended local authorities implement policies to improve water efficiency¹²⁰. However, the Joint Warwickshire Partnership Water Cycle Study (2016) update concludes that there will be sufficient supply to meet the planned growth across the sub-region for the plan period, but there may be longer term implications for water supply¹²¹. The Water Cycle Study (2016) also identifies a number of waste water treatment works across the sub-region, which are currently operating at capacity, or will be, at some point across the plan period¹²². As a result, the council aims to help the sub-region achieve a water neutral position, and is therefore requesting new development to meet the optional Building Regulations for water efficiency.

Passive solar design

- 13.42 Passive solar design is a technique that exploits local climate and site conditions in order to minimise the need to use energy. It uses free renewable sources of energy such as sun and wind to provide heating, cooling, ventilation and natural lighting, reducing the need to use conventional space heating and cooling. Because passive solar design lessens the need to use traditional heating systems, annual energy bills can be cut by a third and carbon emissions reduced, with cost savings paid back in two years.
- 13.43 In 2012, 13.2 % of households across Nuneaton and Bedworth Borough were considered fuel poor, a slight decrease from 13.9 % in 2011¹²³. Integrating passive solar design concepts into new developments could contribute to further reductions in this number, and will have significant environmental and economic benefits for people buying or renting new properties in the borough, which will also result in better social conditions.
- 13.44 Including passive solar concepts into the design is not difficult to apply; it simply requires consideration at the preliminary stages of design. When used correctly, passive solar buildings are comfortable, economically efficient, durable, aesthetically appealing, and environmentally responsible.

Crime and fear of crime

- 13.45 A survey of Warwickshire residents' perception of crime found that Nuneaton and Bedworth Borough residents' fear of crime and anti-social behaviour has

¹²⁰ Halcrow (2010). *Warwickshire sub-regional Water Cycle Study: Nuneaton & Bedworth Borough Council Final report*.

¹²¹ AECOM (2017). *Joint Warwickshire Partnership Water Cycle Study*.

¹²² AECOM (2017). *Joint Warwickshire Partnership Water Cycle Study*.

¹²³ Warwickshire Observatory (2015). *Quality of Life in Warwickshire: 2014/15*

reduced substantially since 2000/2001¹²⁴. Nonetheless, it still remains a significant factor in undermining residents' quality of life. Nuneaton and Bedworth also has the highest level of offences per thousand households across Warwickshire¹²⁵.

- 13.46 The Warwickshire Indices of Multiple Deprivation, the official measure of deprivation in the county, measures the rate of recorded crime for burglary, theft, criminal damage and violence. The number of the borough's Super Output Areas (SOAs) within the top 10 % most deprived for the crime domain increased from nine SOAs in 2007, to 15 SOAs in 2010, falling to 11 SOAs in 2015¹²⁶.
- 13.47 Despite some improvements in peoples' perception of crime and burglary rates, there still remains a significant threat to property and the safety and welfare for residents and visitors. Consequently, new development proposals will need to consider the robustness of the buildings, so that they can withstand unwanted intrusions, as well as consider the safety of the residents and visitors in terms of accessibility and visibility within the surrounding area.

BREEAM

- 13.48 The Building Research Establishment's Environmental Assessment Method (BREEAM) is a credit based assessment system that aims to reduce the environmental impacts throughout construction and operation of a building. BREEAM considers all areas of sustainability, such as ecology, energy use, water consumption, waste management, lighting and location, resulting in a best practice approach in developing sustainable buildings which are adaptable to climate change.
- 13.49 As well as these environmental benefits, meeting at least a very good BREEAM standard can reduce energy and running costs, demonstrate environmental credentials to potential customers and create an improved image for the company.

Sustainable construction

- 13.50 To ensure that the construction of new buildings does not have a negative impact on the environment, proposals are required to have consideration towards minimising waste and emissions that are generated as a result of construction.
- 13.51 Developers should use the waste hierarchy when dealing with waste resulting from construction, in the order of re-use, recycle or recover, and disposal should be a last resort measure when the other options are not suitable.

¹²⁴ Warwickshire Observatory (2010). *Fear of Crime and Perceptions of Anti-Social Behaviour 2009/2010*.

¹²⁵ Warwickshire Observatory (2014). *Warwickshire Domestic Burglary Analysis*.

¹²⁶ Warwickshire Observatory (2015). *Indices of Multiple Deprivation 2015: Briefing Note*

13.52 Wherever possible, on-site management of waste should be pursued.

Borough Plan objectives

13.53 This policy delivers the following Borough Plan objectives:

- Objective 6
- Objective 7
- Objective 8

Evidence base

13.54 The evidence base related to this policy is as follows:

- AECOM (2017). *Joint Warwickshire Partnership Water Cycle Study*.
- Halcrow (2010). *Warwickshire sub-regional Water Cycle Study: Nuneaton & Bedworth Borough Council Final report*.

Delivery mechanisms

13.55 The delivery mechanisms for this policy are as follows:

- Prepare a supplementary planning document on Design Quality and Sustainable Design in order to provide greater detail for developers and decision makers.
- Training for officers to assess Building for Life standards.
- Promote the use of the Energy Toolkit to identify opportunities for carbon reduction in new development.

Monitoring

13.56 The indicators and targets that will be monitored for this policy are outlined in Table 33.

Monitoring ref	Indicator	Target
BE3a	New homes incorporating Building for Life 12 (12 greens)	100 % of new dwellings
BE3b	New homes meeting optional Building Regulations Standard Part M4(2) for accessible and adaptable dwellings	35 % of new dwellings
BE3c	New homes installing rain water harvesting systems in the curtilage of all new buildings	100 % of new dwellings
BE3d	New residential and commercial developments	100 %

	integrating Secure By Design principles	
BE3e	Commercial applications achieving BREEAM very good standard	100 %

Table 33: Indicators and targets to be monitored for Policy BE3

Policy BE4 – Valuing and conserving our historic environment

Development proposals which sustain and enhance the borough’s heritage assets including listed buildings, conservation areas (Appendix B), scheduled monuments (Appendix H), registered parks and gardens, archaeology, historic landscapes and townscapes, will be approved.

Development affecting a designated or non-designated heritage asset and its setting will be expected to make a positive contribution to its character, appearance and significance.

To conserve and enhance the borough’s heritage assets, development proposals must:

1. Understand the asset

Applications affecting the significance of a heritage asset will be required to provide sufficient information and assessment (such as desk-based appraisals, field evaluations, and historic building reports) of the impacts of the proposal on the significance of heritage assets and their setting, in order to demonstrate how that proposal would contribute to the asset’s conservation. The level of detail should be proportionate to the importance of the asset.

The Warwickshire Historic Environment Record, the borough’s Conservation Area Character Appraisals and Management Plans, the local list of non-designated heritage assets and Historic Landscape Characterisation Project are examples of sources of information that will be used to inform the consideration of future development, including potential conservation and enhancement measures.

Applicants should take account of the heritage asset’s communal, aesthetic, evidential and historical values.

2. Conserve the asset

Great weight will be given to the conservation of the borough’s heritage assets, with greater weight being given to assets of higher importance. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals causing harm will be weighed against the public benefits of the proposal in the following ways:

- Whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset
- Whether the works proposed are the minimum required to secure the long term use of the asset.

Scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in-situ.

Where harm to any heritage assets can be fully justified, and development would result in the partial or total loss of the asset and/or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, archaeological excavation where relevant, and ensure the publication of that record to an appropriate standard.

13.57 National planning policy on the historic environment provides guidance on the identification, significance, and protection of heritage assets. These assets include listed buildings, conservation areas, registered parks and gardens, and archaeological remains. National policy expects that the contribution of such heritage assets to local character and sense of place is recognised and valued.

13.58 The borough's historic heritage consists of approximately 90 listed buildings and 60 non-statutory listed buildings, 5 conservation areas, 2 registered parks and gardens and 2 scheduled monuments. Two buildings located in the borough are currently on Historic England's Heritage at Risk Register. The council is working with Historic England to find solutions on how to save these buildings.

Urban characterisation

13.59 To achieve national policy expectations, the council will make use of comprehensive borough-wide urban and landscape characterisation as a means of recognising and protecting local character and distinctiveness. Urban characterisation will set out the local and heritage components that positively contribute to the urban character of individual places across the borough. This policy will seek to ensure that these characteristics are taken account of in new development proposals.

Registered parks and gardens and scheduled monuments

13.60 The majority of registered sites are the grounds of private houses, however, public parks and cemeteries form important categories. This is consistent with the Arbury Hall and Bedworth Cemetery registered sites. Arbury Hall registered park and garden is grade II* listed. It is believed to be the only stately home in Britain to have a private system of canals (built in the 18th century) running through the gardens.

13.61 Bedworth Cemetery registered parks and gardens is grade II listed. It is a municipal cemetery and was consecrated in 1874. The site is around 3 ha

and consists of a number of entrances, several groups of specimen trees, a promenade and a war memorial.

- 13.62 Legal protection for nationally important sites and monuments is achieved through the scheduling of sites under the Ancient Monuments and Archaeological Areas Act 1979. Exhall Hall scheduled monument consists of upstanding earthworks and buried building remains of a variety of features.
- 13.63 The Benedictine Priory and Precinct of St Mary scheduled monument was built in the 13th century, and was one of only four Benedictine nunneries in England identified as belonging to the important Abbey of Fontevault. The priory closed in 1539 as a result of the Dissolution. The priory is also one of the few surviving nunneries with a church and outer precinct complex preserved in a fully urban context.
- 13.64 Both the registered parks and gardens and scheduled monuments, as well as their setting, are unique and are of significant historical and cultural importance to the borough, and will be given due protection.

Non-designated heritage assets

- 13.65 In comparison with neighbouring local authorities, the borough has only a small amount of designated historic heritage, reflecting the fact that much of the built environment dates from the late Victorian period and the 20th century. This is an important point, as after 1840, selection criteria for listed buildings became progressively more difficult. It is important, therefore, to protect these designated assets and recognise the borough's wider heritage assets.
- 13.66 The council's list of non-designated heritage assets is in need of review. These locally listed heritage assets include buildings, monuments, and places that contribute to the distinctive local character of the borough. The council therefore plans to undertake a comprehensive review of places of local architectural and historical interest. This will involve the local community in the identification and selection of additional assets.
- 13.67 Locally listed heritage assets are not afforded the same degree of legislative protection (particularly from demolitions and alterations not requiring planning permission) as statutory listed buildings. In line with national guidance, this policy recognises that local heritage deserves a level of protection appropriate to its value.

Archaeology

13.68 Archaeological sites of national and local importance are identified in the Warwickshire Historic Environment Record¹²⁷. Any further archaeological finds will be added to the record through the Development Management process, with the expectation that desk-based assessment and field evaluation will be carried out for development proposals affecting sites of possible archaeological interest.

Conservation areas

13.69 Conservation areas are designated under the provisions of Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 for their “special architectural and historic interest, the character and appearance of which it is desirable to preserve or enhance”. The borough has five conservation areas:

- Abbey Conservation Area;
- Bedworth Town Centre Conservation Area;
- Bulkington Conservation Area;
- Hawkesbury Junction Conservation Area; and
- Nuneaton Town Centre Conservation Area.

13.70 The key characteristics of each of the borough’s conservation areas are described in conservation area character summaries. Conservation Area Appraisals and Management Plans will be used to identify and assess local character and promote enhancement.

13.71 This policy will ensure that heritage assets are safeguarded or, where possible, enhanced. This does not mean the policy will prevent or unnecessarily restrict development. Rather, it will inspire suitable development to take place which respects both urban and landscape heritage that brings wider benefits to communities. The benefits of implementing the policy will include improvement in the quality of the built and natural historic environment, improvements in architectural design, as well as the creation of stronger local identity and sense of place.

Borough Plan objectives

13.72 This policy delivers the following Borough Plan objectives:

- Objective 6

Evidence base

13.73 The evidence base related to this policy is as follows:

¹²⁷ Available from <http://heritage.warwickshire.gov.uk/archaeology/historic-environment-record/>

- ECUS (2016). *Nuneaton and Bedworth Borough Council Borough Plan – Heritage Assessment*.
- Nuneaton and Bedworth Borough Council (2008). *Abbey Conservation Area*.
- Nuneaton and Bedworth Borough Council (2008). *Bulkington Conservation Area*.
- Nuneaton and Bedworth Borough Council (2009). *Nuneaton Town Centre Conservation Area*.
- Oxford Archaeology (2014). *A Historic Environment Assessment of Potential Development Areas within Nuneaton and Bedworth Borough*.
- TEP (2011). *Nuneaton and Bedworth Land Use Designations Study – Stage 1, Volume 2: Policy Recommendations*.
- TEP (2011). *Nuneaton and Bedworth Land Use Designations Study – Stage 1, Volume 3: Site Analysis and Selection*.
- TEP (2012). *Nuneaton and Bedworth Land Use Designations Study – Stage 1, Volume 1: Landscape Character Assessment*.
- TEP (2012). *Nuneaton and Bedworth Land Use Designations Study – Stage 2 – Individual Site Assessment*.
- TEP (2017). *Nuneaton and Bedworth Landscape Capacity Study*.
- Warwickshire County Council (2010). *Warwickshire Historic Landscape Characterisation Project*.
- Warwickshire County Council (2011). *Warwickshire Historic Farmstead Characterisation Project*.

Delivery mechanisms

13.74 The delivery mechanisms for this policy are as follows:

- To prepare a supplementary planning document on design and the preservation and enhancement of the borough's heritage.
- To complete the Conservation Area Appraisals and Management Plans.
- To complete work on urban character areas, using resources such as Warwickshire County Council's Historic Towns Project.
- To engage local communities in the identification of locally important heritage assets, using models like Warwickshire County Council's Imaging our Past social media Flickr project.

Monitoring

13.75 The indicators and targets that will be monitored for this policy are outlined in Table 34.

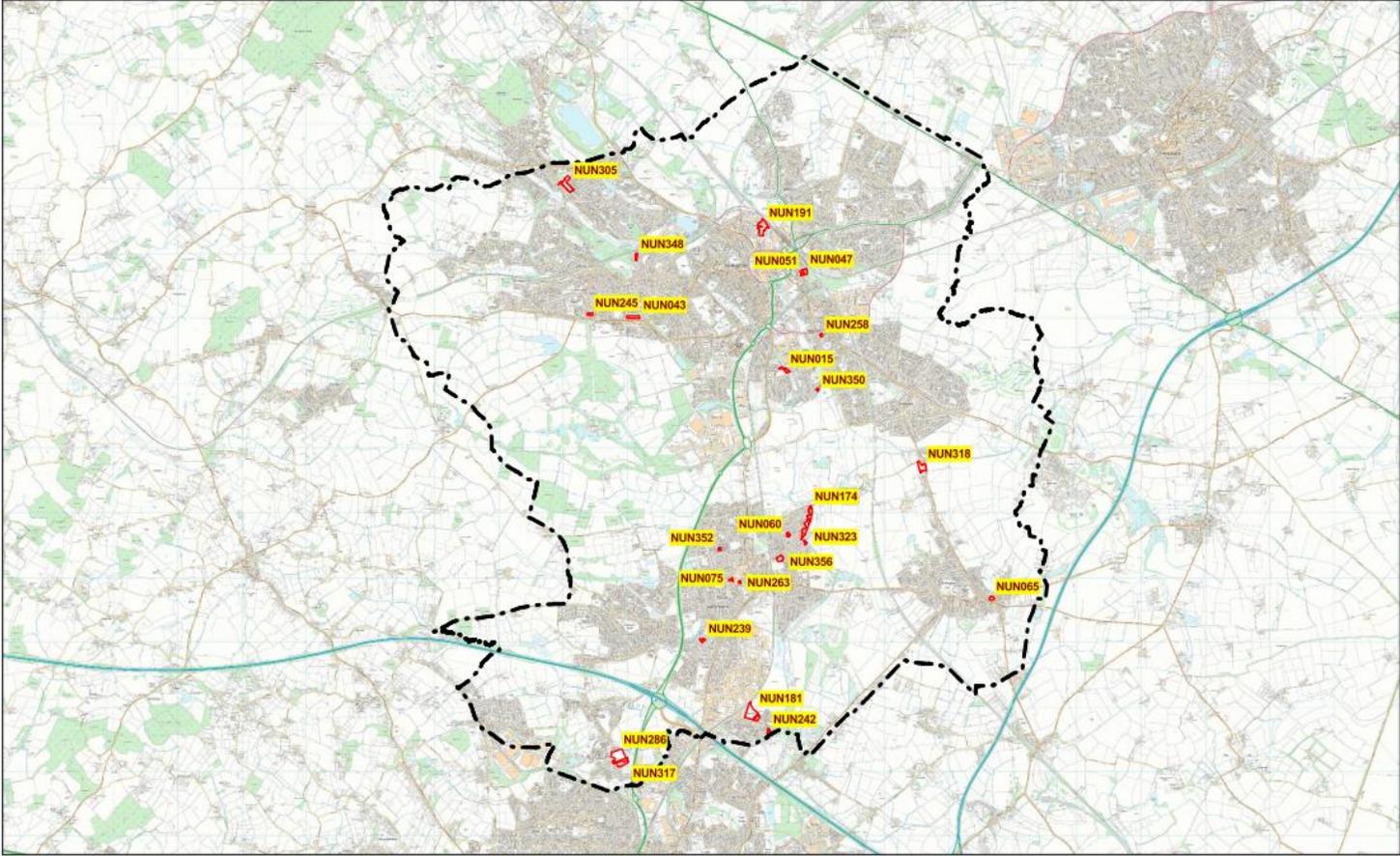
Monitoring ref	Indicator	Target
BE4a	Local list of heritage assets	Complete review
BE4b	No loss of designated historic assets	No loss

BE4c	Harm to registered parks and gardens and scheduled monuments	No harm
BE4d	Review of conservation areas	Complete review

Table 34: Indicators and targets to be monitored for Policy BE4

Appendix A – Non-strategic sites

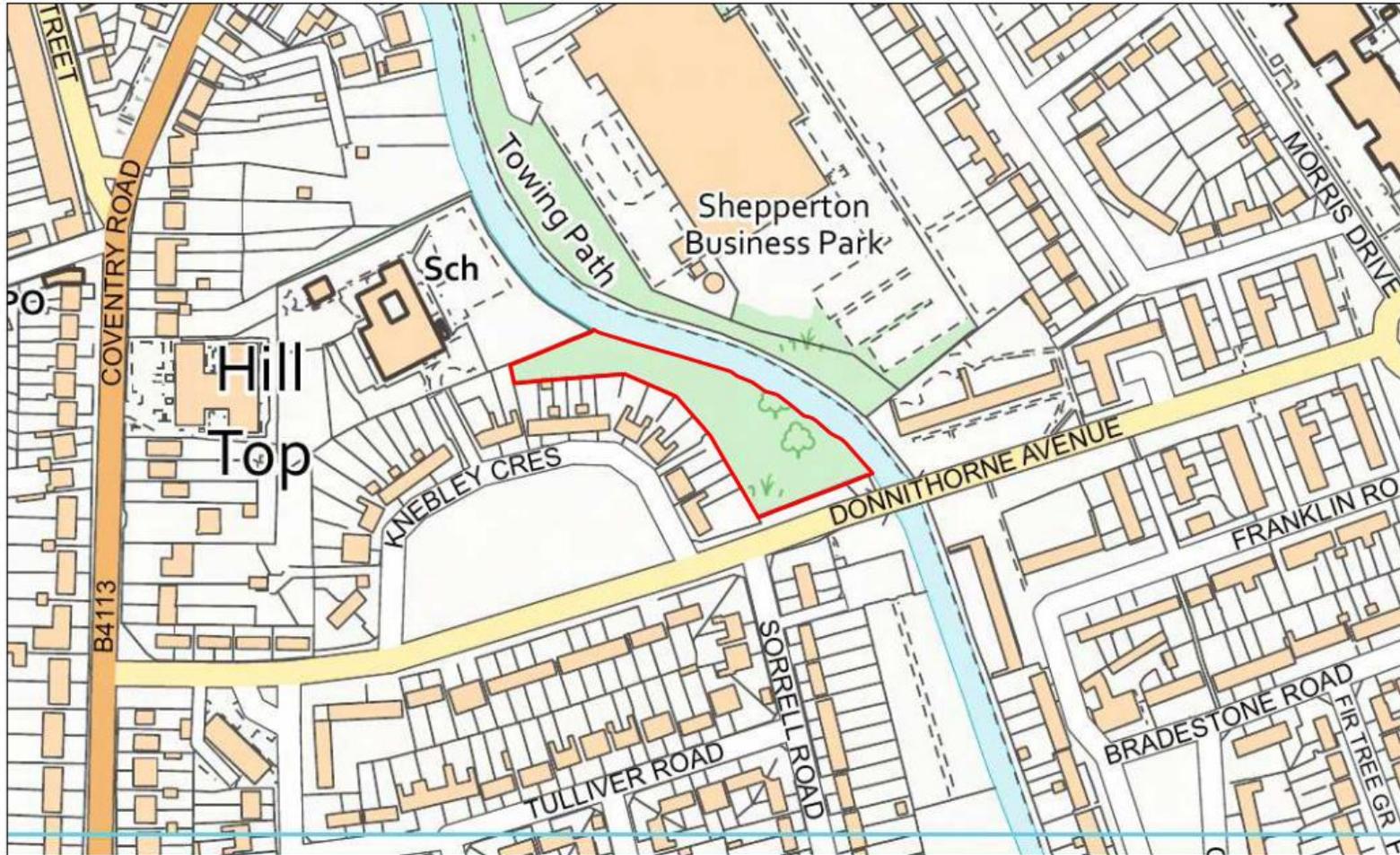
Non-strategic housing sites



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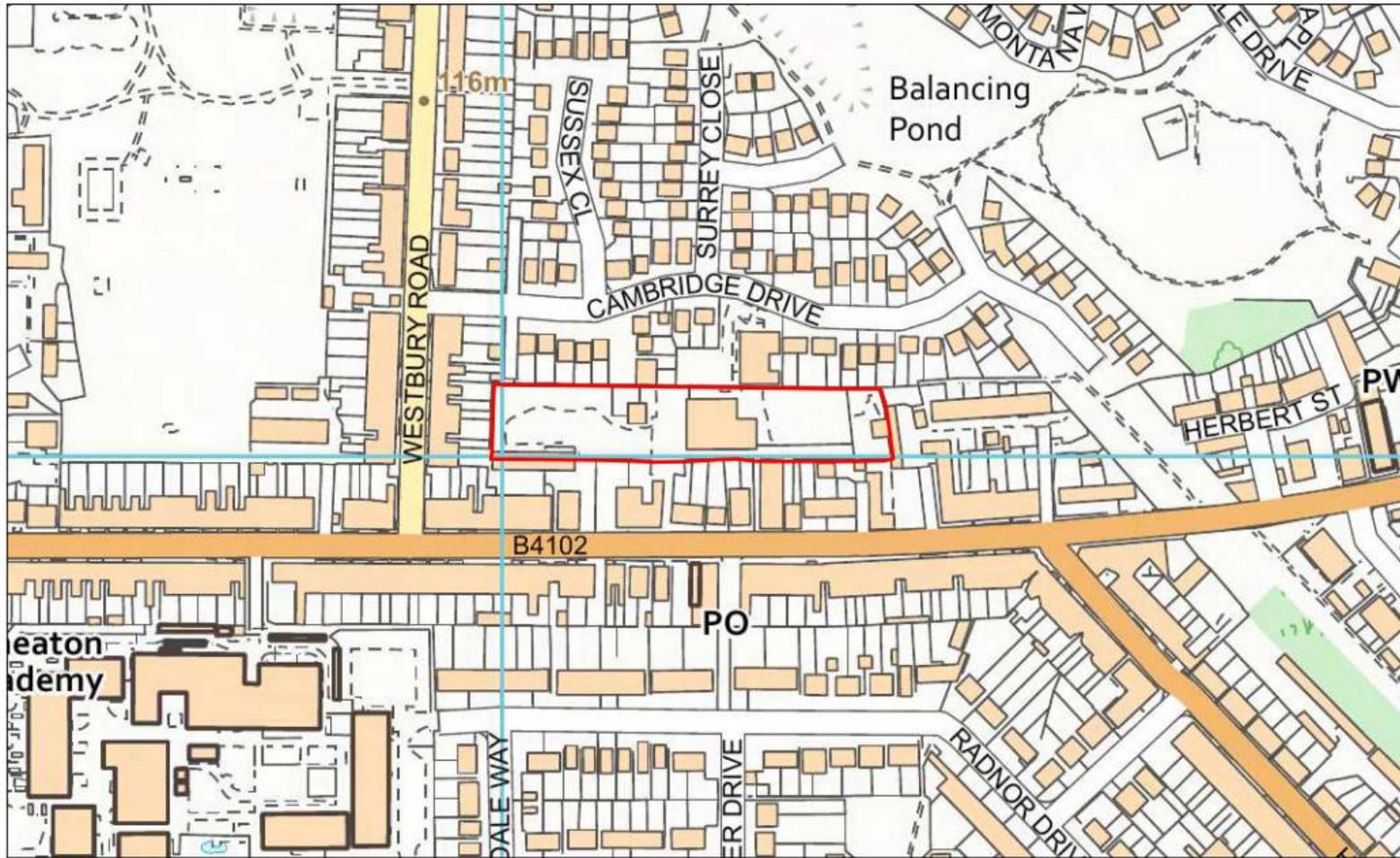
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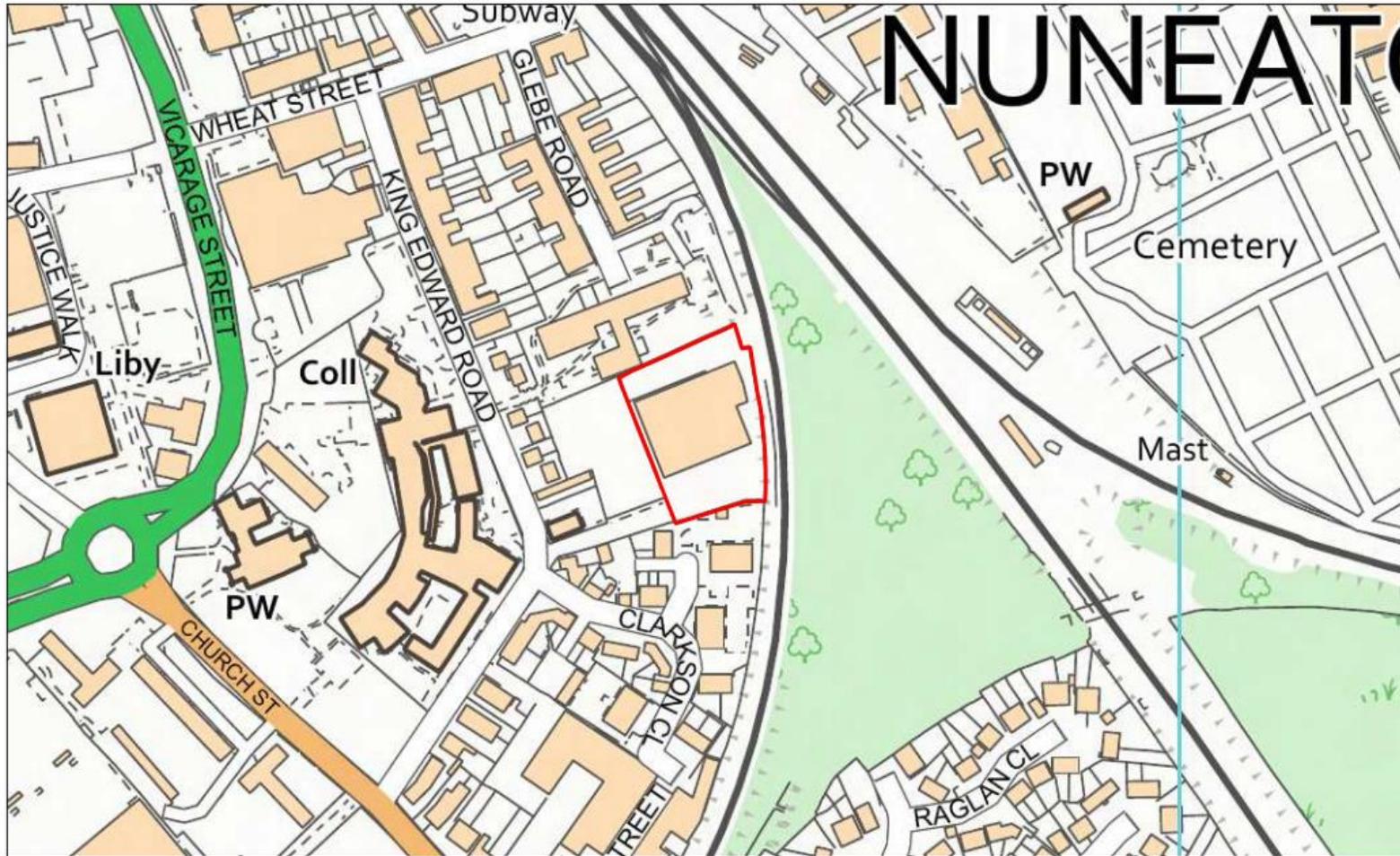
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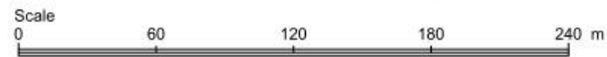
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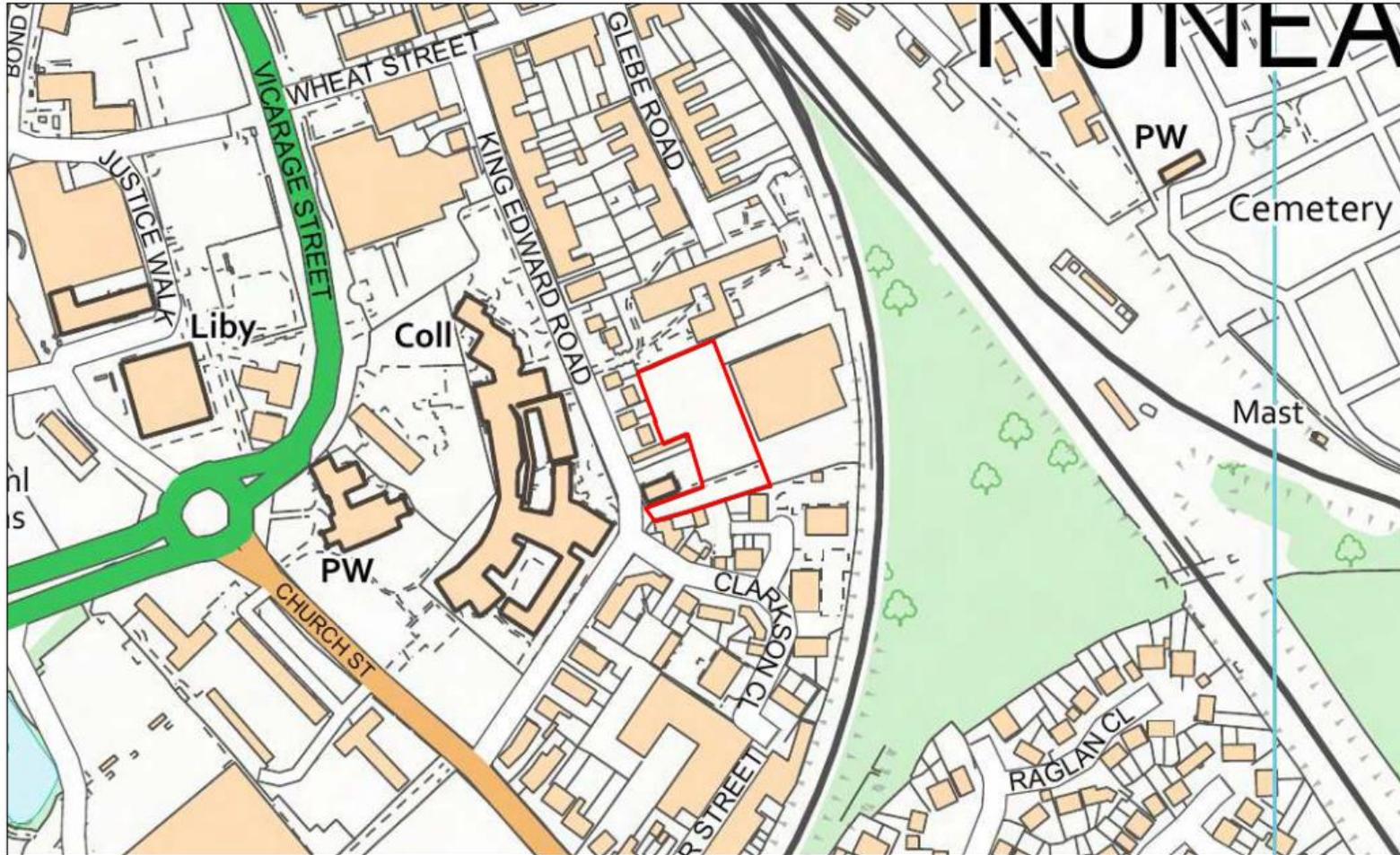
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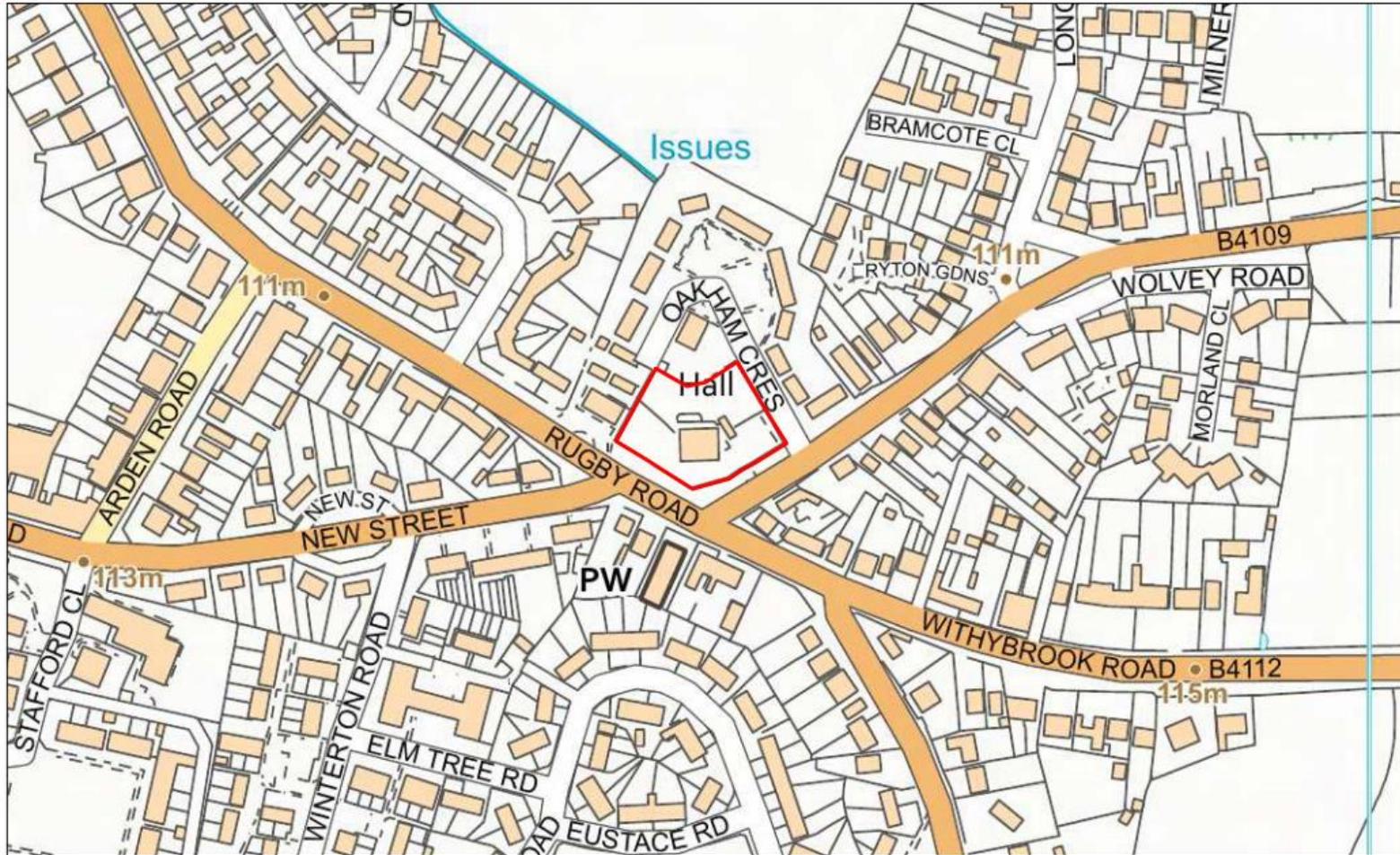
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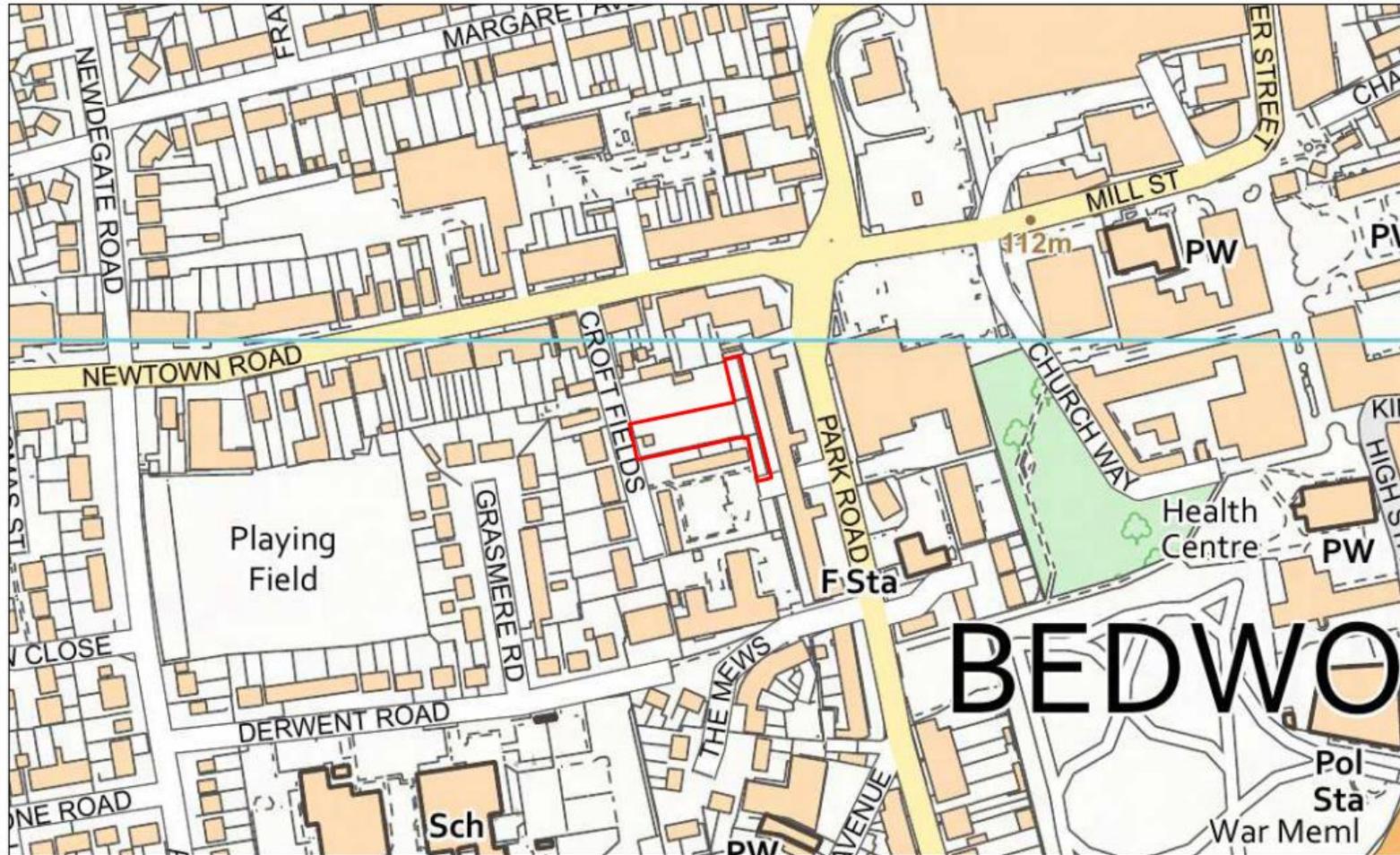
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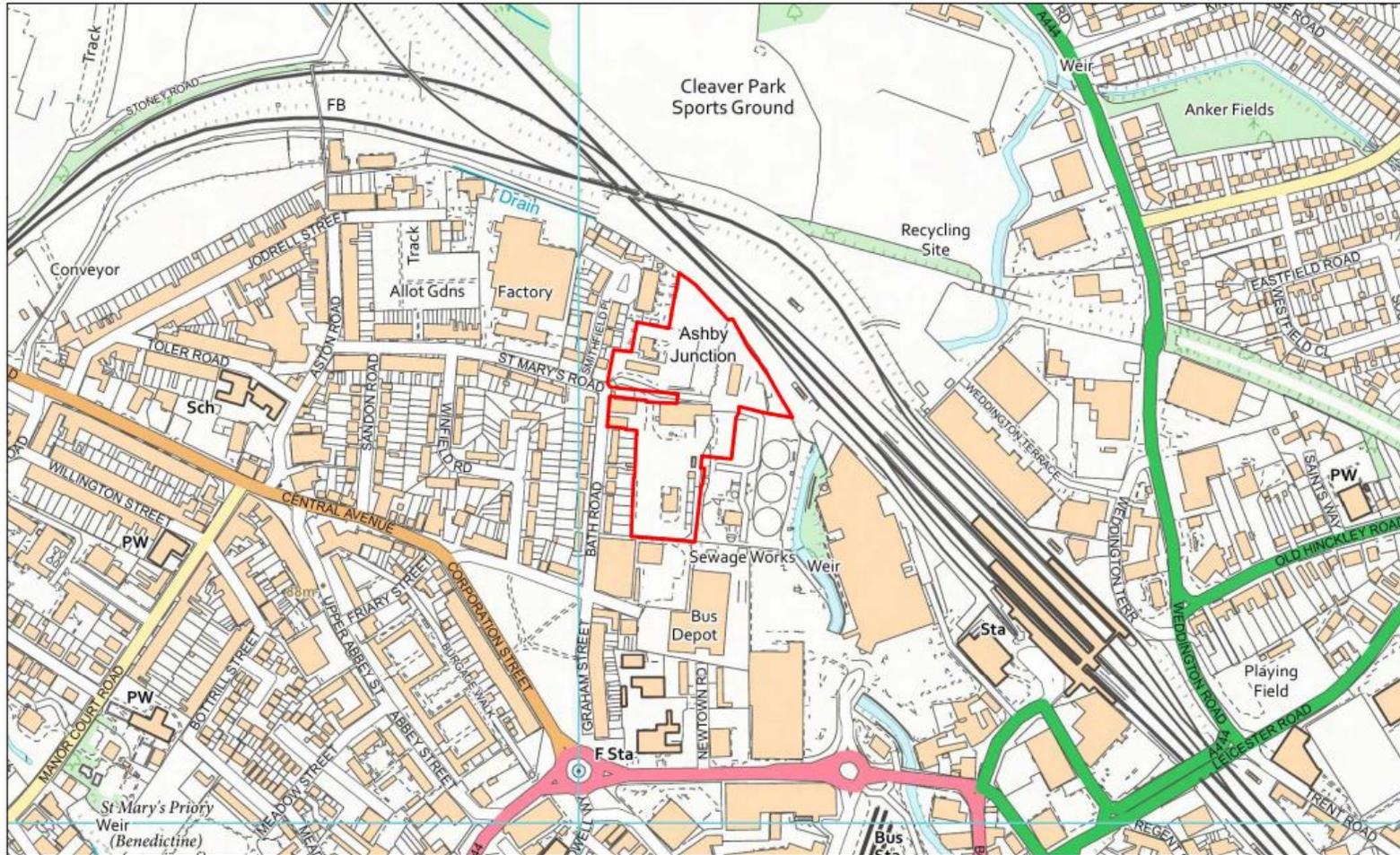
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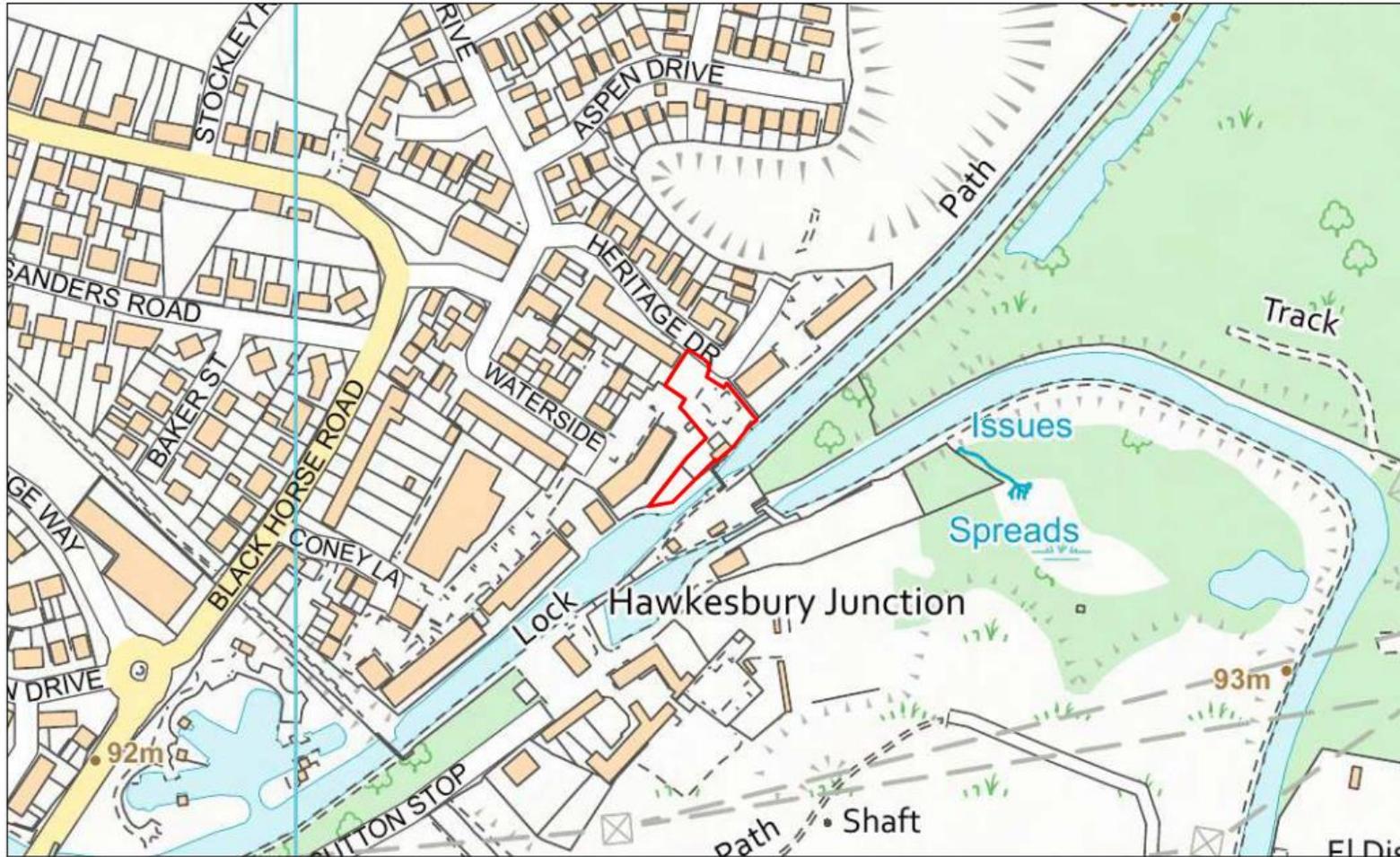
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Exha

NUN242



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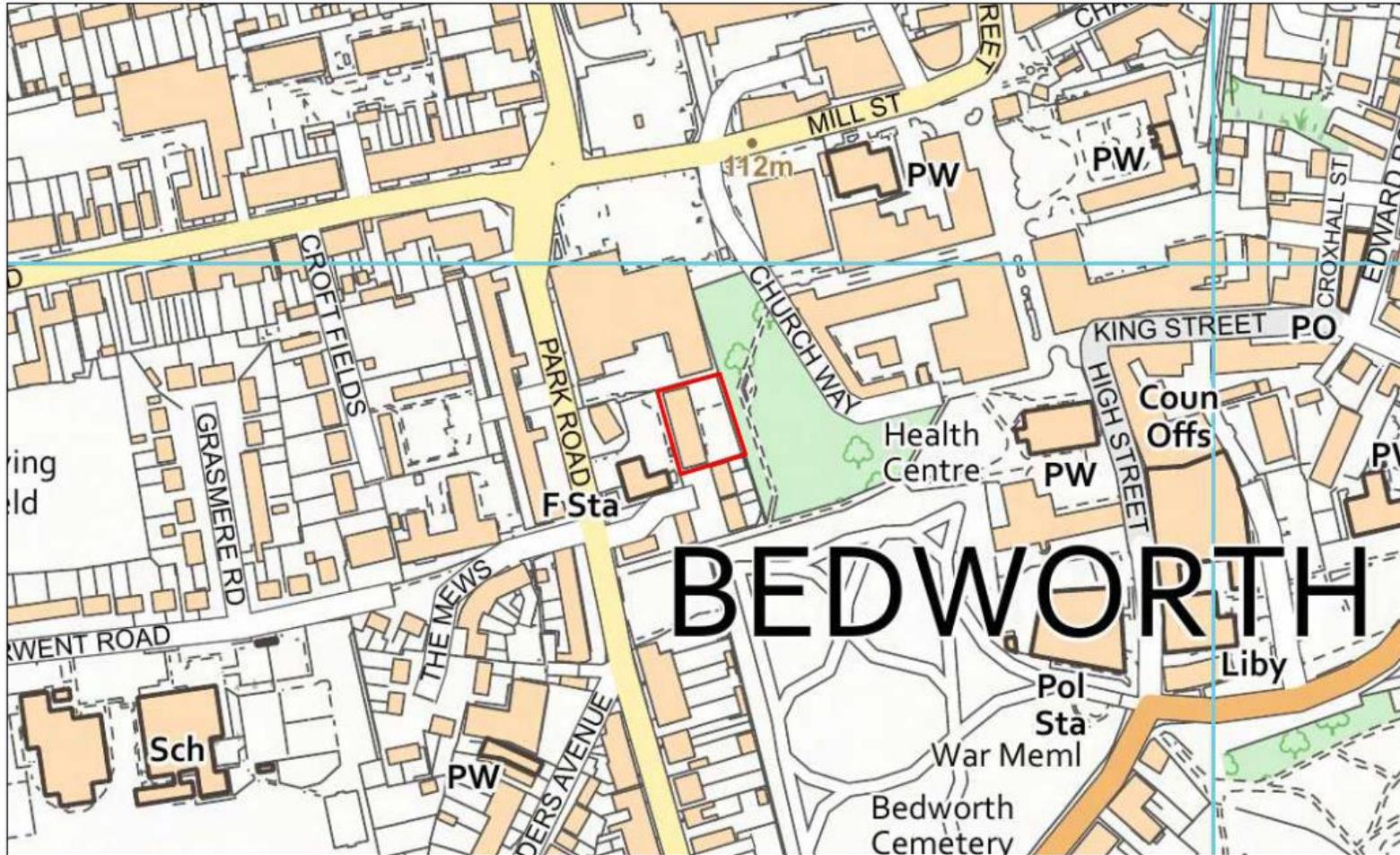
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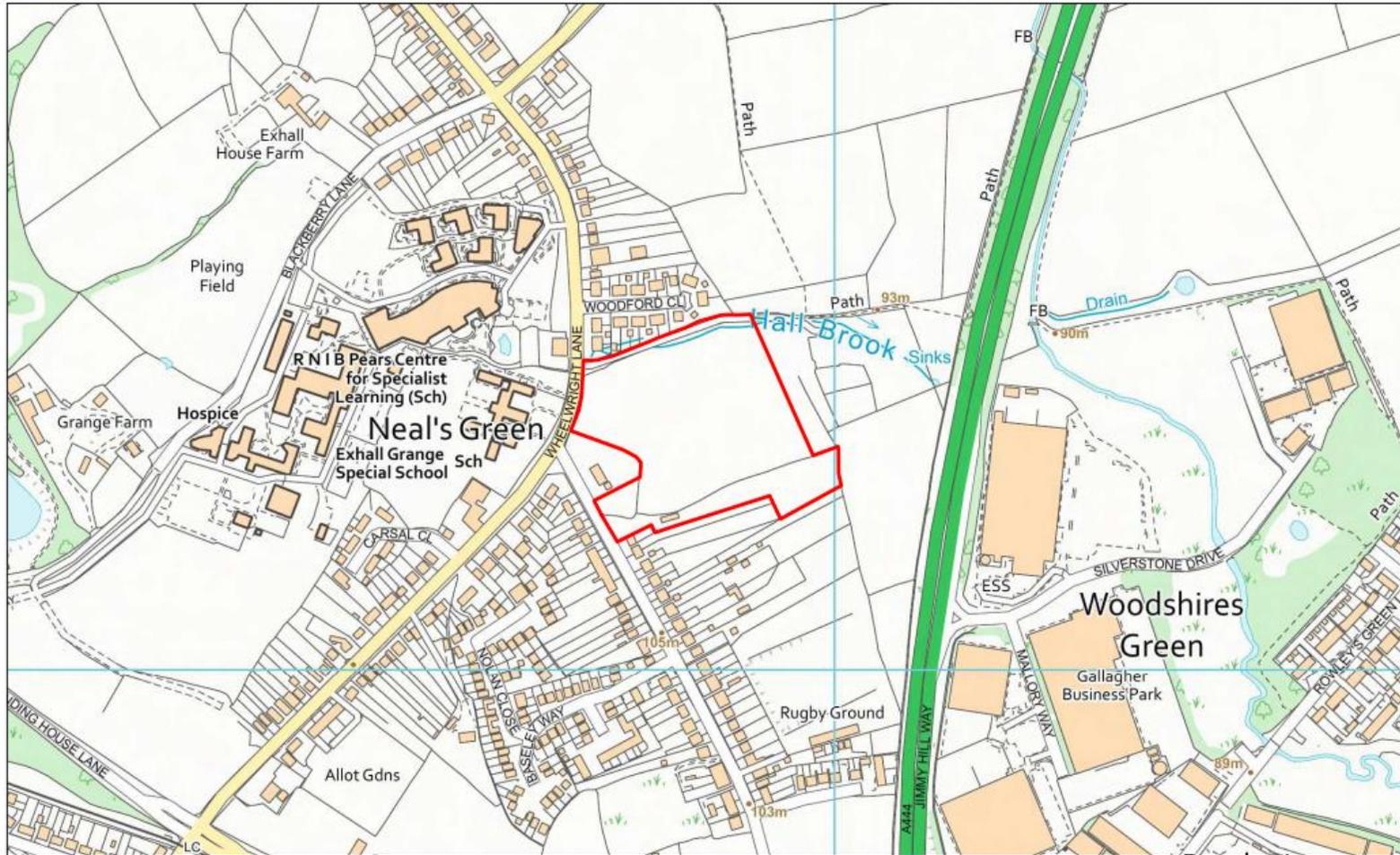
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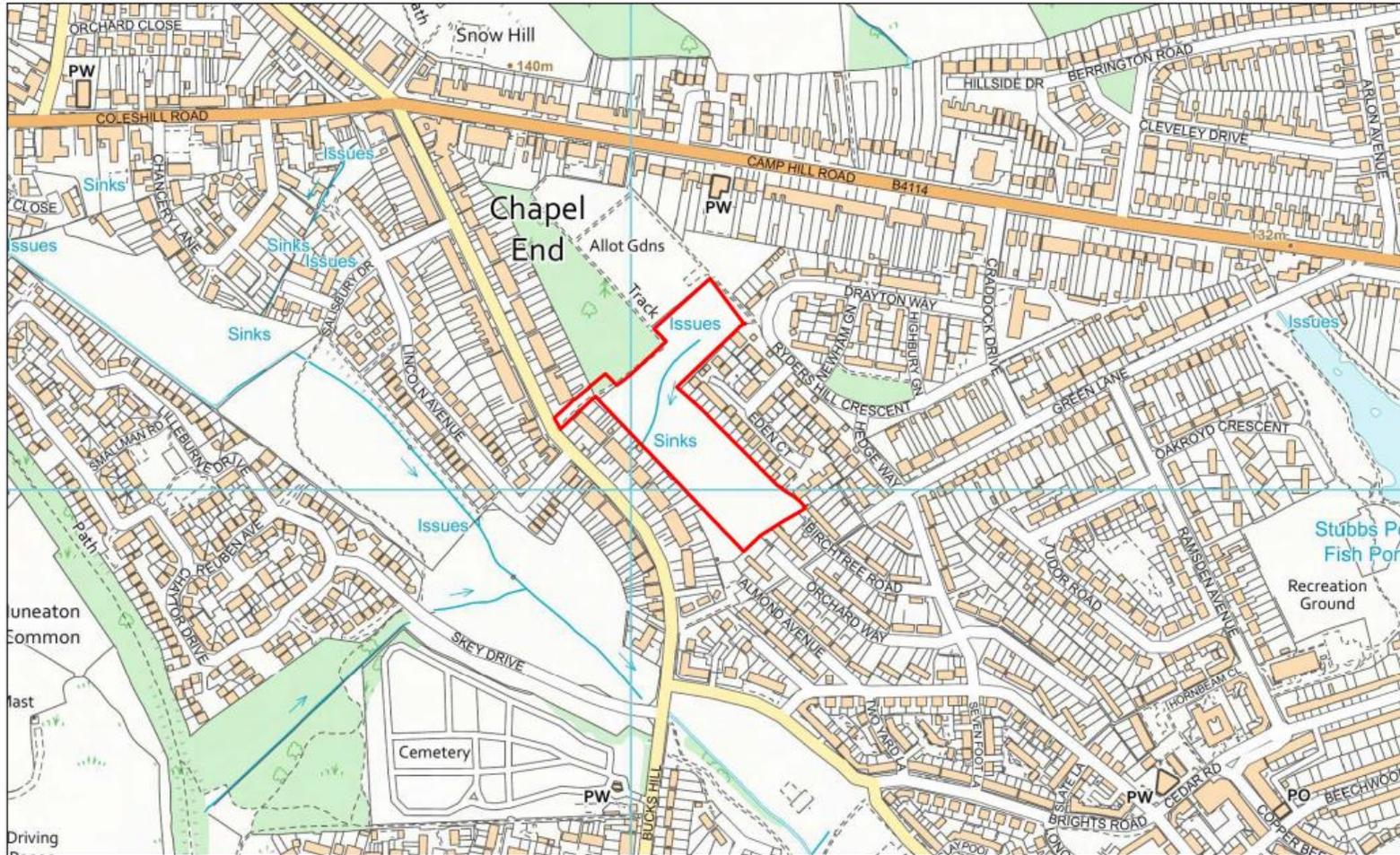
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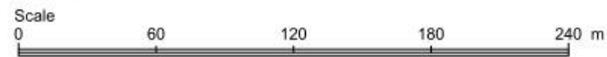
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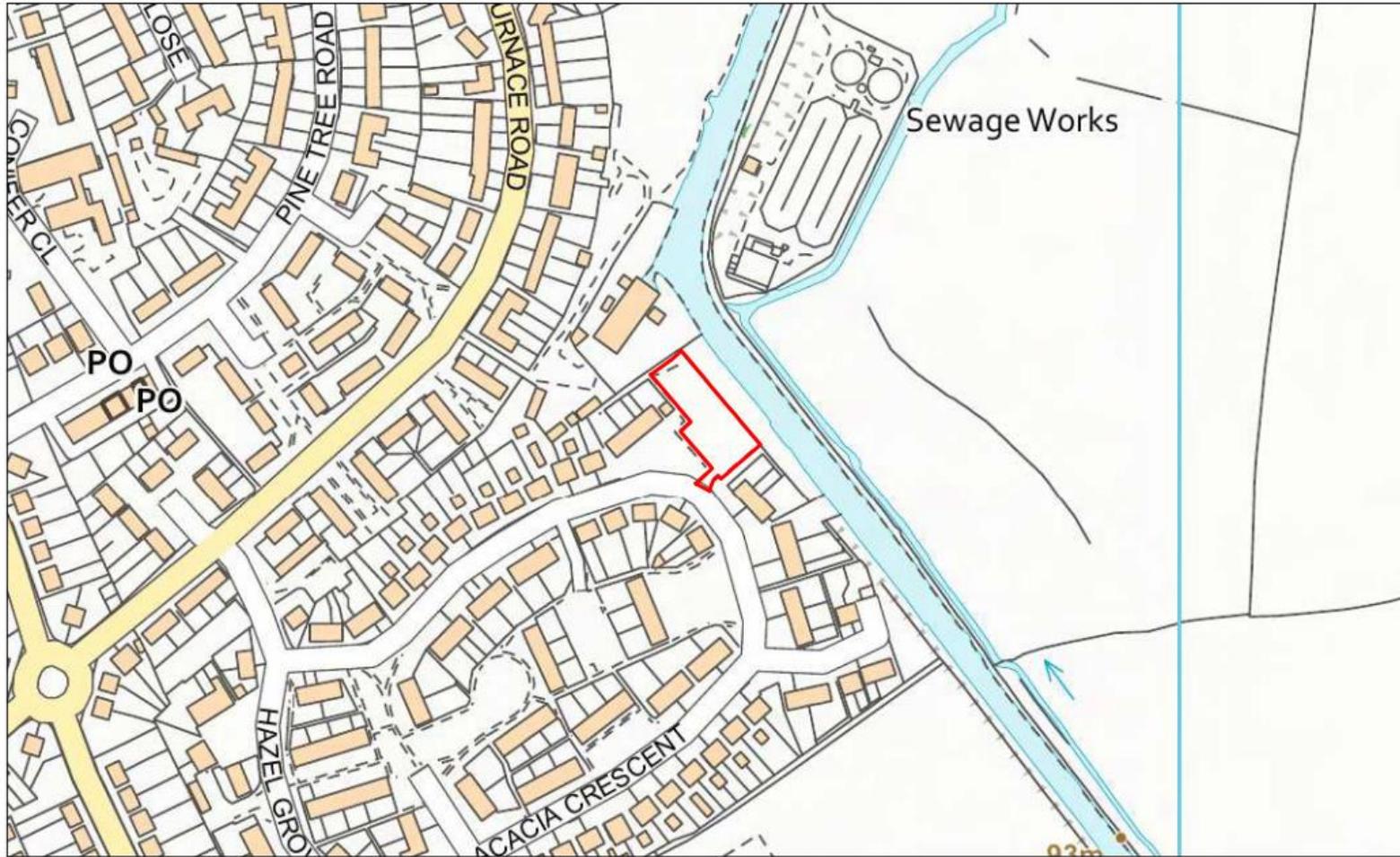
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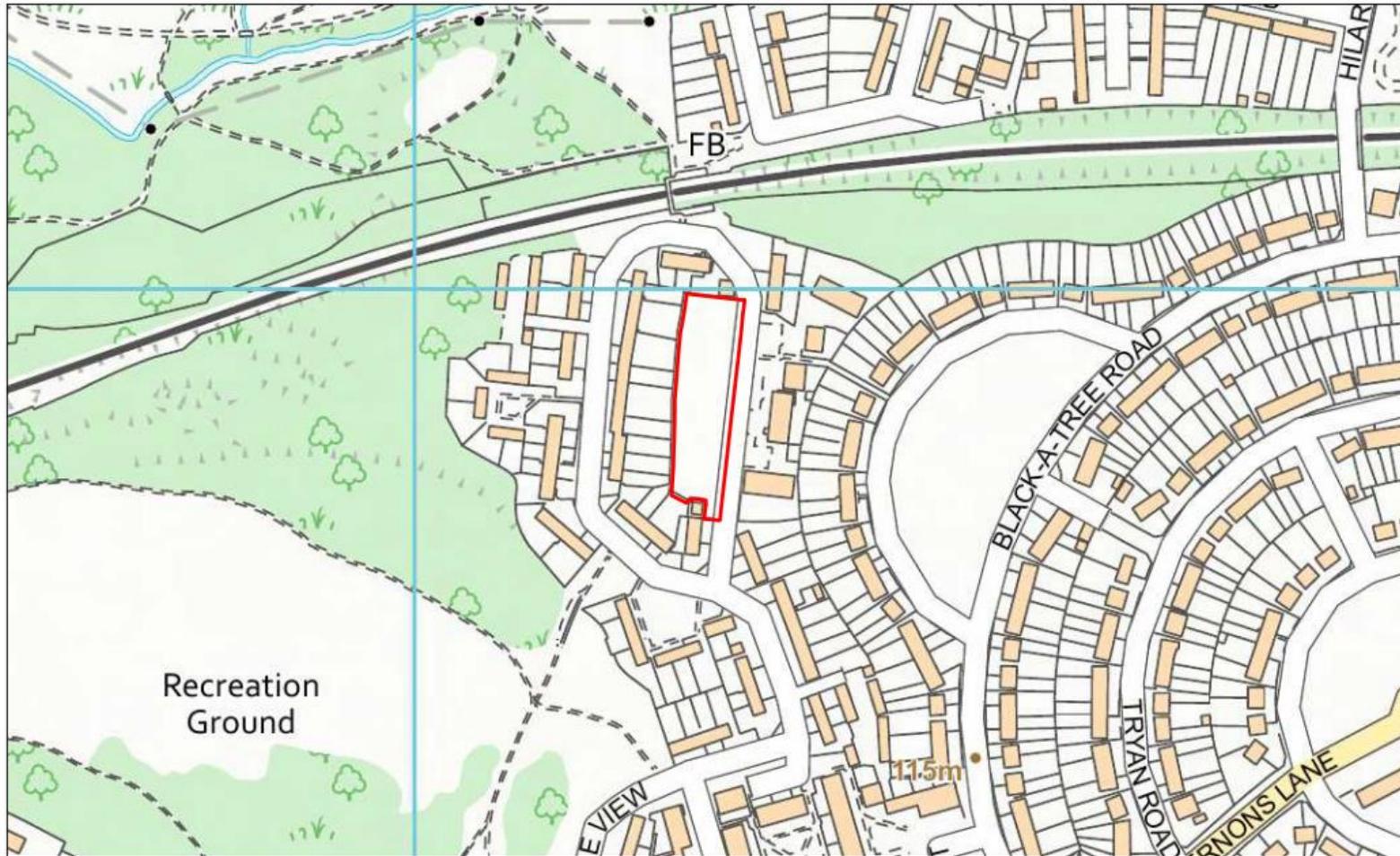
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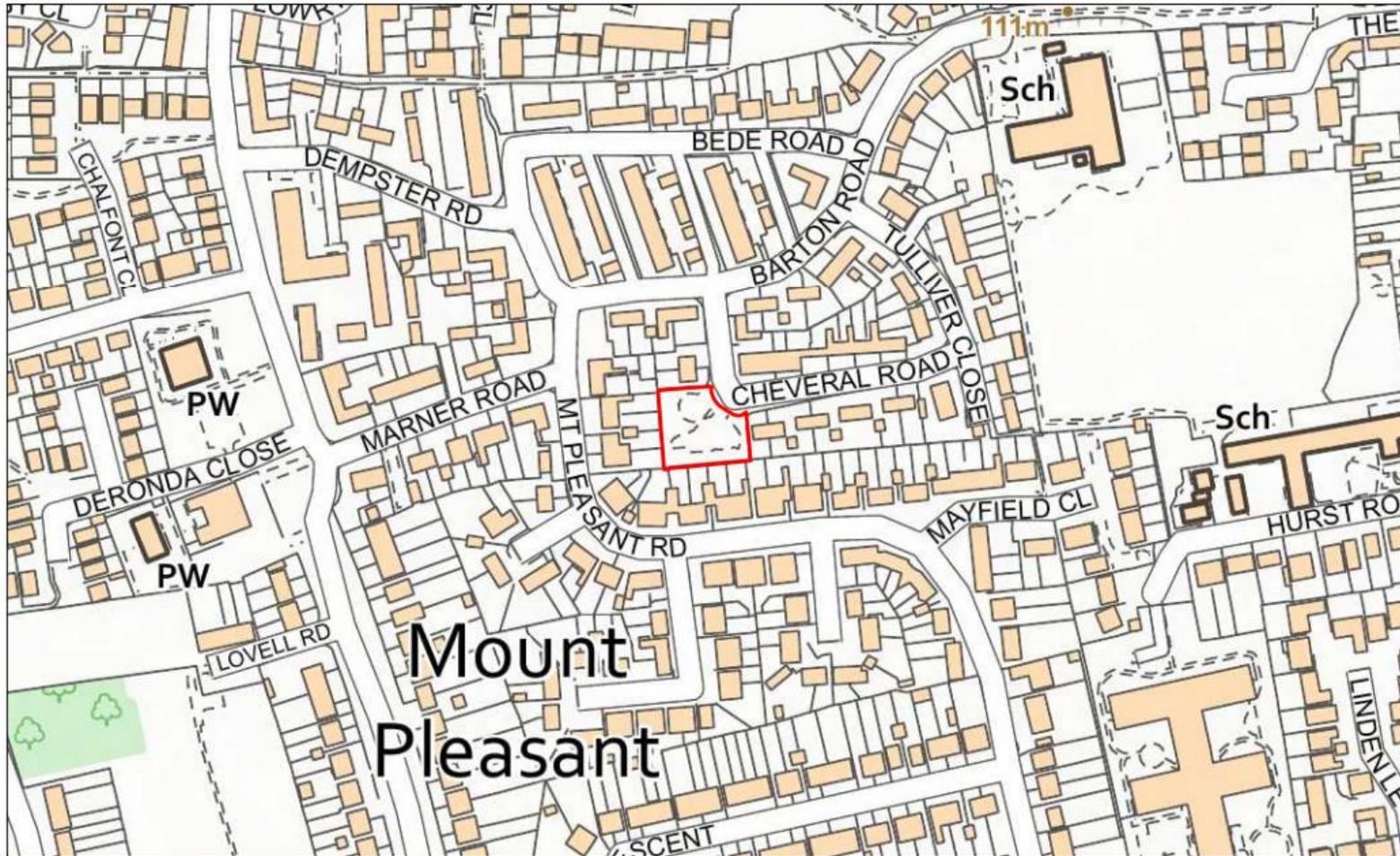
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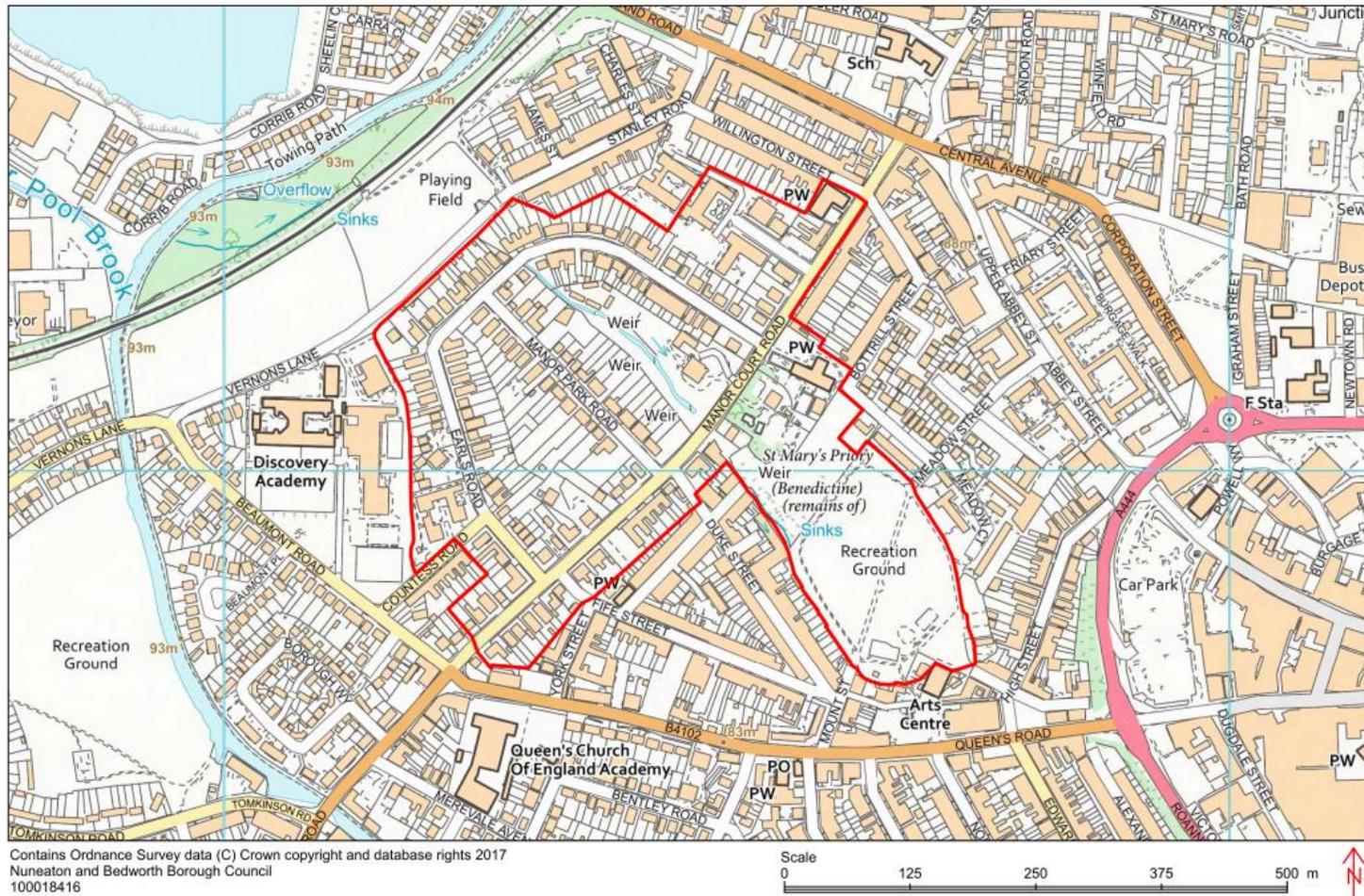


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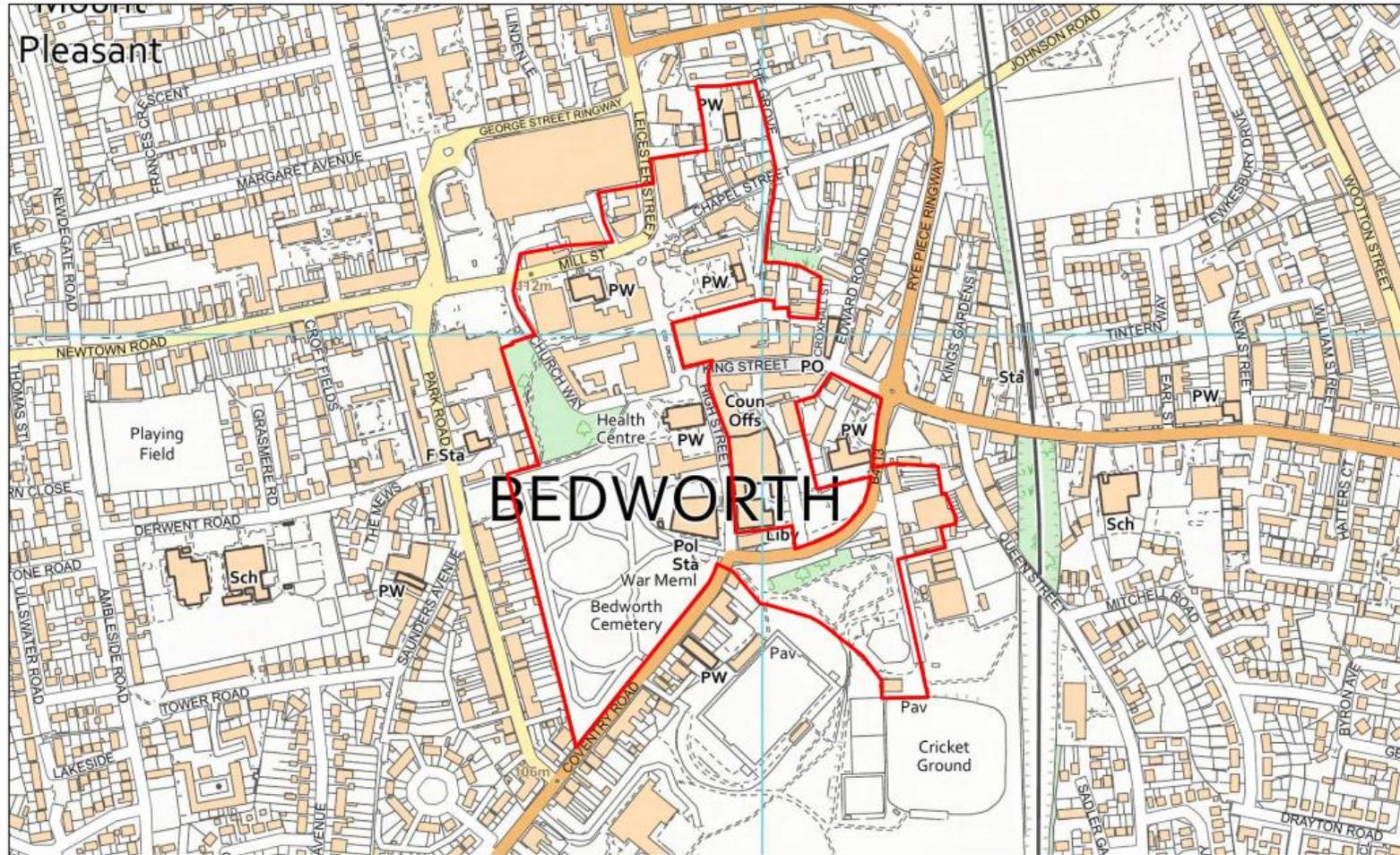


Appendix B - Conservation areas

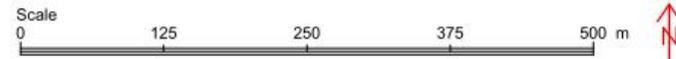
Abbey Conservation Area



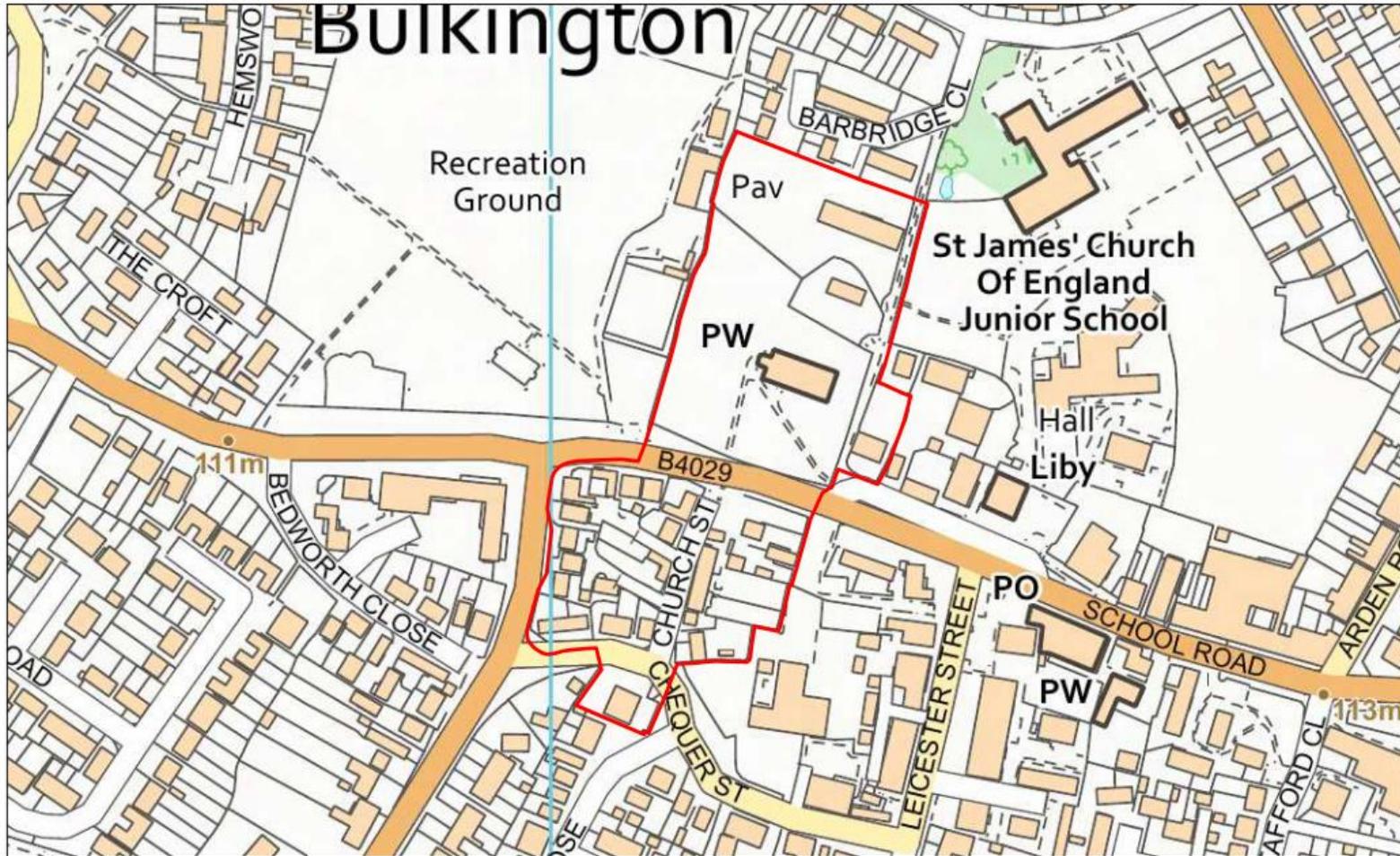
Bedworth Town Centre Conservation Area



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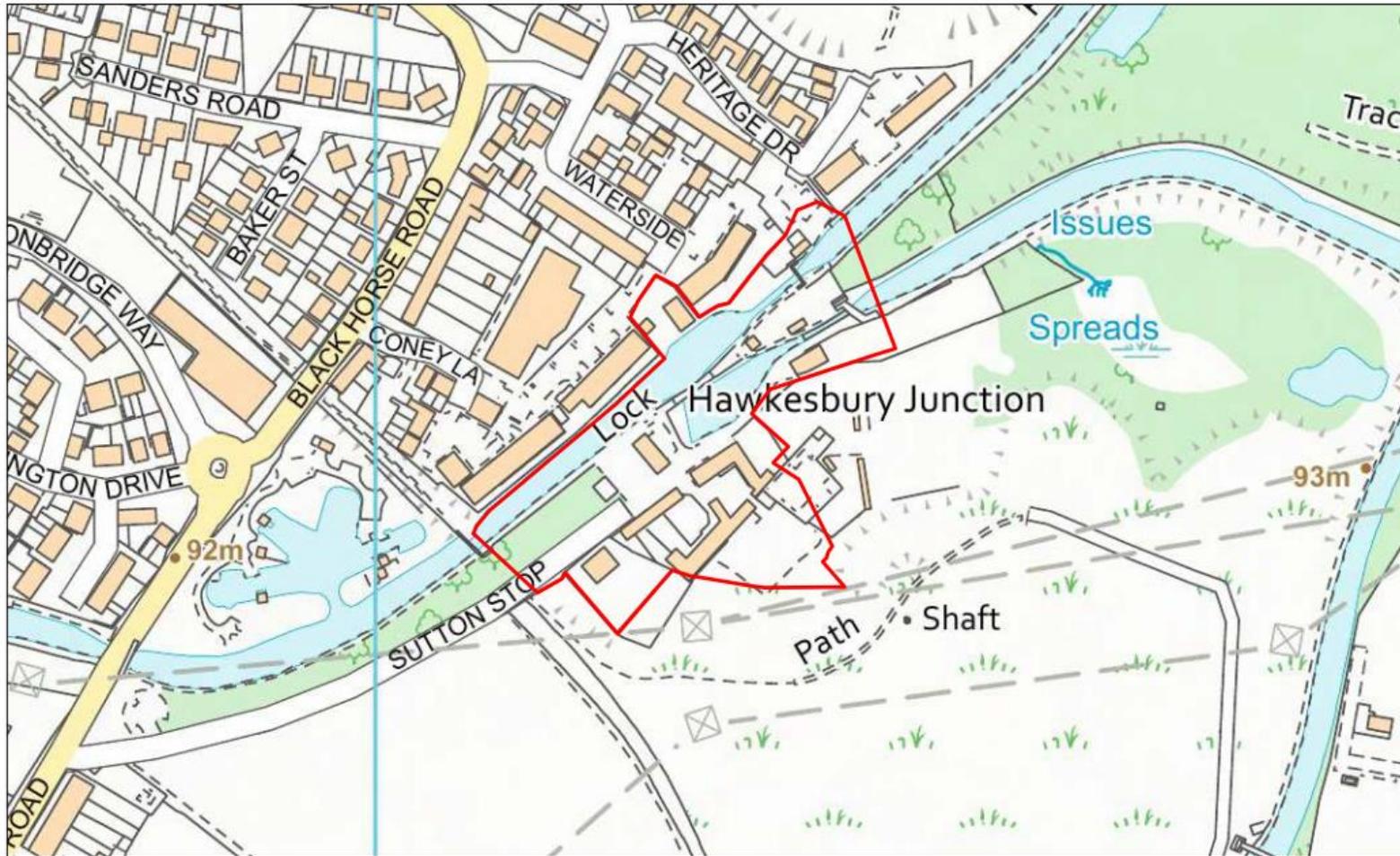
Bulkington Conservation Area



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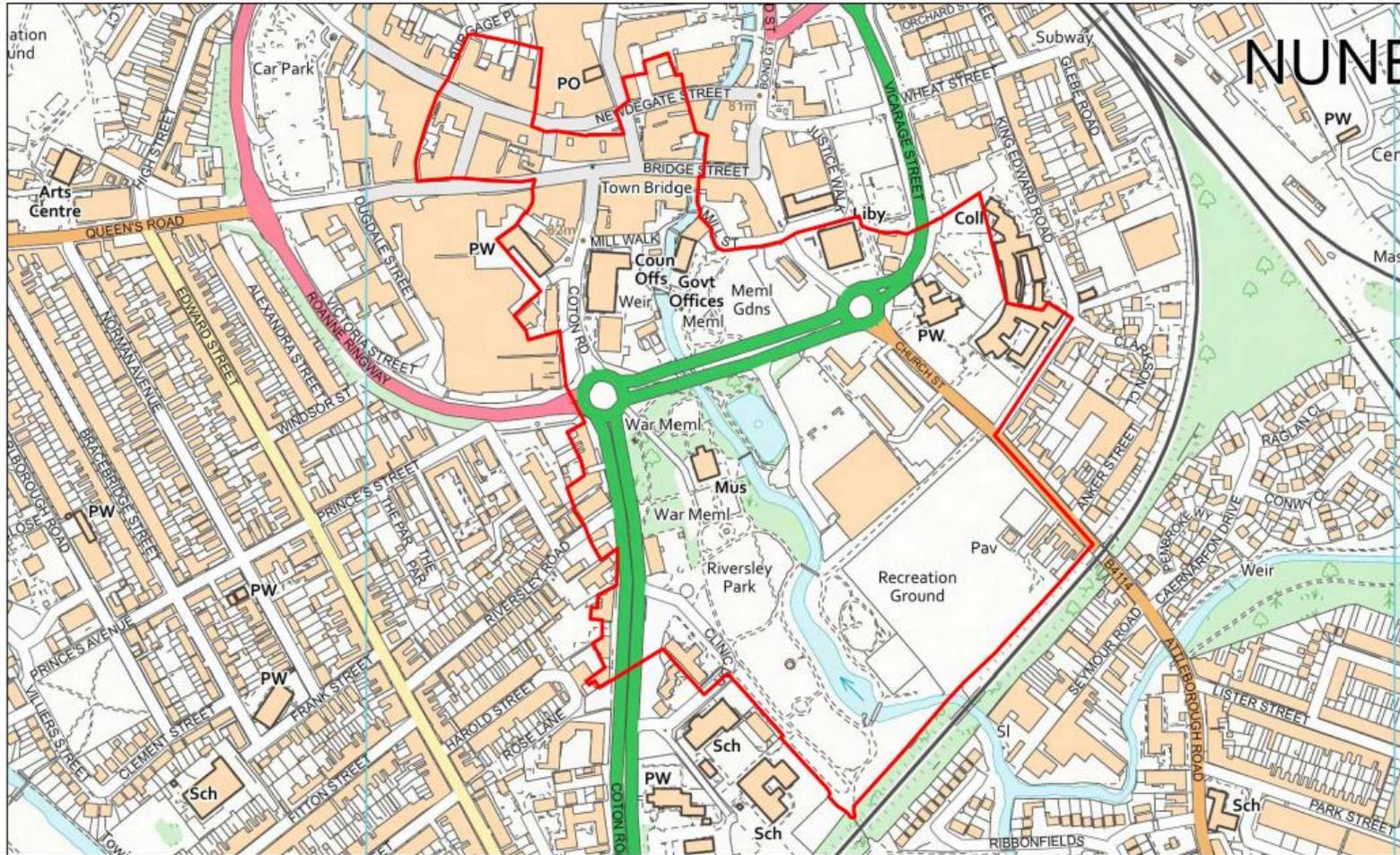
Hawkesbury Conservation Area



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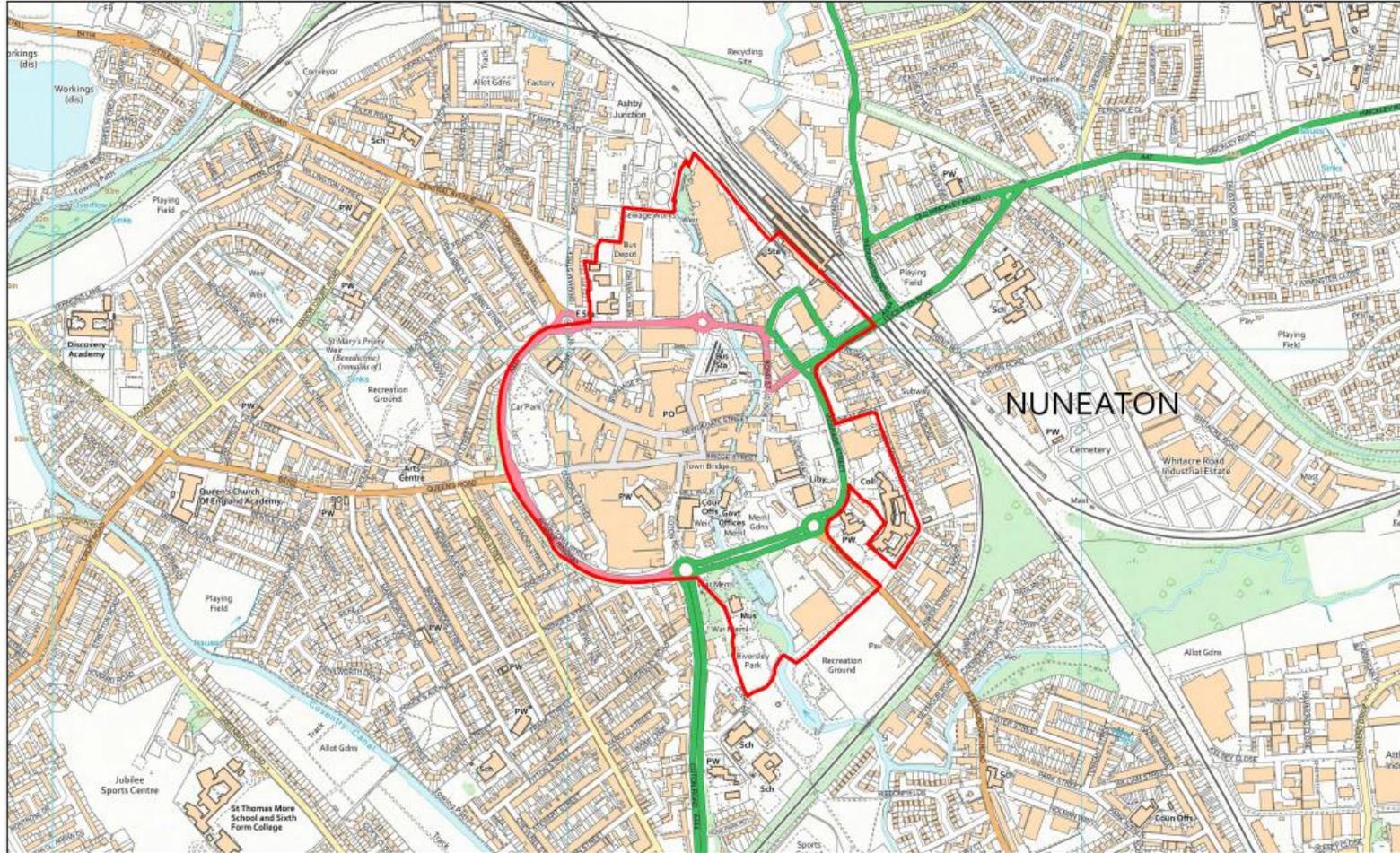
Nuneaton Town Centre Conservation Area



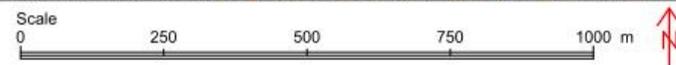
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Nuneaton Town Centre

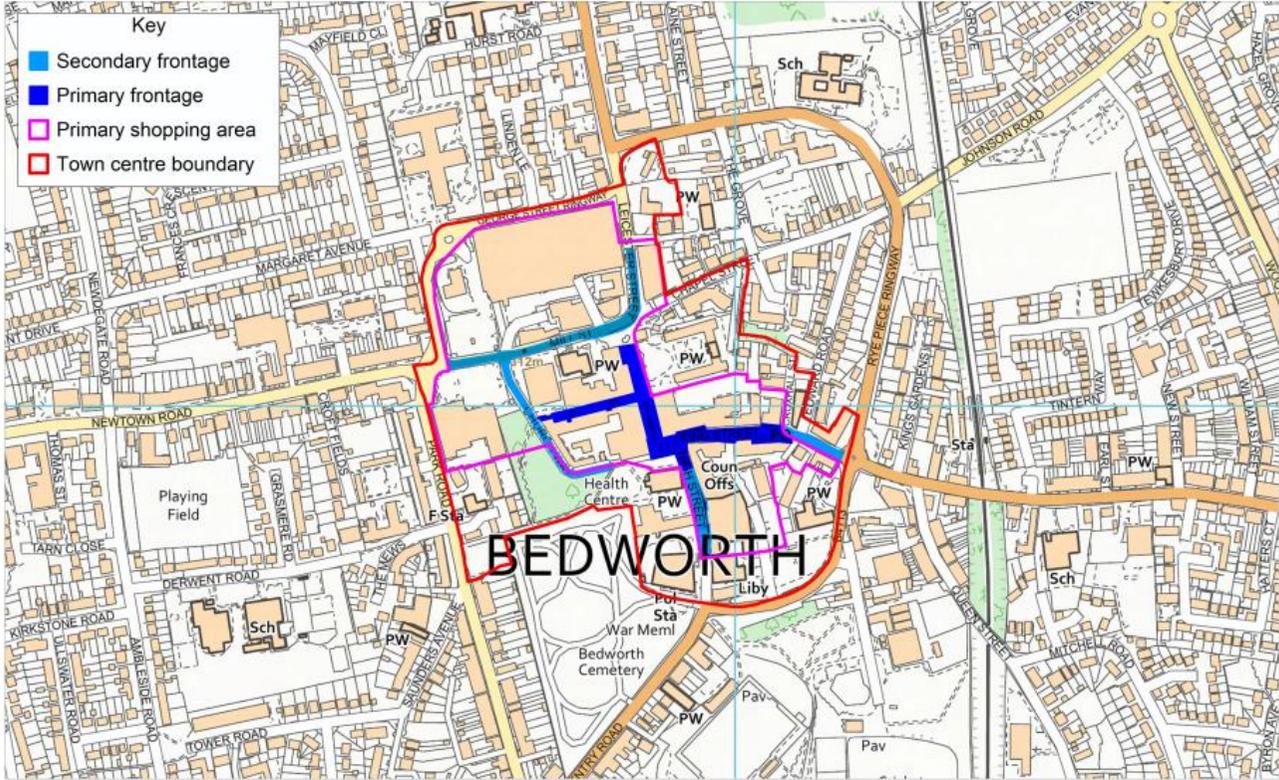


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Appendix D - Town centre primary and secondary frontages

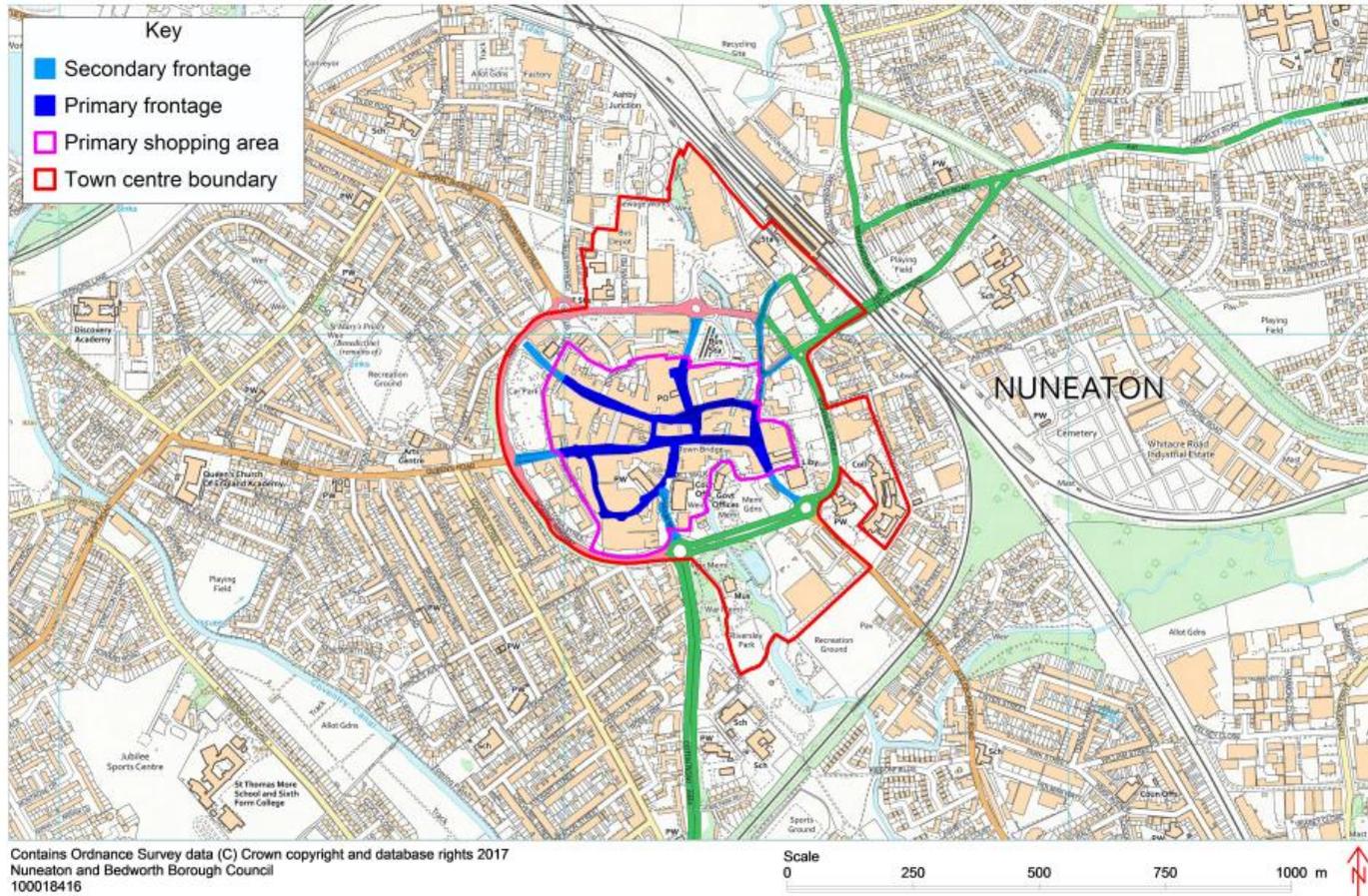
Bedworth shopping area and frontages



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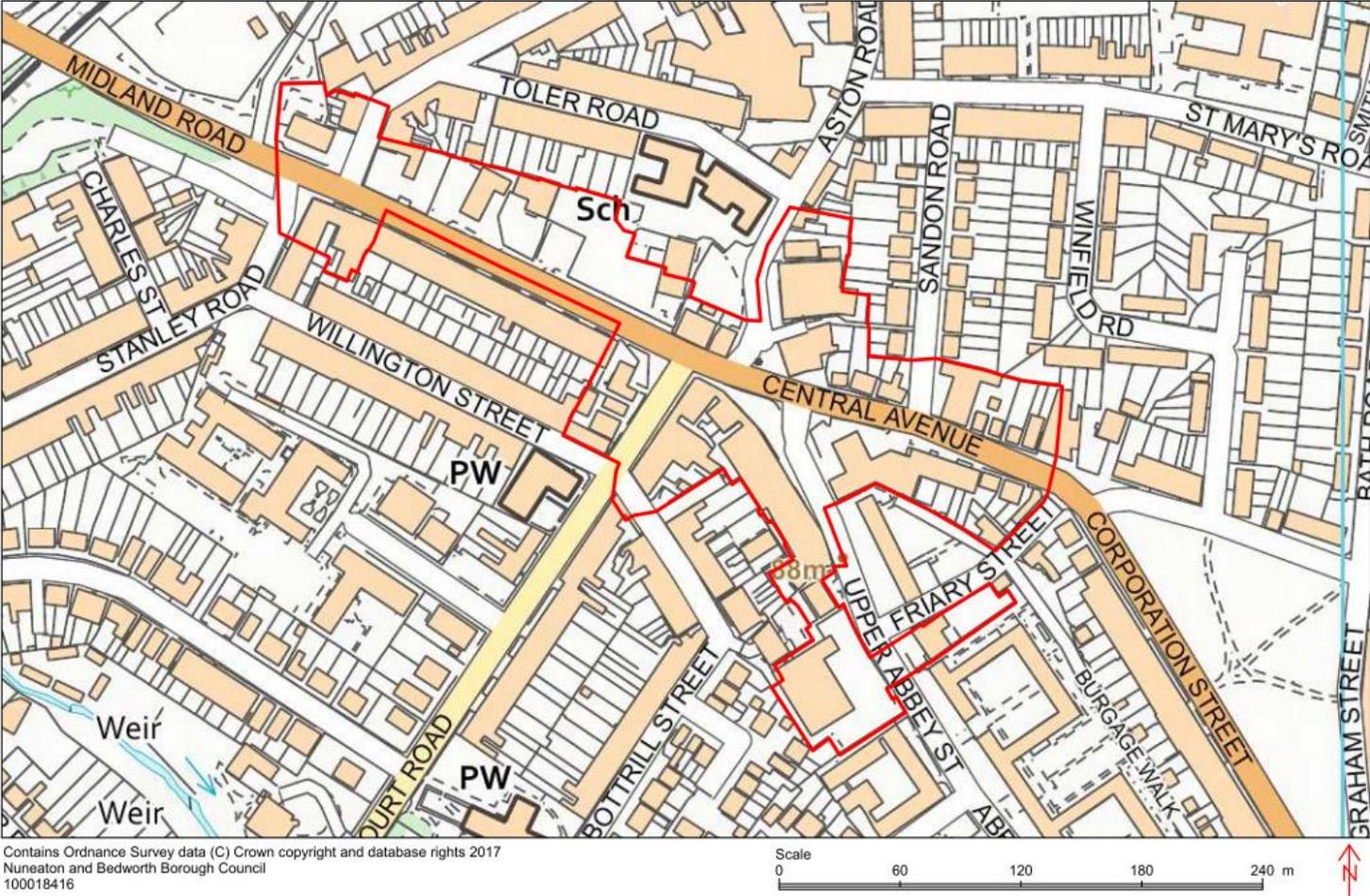


Nuneaton shopping area and frontages



Appendix E - District centres

Abbey Green District Centre



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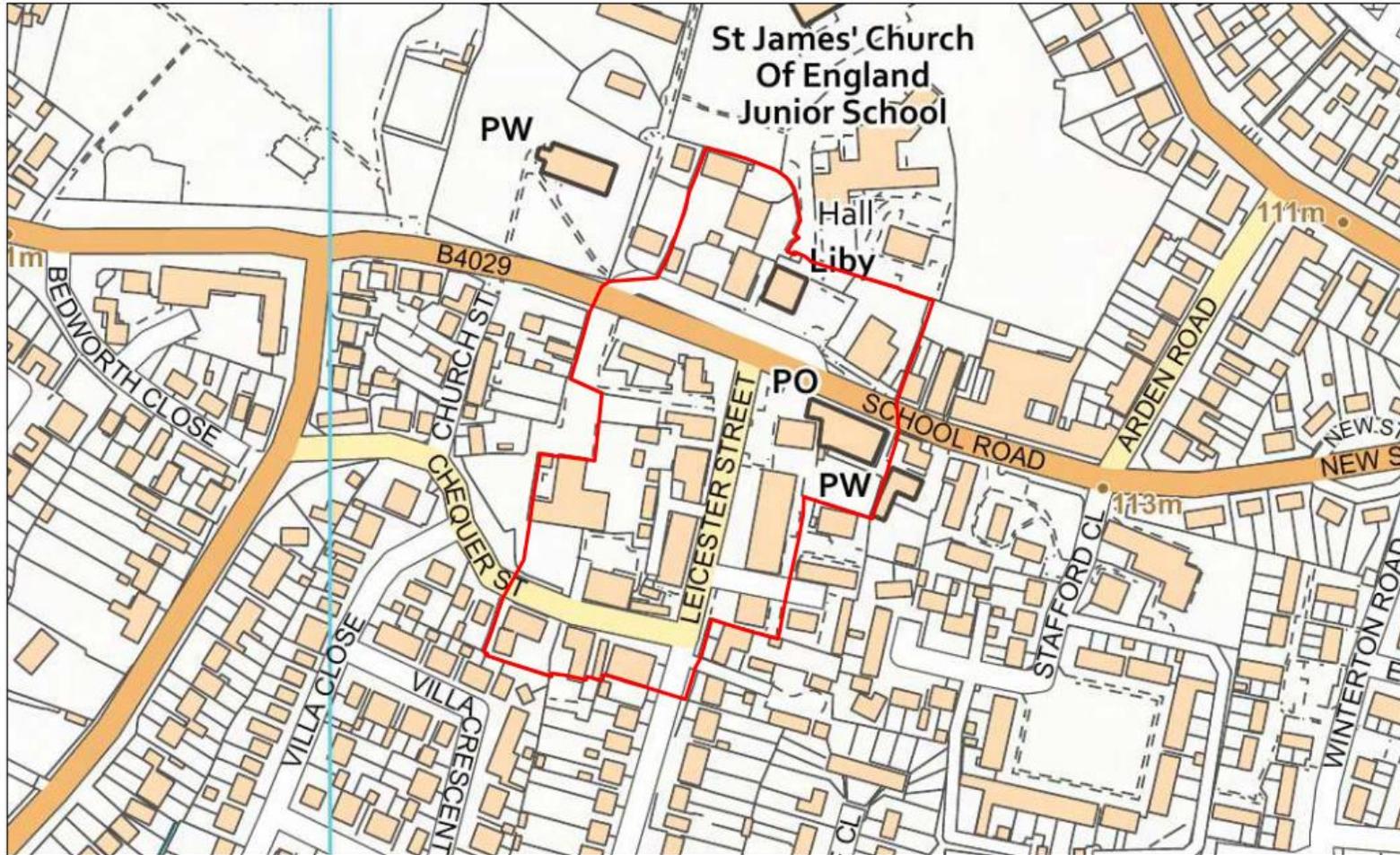
Attleborough District Centre



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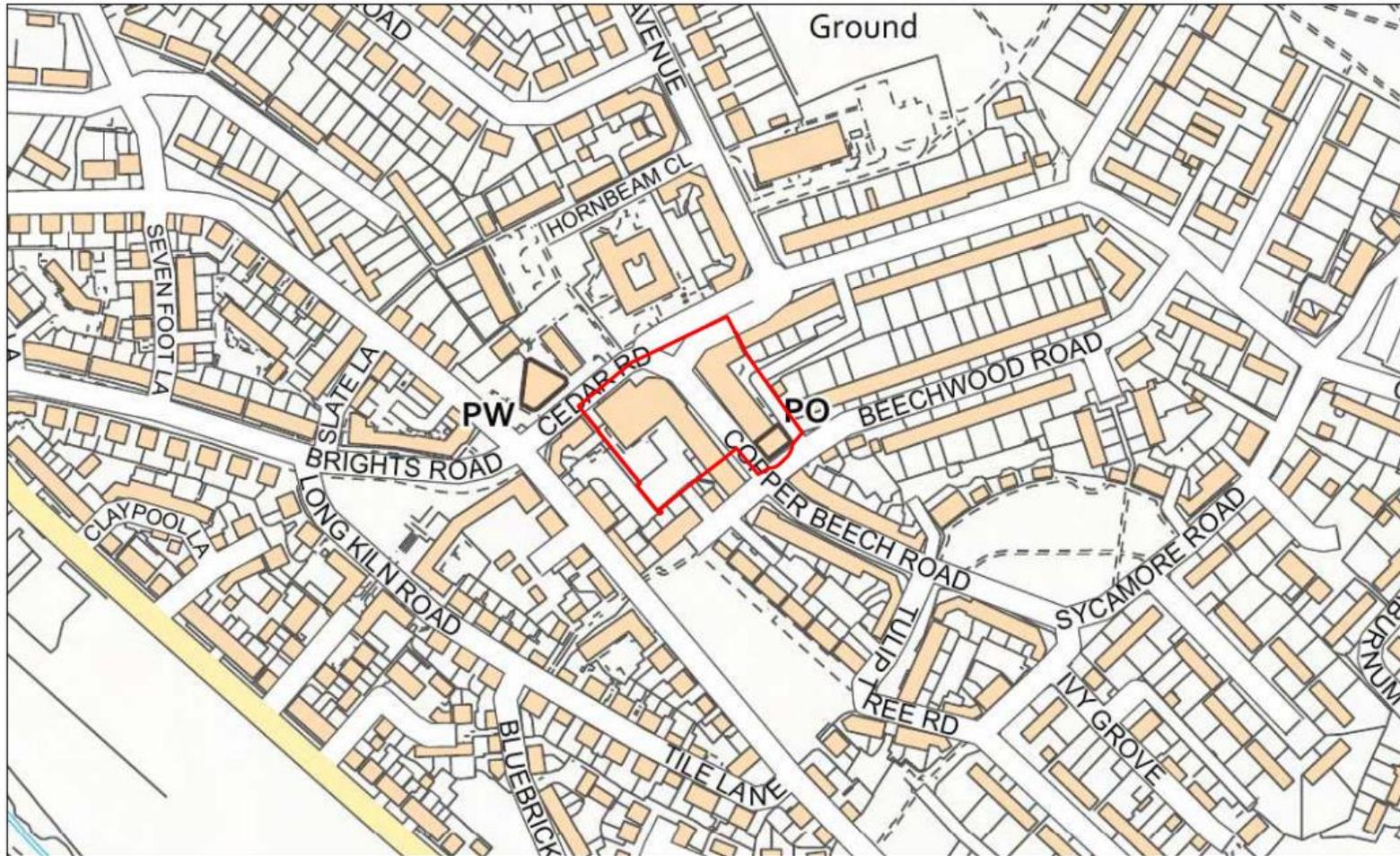
Bulkington District Centre



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Copper Beech Road District Centre



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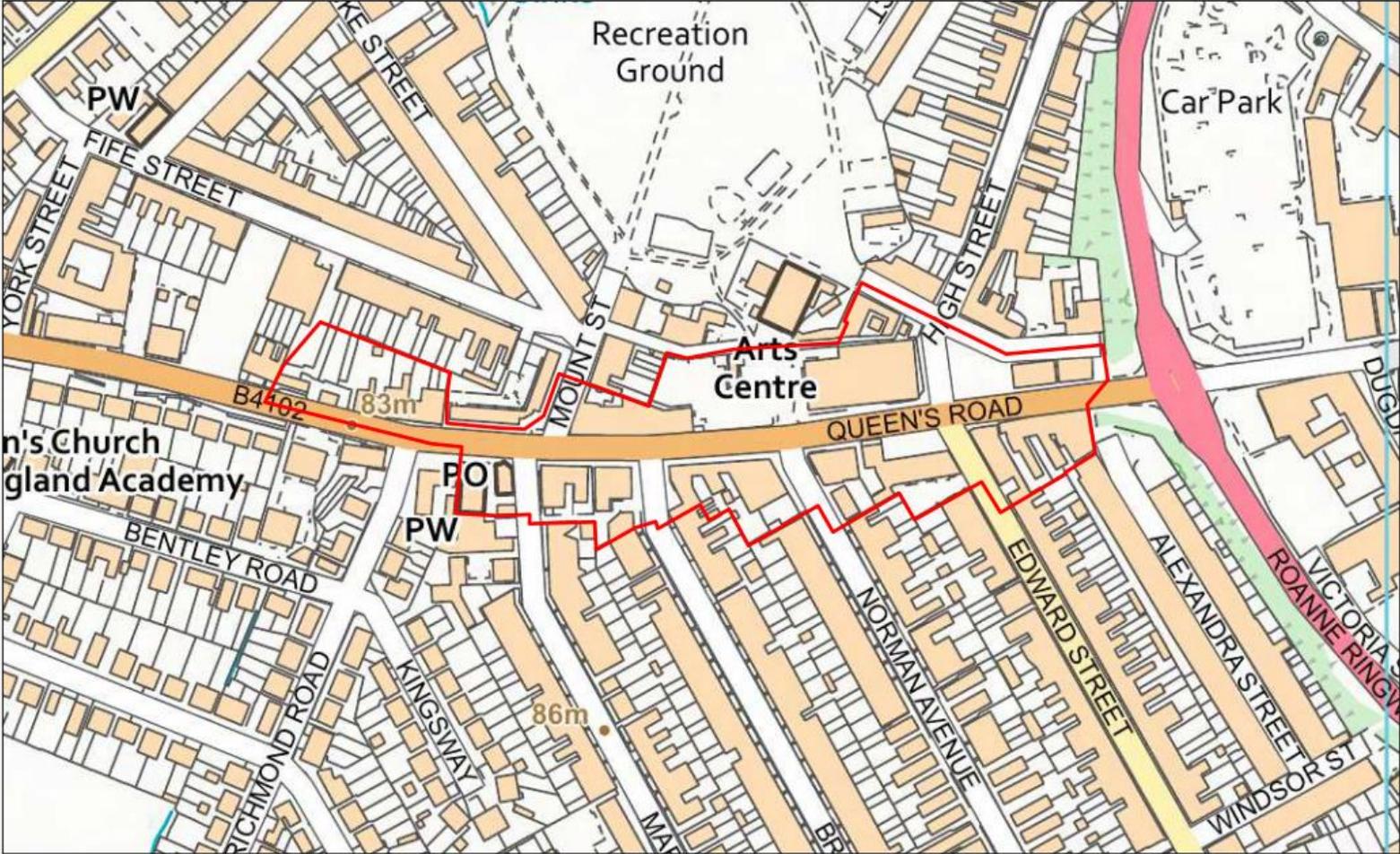
Horeston Grange District Centre



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Queens Road District Centre

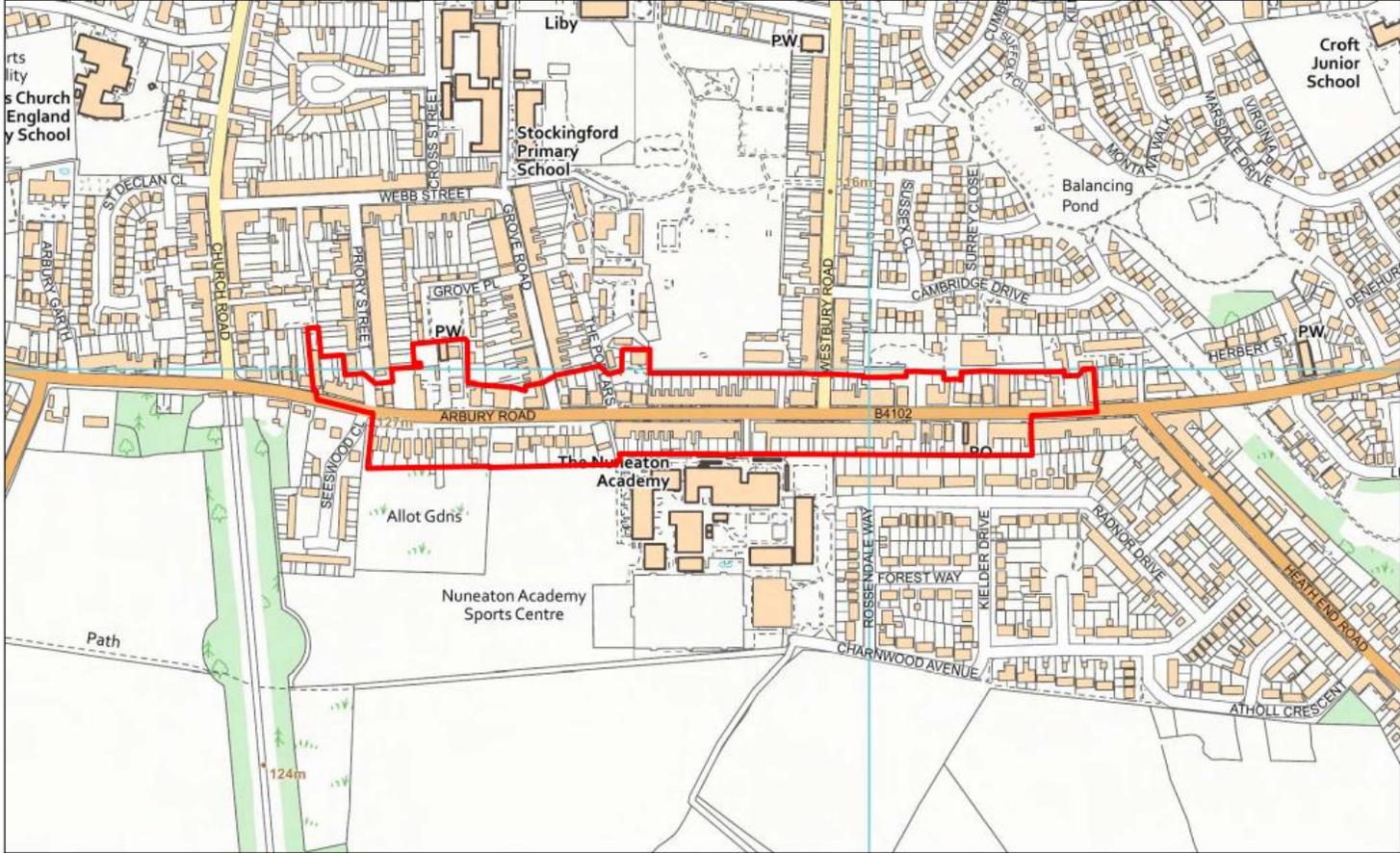


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Appendix F - Local centres

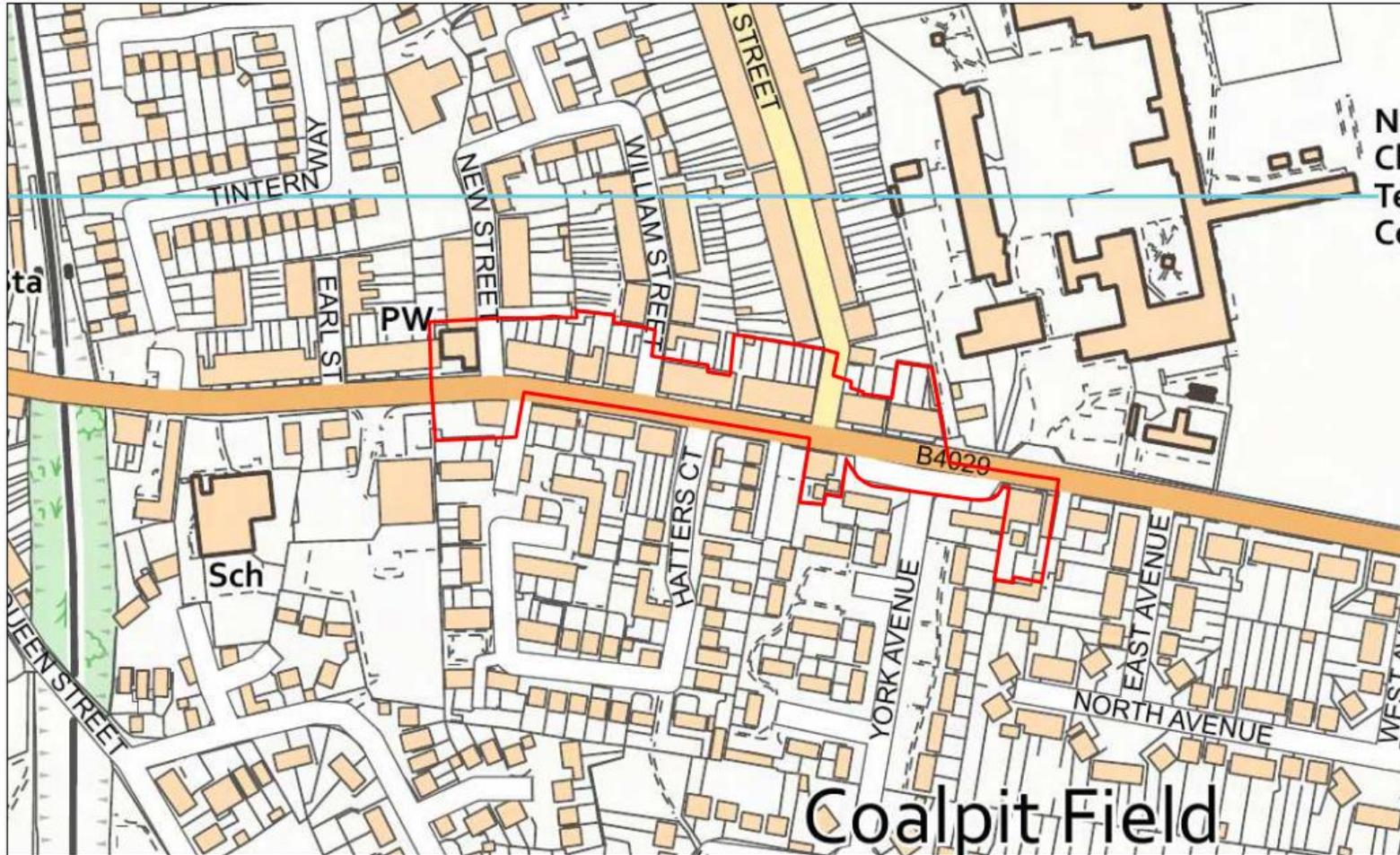
Arbury Road Local Centre



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Bulkington Road Local Centre



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Chapel End Local Centre



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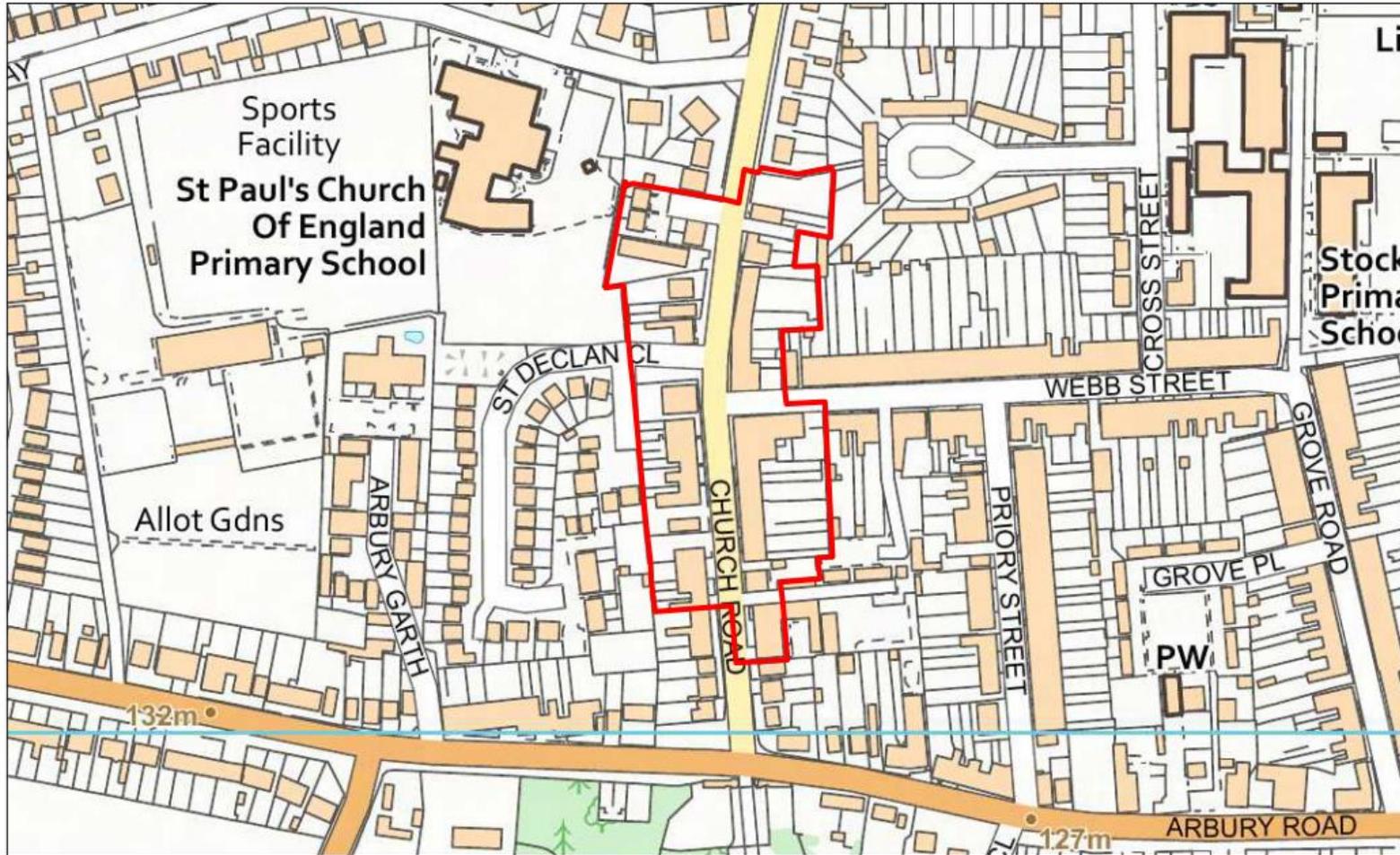
Church Road North Local Centre



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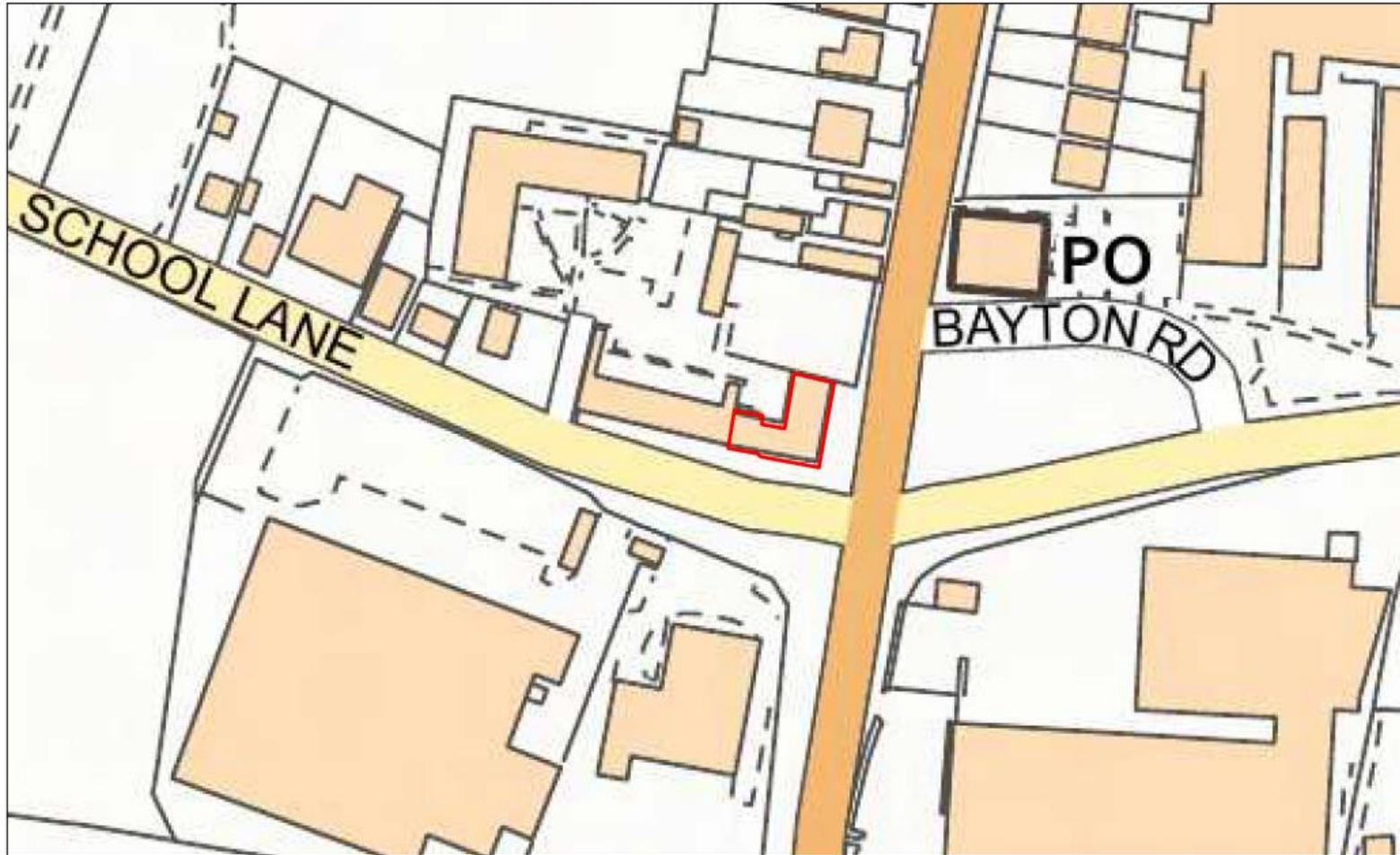
Church Road South Local Centre



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Coventry Road / School Lane Local Centre

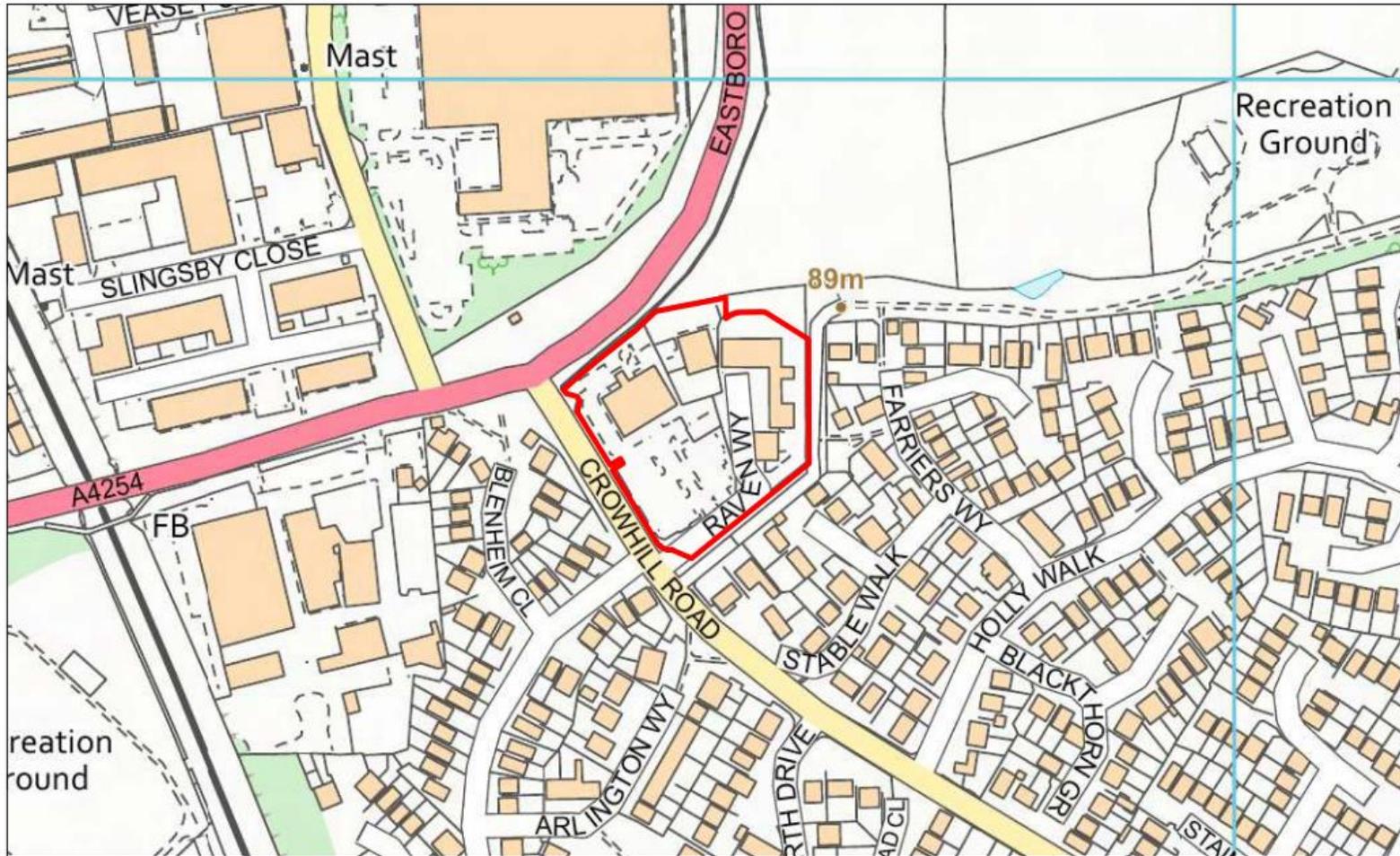


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Scale
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Crow Hill Local Centre



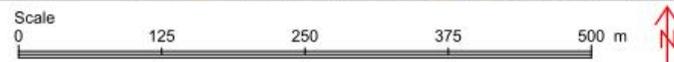
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Kingswood Road Local Centre



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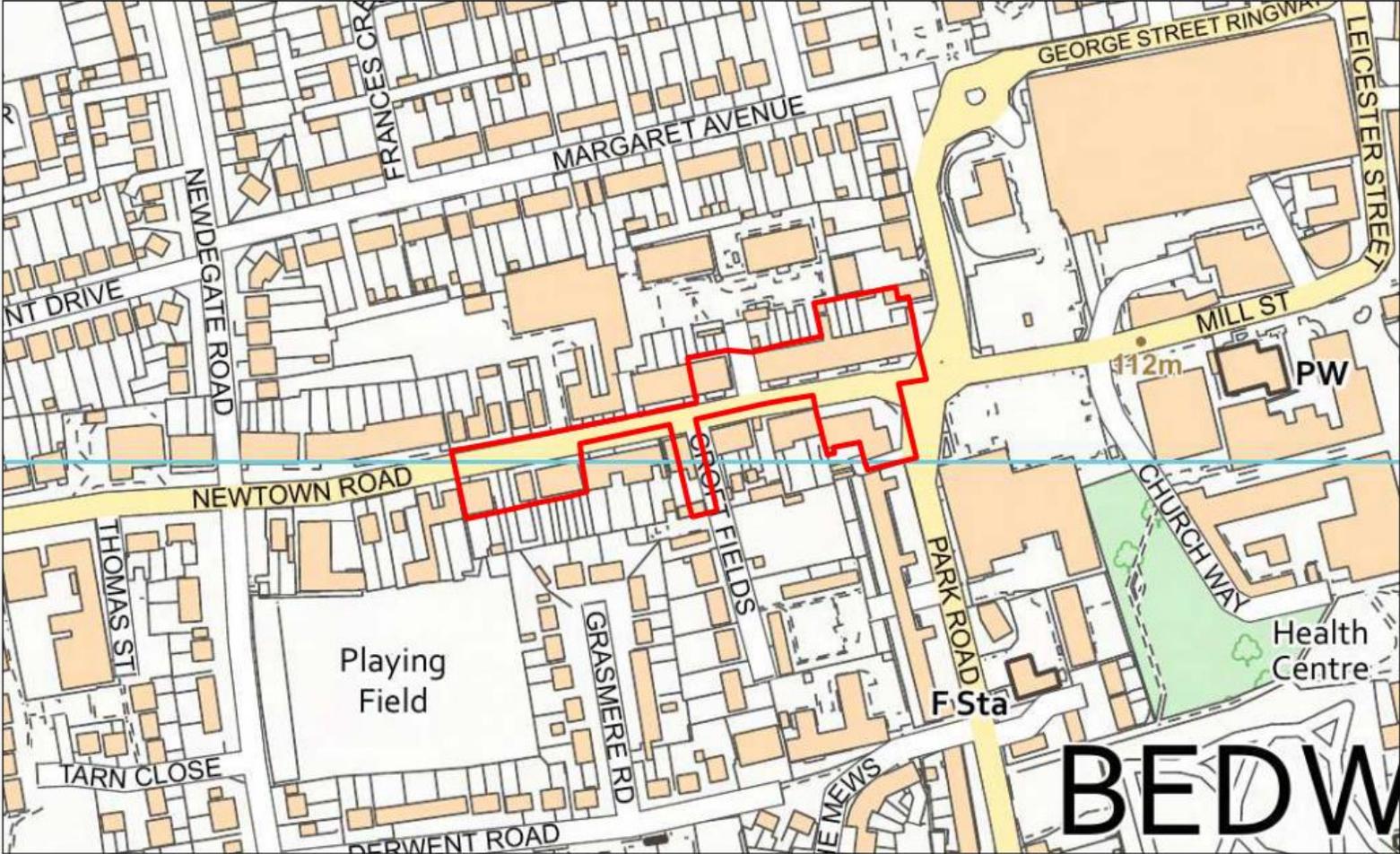
Lutterworth Road Local Centre



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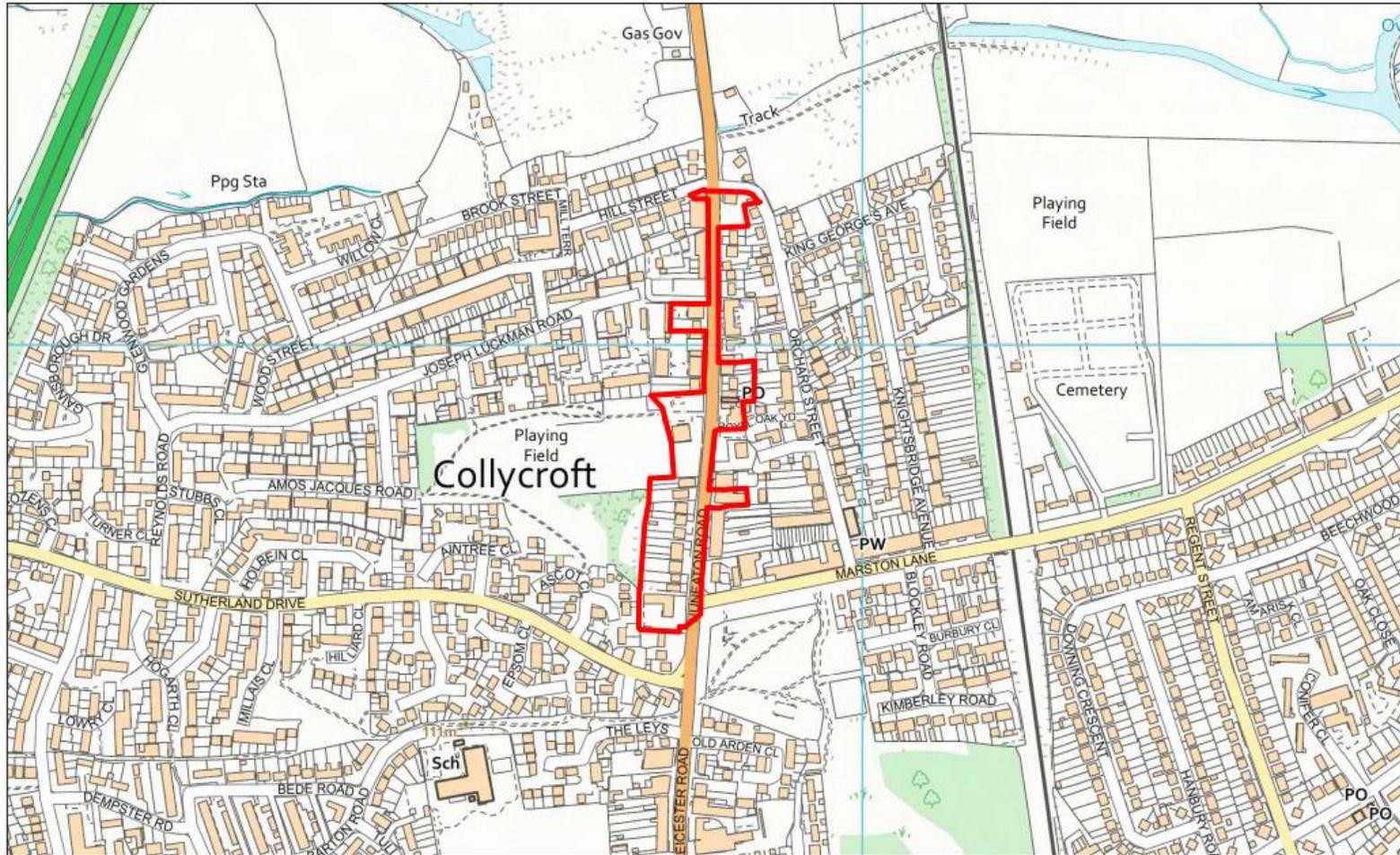
Newtown Road Local Centre



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Nuneaton Road Local Centre



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Pine Tree Road Local Centre



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Scale
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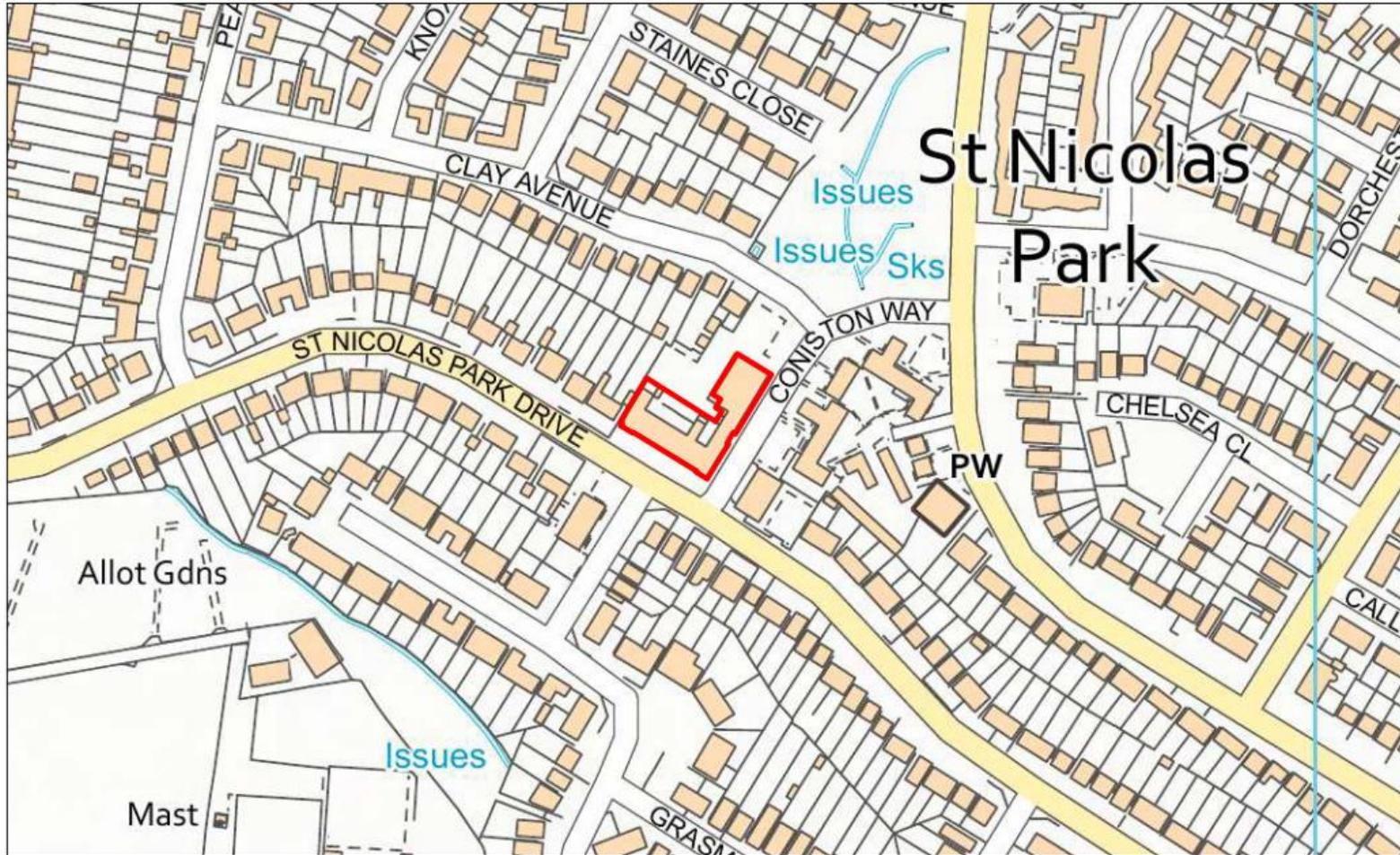
Smorrall Lane Local Centre



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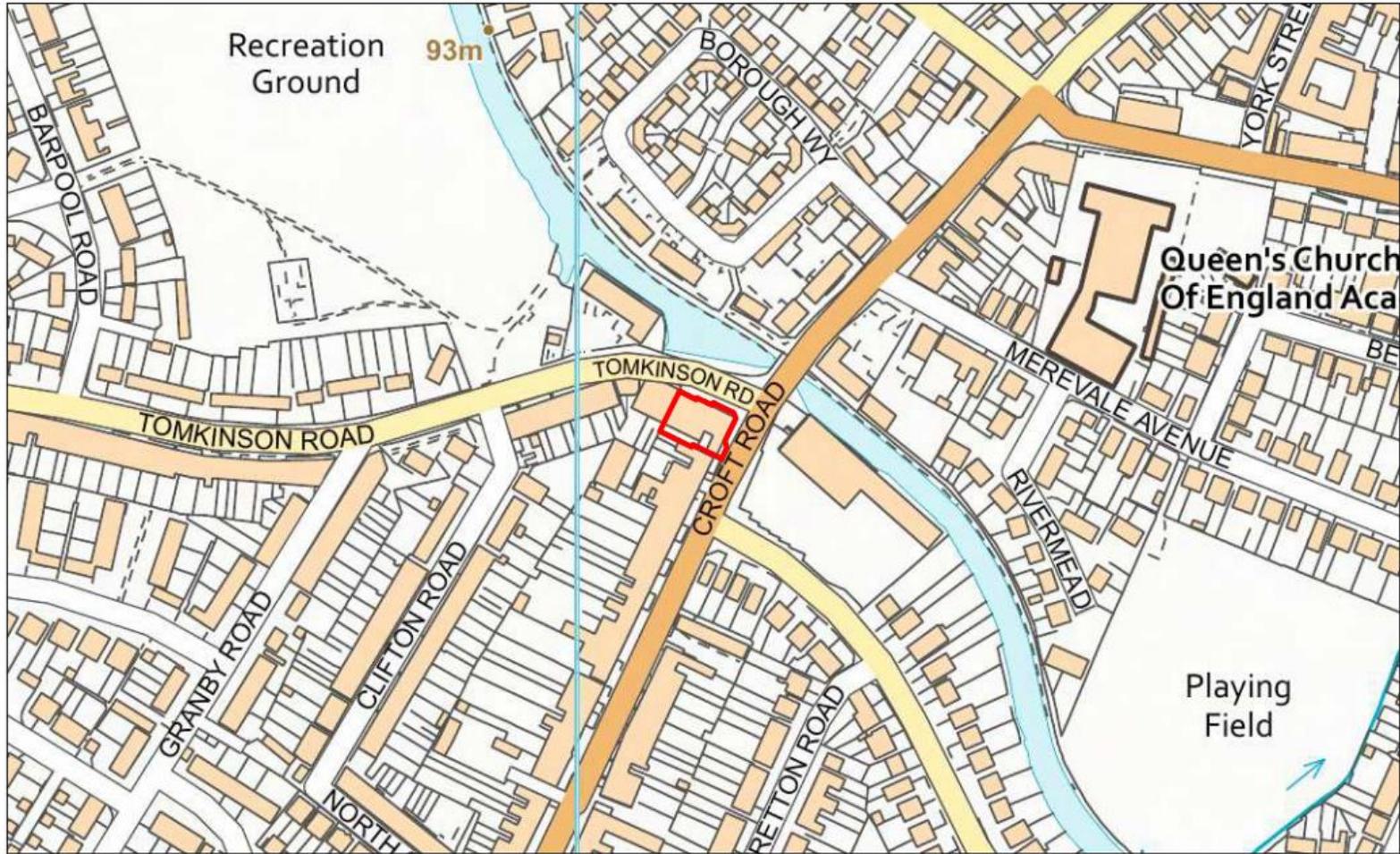
St Nicolas Park Drive Local Centre



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Tomkinson Road / Croft Road Local Centre



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Weddington Road (corner of Brook Lane) Local Centre



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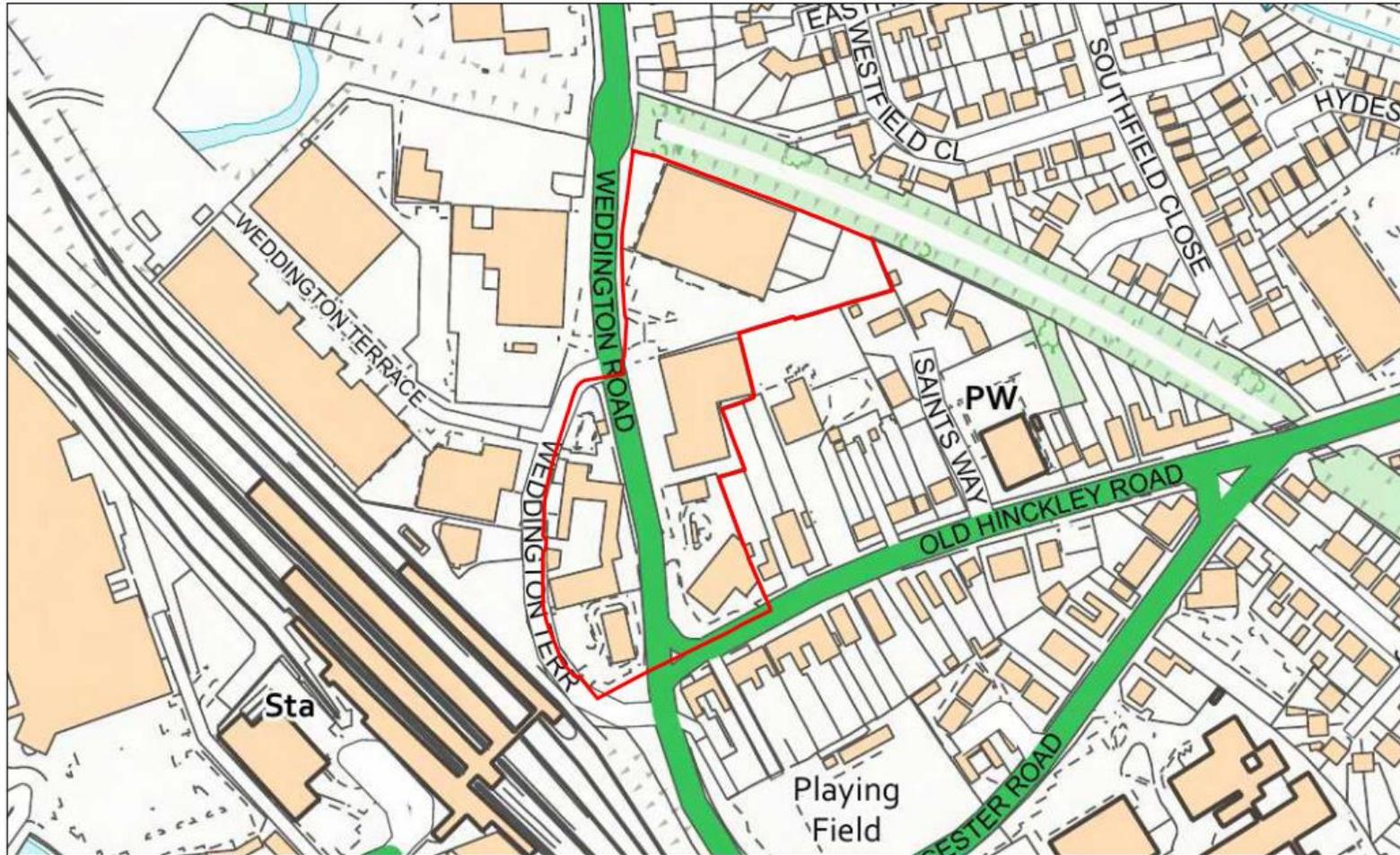
Weddington Road (between Kingsbridge Road and Shanklin Drive) Local Centre



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Weddington Terrace Local Centre

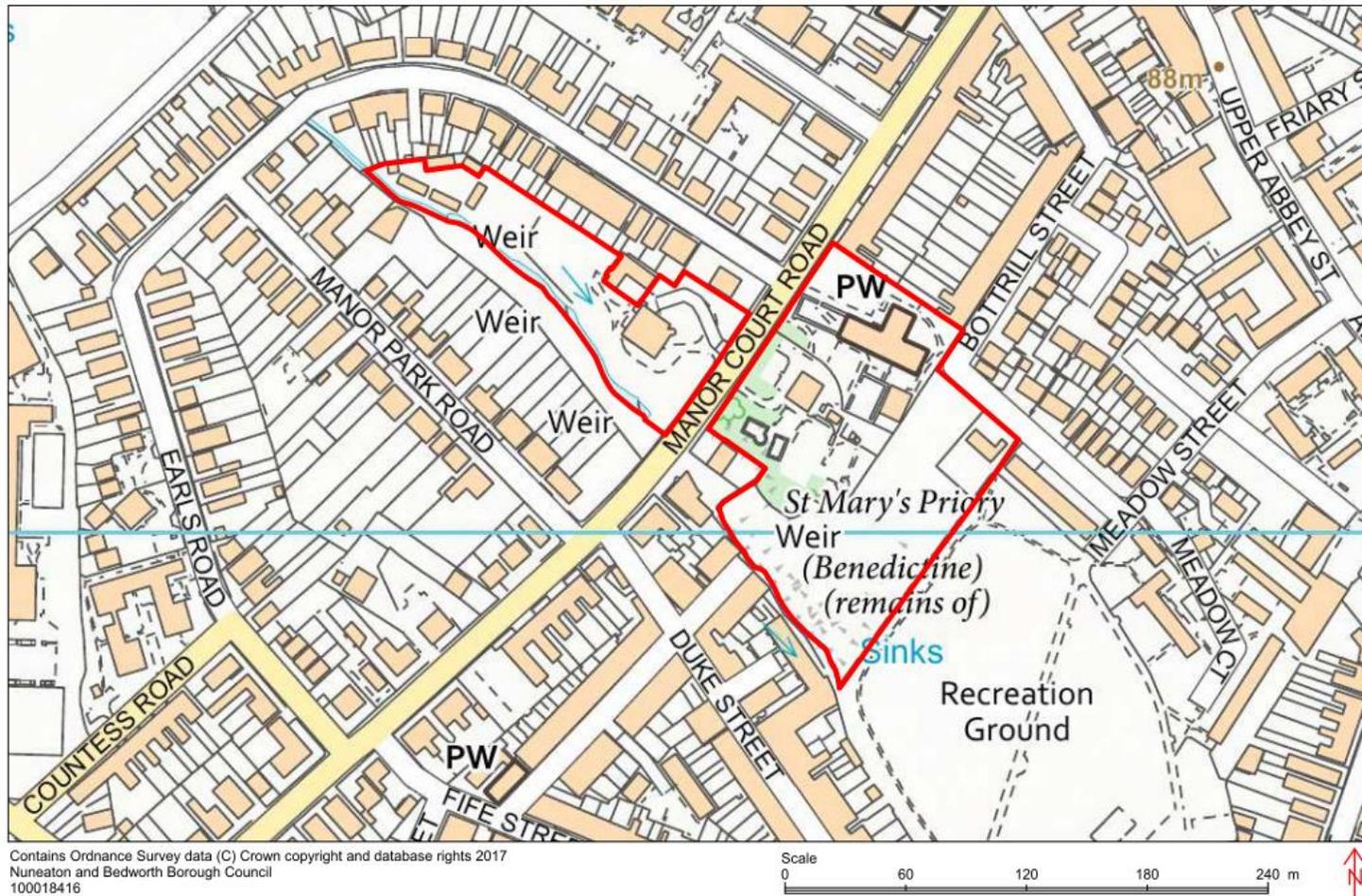


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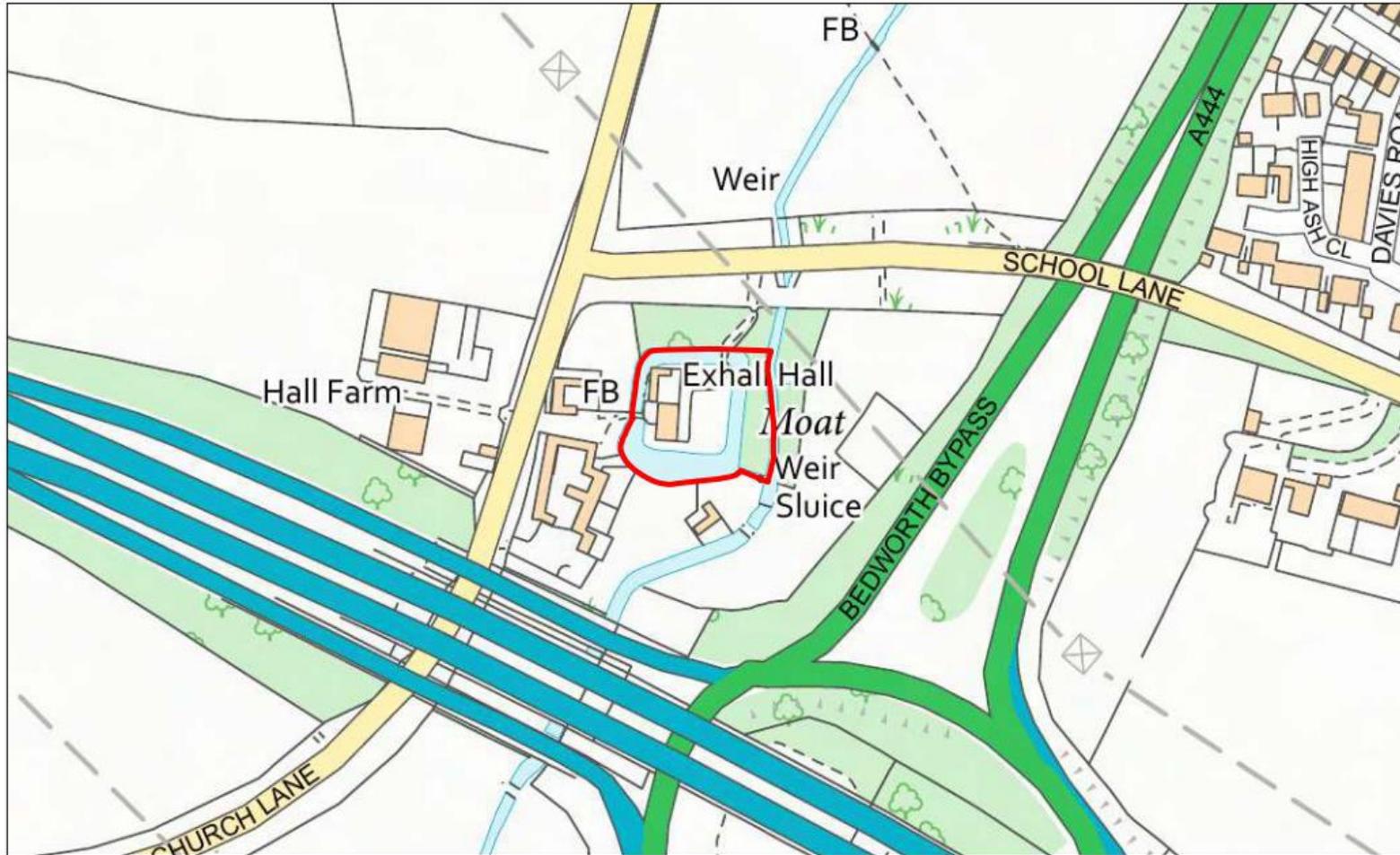


Appendix G - Scheduled monuments

The Benedictine Priory and Precinct of St Mary Scheduled Monument



Moated Site at Exhall Hall Scheduled Monument



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100018416

Scale
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Appendix H - Ensor's Pool

Ensor's Pool Special Area of Conservation



Ensor's Pool Site of Special Scientific Interest

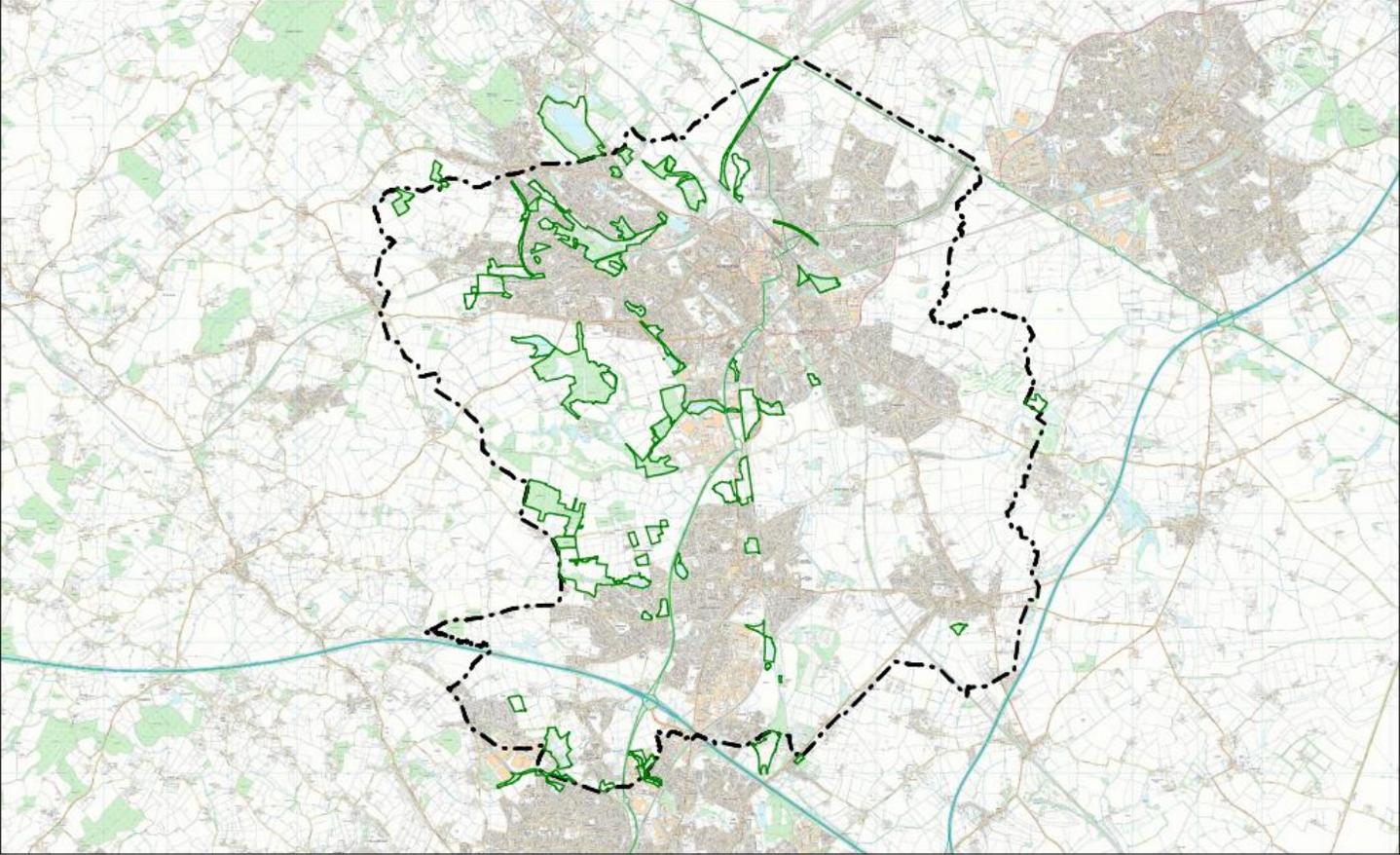


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Appendix I - Local wildlife sites

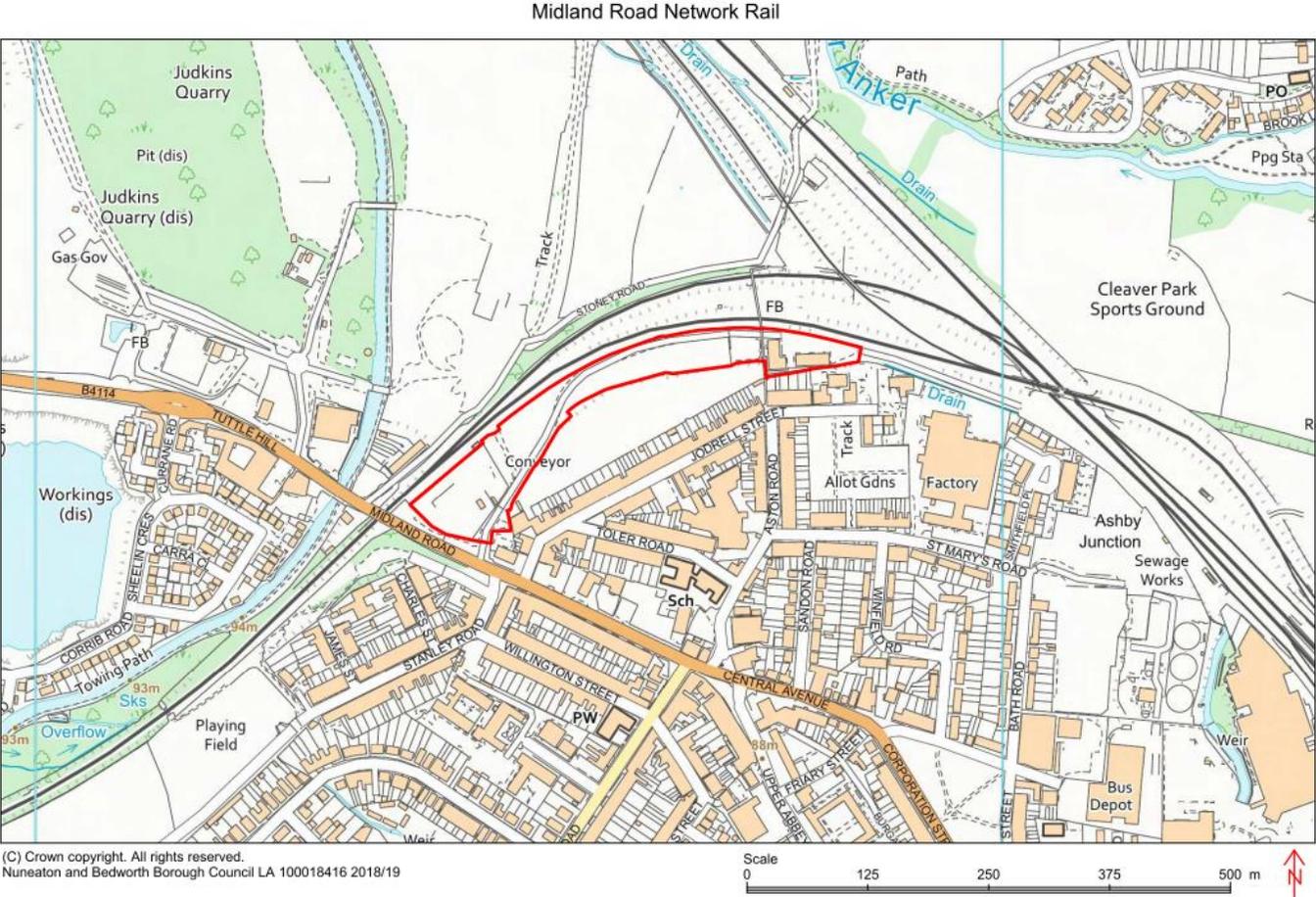
Local Wildlife Sites (2018)



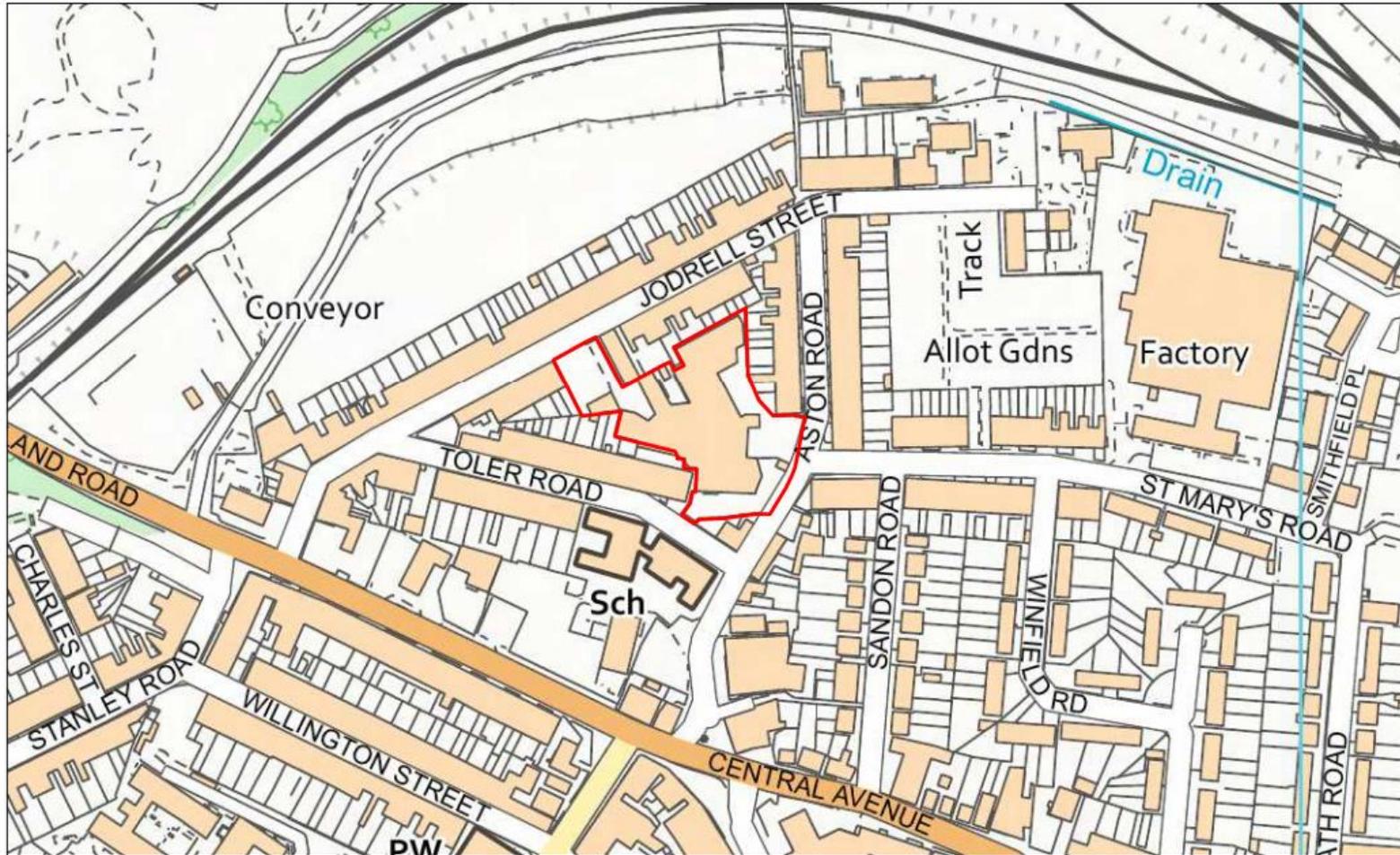
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Appendix J – Employment estates suitable for alternative uses



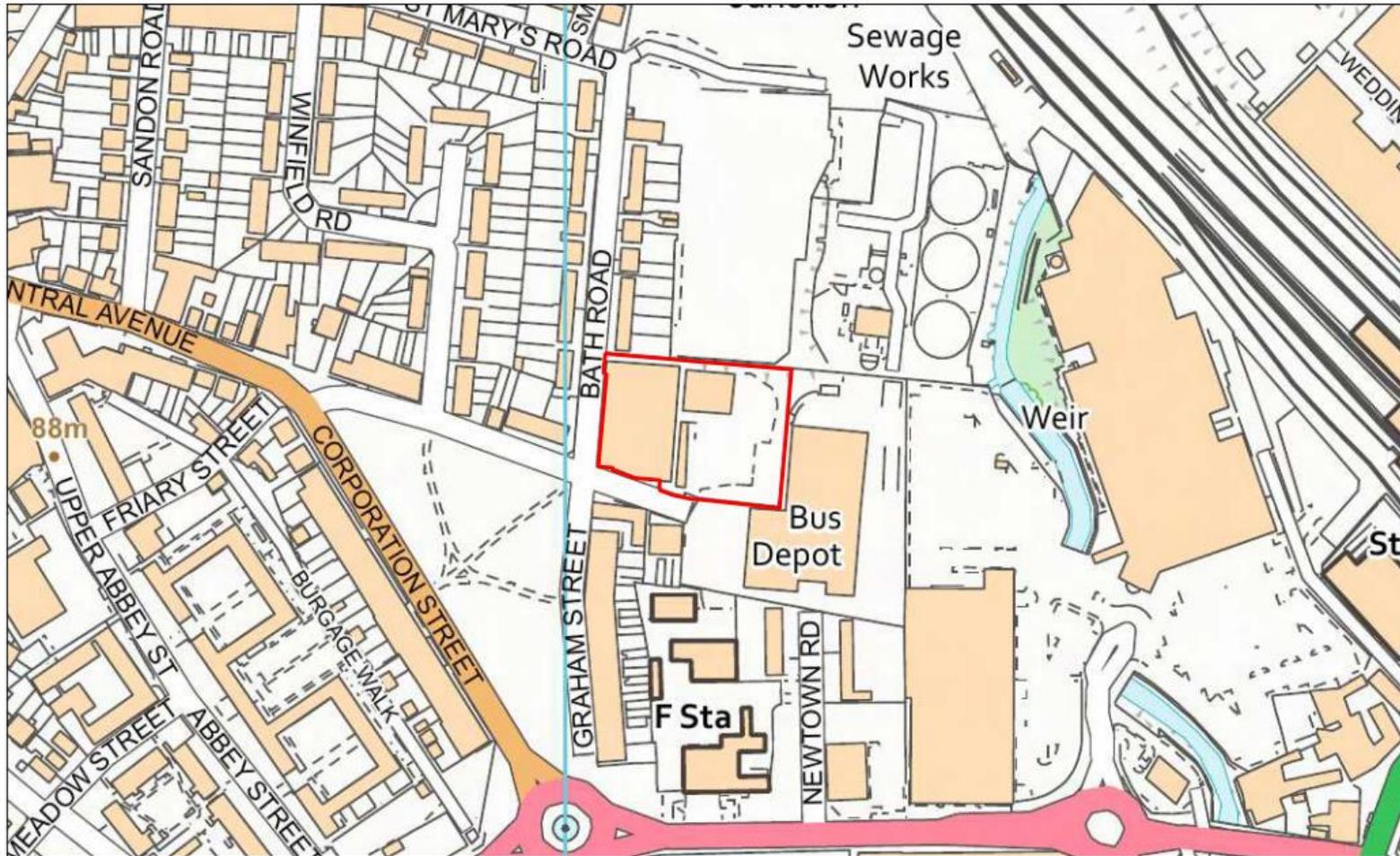
Aston Industrial Estate



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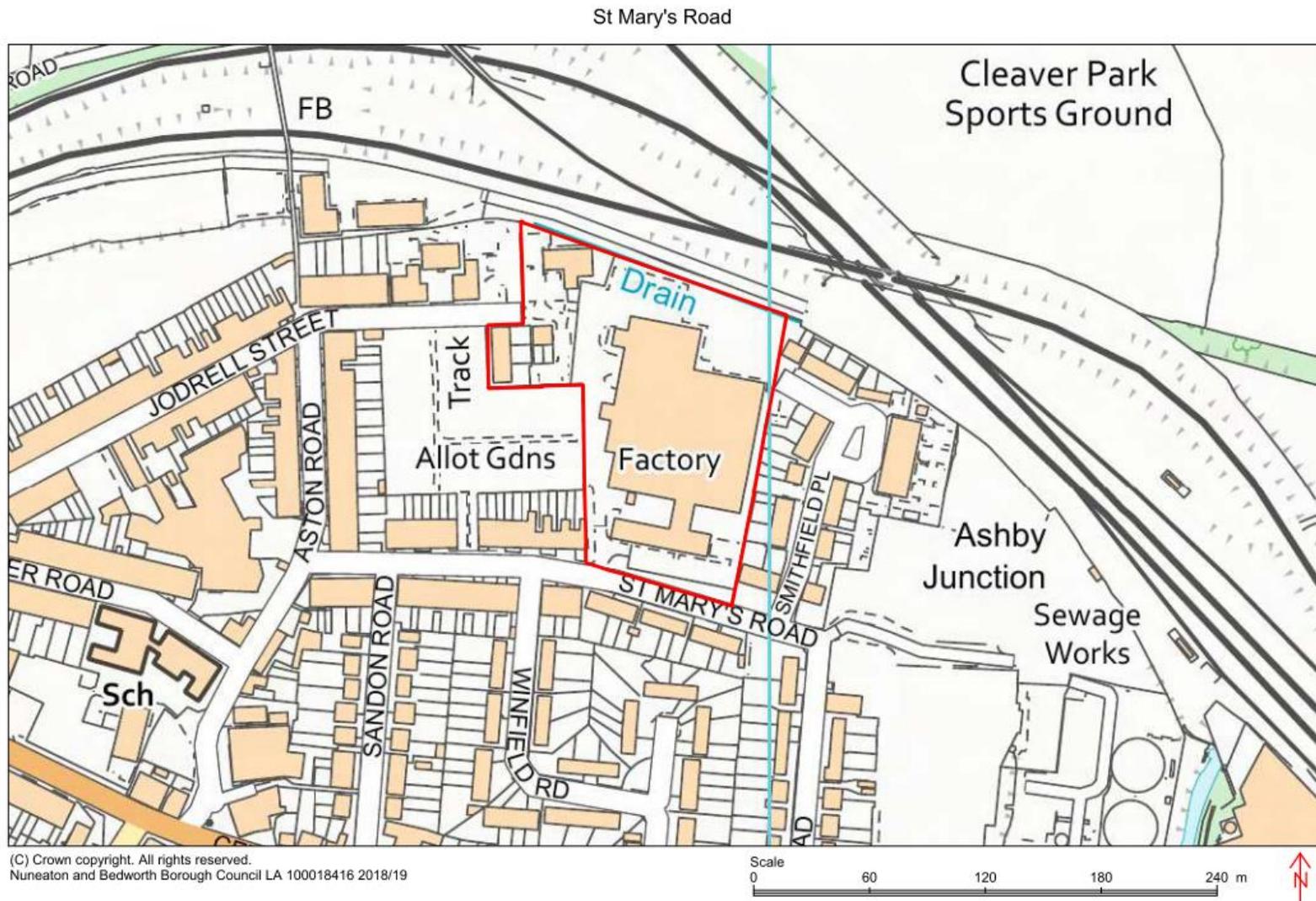


Bath Road

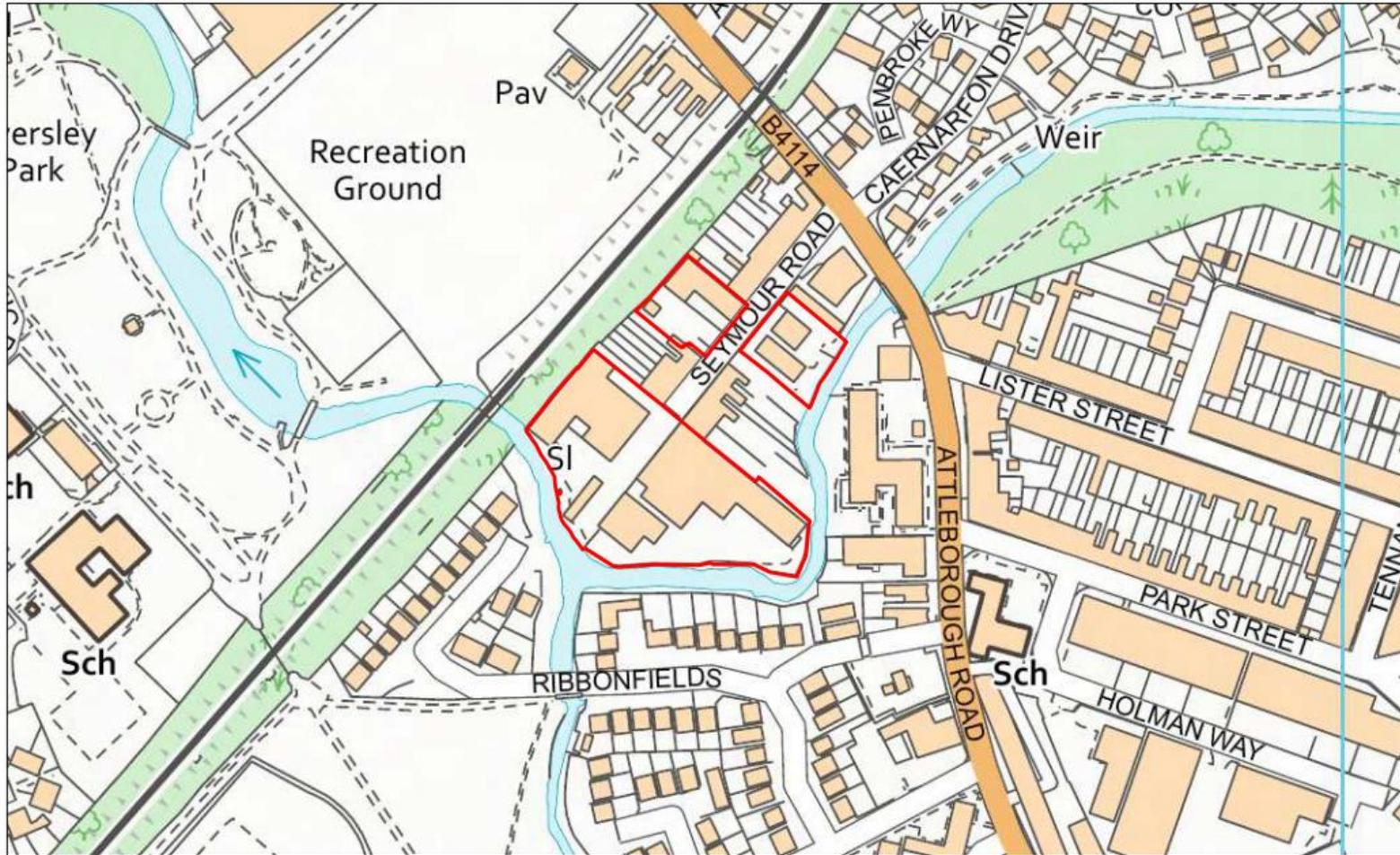


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Seymour Road



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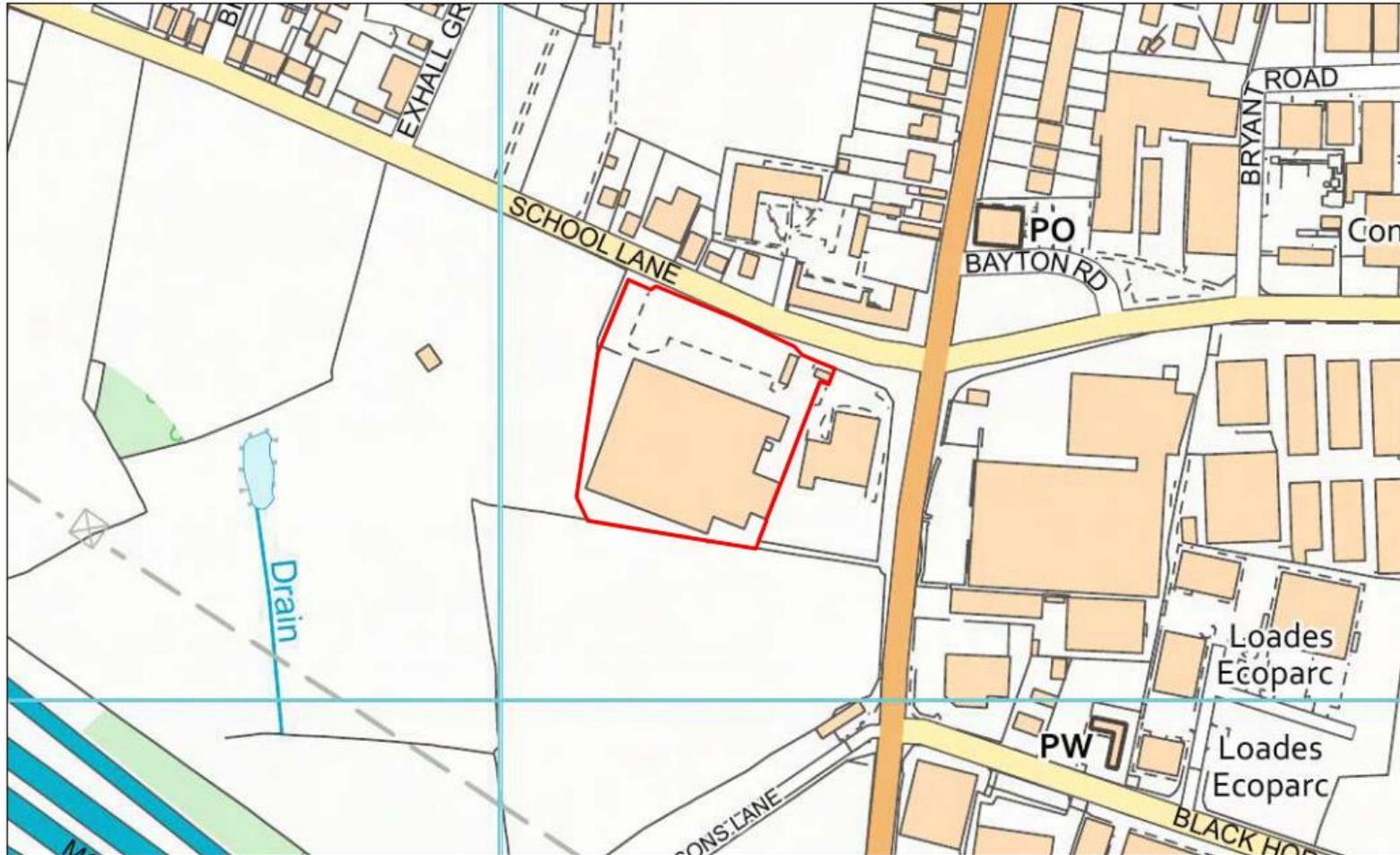
Black Horse Road (E23)



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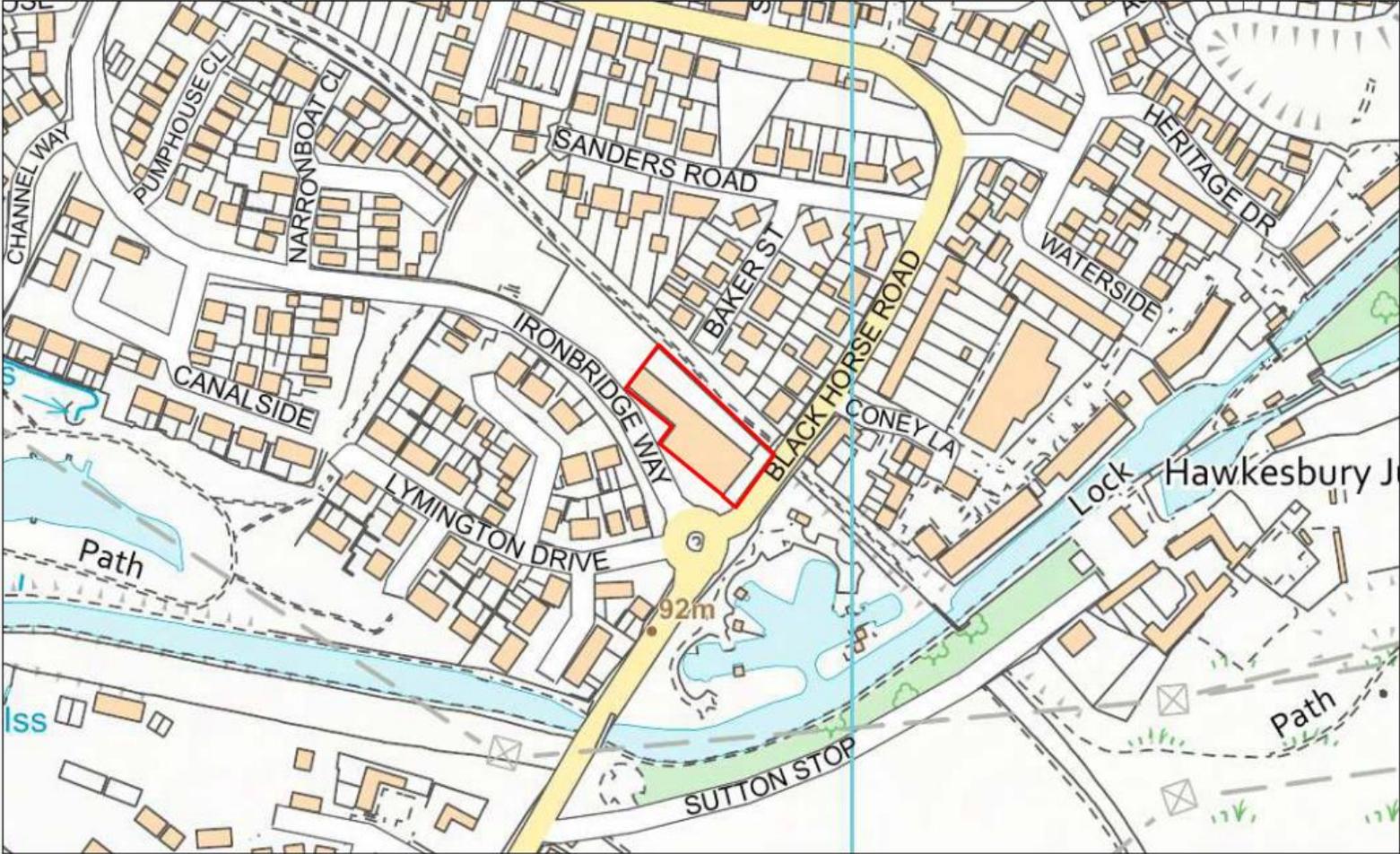
School Lane



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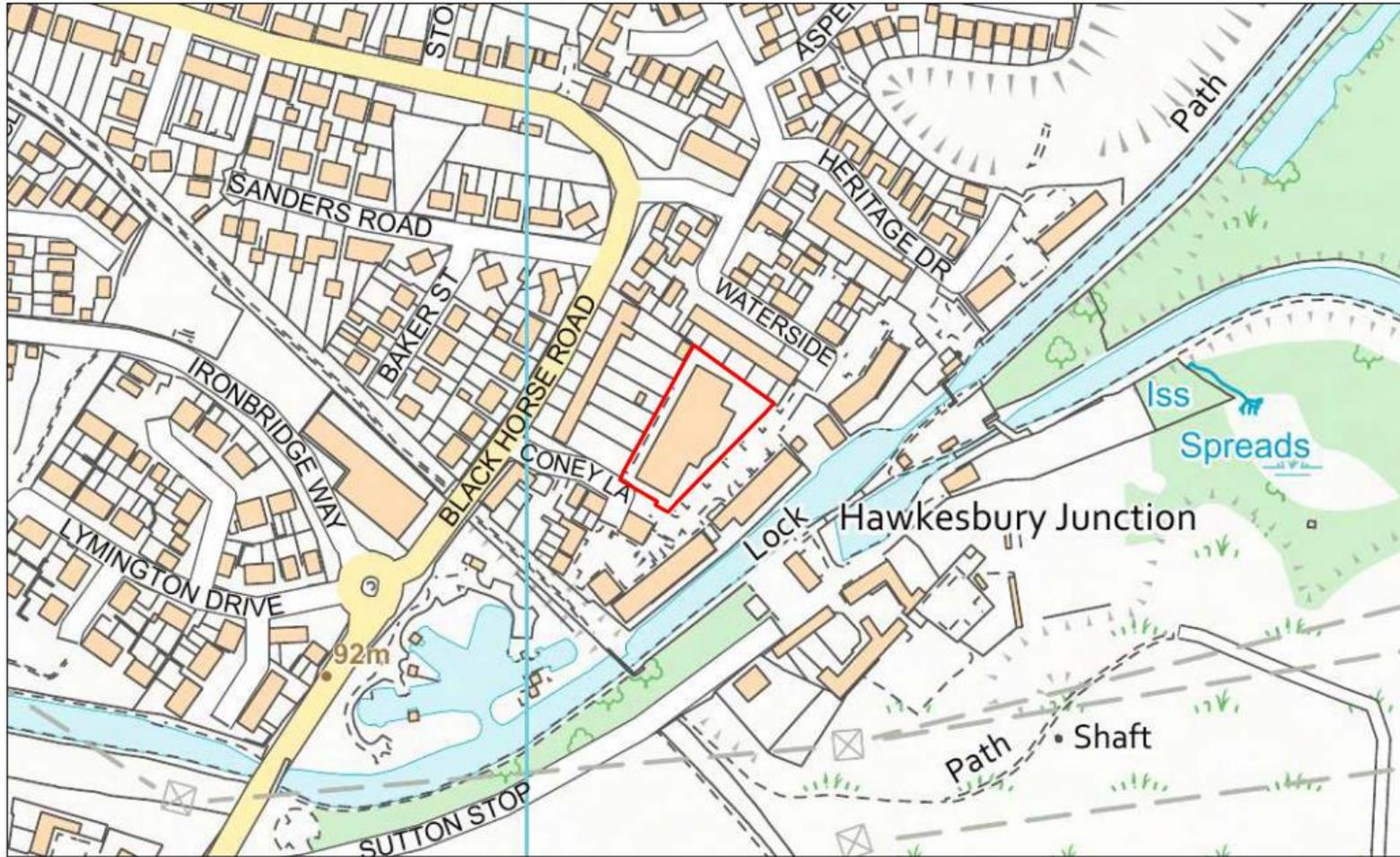
Black Horse Road (E26)



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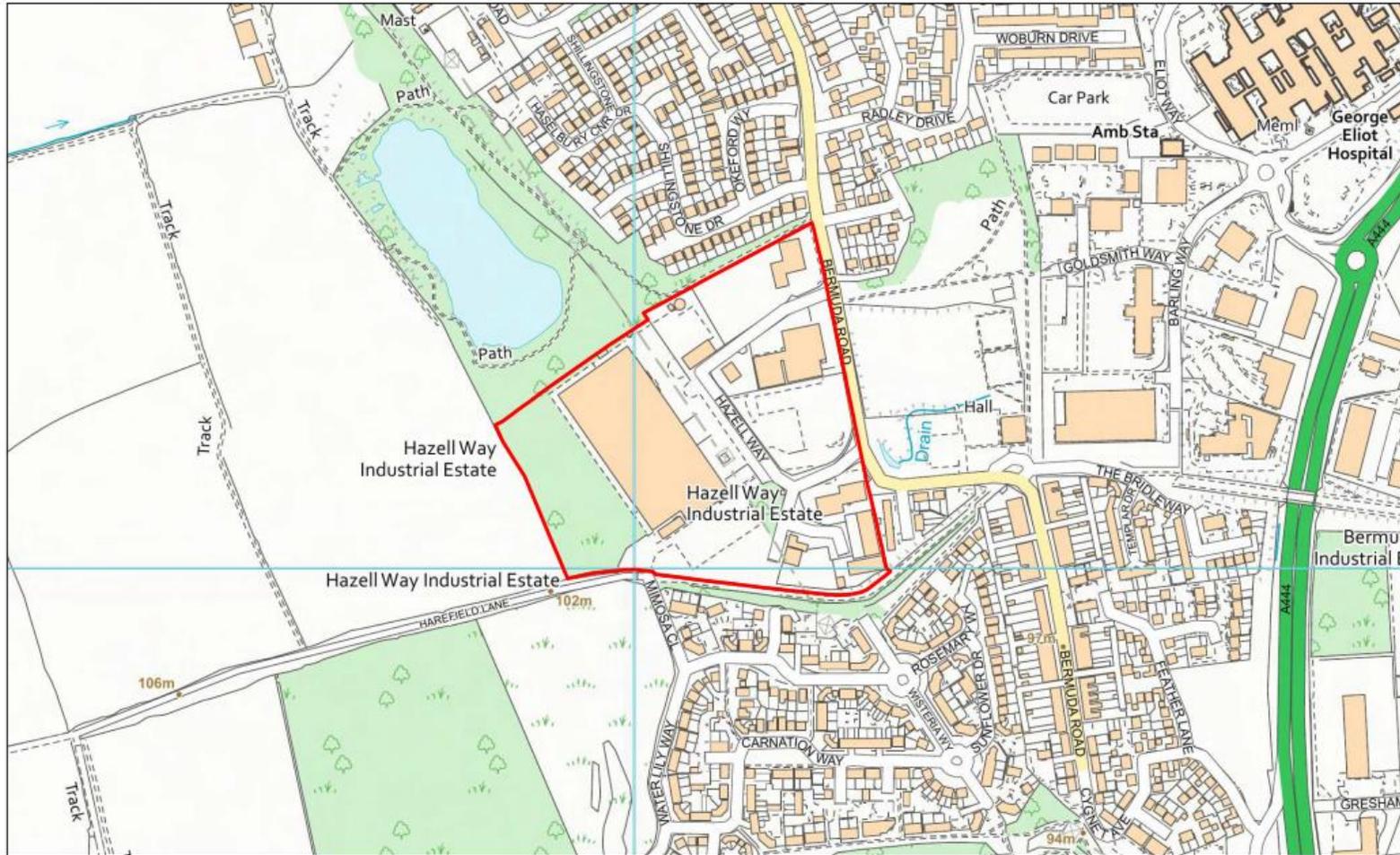
Hawkesbury Lock



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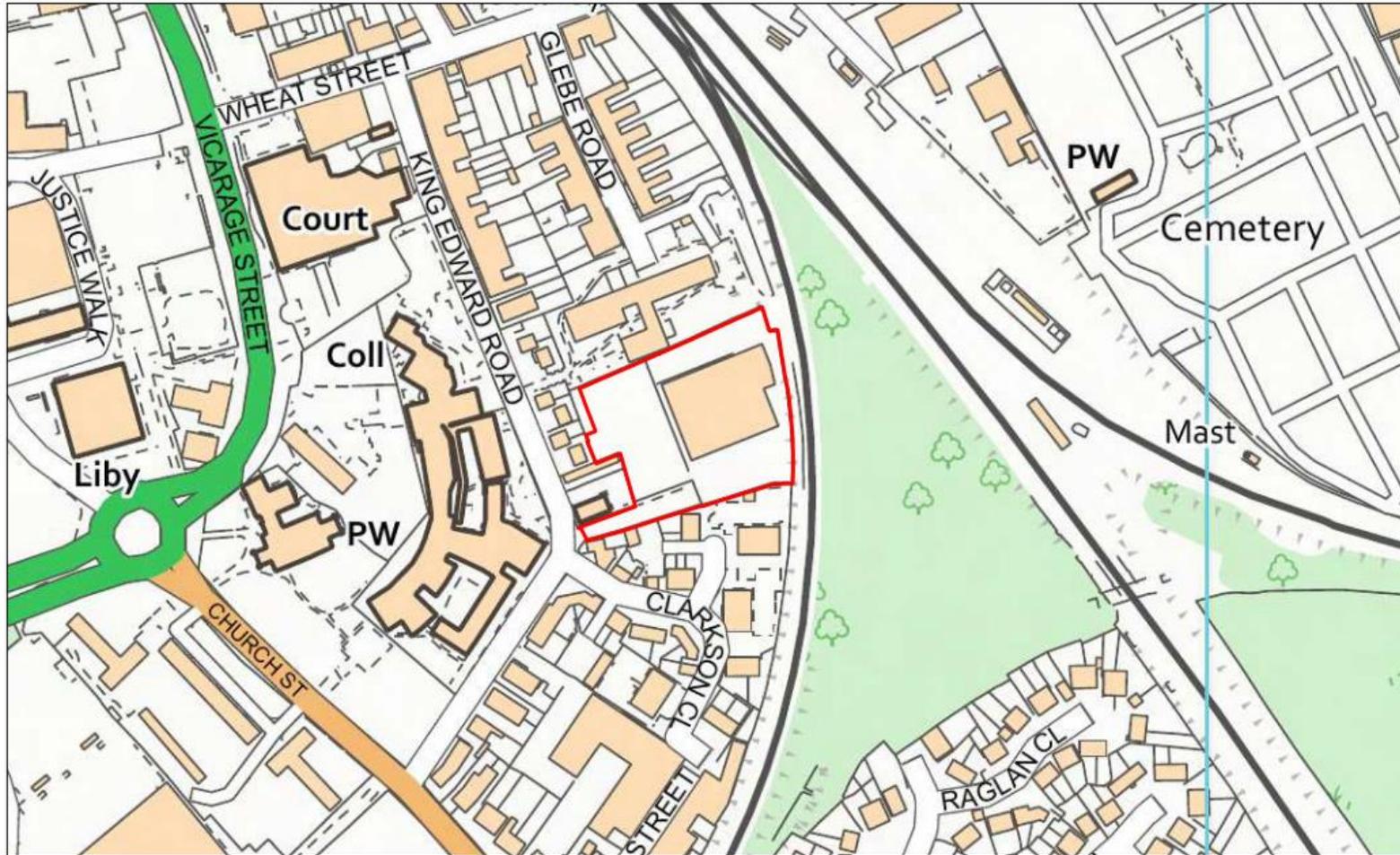
Hazell Way



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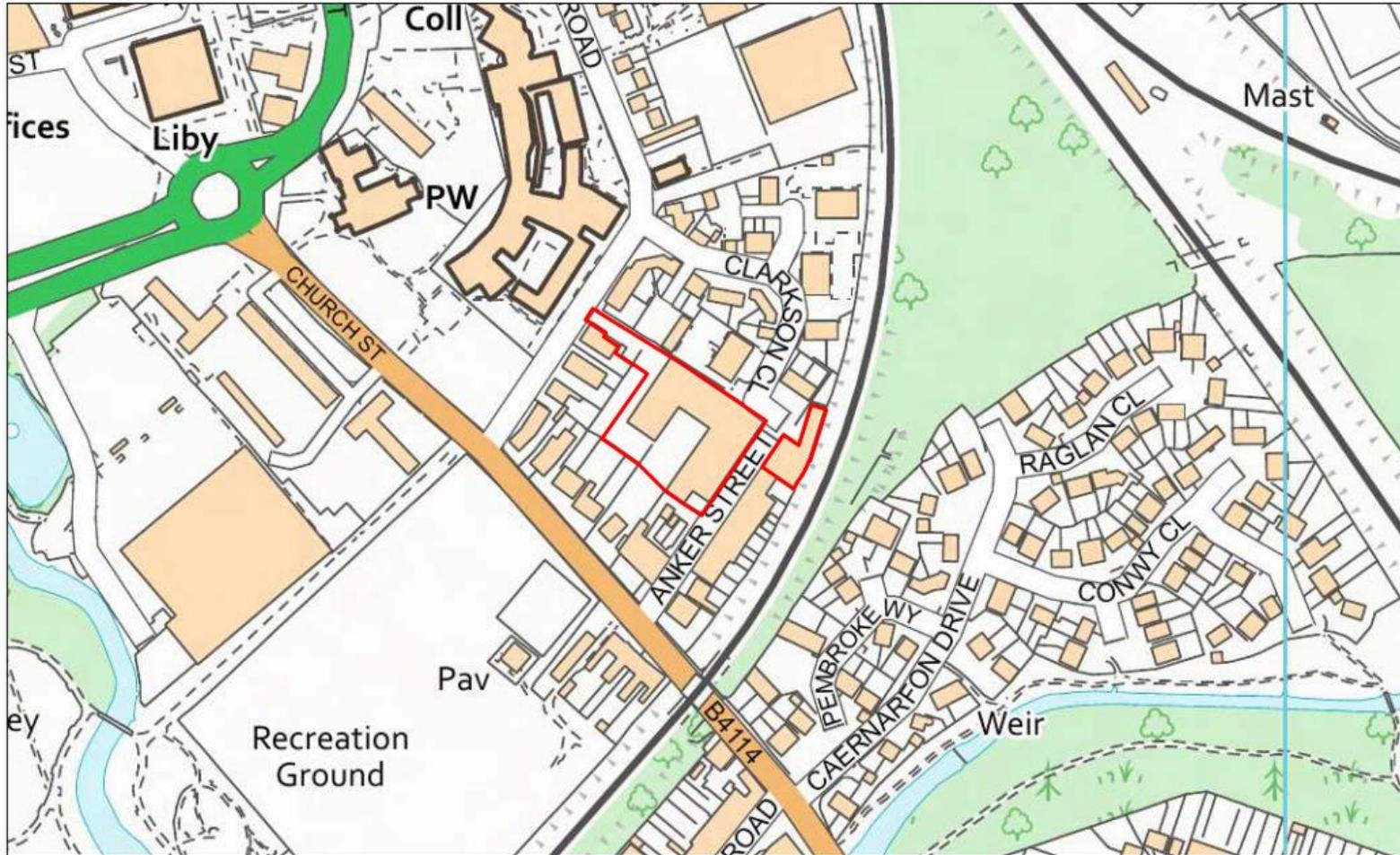
King Edward Road



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Anker Street



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Newtown Road, Bedworth



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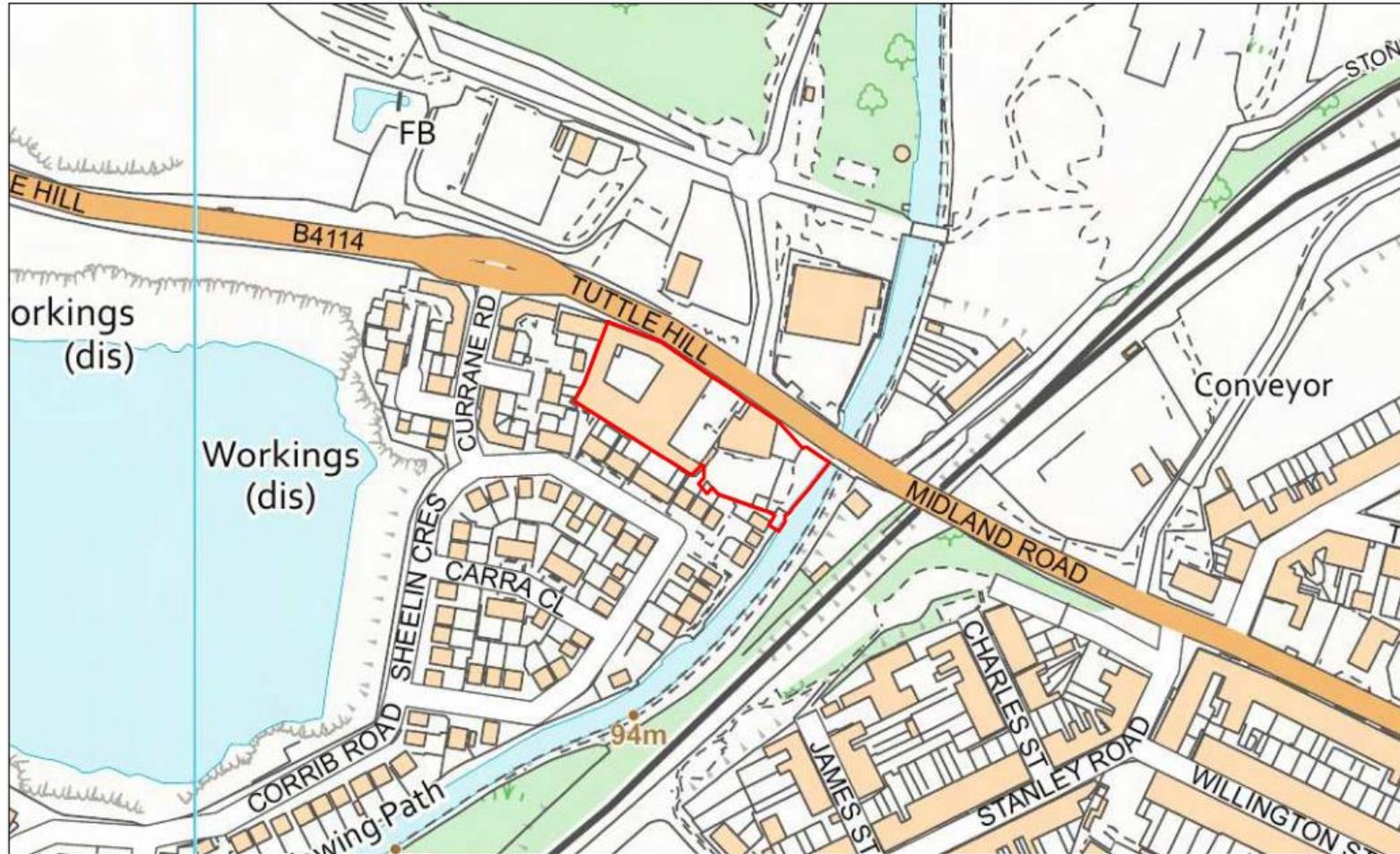
Weddington Road



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Tuttle Hill



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Appendix K - List of superseded policies

Superseded 2006 Local Plan saved policies	Superseding Borough Plan policies
H1 - Housing allocations	DS5 - Residential allocations
H3 - Affordable housing	H2 - Affordable housing
H5 - Special needs housing	BE3 - Sustainable design and construction
H6 - Planning obligations	HS1 - Ensuring the delivery of infrastructure
	SA1 - Development principles on strategic sites
	HSG & EMP - Site specific policies
H10 - Multiple occupation dwellings	N/A
H13 - Gypsy and Traveller sites	H3 - Gypsies and Travellers
EMP1 - Employment allocations	DS6 - Employment allocations
EMP2 - Judkins	N/A
EMP3 - Redevelopment of existing industrial sites or new windfall sites	E1 - Nature of employment growth
	E2 - Existing employment estates
EMP4 - Colliery Lane	N/A
EMP5 - Griff Clara	N/A
EMP9 - Planning obligations	HS1 - Ensuring the delivery of infrastructure
	SA1 - Development principles on strategic sites
	HSG & EMP - Site specific policies
EMP13 - Prison development	N/A
EMP14 - Protecting employment land (B1, B2 and B8)	E1 - Nature of employment growth
	E2 - Existing employment estates
S1 - Development in town centres	TC2 - Nature of town centre growth

Superseded 2006 Local Plan saved policies	Superseding Borough Plan policies
S2 - Development in district and local centres	TC3 - Hierarchy of centres
S3 - Environmental improvements to shopping centres	TC2 - Nature of town centre growth
S7 - A3-A5 uses outside town/district centres	TC2 - Nature of town centre growth
S8 - A3, A4 and A5 uses in town/district centres	TC2 - Nature of town centre growth
S9 - Sui generis uses of retail on industrial estates	N/A
R8 - Green track network	NE1 - Green infrastructure
	NE2 - Open space
R10 - Bermuda Community Park	N/A
ENV1 - Green Belt	DS7 - Green Belt
ENV2 - Areas of restraint	NE5 - Landscape character
ENV3 - Rural and urban countryside	NE5 - Landscape character
ENV14 - SPG on design	BE3 - Sustainable design and construction
ENV27 - Cemeteries	NE2 - Open space
ENV30 - Public art	N/A
T6 - Public transport	HS2 - Strategic accessibility and sustainable transport
T10 - Car parking standards	HS2 - Strategic accessibility and sustainable transport

Appendix L - Index of monitoring indicators

Monitoring reference	Indicator	Target
Development strategy		
DS2a	Employment land	Scale of development in settlements proportional to position in settlement hierarchy
DS2b	Retail	Scale of development proportional to retail hierarchy
DS2c	Leisure floor space	Scale of development in settlements proportional to position in settlement hierarchy
DS2d	Housing completions by settlement	Scale of development in settlements proportional to position in settlement hierarchy
DS3a	Development outside defined settlement boundaries	Zero new unallocated development (except those considered acceptable in the policy) outside development boundaries
DS4a	Housing completions	14,060 dwelling completions
DS4b	Development of employment land	107.8 ha of land is developed for employment uses
DS4c	Gypsy and Traveller accommodation	39 residential pitches and 5 transit pitches provided
DS4d	Housing land supply	Continuous five year land supply of housing
DS5a	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report	All dwellings completed
DS6a	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report	107.8 ha of land is developed for employment uses
DS7a	Number of applications granted planning	Zero

Monitoring reference	Indicator	Target
	permission in Green Belt land although considered inappropriate development	
Housing		
H1a	Number of bedrooms in new dwelling completions	Completions in line with percentages set out in the most recent SHMA
H1b	Extra care housing completions	112 extra care housing completions per year
H2a	Developments of 11 to 14 dwellings and 15+ dwellings where 2 units and 25 % respectively of affordable housing is negotiated	100 %
H2b	Intermediate affordable housing completions	Percentage of intermediate dwellings per annum as outlined in SHMA
H2c	Social or affordable rented housing completions	Percentage of social or affordable rented dwellings per annum as outlined in SHMA
H3a	Gypsy and Traveller accommodation	39 residential pitches and 5 transit pitches provided
H3b	Unauthorised pitches	None
H3c	Unauthorised encampments	None
H3d	Adoption of the Gypsy and Traveller Site Allocations document in accordance with the latest Local Development Scheme	Refer to Local Development Scheme
Employment		
E1a	The number of applications granted in line with the Economic Development Strategy	Zero applications being in conflict with the Economic Development Strategy
E1b	The number of applications granted for non-economic development uses on strategic employment sites	Zero
E1c	Job growth within the Borough by: <ul style="list-style-type: none"> Use of national statistics to track the 	Jobs growth over the plan period to be in line with 'Policy DS4 – Overall development needs'

Monitoring reference	Indicator	Target
	<p>numbers employed. However, it should be noted that the data is out of date by around 2 years, and can be inconsistent, as Government has recently changed the data source which is only published once a year.</p> <ul style="list-style-type: none"> • Carrying out primary research / data collection to estimate job creation. This includes outputs from activities (i.e. from Warwickshire County Council Inward Investment Team), outputs from completions of developments (using industry accepted assumptions relating to numbers of jobs per sq m of development), and information from the press such as the advertisement of job vacancies. • Commissioning work to get more regular and up-to-date data, benchmarked against other areas. 	
E2a	<p>Monitor the loss of employment land to alternative uses and report annually through the Authority Monitoring Report. The indicator will be assessing:</p> <ul style="list-style-type: none"> • Amount of appropriate economic development on estates (this would be 	<p>Qualitative monitoring will be undertaken through the Authority Monitoring Report. Consequently the analysis of this monitoring within the Authority Monitoring Report will determine the impact and effectiveness of the policy.</p>

Monitoring reference	Indicator	Target
	<p>in conformity with policy)</p> <ul style="list-style-type: none"> • Development approved which results in non-conformity with policy. 	
E2b	Monitoring of any new employment estates which should be protected from alternative uses – this will be reported through the Authority Monitoring Report	There is no specific threshold determining what a new estate should be, however anything below 0.4 ha will not be considered a sufficient size for a new employment estate. The Authority Monitoring Report will report anything above this threshold and include analysis regarding the proposal.
E2c	Annual monitoring of losses to employment sites that are not to be protected. This will include a review of whether they are redeveloped in line with alternatives identified in the Economic Development Strategy.	All sites should be developed in line with Economic Development Strategy recommendations
E2d	Monitor the supply and delivery of employment uses and report annually through the Authority Monitoring Report	103.6 ha of employment land over plan period
Town centres		
TC1a	Additional floor space for town centre uses	Increase in A1, A2, B1(a), and D2 floor space in Nuneaton and Bedworth town centres
TC1b	Additional floor space for town centre offices	<p>15,000 sq m of office floor space:</p> <ul style="list-style-type: none"> • Nuneaton: 13,000 sq m - 14,000 sq m • Bedworth 1,000 sq m - 2,000 sq m

Monitoring reference	Indicator	Target
TC1c	Additional floor space for comparison retail	13,470 sq m to 16,460 sq m of comparison floor space: <ul style="list-style-type: none"> • Nuneaton: 11,420 sq m - 13,950 sq m • Bedworth: 1,570 sq m - 1,925 sq m
TC1d	Additional floor space for convenience retail	1,750sq m to 3,580 sq m of convenience floor space: <ul style="list-style-type: none"> • Nuneaton: 910 sq m – 2,500 sq m • Bedworth: 460 sq m – 540 sq m
TC1e	Additional floor space café, restaurant and bars	2,666 sq m to 3,065 sq m of café, restaurant and bar floor space: <ul style="list-style-type: none"> • Nuneaton: 2,324 sq m - 2,672 sq m • Bedworth: 324 sq m – 393 sq m
TC2a	Relevant planning permissions inside and outside of identified centres	Increase town centre uses given permission in defined centres and reduce town centres uses given permissions outside defined centres
TC2b	The net gain and losses of commercial floor space	Minimise the loss of retail units to non-retail uses within the defined district centre boundaries
TC2c	The diversity of uses (e.g. retail, leisure and services offer)	Maintain a good mixture of uses in the town centres
TC2d	Retailer representation and demand	Increase the amount of national retailers present in the town centres
TC2e	Commercial property indicators (such as prime zone A rents)	Increase the number of prime zone A rents
TC2f	Changes in vacancy levels	Maintain a low rate of vacant retail premises in all centres
TC2g	Accessibility and parking provision	Maintain availability of parking provision and improve provision for sustainable transport
TC2h	The quality of the town centre environments	Maintain the current standards of the town

Monitoring reference	Indicator	Target
		centres and seek to improve where necessary
TC2i	Town centre footfall	Increase town centre footfall in both centres
TC3a	Health of district and local centres. Bi-annual review of the local centres study to cover: Health check of centres (this includes district and local centres) Site assessment of any new district or local centres	District and local centres remain healthy in terms of their function, viability and vitality
TC3b	Delivery of new district and local centres	New district or local centres as set out in the strategic site policies
Healthy, safe and inclusive communities		
HS1a	Delivery of infrastructure set out within Infrastructure Delivery Plan	Where infrastructure on strategic sites is not being delivered in line with the Infrastructure Delivery Plan, this will trigger a review with appropriate service delivery partners
HS1b	Applications granted in line with advice of infrastructure service delivery partners	Where applications are granted contrary to advice of infrastructure service delivery partners, it is expected that suitable planning justification is provided by the council. Where advice from partners leads to mitigation, this is considered positive.
HS1c	Monitoring of planning obligations/agreements that are: <ul style="list-style-type: none"> • Agreed • Implemented • Amended 	Qualitative monitoring of this indicator will take place in the Authority Monitoring Report. The purpose is to enable an understanding as to how well the council is performing in terms of the obligations/agreements.

Monitoring reference	Indicator	Target
HS2a	Applications in conformity/non-conformity with Warwickshire County Council and/or Highways England advice: monitor the number of applications granted which are not mitigated against, following objection on transport grounds by either Warwickshire County Council and/or Highways England.	It is expected that applications will not be granted contrary to Warwickshire County Council and/or Highways England advice
HS2b	Monitor number of applications granted which result in a negative outcome when assessed against the criteria set out in the policy	Qualitative assessment of this indicator will take place in the Authority Monitoring Report. It is expected that the policy will be conformed with, however analysis of individual circumstances on each application will be required to understand whether criteria were conformed with.
HS2c	Conformity with supplementary planning document Transport Demand Management Matters	Qualitative assessment of this indicator will take place in the Authority Monitoring Report. It is expected that the supplementary planning document will be conformed with, however analysis of individual circumstances on each application will be required to understand whether the supplementary planning document was conformed with
HS3a	The number of new telecommunications developments permitted in conformity / not in conformity with the policy	It is expected that applications approved for telecommunications will be in line with this policy. Where this does not occur, detailed analysis will need to be undertaken to

Monitoring reference	Indicator	Target
		ascertain whether the policy is effective.
HS4a	Loss of community facilities	Applications granted which result in the loss of community facilities will need to be assessed in consultation with Warwickshire County Council. The impact of the loss(es) will determine the effectiveness of the policy.
HS5a	Monitor the number of applications granted contrary to the health impact assessment recommendations	Zero
HS5b	Monitor number of planning obligations received associated with health matters	Monitoring analysis will compare the overall monetary requirements identified in the Infrastructure Delivery Plan against what the Council receives
HS6a	Monitor number of planning obligations received associated with sport and exercise matters	Monitoring analysis will compare the overall monetary requirements identified in the Infrastructure Delivery Plan against what the council receives
HS6b	Loss and gain of playing pitches	To be identified within the Playing Pitch Strategy
HS6c	Loss of open space	No net loss of open spaces – destination parks, community parks, playing pitches, parks or allotments – to development
HS6d	Improvements to open space	Improvements in the total numbers of residents with adequate access to the different forms of open space provision as well as improvements in the quality of the open spaces
HS6e	Monitor the amount of planning obligations contributions secured,	Increase in the resources secured for, and the provision of, relevant facilities

Monitoring reference	Indicator	Target
	and the on-site provision of relevant facilities	
HS7a	Monitor the number of applications for use class A5 within 400 m of the principal point of access of existing secondary schools and sixth form colleges, excluding applications falling in town, district or local centres	Zero
HS7b	Monitor the number of units under A5 use class as a percentage of each local and district centre	20 % maximum
Natural environment		
NE1a	Green infrastructure	Provision of green infrastructure to support development in line with green infrastructure framework
NE1b	Distance of strategic network cycle routes	Delivery towards strategic cycle network plans
NE2a	Change to open space	No net loss of open spaces made up of destination parks, community parks, neighbourhood parks or allotments to development.
NE3a	Deterioration in SSSI and Special Area of Conservation sites	No deterioration; maintain at favourable status
NE3b	Development causing habitat net losses	Zero
NE3c	Development causing a loss of Local Biodiversity Action Plan habitats and species	Zero
NE3d	Planning permission granted on designated statutory sites and sites with high biodiversity distinctiveness	Zero
NE3e	Local wildlife sites in positive management	All local wildlife sites
NE3f	Increase or decrease in connectivity of ecological network. This could be monitored through	Year on year increase

Monitoring reference	Indicator	Target
	planning applications and the Habitat Biodiversity Audit.	
NE4a	The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of flood risk.	0 %
NE4b	The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to water quality	0 %
NE4c	The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to groundwater quality	0 %
NE4d	Number of developments including sustainable drainage systems	100 %
NE5a	Development given planning permission in highly valued landscape areas	Zero
NE5b	Maintain five year housing land supply	Maintain a minimum of five years housing land supply
Built Environment		
BE1a	Development of a potentially contaminated or unstable site	Remediation is suitable for new use and is no longer considered contaminated
BE2a	Proposals for small wind turbines in conformity with criteria	100 %
BE3a	New homes incorporating Building for Life 12 (12 greens)	100 % of new dwellings
BE3b	New homes meeting optional Building Regulations Standard Part M4(2) for accessible and adaptable dwellings	35 % of new dwellings
BE3c	New homes installing rain water harvesting systems in the curtilage of all new buildings	100 % of new dwellings

Monitoring reference	Indicator	Target
BE3d	New residential and commercial developments integrating Secure By Design principles	100 %
BE3e	Commercial applications achieving BREEAM very good standard	100 %
BE4a	Local list of heritage assets	Complete review
BE4b	No loss of designated historic assets	No loss
BE4c	Harm to registered parks and gardens and scheduled monuments	No harm
BE4d	Review of conservation areas	Complete review

Appendix M – Use classes

The following list gives an indication of the types of use which may fall within each use class. Please note that this is a guide only and it is for the council to determine, in the first instance, depending on the individual circumstances of each case, which use class a particular use falls into¹²⁸.

A1 Shops – Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.

A2 Financial and professional services – Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies. It does not include betting offices or pay day loan shops – these are now classed as ‘sui generis’ uses.

A3 Restaurants and cafes – For the sale of food and drink for consumption on the premises – restaurants, snack bars and cafes.

A4 Drinking establishments – Public houses, wine bars or other drinking establishments (but not night clubs) including drinking establishments with expanded food provision.

A5 Hot food takeaways – For the sale of hot food for consumption off the premises.

B1 Business – Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

B2 General industrial – Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).

B8 Storage or distribution – This class includes open air storage

C1 Hotels – Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).

C2 Residential institutions – Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

C3 Dwellinghouses – this class is formed of 3 parts:

- C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess,

¹²⁸ Planning Portal (2017). Change of use: Use Classes.

servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.

- C3(b): up to six people living together as a single household and receiving care, e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
- C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 houses in multiple occupation definition, but which fell within the previous C3 use class, to be provided for, i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

C4 Houses in multiple occupation – small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

D1 Non-residential institutions – Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non-residential education and training centres.

D2 Assembly and leisure – Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreation (except for motor sports, or where firearms are used).

Sui Generis – Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses and casinos.

Glossary

Air Quality Management Area (AQMA): A designated area where there is a likelihood that the air quality objectives set out in the Air Quality Regulations 2000 will not be met.

Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.

Ancient woodland: Land that has been continuously wooded since 1600. They are full of cultural heritage and are our richest sites for wildlife.

Authority monitoring report: A report published annually to assess the progress of policies and proposals in the Borough Plan.

Area action plan: A development plan document focussing on a specific location or an area subject to change.

Area of restraint: A designation of the adopted Local Plan 2006 to protect land for its open character and the contribution it makes to the character and structure of the urban areas.

Biodiversity offsetting: A way of delivering biodiversity net gains in a measureable way, where the potential to avoid any damage and mitigate any damage has been fully considered which is unavoidable.

Brownfield land / previously developed land: Land that is or was occupied by a permanent (non-agricultural) structure and associated fixed surface infrastructure, including the curtilage of the development, in urban and rural areas. It excludes land and buildings that have been used for agricultural purposes, forest and woodland, and land in built-up areas, which has not been developed previously (known as greenfield land).

Building at risk: A listed building or structural scheduled ancient monument known to English Heritage to be at risk because of neglect and decay or vulnerable to becoming so.

Building for Life 12: A tool for assessing the design quality of homes and neighbourhoods.

Building Research Establishment's Environmental Assessment Method (BREEAM): The world's leading and most widely used environmental assessment method for non-domestic buildings.

Community facilities: Facilities or services for the community, including open space, sport and recreational facilities, community buildings, doctor's surgeries, libraries, pubs, churches, and children's play areas.

Combined heat and power / combined cooling, heat and power: Efficient and simultaneous generation of usable heat and power in a single process, thereby

reducing wasted heat and putting it to use by distributing to buildings via district heating pipes.

Community Infrastructure Levy (CIL): A duty allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Community park: A park normally between 1 and 10 ha.

Comparison retailing: A type of retail selling items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods where a comparison of alternatives is made.

Conservation area: An area designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest, the character and interest of which it is desirable to preserve and enhance.

Contaminated land: Land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.

Convenience retailing: A type of retail selling everyday essential items, including food, drinks, newspapers/magazines and confectionery.

Corporate Plan: Part of the Council's Strategic Planning Framework showing the Council's vision, aims and priorities.

Decentralised energy: The local generation of electricity or heat from renewable and/or low carbon sources at, or near to, its point of use.

Derelict land: Land so damaged by previous industrial or other development that it is incapable of beneficial use without treatment. Treatment can include demolition, clearing of fixed structures or foundations and levelling. The definition also includes abandoned and unoccupied buildings in an advanced state of disrepair i.e. with unsound roof(s).

Destination parks: The Borough's largest parks. Normally covering an area of between 10 and 65 ha and containing a range of quality facilities and experiences for all members of the public.

Development plan document: A statutory component part of the local development framework including the Borough Plan, area action plans and site-specific allocations.

District centre: Provides for the day-to-day shopping and service needs of local people.

District heating network: A local network of insulated pipes used to deliver heat, in the form of hot water or steam, from a centralised boiler or from combined heat and power generation for residential and commercial users.

Economic Development Strategy: A document stating the Council's vision, objectives and priorities for the Borough's economy.

Employment Land Review: A review of the quantity and quality of existing and proposed employment land within the Borough.

Evidence base: Economic, social, and environmental information and data gathered by the Council in order to provide robust and credible evidence to justify the soundness of the policies in the Borough Plan.

Feed-in tariff: A policy mechanism designed to accelerate investment in small scale (less than 5 MW) renewable energy technologies. Under the feed-in tariff, eligible renewable electricity generators (which can include homeowners, business owners, farmers, as well as private investors) are paid a cost-based price for the renewable electricity they produce.

Five year housing supply: A supply of housing sites that can be delivered within five years. To be 'deliverable', sites should be available now, offer a suitable location now, and be achievable on the site within 5 years.

Green Belt: A designation which aims to keep land permanently open or largely undeveloped. The purposes of the Green Belt are to:

- Check the unrestricted sprawl of large built up areas.
- Prevent neighbouring towns from merging.
- Safeguard the countryside from encroachment.
- Preserve the setting and special character of historic towns.
- Assist urban regeneration by encouraging the recycling of derelict and other urban land.

Green corridor: A green linear space that can be used for walking and cycling, and may also provide a habitat for plants and animals.

Greenfield: Land where no development has previously taken place such as agricultural or forestry land.

Green infrastructure: A network of multi-functional green spaces, urban and rural, which are capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure includes parks, gardens, nature reserves, river valleys, footpaths and cycle paths, allotments, and grass verges, and are multi-functional, i.e. they provide wildlife, recreational, cultural and ecological benefits.

Green network: Open spaces of all kinds, including canal-ways and river corridors, are accessibly linked together.

Ground source heat pumps: A system harnesses heat from underground by pumping water through it. The heat pump then increases the temperature, and the heat is used to provide home heating or hot water. The pump needs electricity to run, but the idea is that it uses less electrical energy than the heat it produces. The heat pump performs the same role as a boiler does in a central heating system, but it uses ambient heat from the ground rather than burning fuel to generate heat.

Health impact assessment: A means of assessing the health impacts of policies, plans and projects using quantitative, qualitative and participatory techniques.

Historic park and garden: A park or garden that is deemed to be of sufficient historic interest to merit inclusion on English Heritage's Register of Historic Parks and Gardens.

Infrastructure delivery plan: Provides information about the infrastructure which needs to be delivered in order to support the policies and growth targets set out in the Borough Plan. It outlines the sources of funding for those projects, and identifies who is responsible for the delivery of infrastructure. The Infrastructure Delivery Plan will be accompanied by an Infrastructure Delivery Strategy.

Infrastructure delivery strategy: This accompanies the Infrastructure Delivery Plan and sets out on-going and planned schemes for different infrastructure categories.

Intermediate housing: Homes for sale, and rent, provided at a cost above social, but below market levels. These include shared equity (shared ownership and equity loans), and other low cost homes for sale and intermediate rent, but not affordable rented housing.

Landscape character: What makes an area unique, defined as distinct, recognisable and consistent pattern of elements (be it natural [soil, landform] and/or human [for example settlement and development]) in the landscape that makes one landscape different from another, rather than better or worse.

Landscape character assessment: A tool to identify and understand our local landscapes in terms of their diversity, character, distinctiveness and sensitivity to change.

Listed building: A building or structure of special architectural, historical or cultural interest designated by English Heritage on behalf of the Government. Buildings are listed Grade I, Grade II* or Grade II. Any changes to such buildings require listed building consent.

Local centre: Provides for the day-to-day top-up shopping needs of local people on a smaller scale than a district centre.

Local geological site: Sites identified by local geo-conservation groups as being of geological importance. Nuneaton and Bedworth has eight sites of geological interest.

Local park: Smaller parks normally between 0.4 ha and 10ha.

Local Plan 2006: Old-style development plan prepared by the Council. Adopted in 2006, some policies of the Nuneaton and Bedworth Local Plan are saved until replaced by the Borough Plan.

Local nature reserve: Statutory designation for areas of importance for wildlife, geology, education or public enjoyment. Nuneaton and Bedworth has three local nature reserves at Bedworth Sloughs, Ensor's Pool and Galley Common.

Local Transport Plan: The Local Transport Plan is a documents which set out the long-term vision, objectives and outcomes for transport. The Local Transport Plan should also include a range of policies, underpinned by a strategic programme of investment in maintenance of the existing network, and investments in transport schemes, where these can be justified, to deliver the vision and achieve the objectives and outcomes sought.

Local wildlife site: Area of land with substantive wildlife value. Nuneaton and Bedworth has approximately 30 local wildlife sites, and these are likely to increase as potential local wildlife sites are identified and assessed.

Major development: In relation to the provision of dwellinghouses where the number of dwellinghouses to be provided is 10 or more, or the development is to be carried out on a site having an area of 0.5 hectares or more. In relation to all other types of development, development carried out on a site having an area of 1 hectare or more.

National Planning Policy Framework (NPPF): Government policy on planning matters which seeks to create sustainable communities and foster sustainable development. The policies in the NPPF provide the national framework within which local policy should be prepared.

NUCKLE: NUCKLE is the upgrade of the existing rail line between Leamington and Nuneaton. It will help to improve accessibility and encourage increased use of the train for journeys that might otherwise be undertaken by car. The Phase 1 Coventry to Nuneaton Rail Upgrade scheme includes:

- Two completely new stations at Coventry Arena and Bermuda Park.
- More platforms at Coventry Station, to accommodate six-car trains.
- Longer platforms at Bedworth Station to accommodate longer trains.
- Improvements to the train service, with frequency doubled to every 30 minutes.
- Passenger capacity raised to four times its current level
- Equipment at the new Coventry Arena Station to turn trains around for an events shuttle service.

Primary frontages: Shopping frontages that include a high proportion of retail uses.

Primary shopping area: Where retail development is concentrated, comprising the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage.

Priority species and habitats: Species and habitats that have been identified as being the most threatened and requiring action under the UK Biodiversity Action Plan, 1994. Nuneaton and Bedworth has several species and habitats that are of a priority status. The list of these species and habitats is included the Technical Paper on Biodiversity and Geodiversity.

Proposals map: Visual representation on an ordnance survey map of policies and land allocations in the Borough Plan, as well as other development plan documents in the local development framework.

Renewable Heat Incentive: Payment system for the generation of heat from renewable energy sources. The Renewable Heat Incentive operates in a similar manner to the Feed-in Tariff system, and was introduced through the Energy Act 2008.

Regional Spatial Strategy: Set out the region's policies in relation to the development and use of land for a 15-20 year time period. It identified the scale and distribution of new housing in the region, indicated areas for regeneration, expansion or sub-regional planning and specified priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. The strategy formed part of the development plan for local planning authorities.

Scheduled ancient monument: Process through which nationally important sites and monuments are given legal protection by being placed on a list (schedule). English Heritage takes the lead in identifying sites in England, which are placed on the schedule by the Secretary of State for Culture, Media and Sport.

Secondary frontages: Shopping frontages that include retail uses as well as non-retail town centre uses, such as banks and restaurants.

Section 106: A legally enforceable obligation entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Section 278: An agreement of works to existing highways. Section 278 of the Highways Act 1980 allows a developer to carry out works to the public highway. This is generally necessary where planning permission has been granted for a development that requires improvements to, or changes to, public highways.

Sequential approach: A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, previously developed land before greenfield sites, or town centre retail sites before out-of-centre sites.

Site of Special Scientific Interest (SSSI): An area of special interest by reason of its flora, fauna, geological or physiographical features designated under the Wildlife and Countryside Act 1981.

Small scale wind energy: Is defined as having less than 100 kW, and typically comprise single turbines. They are considered to be viable at lower wind speeds (4.5 m/s at 10 m above ground level).

Social rented housing: Housing that is let at below market rents and on a secure basis to people in housing need, usually by local authorities or a registered social landlord.

Special area of conservation: European designation to protect habitats and species considered to be of European interest under the EC Habitats Directive.

Strategic environmental assessment: Procedure, set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Strategic Flood Risk Assessment (SFRA): An assessment, at a strategic level, of all forms of flood risk, taking into account the impacts of climate change.

Strategic Housing Land Availability Assessment (SHLAA): The SHLAA is a key tool in the development of local housing policy and proposals. It assesses whether a site is deliverable, developable or not currently developable. The definitions of these attributes is outlined below.

- Deliverable – the site is available now, offers a suitable location for housing and there is a reasonable prospect that housing will be delivered within five years.
- Developable – the site is a suitable for location for housing and there is a reasonable prospect that it will be available and delivered for housing at a specific point in time – for example, by the end of the plan period.
- Not currently developable – it is unknown when the site could be developed.

Strategic Housing Market Assessment (SHMA): An assessment of the demand and need for market and affordable housing, as well as types of housing tenures in Nuneaton and Bedworth, in addition to associated housing market areas within the C2 housing market area.

Strategic sites: Large scale sites that are key to the successful delivery of the Borough Plan.

Sub-regional strategy: A wide reaching approach for managing growth within the sub-region. Relevant to Nuneaton and Bedworth are Coventry, Solihull and Warwickshire (including all boroughs/districts).

Super Output Area (SOA): A small area used for the collection and publication of small area statistics. They can be used for statistical comparison because they are of consistent size and are not subject to frequent boundary change.

Supplementary planning document: Provide further detail on policies and proposals contained within a development plan document, and are a material consideration when determining planning applications.

Sustainability appraisal: A tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors), and is required to be undertaken on the Borough Plan.

Sustainable Community Plan: Required under the Local Government Act 2000, a Sustainable Community Plan (also referred to as a Sustainable Community Strategy) sets out the strategic vision for a place which aims to improve the social, economic

and environmental well-being of an area. It is produced by the Local Strategic Partnership. The Borough Plan can be viewed as a delivery tool for the Sustainable Community Plan, and therefore needs to be aligned with it.

Sustainable design: Design principles to reduce negative environmental impacts through skillful, sensitive design and connect people with open spaces, as well as being responsive to local context, adaptable, resource efficient and deliver value over its whole life.

Sustainable drainage systems: A management practice which enable surface water to be drained in a way which mimics, as closely as possible, the run-off prior to site development.

Acronyms

AQMA: Air Quality Management Area

BME: Black, Minority and Ethnic

BREEAM: Building Research Establishment's Environmental Assessment Method

CFMP: Catchment Flood Management Plan

CSW: Coventry, Solihull and Warwickshire

DEFRA: Department for Environment, Food & Rural Affairs

ELMOU: Employment Land Memorandum of Understanding

FTTP: Fibre to the Premises

LLFA: Lead Local Flood Authority

NPPF: National Planning Policy Framework

NUCKLE: Nuneaton, Coventry, Kenilworth and Leamington

RBMP: River Basin Management Plan

SHLAA: Strategic Housing Land Availability Assessment

SHMA: Strategic Housing Market Assessment

SNPP: Sub-National Population Projections

SOA: Super Output Area

SSSI: Site of Special Scientific Interest

WMCA: West Midlands Combined Authority

Statement on behalf of the Claimant
Sarah Matile – First Statement
Exhibits ‘SM1-SM3’
Dated: 16 October 2025

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION**

Claim No: QB-2019-000616

BETWEEN :

**(1) Nuneaton and Bedworth Borough Council
(2) Warwickshire County Council**

Claimants

– and –

**(1) Thomas Corcoran
(2)-(53) Other Named Defendants
(54) Persons Unknown Forming Unauthorised Encampments within the Borough of
Nuneaton and Bedworth**

Defendants

Exhibit ‘SM2’

Gypsy and Traveller Site Allocations DPD

2021 - 2037



Nuneaton and Bedworth Borough Council

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Adopted January 2024

1.0 Introduction

- 1.1 Nuneaton and Bedworth Borough Council adopted a Borough Plan on 11th June 2019 which planned for new development in the borough until 2031. The Borough Plan plans, principally, for new commercial, employment, and residential uses. In terms of residential uses the Borough Plan must plan for all parts of the community and thus deals with provision for Gypsies and other Travellers.
- 1.2 Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the need for new pitches by 2031/2032 to be at least 39 residential and 5 transit pitches. Policy H3 does not set out where the new pitches would be provided but sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It is through this DPD that land is identified and allocated for future traveller sites. Policy H3 of the current adopted Borough Plan (2011-2031) is superseded entirely by the DPD and in the emerging Borough Plan Policy H3 will purely refer to the DPD for Policies relating to Gypsy, Travellers and Showperson pitches and plots.
- 1.3 The current Local Development Scheme (2020) sets out the timetable for the production of Gypsy and Traveller Site Allocations DPD which is as follows:
 - May 2021 – consultation on an Issues and Options document;
 - January 2022 – consultation on a publication document;
 - July 2022 – submission of the document to the Secretary of State;
 - January 2023 – receipt of Inspector’s report on the examination of the document; and
 - February 2023 – adoption of the document.
- 1.4 This adopted DPD was preceded by the Publication version of the Gypsy and Traveller Site Allocations DPD; which was the formal document required by Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. This was consulted on between 28th January 2022 and 25th March 2022. A consultation on the previous version of the Gypsy and Traveller Site Allocations DPD, the Issues and Options consultation draft, took place between 11th June 2021 and 6th August 2021. This document was that required by Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. A consultation statement has been produced which sets out the responses received and how they were considered in producing the DPD.

- 1.5 The document is set out in four subsequent chapters addressing the vision and objectives of the DPD, followed by the need for new pitches, the locations of these new pitches and a monitoring schedule for the DPD.
- 1.6 To support this document the Council has commissioned a consultant to produce a new Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA) and this can be viewed alongside this document. The most recent study prior to this new GTAA dates from 2016 and it concluded that the evidence base is refreshed on a five-yearly basis to ensure that the level of pitch and pitch provision remains appropriate. The DPD is also supported by a 'Site Assessments and the Green Belt' document, a Sustainability Appraisal Report, and an Appropriate Assessment, the contents of which have been considered in the production of this DPD. All supporting documents can be seen on the Borough Council's website alongside this DPD as part of the formal consultation.

2.0 Vision & Objectives

Vision

- 2.1 The vision was contained within the Issues and Options consultation draft of the DPD. Since that document the vision has been amended so that reference to the environment is made thereby linking the vision more to objective 3.

- 2.2 The vision for this DPD is for the needs of the travelling community in and visiting the borough to be provided with sufficient pitches so that they can live, work, and rest in the borough. Pitches will be well located and integrated into the environment and the local community thereby providing good access to essential services.

Objectives

- 2.3 The following objectives will help achieve the vision for the DPD. Three objectives were consulted upon and although no issues were raised by consultation responses on the content of the objectives, objective 3 has been amended. The intent of the objective remains the same, but the terminology has been changed so that it aligns better with the language used in the adopted Borough Plan.

Objective 1 - to provide sufficient pitches for the needs of the travelling community.

Objective 2 - to provide provision in sustainable locations with good access to local services.

Objective 3 - to provide provision in such a way that the local environment is protected and, where appropriate, enhanced.

These objectives are interrelated and in combination they will contribute to realising the vision for the DPD.

3.0 Need

Introduction

- 3.1 The evidence base that supported the formation of the need for new pitches in the Borough Plan was the 2016 Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA). Since the 2016 GTAA was produced the 2016 Housing and Planning Act introduced the need to conduct a wider assessment of all caravan and houseboat accommodation needs, not just those from Gypsy and Traveller ethnicities. A new assessment of accommodation needs has been produced, dated from 2021. This assessment updates the need for new pitches to those published in the Borough Plan and addresses the implications of the 2016 Housing and Planning Act.
- 3.2 The Issues and Options consultation proposed four options for the number of pitches to provide ranging from that in the 2021 GTAA through to figures above those in the GTAA from 2016 (and published in the Borough Plan). After careful consideration it is considered that the figures from the 2021 GTAA should be used as the basis for the need. Even though representations on the DPD were low, the newer figures were clearly preferred over those that were now nearly six years old by respondents. Not only are these figures more recent, but the interview rate was also much higher giving greater confidence that the assessment of need is more robust and closer to that actually required. These four options were assessed in the accompanying sustainability appraisal to the issues and options document and these four options all came out the same, partly because all reasonable options considered would achieve the number of pitches set in the 2021 GTAA as a minimum (which is the most recent data source) but also because there were many unknowns of the likely impacts that would result from these different sets of figures for new pitch numbers.
- 3.3 Using the requirement for new pitches from the 2021 GTAA as a minimum rather than the higher figures in the extant Borough Plan means that this document will need to supersede the requirements for new pitches set out in Policies DS4 and H3 of the Borough Plan.

Gypsies and Travellers

- 3.4 The first part of the 2021 GTAA was to assess the current occupancy of pitches within the borough, then to assess how much capacity remains above this, so, how many pitches are unoccupied but are available, followed by calculating how many more pitches are needed to fulfil the need for new pitches within the borough. The new GTAA advises that with the current

occupied and vacant pitches within the borough there is a need for 16 additional residential and no transit pitches to meet the needs of those who meet the definition of travellers as set out in the Planning Policy for Traveller Sites, August 2015; this increases by four to a total of 20 additional residential pitches to meet a cultural need (that is, people who do not meet the definition of a traveller but nevertheless live on pitches). For travellers, this is change of 23 residential pitches and 5 transit pitches from those figures published in the Borough Plan (both decreasing). Table 1 below repeats the figures from Table 6.3 of the 2021 GTAA in which the need for new pitches is set out.

Table 1 - Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37.

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Longer-term need		
<i>Over period 2026/7 to 2030/31 (B)</i>	4	3
<i>Over period 2031/32 to 2036/37(C)</i>	8	7
<i>Longer-term need TOTAL to 2036/37 (12 years) D=(B+C)</i>	12	10
NET SHORTFALL 2021/22 to 2036/37 (A+D) (11 years)	20	16

PPTS = Planning Policy for Traveller Sites (2015) within which the definition of Gypsies and Travellers is provided.

- 3.5 The 2021 GTAA assumes that some of this provision for additional pitches can be found through turnover on the site at The Griff and by a combination of intensification and expansion of three existing sites to provide 11 pitches. Table 2 below repeats the figures from Table 6.4 of the 2021 GTAA which sets out these assumptions. Thus, the table shows that through the provision of 11 new additional pitches the need up to 2036/37 is met and, therefore, this meets the need evidenced in the 2021 GTAA.

Table 2 - Addressing Gypsy and Traveller pitch need.

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6

Anticipated minimum turnover on council site (B)	7	7
Potential intensification/expansion of existing sites (C)	6	6
Residual need 2021/22 to 2025/26 after turnover and potential intensification/expansion (D) = A-B-C	-5 Need met	-7 Need met
Longer-term need 2026/27 to 2036/37 (E)	12	10
Anticipated minimum turnover on council site (F)	15	15
Potential intensification/expansion of existing sites (G)	5	5
Residual need 2025/26 to 2036/37 after turnover (H) = E-F-G	-8 Need met	-10 Need met
Residual need 2021/22 to 2036/37 after turnover and potential pitch development considered (I) = D+H	-13 Need Met	-17 Need met
Summary	Cultural need	Of which: PPTS NEED
Plan period Authorised Pitch Shortfall (2021/22 to 2036/37) (J = A+E)	20	16
Anticipated minimum turnover on council site (K) = B+F	22	22
Potential intensification/expansion of existing sites (L)=C+G	11	11
Residual need 2021/22 to 2036/37 after turnover (M=J-K-L)	-13 Need met	-17 Need met

- 3.6 Although turnover has been considered and has the potential to meet need based on past trends, this cannot be wholly relied upon as the future level of turnover at The Griff is not guaranteed. Instead, turnover is one element of supply but there remains a need to take positive steps to increase the number of pitches available to households across the borough to meet the needs identified and to plan positively for the area. This is particularly important for the Council to achieve a 5-year land supply of new pitches. So, turnover can be relied upon to meet some of the forecast need but not to the exclusion of allocating new pitches. The GTAA of 2021 identified 11 pitches that could be found in the Borough and this should be used to form

the basis of the minimum new pitches to provide, the remainder will be met by turnover.

Travelling Showpeople

- 3.7 The GTAA from 2021 states that there is 1 occupied and 3 vacant pitches in the Borough for use by Travelling Showpeople. The 2016 GTAA set out that there were 4 private owned pitches, and plots on site/yards of which 4 were occupied and 0 were vacant. Therefore, plot numbers have remained the same but vacant plot numbers have increased. No additional provision is recommended by the current GTAA.

Bargee Travellers

- 3.8 In the 2016 GTAA bargee Travellers were accounted for by one family present in the borough. No change to bargee Traveller numbers are contained within the updated GTAA.

Future Need

- 3.9 In the 2021 GTAA it is recommended that the *"...evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth."* This is an important element of confirming that the need in this DPD remains as required. It is therefore the Council's intention that the number of new pitches will be assessed each year at the Authority Monitoring Report (AMR) stage and landowners contacted to encourage the sites to come forwards. The DPD will be reviewed five years after adoption and subsequently five years thereafter on an ongoing basis, to ensure the document meets the current needs. The update of the GTAA is referenced in Table 3 of Chapter 5.0 on Monitoring of this document. Should need be found to have changed beyond that set out in this DPD (or indeed for another reason such as undeliverability of a site or sites) then this should trigger a review of this DPD.

Strategic Policy GT1 – Overall Need

The following levels of development will be planned for and provided within Nuneaton and Bedworth Borough between 2021 and 2037:

- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025 and
- At least a further 5 permanent residential pitches beyond those required by 2025 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2037.

This Policy supersedes the third bullet point of DS4 of the adopted Borough Plan (2011-31).

4.0 Location of Pitches

Green Belt

- 4.1 Two of the sites to receive new pitches are within the Green Belt, namely Sunrise Cottage and The Old Nursery. Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt and Green Belt forms a large part of the borough. The Green Belt is mostly located to the south of Nuneaton, but also surrounds the main areas of Bedworth, Bulkington, and Ash Green. Nationally, the government attaches great importance to the Green Belt. The five key purposes of Green Belts are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.2 Alterations to the Green Belt boundary are only approved in exceptional circumstances and must be done during the local plan making process. In reviewing land to be released from the Green Belt for development, the exceptional circumstances should be weighed up against any potential adverse effects on the overall integrity of the Green Belt, according to an assessment of the whole of the Green Belt based around the five purposes set out above. Traveller sites are inappropriate development in the Green Belt. Furthermore, subject to the best interests of the child, personal circumstances, and unmet need Traveller sites in the Green Belt are unlikely to clearly outweigh harm to the Green Belt.
- 4.3 Sunrise Cottage and The Old Nursery are not currently being considered for the removal of their Green Belt status. The removal of the two sites from the Green Belt would not be consistent with Policy DS7 of the current Borough Plan (and would be noncompliant with Regulation 8(4) of the 2012 Regulations) which is the Part 1 plan. Notwithstanding this, the Borough Plan is currently being reviewed and the Green Belt status of these two sites may be revisited, if necessary, when the Borough Plan is updated as part of a wider review of the Green Belt. However, the Site Assessments and the Green Belt document explains how the Green Belt sites may be considered suitable for development subject to meeting national policy for the Green Belt.
- 4.4 If future planning applications on these sites are considered to be inappropriate development in the Green Belt, then it would be necessary to demonstrate 'very special circumstances' in accordance with the
-

Framework. In this regard, the allocation of these sites for new Gypsy and Traveller pitches in this DPD will be an important consideration in any such assessment.

Sustainability

- 4.5 Beyond the issue of the Green Belt, which is a significant matter, there are other factors that may need consideration for the locating of new Gypsy and Traveller pitches. Sites should have reasonable access to services, such as shops, schools, GP surgeries, and pharmacies, and this access should be capable of being done by modes of transport other than private car. Walking is the easiest and cheapest way to access services and thus is the focus for accessibility. However, many of the current sites are limited by their options for modes of travel.
- 4.6 Sites should also avoid locations that would impact upon land that has been designated for its interest, so, sites of ecological, heritage, or geological value. Similarly, contaminated land, land prone to flooding, and land in a sensitive landscape should also be avoided. These and other criteria for selecting new Gypsy and Traveller sites are set out in Policy GT2 – Strategy.

Locational Strategy

- 4.7 The fundamental purpose of the Gypsy and Traveller Site Allocations DPD is to allocate land to provide for the number of pitches identified for the required need to 2037. The Issues and Options consultation draft proposed four strategies for allocating new pitches. These were all assessed within the accompanying sustainability appraisal and two of the options were found to be the most sustainable, namely the following:
 - A. Seek to allocate new pitches firstly within the permitted area of existing sites and/or adjacent to these sites, then based on walking distances to services, and then by existing Policy H3.
 - D. Seek to allocate new pitches firstly within the permitted site area of existing sites, then adjacent to these existing pitches, then based on the criteria set out in the latter part of the policy.
- 4.8 Respondents to the issues and options selected only options A and D – with an even split of numbers to these two options from respondents. Options A and D – the first difference is that option A uses extant Policy H3 to assess sites at the outset whilst option D only uses extant Policy H3 once insufficient sites have been found via other means. The second difference is that option D separates out the permitted areas of existing sites from land adjacent to existing sites whereas option A does not and treats them together. It is considered that option D should form the basis of the

allocation of new pitches as it allows for the consideration of the permitted site area of existing sites first (and in isolation) and this has the potential for the least impact. However, in hindsight, the use of the word 'adjacent' could give rise to some ambiguity and the word 'adjoining' will be used instead to emphasise that there should be a physical relationship between the new and the existing. It should be noted that should planning applications be made for new pitches on unallocated sites then the strategic policy in this DPD would be used as the starting point to assess their suitability.

- 4.9 Policy GT2 identifies that new Gypsy and Traveller pitches will generally be supported within the sites allocated within GT3 or within the permitted area of existing lawful, authorised Gypsy and Traveller sites. In addition, to ensure that consideration is given to sustainability, any new sites that come forwards within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan). In addition, land adjoining the permitted area of existing lawful, authorised Gypsy and Traveller sites will be considered as long as these are in proportion appropriate to the scale of the existing site. The intention is to supersede entirely Policy H3 in the current adopted Plan (2011 – 2031). Within the emerging Borough Plan (2024 – 2039) emerging Policy H3 will simply signpost to the adopted DPD for guidance on any new pitches or plots.

Strategic Policy GT2 – Strategy

Planning permission will be granted for new Gypsy and Traveller pitches subject to compliance with other policies of the development plan and with national policy, including in relation to Green Belt, on the following land:

- a) Sites allocated in Policy GT3 or within the permitted area of existing lawful, authorised Gypsy and Traveller sites;
- b) Sites within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan);
- c) Extensions adjoining the permitted area of existing lawful, authorised Gypsy and Traveller sites that are proportionate in scale to the existing site.

Any proposed sites considered must comply with all of the following:

- a) The site should have reasonable access to essential services including health and education facilities and access to local shops;
- b) The number of pitches or plots is in proportion to the size and scale of the site;
- c) The number of pitches or plots is in proportion to the size and density of the nearest settled community;
- d) The site is not located in areas of high flood risk;

- e) The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets;
- f) The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected;
- g) The site has suitable access to the highway network;
- h) The site is located where air or noise pollution will not significantly affect the health and well-being of site residents; and
- i) The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made.

This Policy supersedes Policy H3 of the adopted Borough Plan (2011-31).

- 4.10 Where alternative methods for foul water treatment such as septic tanks or cesspits are required; consent will be required from the Environment Agency for an Environmental Permit (Regulations 2016). This is to enable the discharge of polluting substances (including sewage effluent) into surface waters or the ground. It is the Applicants responsibility to make the appropriate enquiries regarding any Environmental Permit requirements. (Environmental Permitting Guidance can be found at: <https://www.gov.uk/environmental-permit-check-if-you-need-one>)

Allocation of Sites

- 4.11 Using the strategy above as the basis for allocating new pitches, the starting point is within existing sites. The 2021 GTAA identified two privately owned sites within the Borough which had the potential to accommodate new additional pitches within their existing approved extent. These are Winter Oak, Watling Street, Nuneaton and Sunrise Cottage, Mile Tree Lane, Bulkington. The GTAA indicated that these could accommodate up to 11 additional pitches. These have been independently assessed and it was concluded that they could accommodate 9 additional pitches without detriment to the existing occupiers. The sites have also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in these locations (this can be viewed in the 'Site Assessments and the Green Belt' document).
- 4.12 The 2021 GTAA also identified another site that had the potential to accommodate new pitches through the physical expansion of the site. This was the privately owned site at Fella's Acre, Mile Tree Lane, Bulkington which it was considered could accommodate an additional two pitches. This was also independently assessed and following this the site was deemed to be unsuitable for expansion – mainly relating to deliverability. However, the

landowner expressed an interest in developing another site for new pitches, namely The Old Nursery, Parrotts Grove, Coventry. This has been independently assessed and it was concluded that the site could be developed to provide five to six new pitches. The site has also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in this location.

- 4.13 The number of pitches provided by the three sites found acceptable for allocation would provide 14-15 pitches which would, firstly, meet the minimum 11 pitches required and, secondly, build in some resilience should the anticipated levels of turnover at The Griff not take place.
- 4.14 To support the production of this document the Council ran a call for sites between 17th September 2021 and 22nd October 2021 which included Gypsy and Traveller sites. No sites were put forward for this type of use as a result of this call for sites. Therefore, the three assessed independently for the Council remain the only sites for consideration.
- 4.15 Further to the independent assessment and the Council's 'Site Assessments and the Green Belt' document the sites (and the policies) were assessed in the Sustainability Appraisal Report and the Habitats Regulations Assessment. This latter document is a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The Habitats Regulations Assessment concludes that due to the location of the allocated sites and the general absence of realistic linking impact pathways that there would be no likely significant effects on either Ensor's Pool Special Area of Conservation (SAC) or the River Mease SAC either alone or in combination.
- 4.16 The need for new Gypsy and Traveller pitches set out in Strategic Policy GT1 – Overall Need is for at least 11 permanent residential pitches to accommodate Gypsies and Travellers. The sites that have been found acceptable to allocate would provide up to 15 pitches at three locations and these are set out in Policy GT3 – Site Allocations. Below the policy an accompanying plan is provided showing the area to which the allocation relates.
- 4.17 As a result of the assessments of the sites a number of matters are considered important for any subsequent planning application to address, and these have been set out as key development requirements in the relevant policy. The basis of these principles are the responses received

during the informal consultation with key technical stakeholders on the three sites (the details of which can be viewed in the supporting 'Site Assessments and the Green Belt' document) and analysis of the site's context.

- 4.18 It is considered that to make additional use of the accesses at The Old Nursery and Sunrise Cottage sites some key development principles are required to ensure the use of the access is safe. Related to this is a requirement to ensure any new layout encompasses suitable bin storage to ensure these do not end up being stored outside the site. The sites have been assessed against the Wildlife Assessment Check tool as advised by the Open Spaces and Green Infrastructure SPD and in all cases a Preliminary Ecological Assessment is required to ascertain if further ecological survey work is required. The sites of Winter Oak and The Old Nursery both have boundary hedgerows and these help in reducing the site's impact on the local landscape and, thus, any development of the site should not result in these being affected.
- 4.19 The 'Designing Gypsy and Traveller sites: good practice guide' of 2008, although withdrawn on 1st September 2015 and replaced by the 'Planning policy for Traveller sites' document remains a useful guide setting out broad principles to consider in Traveller and Gypsy sites. With regard to communal recreation areas for children the good practice guide set out that it is considered that such areas should be provided where suitable provision is not available within walking distance on a safe route or using easily accessible public transport.
- 4.20 The independent assessment of the sites highlighted that the site at Sunrise Cottage already had provision of a small play area within the site. The Winter Oak site does not but on the other side of the A5 land is being developed for residential uses (reference 034076) which includes a play area, and this would be accessible nearby and thus provision within the site is not considered essential. However, the new site at The Old Nursery has no obvious communal play area in proximity to it and, thus, should be provided within the site – the independent assessment set out that there was sufficient space to accommodate it.
- 4.21 The matter of flooding is not addressed because at this time it is not considered to be relevant as sites are in flood zone 1 and there is no indication that they suffer inundation. However, climate change means that this could change and should this be the case then extant Policy NE4 – Managing flood risk and water quality (Borough Plan) would be used.

Policy GT3 – Site Allocations

Planning permission will be granted for new Gypsy and Traveller pitches at the following sites and as denoted with a solid red line on the accompanying site plans:

GTSA1 – Sunrise Cottage for three additional pitches within the existing site as shown as a solid red line on the accompanying plan.

GTSA2 – The Old Nursery for five to six new pitches within the site as shown as a solid red line on the accompanying plan.

GTSA3 - Winter Oak for six additional pitches within the existing site as shown as a solid red line on the accompanying plan.

Key Development Requirements

Planning applications at the allocated sites shall contain the details as set out below:

GTSA1 – Sunrise Cottage

- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.

GTSA2 – The Old Nursery

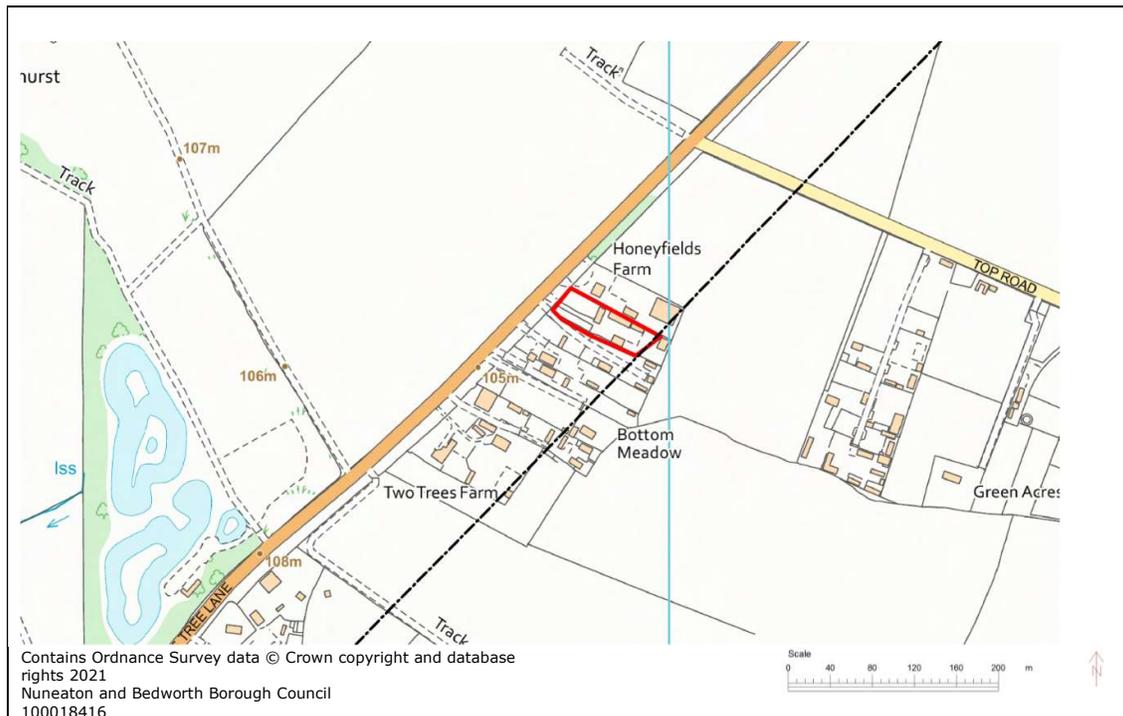
- Closure of the northern access within the site.
- Access to be made in and out of the site from the southern access within the site.
- Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site.
- Any gates within the access to be setback sufficient distance to allow any vehicle entering the site to exit the highway completely whilst the gates are opened or closed.
- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Landscaping of the site boundary to soften the appearance of the pitches from external views.

- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.
- Address any contamination on the site.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.

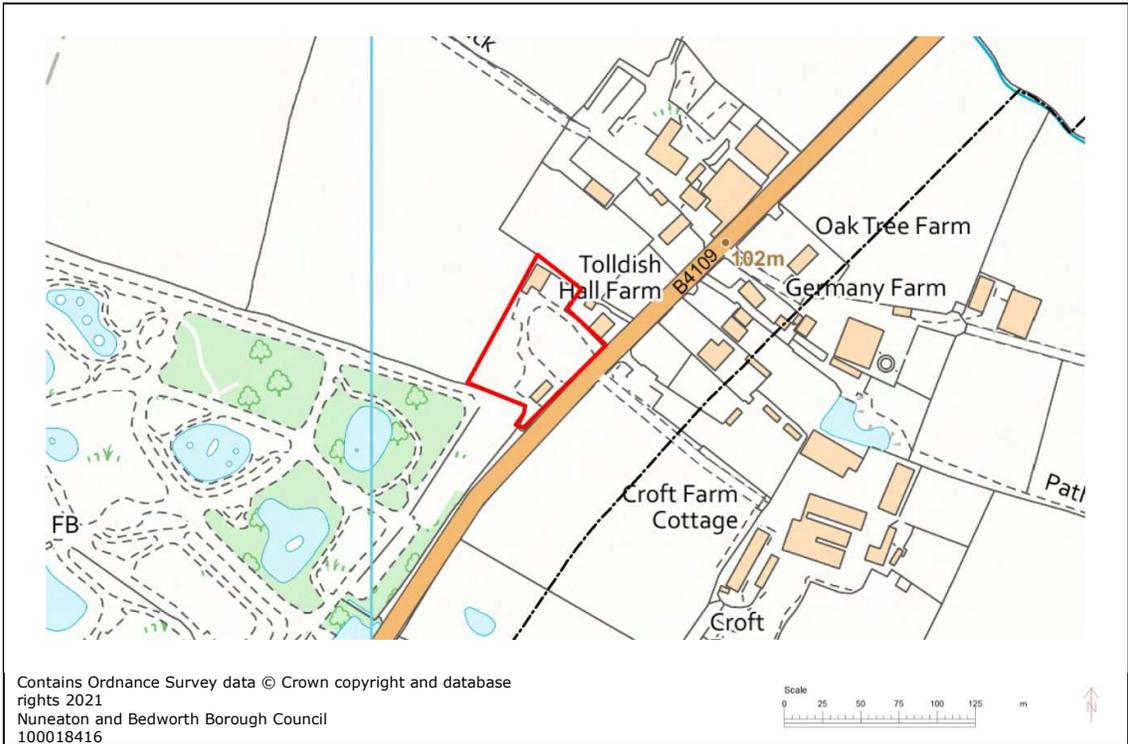
G TSA3 – Winter Oak

- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.
- Ensure air and noise quality to future residents of the site is acceptable.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water quality will need to be considered.

G TSA1 – Sunrise Cottage



G TSA2 – The Old Nursery



G TSA3 – Winter Oak



4.22 For site G TSA3 – Winter Oak, it is suggested that prior to any submission of a planning application, that the Applicant contacts National Highways to discuss the access and the information they may require to be submitted for any formal submission. In addition, for this particular site, an Air Quality Exposure Assessment and Noise Assessment may be required to determine any formal planning application to inform of any mitigation required.

Policy GT4 – Site Safeguarding

The Travelling Showpeople site at Spinney Lane/Whittleford Road, Nuneaton as denoted on plan G TSA4 with a solid red line will be safeguarded for use by Travelling Showpeople.

Alternative uses will only be permitted if it is clearly demonstrated that the site is no longer required for Travelling Showpeople accommodation.

G TSA4 – Spinney Lane/Whittleford Road, Nuneaton



4.23 As well as the allocation of sites for new Gypsy and Traveller pitches the Council has considered the ongoing need for a Travelling Showperson’s yard within the Borough, currently at Spinney Lane/Whittleford Road, Nuneaton. This is the only such type of accommodation in Warwickshire and thus has considerable importance to the County as an asset and also by ensuring continuity and availability of these plots within the Borough it contributes towards provision. The issues and options consultation document proposed the safeguarding of the site for its current use given its special status in the County. Comments were sparse on this matter, but no responses were received stating that safeguarding of this site for this purpose was

incompatible with surrounding land uses or unacceptable. The Habitats Regulations Report and the Sustainability Appraisal Report both conclude that there would be no significant adverse impacts from the identified land continuing to be used for its current use.

5.0 Monitoring

- 5.1 The Council produces annually an Authority Monitoring Report (AMR). Within the AMR the performance of the policies in the Borough Plan are reported as well as those in other DPDs (Development Plan Documents). Therefore, the AMR will need to report on the policies of the performance of this DPD once it has been adopted. Table 3 below sets out the indicators and targets that will be used to monitor the policies of this DPD.

Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).

Policy	Indicator	Target
Strategic Policy GT1 – Overall Need	Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.
Strategic Policy GT2 – Strategy	Sites permitted in accordance with the criteria mentioned in policy GT2.	100%. Timescales as below.
Policy GT3 – Site Allocations	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report. Contact the proposed sites on a yearly basis after the AMR to encourage the sites to come forwards and answer any concerns the owners may have on bringing the sites forwards at that time.	A minimum of six additional residential pitches permitted and available for use by 2025 and a minimum of 11 additional residential pitches permitted and available by 2037.
Policy GT4 – Site Safeguarding	Monitor the use of the safeguarded site.	The identified site at Spinney Lane/Whittleford Road, Nuneaton to remain used for Travelling Showpeople unless it is clearly demonstrated that the site is no longer required for Travelling Showpeople accommodation.

Appendix 1

Relationship between the policies in this DPD and the extant Borough Plan.

Existing Borough Plan policies	Effect of Gypsy and Traveller Site Allocations DPD policies
Policy DS4 – Overall development needs (third bullet point only).	Superseded by Strategic Policy GT1 – Overall Need.
Policy H3 – Gypsies and Travellers.	Superseded by Strategic Policy GT2– Strategy.

For reference Policy DS4 Overall development needs should now read:

The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2011 and 2031:

- *At least 14,060 homes*
- *At least 107.8 ha of employment land*
- ~~*At least 39 residential pitches and 5 transit pitches to accommodate Gypsies and Travellers*~~

Statement on behalf of the Claimant
Sarah Matile – First Statement
Exhibits ‘SM1-SM3’
Dated: 16 October 2025

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION**

Claim No: QB-2019-000616

BETWEEN :

**(1) Nuneaton and Bedworth Borough Council
(2) Warwickshire County Council**

Claimants

– and –

**(1) Thomas Corcoran
(2)-(53) Other Named Defendants
(54) Persons Unknown Forming Unauthorised Encampments within the Borough of
Nuneaton and Bedworth**

Defendants

Exhibit ‘SM3’

Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2021 Update

Nuneaton and Bedworth Borough Council

Final Report
December 2021

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Executive Summary

Introduction

The Nuneaton and Bedworth Borough Council Gypsy and Traveller Accommodation Assessment (GTAA) provides the latest available evidence to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople across the borough.

The GTAA updates the study of 2016 and has included:

- A review of existing (secondary) data.
- Stakeholder consultation; and
- A household survey. Survey data for 46 out of 52 Gypsy and Traveller households living on pitches (an 88.5% response rate) and a survey response from the Travelling Showperson household living in the borough were obtained.

These data have been analysed to provide a picture of current provision and activity across the district and an assessment of future need. The findings of the study provide an up-to-date, robust and defensible evidence base for policy development.

Population and current accommodation provision

The 2011 Census identified a total of 29 households in Nuneaton and Bedworth where the Household Reference Person had a 'White: Gypsy or Irish Traveller' ethnicity. Of these 13 lived in a caravan and 16 in bricks and mortar housing.

The bi-annual DCLG Traveller caravan count (July 2019 reported a total of 85 caravans (54 social rented and 31 private) and an average of 58 caravans over the last nine counts starting in January 2016. The annual Travelling Showperson caravan count (undertaken each January) has consistently showed zero caravans on Travelling Showperson's yards but there is one occupied Showperson's yard which currently has 1 occupied caravan.

In terms of Gypsy and Traveller site provision there is one county council site (25 pitches), 12 private authorised sites (41 pitches). There is one Travelling Showperson yard (4 plots).

Planning policy requirements for needs assessments

The 2019 National Planning Policy Framework (NPPF) states in Paragraph 61 '*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy (including travellers)*'. A footnote in the NPPF then states '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document*'.

The 2015 Planning Policy for Traveller Site (PPTS) document states that ‘local planning authorities should make their own assessment of need for the purposes of planning’ and ‘ensure that their Local Plan includes a fair, realistic and inclusive policies to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply’.

In the absence of further guidance on preparing GTAAs, the methods adopted by arc⁴ reflect the PPTS, build upon those methods established through previous guidance, our practical experience and decisions made at planning inquiries and appeals.

‘Cultural’ and ‘PPTS need’

In order to reconcile the requirements of national policies, the GTAA establishes an overall ‘cultural’ need for pitches which accords with the overall need for the Travelling community and takes into account the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. A PPTS ‘policy filter’ is then applied to identify the level of need associated with those households meeting the definitions set out in the PPTS Annex 1. It is our understanding that the needs arising from the PPTS analysis establishes the level of need against which a 5-year land supply is assessed, but the Council should be mindful of a wider obligation to consider overall ‘cultural’ need.

Analysis of the travelling behaviour of households or emerging households planning to move residential location indicates that 80% meet the nomadic habit of life/travelling behaviour criteria set out in PPG.

Plan periods

Need has been assessed over a short-term 2021/22 to 2025/26 and longer-term 2025/26 to 2036/37.

Gypsy and Traveller pitch requirements

Overall need

For the period (2021/22 to 2036/37) the GTAA has identified the following Gypsy and Traveller pitch needs: a cultural need of 20 pitches of which the PPTS need is 16 pitches. Needs figures are broken down into time periods as show in Table ES1.

The main drivers of need are net-in migration and household formation. This level of need should be recognised in the Local Plan.

Table ES1 Gypsy and Traveller pitch need: Nuneaton and Bedworth 2021/2 – 2036/37		
	Cultural need	Of which: PPTS NEED
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Longer-term need		
<i>Over period 2026/7 to 2030/31 (B)</i>	<i>4</i>	<i>3</i>
<i>Over period 2031/32 to 2036/37 (C)</i>	<i>8</i>	<i>7</i>
Longer-term need TOTAL 2021/22 to 2036/37 (11 years) D=(B+C)	12	10
NET SHORTFALL 2020/21 to 2036/37 (A+D) (17 years)	20	16

Meeting the need

The GTAA analysis needs to take account of the potential additional supply of pitches before a final shortfall figure is calculated. This supply can come through turnover of pitches on The Griff County Council site – that is pitches becoming vacant and available for new households to move onto them; through existing sites being extended or intensified (more pitches within the site); and through new site development.

Turnover

Based on household survey evidence, 7 pitches became available on The Griff County Council site in the past 5 years, or 1.4 pitches each year. Over the next five years and estimated 7 pitches will come available based on past trends and over the period 2026/7 to 2036/7, a further 15 pitches are expected to become available to meet identified need.

Expansion/intensification of existing sites

There is potential for an additional 11 to 13 pitches across Nuneaton and Bedworth through site expansion (increasing the size of a site to accommodate new pitches) or site intensification (increasing the number of pitches on an existing site).

Overall impact on need

Table ES2 considers the impact of turnover and site expansion/intensification on overall pitch need to 2036/37.

Table ES2 Addressing Gypsy and Traveller pitch need		
Nuneaton and Bedworth	Cultural need	Of which: PPTS NEED
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Anticipated minimum turnover on council site (B)	7	7
Potential intensification/expansion of existing sites (C)	6	6
Residual need 2021/22 to 2025/26 after turnover and potential intensification/expansion (D) = A-B-C	-5 Need met	-7 Need met
Longer-term need 2026/27 to 2036/37 (E)	12	10
Anticipated minimum turnover on council site (F)	15	15
Potential intensification/expansion of existing sites (G)	5	5
Residual need 2025/26 to 2036/37 after turnover (H) = E-F-G	-8 Need met	-10 Need met
Residual need 2021/22 to 2036/37 after turnover and potential pitch development considered (I) = D+H	-13 (Need Met)	-17 Need met
Summary	Cultural need	Of which: PPTS NEED
Plan period Authorised Pitch Shortfall (2021/22 to 2036/37) (J = A+E)	20	16
Anticipated minimum turnover on council site (K) = B+F	22	22
Potential intensification/expansion of existing sites (L)=C+G	11	11
Residual need 2021/22 to 2036/37 after turnover (M=J-K-L)	-13 Need met	-17 Need met

Transit site/stop over need

There is currently no provision to address transit need but given unauthorised encampment activity, the Council will need to consider appropriate responses. These include transit pitches, stopover places and negotiated stopping arrangements. The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. The need to identify land for negotiated stopping¹ is a priority.

Travelling Showperson plot requirements

There is currently one Travelling Showperson yard in the borough accommodating 1 household on 4 plots. The GTAA has evidenced no additional need but it does

¹ See <https://www.negotiatedstopping.co.uk> for further details

recommend that the Council safeguards the current yard for Travelling Showperson use.

Temporary stopping places and transit provision

There are a number of ways to deliver temporary places where Travellers can stop whilst passing through a local authority area. There is currently no provision to address transit need but given unauthorised encampment activity, the Council will need to consider appropriate responses. These include transit pitches, stopover places and negotiated stopping arrangements. The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. The need to identify land for negotiated stopping² is a priority.

Regarding Bargee Travellers, the 2016 GTAA identified at least one family and the council needs to explore the potential of establishing at least one affordable permanent mooring within Nuneaton and Bedworth

Policy recommendations

The Local Plan should recognise an overall cultural need for 20 pitches of which 16 is from households who meet the PPTS household definition over the period to 2036/37. However, anticipated turnover on The Griff and the potential expansion and intensification of existing private sites is expected to meet the identified need.

The level of turnover on The Griff should be monitored through site management data. The Council should also carry out technical appraisals of the expansion/intensification of existing sites to confirm that additional pitches can be delivered.

The analysis would indicate there is no overall strategic need for additional sites. It is however recommended that the Local Plan sets out criteria-based policies to inform future planning applications for small private sites.

The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. This includes identifying land for Negotiated Stopping arrangements.

Although there is no additional need for Travelling Showperson plots, it is recommended that the existing yard is safeguarded for Travelling Showperson use.

² See <https://www.negotiatedstopping.co.uk> for further details

1. Introduction

Overview

- 1.1 In January 2021 , arc⁴ was commissioned by Nuneaton and Bedworth Borough Council to update the 2016 Gypsy and Traveller Accommodation Assessment which had also been carried out by arc⁴.
- 1.2 The overall scope of the study is to ensure that the Council has a robust evidence base to determine an appropriate level of residential pitch and transit provision over the period to 2036/37 and to identify the accommodation needs of Gypsies and Travellers to meet both the PPTS-defined need and the Council's obligations under Section 124 of the Housing and Planning Act 2016.
- 1.3 The Council are also looking to develop a site allocations documents to sit alongside the Borough Plan which is based on up to date evidence. The 2021 GTAA replaces the 2016 GTAA.
- 1.4 The 2021 GTAA will:
 - Inform the development of future pitches across the borough.
 - Provide information on Gypsy, Traveller and Travelling Showpeople's accommodation needs – both temporary and permanent (including bricks and mortar accommodation).
 - Help gain a better understanding of the pattern of movements and encampments in the Council's administrative area.
 - Consider key health, education, employment and social care considerations to feed into a community development strategy.
- 1.5 The needs of Bargee Travellers/Houseboat dwellers will also be considered in this GTAA and build upon the evidence base established in the 2016 GTAA.
- 1.6 This GTAA has assessed pitch needs based on the overall requirements of the Gypsy and Traveller community. It then takes into account the definitions in Annex 1 of the PPTS relating to travelling behaviour in line with government guidance. This is discussed in further detail in Chapter 2 of this report.
- 1.7 This GTAA forms part of the evidence base for the emerging Local Plan.
- 1.8 This study has been carried out during the 2020 COVID-19 pandemic and lockdown. We are extremely grateful to the help and support provided by the Council in preparing this GTAA.

Who the study covers

- 1.9 This GTAA adopts the definition of 'Gypsies and Travellers' set out within *Planning policy for traveller sites (PPTS)*, which was published by the government in August 2015. This sets out the following definition of 'Gypsies and Travellers':

‘Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.’³

- 1.10 In addition, PPTS 2015 provides the following ‘clarification’ for determining whether someone is a Gypsy or Traveller:

‘In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) *whether they previously led a nomadic habit of life*
- b) *the reasons for ceasing their nomadic habit of life*
- c) *whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.’⁴*

- 1.11 The following definition of ‘Travelling Showpeople’ is set out in PPTS 2015:

‘Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.’⁵

- 1.12 In addition:

‘For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use pitches for “travelling showpeople”, which may/will need to incorporate space or to be split to allow for the storage of equipment.’⁶

- 1.13 For the purposes of this study, therefore, Gypsies and Travellers live on pitches on sites, whilst Travelling Showpeople live on plots on yards.

- 1.14 This GTAA expresses two levels of need for pitches: a ‘cultural’ and ‘PPTS’ need. This is to ensure that the overall needs of the Travelling community are fully reflected in the evidence base which needs to accord with planning and wider policies.

³ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 1

⁴ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 2

⁵ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 3

⁶ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 5

Report structure

1.15 The GTAA 2021 report structure is as follows:

- **Chapter 1 Introduction:** provides an overview of the study.
- **Chapter 2 Policy and local context:** presents a review of the national policy context which guides the study and the key findings from the 2016 GTAA.
- **Chapter 3 Methodology:** provides details of the study's research methodology.
- **Chapter 4 Review of current Gypsy and Traveller population and provision of pitches/plots:** reviews estimates of the Gypsy and Traveller and Travelling Showpeople population across the study area and existing site/yard provision.
- **Chapter 5 Household survey:** presents relevant data obtained from the household survey research.
- **Chapter 6 Pitch/plot/transit requirements:** focuses on current and future pitch/plot requirements. This chapter includes a detailed assessment of drivers of demand, supply and current shortfalls across the study area.
- **Chapter 7 Conclusion and strategic response:** concludes the report, providing brief summary of key findings and recommendations.

1.16 The report is supplemented by the following appendices:

- **Appendix A** Household questionnaires;
- **Appendix B** Glossary of terms.

2. Policy and local context

- 2.1 This study is grounded in an understanding of the national legislative and planning policy context that underpins the assessment and provision of accommodation for Gypsies and Travellers and Travelling Showpeople.
- 2.2 This chapter sets out the policy context within which this GTAA has been prepared, including a consideration of the previous GTAA for the borough.

Government policy and guidance

- 2.3 The 2019 National Planning Policy Framework states in Paragraph 61 *'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies'* It then lists a number of groups including Travellers. A footnote to the paragraph states *'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document'*.
- 2.4 The 2015 Planning Policy for Traveller Site (PPTS) document states that *'local planning authorities should make their own assessment of need for the purposes of planning'* and *'ensure that their Local Plan includes a fair, realistic and inclusive policies to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply'*.
- 2.5 Policy A of the 2015 PPTS relates to evidence needed to plan positively and manage development. This states *'in assembling the evidence base necessary to support their planning approach, local planning authorities should:*
 - *pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups);*
 - *co-operate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and*
 - *use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.*
- 2.6 In the absence of further guidance on preparing GTAAs, the methods adopted by arc⁴ reflect Policy A of the PPTS; build upon those methods established through previous guidance; our practical experience and findings from planning inquiries and appeals.
- 2.7 The calculation of pitch/plot requirements is based on established DCLG modelling methodology, as advocated in *Gypsy and Traveller Accommodation Needs Assessment Guidance* (DCLG, 2007). Although this guidance was

formally withdrawn in December 2016, in the absence of any updated guidance on the subject, it continues to provide a good practice approach for needs modelling.

- 2.8 Policy B of the 2015 PPTS relates to planning for traveller sites and requires Local Plans:
- to be prepared with the objective of contributing to the achievement of sustainable development and consistent with the policies of the NPPF; and
 - to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- 2.9 Policy B (paragraph 10) sets out that local authorities should, in producing their Local Plan:
- a. identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
 - b. identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
 - c. consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
 - d. relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
 - e. protect local amenity and environment.
- 2.10 Policy B (paragraph 13) sets out that local authorities should ensure that traveller sites are sustainable economically, socially and environmentally and therefore ensure that their policies:
- a. promote peaceful and integrated co-existence between the site and the local community;
 - b. promote, in collaboration with commissioners of health services, access to appropriate health services;
 - c. ensure that children can attend school on a regular basis;
 - d. provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
 - e. provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers who may locate there or on others as a result of new development;

- f. avoid placing undue pressure on local infrastructure and services;
- g. do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- h. reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Intentional unauthorised development

- 2.11 The planning policy statement issued with PPTS 2015⁷ (and confirmed by Ministerial Statement⁸) makes clear that if a site is intentionally occupied without planning permission this would be a material consideration in any retrospective planning application for that site. Whilst this does not mean that retrospective applications will be automatically refused, it does mean that failure to seek permission in advance of occupation will count against the application.
- 2.12 In addition, PPTS 2015 (Paragraph 12) makes clear that in exceptional cases where a local authority is burdened by a large-scale unauthorised site that has significantly increased their need, and their area is subject to strict and special planning constraints, then there is no assumption that the local authority will be required to meet their Gypsy and Traveller site needs in full. This is intended to protect local planning authorities with significant land constraints from being required to provide for additional needs arising directly from large sites such as Dale Farm (a large unauthorised site in Essex).

PPTS Definitions

- 2.13 The PPTS 2015 Annex 1 sets out definitions of Gypsies and Travellers and Travelling Showpeople for the purposes of planning policy:
- “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.”⁹*
- 2.14 In addition, PPTS 2015 adds the following ‘clarification’ for determining whether someone is a Gypsy or Traveller:
- “In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:*
- a) *whether they previously led a nomadic habit of life*
 - b) *the reasons for ceasing their nomadic habit of life*

⁷https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457632/Final_Chief_Planning_Officer_letter_and_written_statement.pdf

⁸<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-12-17/HCWS423/>

⁹ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 1

c) *whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*¹⁰

- 2.15 The following definition of ‘Travelling Showpeople’ is used, also taken from PPTS 2015:

“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.”¹¹

- 2.16 In addition:

“For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use pitches for “travelling showpeople”, which may/will need to incorporate space or to be split to allow for the storage of equipment.”

Considering ‘Cultural’ and ‘PPTS’ need

- 2.17 Paragraph 61 of the 2019 NPPF recognises the need to assess a range of community needs including those of Travellers. The February 2019 Planning Practice Guidance (PPG) which accompanies the NPPF states, ‘the household projections that form the baseline of the standard method are inclusive of all households including Gypsies and Travellers as defined with Planning Policy for Travelling Sites’¹². The NPPF states that the PPTS sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document. The planning policy therefore differentiates between ‘travelling’ and ‘non travelling’ Gypsies and Travellers.
- 2.18 For non-travelling Travellers, their needs should also be met by the requirements of the NPPF as non-travelling households are a component of overall housing need. The needs of non-travelling Gypsies and Travellers are therefore effectively contained within the general housing requirement that Local Plans will set out. Additionally, the Human Rights Act 1998 and the Equalities Act 2010 protects the cultural choice of Gypsies and Travellers to live in mobile accommodation and therefore there is a need to plan for this type of accommodation. The Housing and Planning Act 2016 section 124 also makes specific reference to the needs of households living in caravans.
- 2.19 Therefore, our GTAAs establish an overall ‘cultural’ need for pitches which accords with the overall need for the Travelling community and takes into account the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. A PPTS ‘policy filter’ is then applied to identify the level of need associated with those households meeting the definitions set out in the PPTS Annex 1. It is our understanding that the needs

¹⁰ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 2

¹¹ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 3

¹² 2019 PPG Paragraph: 017 Reference ID: 2a-017-20190220

arising from the PPTS analysis establishes the level of need against which a 5-year land supply is assessed but the Council should be mindful of a wider obligation to consider overall 'cultural' need.

- 2.20 Our assessment methodology is set out in Chapter 3 and the outworking of this approach for Nuneaton and Bedworth is set out in Chapter 7.

Previous GTAA

- 2.21 A Gypsy and Traveller and Travelling Showperson Accommodation Assessment was prepared in 2016. This evidenced an overall need for 19 pitches over the period 2016/17 to 2031/32. However, this took into account potential supply of 20 pitches at Parrotts Grove which had been verified by Warwickshire County Council as potential pitches for occupancy. The need also assumed that 2 pitches would come available each year on The Griff, the County Council run site. A need for 5 transit pitches was also identified. There was no additional need for Travelling Showperson plots identified.

Responding to challenges

- 2.22 GTAAs are subject to intense scrutiny, particularly at planning inquiries and hearings. The methodological approaches taken by arc⁴ aim to maximise the robustness of evidence and measures include:
- An up-to-date assessment of the number of pitches on sites and the number of households living on pitches and any vacancies.
 - Maximising response rates from households.
 - Carefully considering the relationship between households and the pitches they occupy.
 - Sensitive analysis of the flows of existing households from and to districts.
 - Consideration of overcrowding and concealed households.
 - Careful consideration of turnover on council/housing association pitches, with clear assumptions over future potential capacity from households moving away from pitches.
 - Longer-term modelling of need using detailed demographic information contained from household survey work.
 - Reasonable assumptions around the number of households in bricks and mortar accommodation who may want to move to a pitch.

3. Methodology

Introduction

- 3.1 The GTAA research method is grounded in an understanding of the requirement of the NPPF and based on an established methodology which regularly withstands scrutiny at planning inquiries and hearings.
- 3.2 The methodology has comprised:
- a desktop analysis of existing documents, including data on pitches/sites, plots/yards and unauthorised encampments;
 - the collection of primary data, including a household interviews with Gypsies and Travellers and Travelling Showpeople; and
 - an assessment of accommodation needs taking into account all available data and information.
- 3.3 The information gathering has been carried out in three phases, as outlined below:
- Phase 1: Literature/desktop review.
 - Phase 2: Survey of Gypsies and Travellers and Travelling Showpeople across the districts.
 - Phase 3: Survey of stakeholders.
 - Phase 4: Needs assessment and production of the GTAA 2021 report.

Phase 1: Literature/desktop review and steering group discussions

- 3.4 We have reviewed relevant literature, including legislative background and best practice information; and analysis of available secondary data relating to Gypsies and Travellers and Travelling Showpeople in the borough.

Phase 2: Fieldwork survey and interviews with Gypsies and Travellers and Travelling Showpeople

- 3.5 Our aim is to obtain interviews from all households living on sites using a standard questionnaire (Appendix A). This questionnaire has been carefully designed in consultation with councils, feedback from community representatives and planning agents. Letters were sent to residents advising them that the study was taking place and inviting people to contact arc⁴ directly if they wanted the interview done over the phone. Site visits took place during early March 2021 and some interviews were conducted with appropriate social distancing taking place. Most interviews took place during late April following

the easing of lockdown restrictions, but social distancing measures were maintained.

- 3.6 Regarding the PPTS definition, the questionnaire asks if households have been travelling in the preceding year or within the past 5 years and/or intend to travel in the next year or in any year in the next five years. Note that households who cannot travel due to age or health limitations are excluded from analysis. If eligible households answer 'yes' to either question the household meets the travelling criteria set out in PPTS. By contrast, all households identifying as part of the Gypsy and Traveller or Travelling Showpeople community are contained within a broader 'cultural' definition.
- 3.7 Analysis of the travelling behaviour of households or emerging households planning to move residential location indicates that 76.2% meet the nomadic habit of life/travelling behaviour criteria set out in PPG, These households meet the criteria by either travelling in the preceding year or within the past 5 years and/or intend to travel in the next year or in any year in the next five years. This is discussed further in the analysis in Chapter 7.

Phase 3: Stakeholder survey

- 3.8 The survey of stakeholders was conducted during January to March 2021, each stakeholder was contacted and provided with a questionnaire and invited to answer questions they felt were relevant to their knowledge and experience.
- 3.9 Stakeholders included representatives from all of the neighbouring local authorities, who were requested to provide information regarding their local situation and provision, including issues such as unauthorised encampment activity. This approach assists the Council in meeting their requirements under the Duty to Cooperate.
- 3.10 A total of three responses to the stakeholder survey were obtained and the findings of the online stakeholder survey are set out in Chapter 6 of this report.

Phase 4: Needs assessment and production of report

- 3.11 A detailed explanation of the analysis of pitch requirements is contained in Chapter 6 but briefly comprises analysis of the following:
- current pitch supply, households living in bricks and mortar accommodation; households planning to move in the next five years, and emerging households to give total need for pitches; and
 - supply based on the number of authorised pitches and turnover on sites on public pitches.
- 3.12 The overall need for pitches is then compared with the overall supply.
- 3.13 The need for transit pitches was calculated using unauthorised encampment data which set out how many encampments had taken place and the number of caravans on them. The survey also asked households if they felt there was a need for transit pitches.

Pitches and households

- 3.14 One of the key challenges faced when assessing Gypsy and Traveller pitch requirements is the actual nature of pitches and how this relates to the number of households they can support.
- 3.15 PPTS 2015 refers to the need for local planning authorities to *'identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets'* and *'relate the number of pitches/plots to the circumstances of the specific size and location of the site and the surrounding population's size and density'* (PPTS 2015, paragraph 10).
- 3.16 Planning decision notices usually refer to the number of pitches on a site or the specifics of what can be on a pitch e.g. statics, tourers; or specific individuals and/or households.
- 3.17 As part of the GTAA, it is essential that the characteristics of sites, the number of pitches and how many households these can support is carefully considered. There are a range of issues which need to be considered when reviewing site and pitch characteristics and their potential implications for future pitch and site requirements which are now summarised.

Site and pitch size

- 3.18 There are no definitive parameters for site or pitch sizes. Previous Design Guidance (DCLG, 2008) states in paragraph 4.4 that *'Gypsy and Traveller sites are designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking. Sites of various sizes, layouts and pitch numbers operate successfully today and work best when they take into account the size of the site and the needs and demographics of the families resident on them'*.
- 3.19 Paragraph 4.47 states that *'to ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 metres from any other trailer, caravan or park home that is occupied separately'*.
- 3.20 Paragraph 7.12 states that *'as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area'*.
- 3.21 Paragraph 4.13 states that *'smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle'*.
- 3.22 As a general guide, it is suggested by arc⁴ that the minimum pitch size is 25m by 25m (625 square meters or 0.0625 hectares). This would support a twin-unit chalet/mobile home (15m x 6.5m), a tourer, an amenity shed/building (5m x 4m), two vehicle spaces (minimum 2.4m x 4.8m for each space) and turning circle for vehicles, amenity space and a small garden area/play space. Residential units need to be 3m from the pitch boundary and at least 6m apart. A slightly larger pitch of 25m by 30m (750 square meters or 0.075 hectares)

would be appropriate for larger household units requiring several residential units.

- 3.23 There is no guidance on the maximum size of a site but it is generally accepted amongst the Travelling community that sites of 6-10 pitches are appropriate.

Occupancy

- 3.24 A pitch may accommodate more than one family unit, for instance it could include a family, older children who have formed their own household and other family members. This could lead to potential overcrowding and this is considered as part of the GTAA household survey.
- 3.25 Private sites may restrict occupancy to close family/friends. This limits opportunity for others to move onto the site but this restrictive occupancy may provide for emerging needs within a household, for example as grown-up children (previously living within a parent(s) or grandparent(s) home) form independent households of their own.
- 3.26 Quality, size of pitch and proximity of caravans on pitches vary dramatically.

Response

- 3.27 For each site, a pragmatic and reasonable judgement should be made as part of the GTAA regarding the number of pitches or sub-divisions on sites. This may relate to the number of families living on sites, and could include a consideration of the potential intensification of sites (for instance through further sub-division, extension or use of vacant areas within the site). Capacity and layout of sites should be identified through site observation (directly or indirectly through Google maps or similar), planning history and local knowledge of planning, enforcement and liaison officers.
- 3.28 Pitches can become intensified or sub-divided once planning applications have been approved. These sub-divisions tend to be tolerated by councils. Often pitches become subdivided to provide space for newly-forming households, particularly from family members. The potential for pitch intensification/sub-division was considered on site visits and respondents were asked whether intensification/sub-division was possible on the site they lived on.

4. Review of the Gypsy, Traveller and Travelling Showpeople population and existing provision of pitches and plots

- 4.1 This chapter looks at the current picture in terms of the current population and demography of Gypsies and Travellers across the study area before going on to explore the extent and nature of provision across the area.

2011 Census population and household estimates

- 4.2 The 2011 Census (Tables 4.1 and 4.2) identified a total of 75 people and 29 households in Nuneaton and Bedworth with a Household Reference Person who identified as having a White Gypsy or Irish Traveller ethnicity. 46.7% of households who identified as Gypsy/Traveller lived in bricks and mortar accommodation.

Table 4.1 People from households identifying as White Gypsy or Irish Traveller by accommodation type

Local Authority	Total: Accommodation type	House or bungalow	A flat, maisonette or apartment	A caravan or other mobile or temporary structure
Nuneaton and Bedworth	75	31	4	40

Source: 2011 Census CT127

Table 4.2 Households identifying as Gypsy Traveller by accommodation type

Local Authority	Total: Accommodation type	House or bungalow	A flat, maisonette or apartment	A caravan or other mobile or temporary structure
Nuneaton and Bedworth	29	12	4	13

Source: 2011 Census CT0128

Caravan Count information

- 4.3 Snapshot counts of the number of Gypsy and Traveller caravans were requested by the government in 1979 and have since been undertaken every January and July by local authorities. An annual count of Travelling Showperson caravans takes place every January. The counts provide a source of information on the number of caravans located on authorised and unauthorised sites but do not record the actual number of pitches on sites/yards.
- 4.4 The figures for the last nine Traveller caravan counts for Nuneaton and Bedworth are set out in Table 4.3. Data shows that an average of 58 caravans have been recorded on sites across the borough during the nine-count period. Of these, 63.8% have been on the county council site, 35.2% on private sites and 1% on unauthorised sites.

Table 4.3 Bi-annual Traveller caravan count figures January 2016 to January 2020 Nuneaton and Bedworth

Date	Authorised sites with planning permission		Unauthorised sites without planning permission	Total
	Social Rented	Total Private	Total Unauthorised	
Jan 2016	28	20	1	49
Jul 2016	37	17	0	54
Jan 2017	28	20	1	49
Jul 2017	28	3	1	32
Jan 2018	28	20	1	49
Jul 2018	54	31	0	85
Jan 2019	*	*	*	0
July 2019	54	31	0	85
Jan 2020	*	*	*	0
Nine-Count Average (excluding missing counts)	37	20	1	58
Nine-Count % Average	63.8	35.2	1.0	100.0

Source: MHCLG Traveller Caravan Count, Live Table 1 (January 2020)

*No data reported in MHCLG tables

Source: MHCLG Traveller Caravan Count, Live Table 1

- 4.5 Over the period 2015 to 2020 there were no reported Travelling Showperson caravans across Nuneaton and Bedworth in the MHCLG caravan count

statistics (Table 4.4). However, there is one Showperson’s yard at Whittlesford which currently has 1 caravan .

Table 4.4 Annual Travelling Showpeople caravan count figures January 2015 to January 2020

Count	Authorised sites with planning permission		Unauthorised sites without planning permission	Total
	Social Rented	Total Private	Total Unauthorised	
2015	0	0	0	0
2016	0	0	0	0
2017	0	0	0	0
2018	0	0	0	0
2019	0	0	0	0
2020	0	0	0	0
Six-Count Average	0	0	0	0
Six-Count % Average	0	0	0	0

Source: MHCLG Travelling Showpeople Caravan Count, Live Table 3 (January 2019)

Local site and yards

- 4.6 Broadly speaking, authorised sites are those with planning permission and can be on either public or privately-owned land. Unauthorised sites are made up of either longer term¹³ unauthorised encampments¹⁴, that have been in existence for some considerable time and so can be considered to be indicative of a permanent need for accommodation (in some instances local authorities class these as tolerated sites and do not take enforcement action to remove them); and unauthorised developments, where Travellers are residing upon land that they own and that does not have planning permission (see Appendix B for more detailed definitions).
- 4.7 Table 4.5 sets out the range of sites and Travelling Showpersons yards across Nuneaton and Bedworth. The table also shows the number of household survey responses obtained. In summary there is one county council site (25 pitches), 12 private authorised sites (41 pitches) and one Travelling Showperson yard (4 plots).

¹³ Approximately three months or longer

¹⁴ Please note that unauthorised encampments also encompass short-term illegal encampments, which are more indicative of transit need, see para 7.10 for more information on these encampments.

Table 4.5 List of Gypsy & Traveller Pitches on Sites and Showperson Plots on Yards (as at April 2021)

Site Reference	Site Name	Site Location	Type of Site	Ownership	Total Number of Pitches	Total Occupied Pitches	Total Vacant Pitches	Number of households	Household interview achieved*	Household interviews not achieved	Reason why household interview not achieved	
											Residents not present	Unable to contact
Priv1	Tides Reach, Smorrall Lane	Smorrall Lane, Bedworth, CV12 0NL	Permanent	Private	1	1	0	2	2	0		
Priv2	Bottom Meadow, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	8	8	0	3	3	0		
Priv3	Fella's Acre, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	5	5	0	3	3	0		
Priv4	Rosewood, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	1	1	0	1	1	0		
Priv5	The Haven, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	3	3	0	3	3	0		
Priv6	The Poppy's Mobile Caravan Park	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	6	5	1	5	5	0		
Priv7	Two Trees	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	2	2	0	2	0	2	0	2
Priv8	Plot 5, Parrotts Grove	Parrotts Grove, Coventry, CV2 1NQ	Permanent	Private	2	2	0	1	1	0		

CONTINUED ON NEXT PAGE

Priv9	Boundary Paddock, Withybrook Road	Withybrook Road, Bulkington, CV12 9JW	Permanent	Private	2	2	0	3	3	0		
Priv10	Watling Street (also known as Winter Oak and The Paddock)	Watling Street, Nuneaton, CV11 6BQ	Permanent	Private	6	6	0	4	4	0		
LA1	The Griff, Coventry Road	Coventry Road, Nuneaton, CV10 7PE	Permanent	Council	25	20	5	20	19	1	1	0
Priv11	Tara Park	Coventry Road, Bulkington, CV2 1NT	Permanent	Private	2	2	0	1	1	0		
Priv12	Sunrise Cottage	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	3	3	0	3	1	2	0	2
Gypsy and Traveller TOTAL					66	60	6	51	46	5	1	4

Yard Reference	Site Name	Site Location	Type of Site or Yard	Ownership	Total Number of Plots on Yard	Total Occupied Plots	Total Vacant Plots	Number of households	Household interviews achieved	Household interviews not achieved	Reason why household interview not achieved	
											Residents not present	Unable to contact
TSP1	Fairways Showman's Site	Spinney Lane/Whittlesford Road, Whittlesford, Nuneaton, CV10 9HU	Permanent	Private	4	1	3	1	1	0		

* The total number of completed surveys was 38. For some sites, one survey covered multiple households (Priv1 Tides Reach 1 survey covered 2 households; Priv 2 Bottom Meadow 1 survey covered 3 households; Priv 3 Fellas Acre 1 survey covered 3 households; Priv 5 The Haven 1 survey covered 3 households; Priv 9 Boundary Paddock 1 survey covered 3 households. This results in data from 46 Gypsy and Traveller households being obtained out of 51 households (90.2%)

Table 4.6 Summary of Gypsy, Traveller pitches and Travelling Showperson plots									
Summary		Total number of pitches/plots	Total occupied pitches/plots	Total vacant pitches/plots	Number of households on pitches/plots	Household interviews achieved	Household interviews not achieved	Reason for not achieving interview	
								Residents not present	Unable to contact
Gypsy and Traveller	Private	41	40	1	31	27	4	0	4
	Council	25	20	5	20	18	1	1	0
	Total	66	60	6	51	46	5	1	4
Travelling Showperson	Private	4	4	0	1	1	0	0	0

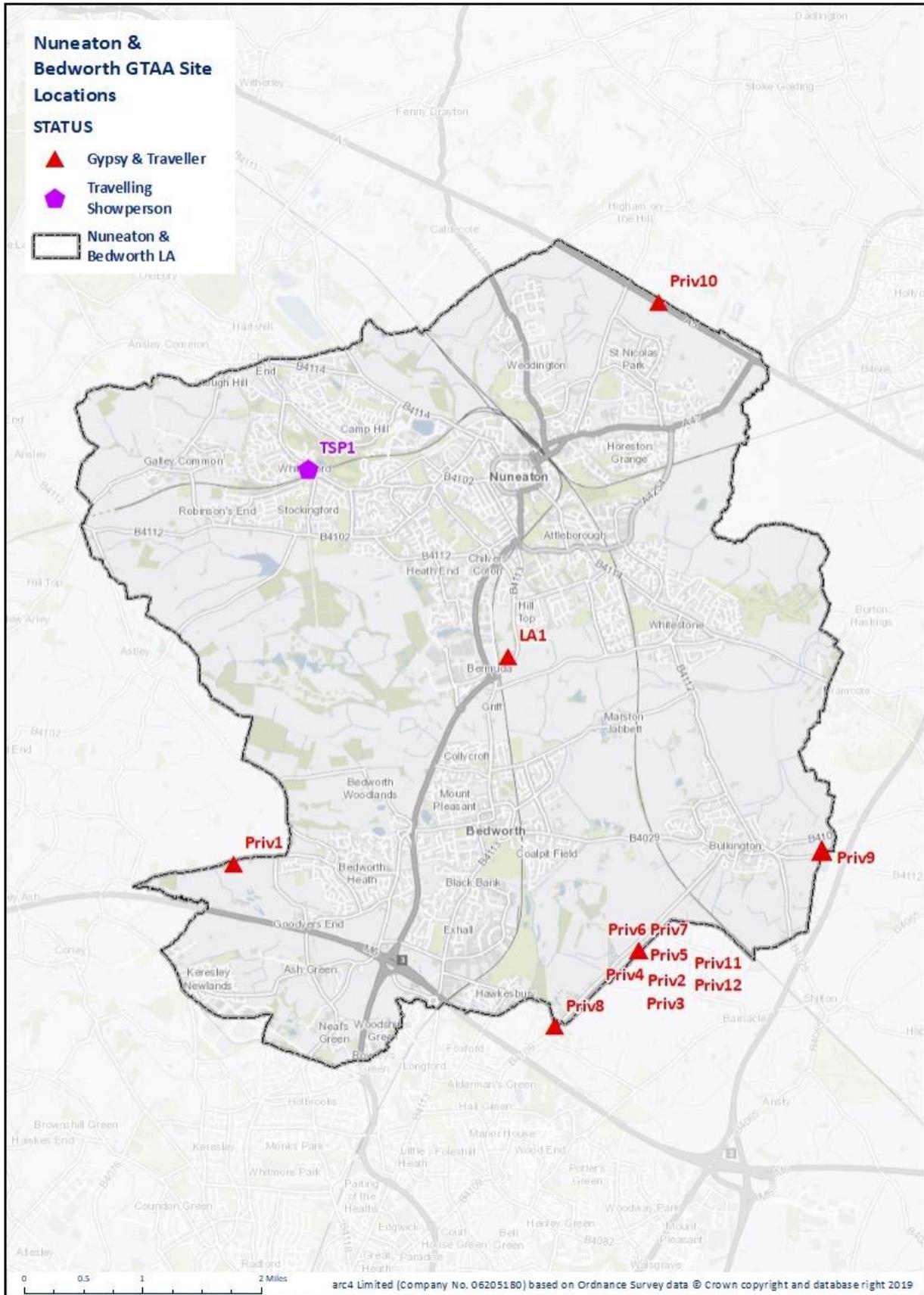
Source: Council data 2021, site survey fieldwork 2021

Note: the following sites are no longer assumed to be part of supply:

Parrots Grove CV2 1NQ: Sunny Acre, Half Acre, Plot 3, Gypsy Site No, 4

Punch Bowl Bridge, Stoney Road, Nuneaton, CV10 0JS

Map 4.1 Location of sites and yards in Nuneaton and Bedworth



5. Household survey and stakeholder findings

5.1 This chapter presents the findings of the household survey, which was carried out to provide primary data to inform this GTAA. The survey aimed to reach as many Gypsy, Traveller and Travelling Showpeople living in the study area as possible. It was conducted using the questionnaire presented in Appendix A. Data from site management information is also included in the analysis where appropriate.

Gypsy and Traveller households living in Nuneaton and Bedworth

- 5.2 There were a total of 38 responses to the household survey. Of these:
- 19 surveys were completed by households living in the Griff County Council site.
 - 19 were surveys completed by Gypsy and Traveller households living on private sites. Some of these surveys included information for multiple households living on family sites. Information for 8 households was collected in this way.
 - The total number of Gypsy and Traveller household responses was therefore 46.
 - 1 survey was completed by a Travelling Showperson family.
- 5.3 It would not be appropriate to provide a detailed analysis of the survey information as this has the potential to identify individual responses. Broad summaries of the household survey data findings from all 47 households are presented below in order to maintain respondent confidentiality. Each question includes a 'base' number which is the number of households responding to a particular question.
- 5.4 Of household representatives interviewed (base=38), 34.2% described themselves as Gypsy (including Romany, Romany Gypsy and English Gypsy), 34.2% as English Traveller, 28.9% as Irish Traveller and 2.8% as Travelling Showperson.
- 5.5 Data from the household survey provided an insight into household size, type and the age of residents living on pitches/plots.
- 5.6 In terms of household size (base=38): 18.4% of households were single person; 15.8% were two person; 18.4% were three person; 7.9% were four person, 18.4% were five person, 13.2% were six person and 7.9% were six or more person households.
- 5.7 Regarding household type (base=38), 18.4% were singles, 15.8% couples, 31.6% couples with children, 18.4% lone parents and 15.8% other household types (for instance extended families).

- 5.8 Across the sites/plots there were a total of 132 people recorded living in 47 households. Overall, 34.1% of the Travelling population living on pitches/plots were aged 13 or under and 7.6% were aged 14-17. In addition, 22% were aged 18-34, 15.2% aged 35-49, 11.4% aged 50-64 and 9.8% aged 65 and over.
- 5.9 In terms of length of residence (base=35), 51.4% had lived at their current place of residence for less than 5 years, 11.4% between 5 and less than 10 years, 17.1% between 10 and less than 20 years and 20% for 20 years or more.
- 5.10 When asked about overcrowding (base=38), 18.4% of respondents said that their home is overcrowded and 23.1% said their pitch was overcrowded.
- 5.11 The consensus amongst respondents was that more pitches were needed (71.9%, base = 32). 15 respondents stated a number: 11 (73.3%) said less than 10 pitches, 2 (13.3%) between 10 and 20 pitches and 2 (13.3%) between 20 and 25 pitches.
- 5.12 19 respondents provided information on why they travel and they could state one or more reason for travelling. The most frequently mentioned reasons for travelling were work (52.6% mentioned) or cultural reasons (52.6%). Other reasons included visiting family/friends (15.8%), to attend fairs (5.3%) and limited opportunities to settle down (5.3%).
- 5.13 17 respondents provided further information on where they travel. Respondents tend to give general answers, with 6 saying 'all over' and 5 saying they travel to where fairs and religious conventions are taking place. Some gave specific responses such as Manchester and the North, Nottingham and Wales. But there was no specific pattern of travelling behaviour that could be ascertained from the responses.

Health and support needs

- 5.14 The household survey asked if the respondent or members of their family had particular health issues (base=38). The most frequently mentioned were: asthma (26.3% of respondents), depression (15.7%) and arthritis (7.9%).
- 5.15 The survey also asked if households needed their home to be adapted in any way (base=38). The need for insulation was most frequently mentioned (18.4%) followed by better heating (15.7%). There was one response for each of the following needs: adaptations relating to sensory needs, internal grab rails, external grab rails, lever door handles and wheelchair adaptations.
- 5.16 Regarding support needs, the survey (base=38) found that 15.7% of households included someone with the need for hospital medical treatment and 5.3% counselling. There was one response for each of the following: pregnancy support, post-natal support and occupational therapy.

Education and training support needs

- 5.17 Regarding educational support (base=38), 28.9% of respondents stated they needed educational support for primary school aged children and 13.2% required support for secondary school aged children.

- 5.18 Support was also needed for job-related training (base=38). 13.2% of respondents wanted help with English, maths and/or IT skills; 5.3% help with applying for an apprenticeship and 2.6% help with applying for a course at college/university.
- 5.19 As part of stakeholder consultation, the Gypsy and Traveller Liaison officer at Warwickshire police commented:
- “Many of the families that have established in the Borough are registered with health care providers Children are either home educated monitored by the County Traveller education team or attend local primary schools. There are challenges to secondary education that remains an issue to many families and then further education becomes difficult due to the often lack of literacy skills. Often this can lead to youngsters becoming bored and getting involved in less constructive activities leading to a more destructive path within the community. This impact on other parts of the community has been evidenced as detrimental to the cohesion process.”

Questions on site locations

- 5.20 The survey asked, when thinking about new residential sites, what was important to the respondent. The most frequently mentioned things of importance (base=38) were locations within walking distance of primary schools (42.1%), close to doctors (36.8%), walking distance to secondary schools (26.3%) and walking distance to shops (21%).
- 5.21 Regarding other important factors, 15.7% said visitors parking and room for visitors. 10.5% said child friendly/safe places to play and proximity to main roads. 7.9% said easy access to public transport/bus stops and community spaces/buildings. 5.3% said making sites accessible for people with disabilities and having different sizes of pitches for different types of household.

Stakeholder consultation

- 5.22 As part of the GTAA a range of stakeholders were contacted. The key points raised in consultation are now summarised.
- 5.23 Feedback from Rugby Borough Council:
- Nationally there is a shortage of provision for Gypsies and Travellers so there is likely to be a need in Nuneaton and Bedworth Borough.
 - The land Gypsy and Travellers can afford to buy is often in the green belt where policy indicates provision should not be made. There is often conflict between the settled community and the Travelling community, so sites need to be close enough to facilities but far enough away from the settled community.
 - Council were not aware of any regular movements between the Rugby and Nuneaton and Bedworth council areas.
 - Council agreed that this questionnaire contributes to the requirement on the Duty to Cooperate with neighbouring authorities.

5.24 Feedback from Coventry City Council

- Not aware of any regular movement between Coventry and Nuneaton and Bedworth.
- Evidence base needs to comply with the NPPF.
- Council agreed that this questionnaire contributes to the requirement on the Duty to Cooperate with neighbouring authorities.

5.25 Feedback from Warwickshire Police Gypsy and Traveller Liaison Officer

- Over the last few years I have dealt with numerous families in Warwickshire some on unauthorised encampments and some who have a desire to settle in Nuneaton and Bedworth. There has often been no permanent provisions available and even with a waiting list this only provides limited prospects of availability for families to be near to relatives already residing in the area.
- The one County Council site in the borough is full and has a waiting list. Some of these families have had to take up residency in other areas due to the lack of permanent pitch availability. I would estimate that in addition to the pitches currently in the borough the identified 39 further pitches needed would greatly assist in meeting the short fall although that is at the present time. As time goes on this requirement will almost certainly increase as families themselves grow in size and youngsters become adults and need their own units but traditionally keeping close to family which often provide a reliable support mechanism.
- Permanent sites ideally should be located within the urban boundaries of the borough and giving access to services within a proportionate distance in line with that of other housing developments.
- Local Authority owned and managed sites need to be sited with easy access to schools, shops and recreational facilities. Where land is being purchased and developed privately there should not be a distance parameter in place that prevents the freedom of choice to families who may wish to be located in a more rural location where planning legislation is able to be conformed to. It is the freedom of choice that is important and one which is afforded to other communities.
- There are families who would be happy to reside in urban areas with easy access to facilities but as with all communities this is not the ideal for all and the planning criteria should ensure that it caters for the needs of all where possible within the parameters of legality.
- Key barriers to new site provision include the challenge of families obtaining planning permission; political pressure when local authorities try to identify suitable land for permanent and transit provision; a greater

understanding of the Travelling community as a whole may assist with understanding their accommodation needs.

- The officer provided useful background to transit need which is presented in Chapter 6.
- Nuneaton and Bedworth has well-established Gypsy and Traveller communities with families that have resided in the borough for generations. There are a mixture of Romany and Irish Traveller families on The Griff caravan site in Nuneaton. There are numerous private sites which are in the main English families and make up the largest visible Traveller community in the Bulkington area of the borough.
- There is transient movement between settled families and neighbouring districts and boroughs. There are many family links between the community residing in Nuneaton and Bedworth and neighbouring districts and boroughs which means a significant amount of travel across borders.
- With regards to unauthorised encampments in the past we have seen families moving in and out of the borough sometimes only just over the border within the county. This pattern seems to have changed over the last couple of years since numerous families have settled across the border into North Warwickshire or other areas of the country.

5.26 Key strategic messages from the Warwickshire Police Gypsy and Traveller Liaison Officer include:

- A realistic timescale for the delivery of new residential pitches.
- Some Traveller families would be happy to go into bricks and mortar and still lead a nomadic habit of life and this should be considered when new residential building is taking place.
- Delivery of a transit site is likely to take some time. Work should be undertaken to identify land to provide suitable transit site provision in the north and south of the county.
- In the meantime I believe that it is a priority to identify land that can be used for Negotiated Stopping and can be incorporated into the Warwickshire Countywide protocol for managing unauthorised encampments. This will allow for the temporary accommodation for suitable families. This process has many benefits and is something that can be achieved very easily by countywide partners with the relevant expertise.

6. Gypsy and Traveller pitch, Travelling Showperson plot and transit site requirements

Introduction

- 6.1 This section reviews the overall pitch and plot requirements of Gypsies and Travellers and Travelling Showpeople across Nuneaton and Bedworth. It takes into account current supply and need, as well as future need, based on modelling of data. This chapter also considers transit pitch requirements for Gypsies and Travellers. Finally, it presents planning policy recommendations.
- 6.2 The calculation of pitch requirements is based on modelling as advocated in *Gypsy and Traveller Accommodation Assessment Guidance* (DCLG, 2007). Although now formally withdrawn, the former DCLG Guidance still provides the best-practice approach towards the assessment of pitch and plot needs (see Chapter 2 for further discussion).
- 6.3 This approach requires an assessment of the current needs of Gypsies and Travellers and a projection of future needs. It advocates the use of a survey to supplement secondary source information and derive key supply and demand information.
- 6.4 The GTAA has modelled current and future need and current and future supply separately for Gypsies and Travellers and Travelling Showpeople. For both groups, the modelling shows an overall ‘cultural’ need and then a ‘policy-on’ ‘PPTS need which takes into account those households who met the PPTS planning definition.

Gypsy and Traveller pitch requirement model overview

- 6.5 Pitch need is assessed for two time periods. A short-term 5-year model looks at need over the next 5 years (2021/22 to 2025/26). A longer-term model looks at need over the remainder of the plan period (to 2036/37) arising from children likely to need a pitch.
- 6.6 In terms of **cultural need**, the 5-year model considers:
- the baseline number of households on all types of site (authorised, unauthorised and temporary authorised sites) as at April 2021;
 - existing households planning to move in the next five years (currently on sites and also from bricks and mortar) and where they are planning to move to; and
 - emerging households currently on sites and planning to emerge in the next five years and stay within the study area on a pitch; to derive a figure for
 - total pitch need.
- 6.7 In terms of **supply**, the model considers:
- total supply of current pitches on authorised sites; and

- vacant pitches on authorised sites.
- 6.8 The model then reconciles total need and existing authorised supply over the next 5 years by summarising:
- total need for pitches; and
 - total supply of authorised pitches.
- 6.9 The longer-term model then considers the cultural need over the period to 2036/37. This is based on the age profile of children under 13 living in Gypsy and Traveller households on pitches (the longer-term model).
- 6.10 For each model, the likely pitch need from households meeting the PPTS definition is also calculated.

Nuneaton and Bedworth Gypsy and Traveller pitch need analysis: Description of factors in the 5-year need model

- 6.11 Table 6.1 provides a summary of the 5-year pitch need calculation. Each component in the model is now discussed to ensure that the process is transparent and any assumptions clearly stated.

Need

6.12 **Current households living on pitches (1a to 1e)**

These figures are derived from planning data and site observation data. There are a total of 20 households on the county council site and 31 households on private pitches. No households were identified as being concealed/doubled up on pitches.

6.13 **Current households in bricks and mortar accommodation (2)**

The 2011 Census suggested there were 16 households living in bricks and mortar accommodation.

6.14 **Existing households planning to move in the next five years (3)**

This was derived from information from the household survey for respondents currently on authorised pitches.

Of existing households currently on sites, 12 plan to move and in the next 5 years.

For households currently in bricks and mortar, based on national arc⁴ studies it is estimated that 5.3% of households living in bricks and mortar would prefer to live on a site which would equate to 1 household. A need from 1 household is therefore included within the modelling at 3e.

Regarding in-migration, analysis of household survey data indicates that 16 households have moved into the borough and onto a pitch in the past 5 years and shown at row 3g.

The factors presented in section 3 of the model result in an overall net requirement of +6 pitches from existing households planning to move in the next 5 years which includes an allowance for in-migration.

6.15 **Emerging households (4)**

This is the number of households expected to emerge in the next 5 years based on household survey information. The total number is +9 of whom 2 plan to live outside the district. This results in a net need from 7 emerging households.

If children old enough to form their own household were living with family and have not specified that they want to form a new household, this is assumed to be through choice and the model does not assume they want to form a new household.

6.16 **Total need for pitches (5)**

This is a total of current households on authorised pitches, households on pitches planning to move in the next five years and demand from emerging households currently living on pitches. This indicates a total need for 64 pitches (51 existing households on pitches plus a net need for 6 pitches from existing households planning to move including in-migration and a need for 7 pitches from emerging households).

Supply

6.17 **Current supply of authorised pitches (6)**

This is a summary of the total number of occupied authorised pitches and the number of vacant authorised pitches. This shows a total supply of 51 authorised pitches plus 5 vacant pitches on the county council site resulting in a total supply of 56 authorised pitches. Note that some households on private sites occupy more than one pitch.

Reconciling supply and demand

- 6.18 There is a total need over the next five years (2021/22 to 2025/26) for 64 additional pitches in Nuneaton and Bedworth (Table 6.1) compared with a supply of 56 authorised pitches (including vacant pitches). The result is an overall cultural shortfall of 8 pitches.

Table 6.1 Summary of demand and supply factors: Gypsies and Travellers – 2021/22 to 2025/26			
CULTURAL NEED		Nuneaton and Bedworth	
1	Households living on pitches	1a. On County Council Site	20
		1b. On Private Site - Authorised	31
		1c. Unauthorised	0
		1d. Total (1a to 1c)	51
2	Estimate of households living in bricks and mortar accommodation	2011 Census	16
3	Existing households planning to move in next 5 years	Currently on sites	
		3a. To another pitch/same site (no net impact)	0
		3b. To another site in district (no net impact)	1
		3c. From site to Bricks and Mortar (-)	0
		3d. To site/bricks and mortar outside borough	11
		Currently in Bricks and Mortar	
		3e. Planning to move to a site in LA (+)	1
		3f. Planning to move to another B&M property (no net impact)	0
		In-migrant households	
		3g. Allowance for in-migration (+)	16
3h. TOTAL Net impact (3g+3e-3c-3d)	6		
4	Emerging households (5 years)	4a. Currently on site and planning to live on current site	5
		4b. Current on site and planning to live on another site in the borough	2
		4c. Currently on site and planning to live outside the borough (no net impact)	2
		4d. Currently in B&M planning to move to a site in LA (+)	0
		4e. Currently in B&M and moving to B&M (no net impact)	0
		4f. Currently on Site and moving to B&M (no net impact)	0
		4g. TOTAL (4a+4b+4d)	7
5	Total Need	1d+3h+4g	64
SUPPLY			
6	Current supply of authorised pitches	6a Current supply of authorised pitches	51
		6b. Current unoccupied authorised pitches	5
		6c. Total current authorised supply (6a+6b)	56
RECONCILING NEED AND SUPPLY			
7	Total need for pitches	5 years (from 5)	64
8	Total supply of authorised pitches	5 years (from 6c)	56
5 YEAR AUTHORISED PITCH SHORTFALL 2021/22 TO 2025/26			8

Longer-term pitch requirement modelling

6.19 Longer-term pitch need modelling has been carried out using known household structure information from the household survey of households living on pitches. On the basis of the age of children in households, it is possible to

determine the extent of ‘likely emergence’, which assumes that a child is likely to form a new household at the age of 18.

- 6.20 The year when a child reaches 18 has been calculated and it is possible to assess how many newly forming households may emerge over the period 2026/27 to 2036/37. A reasonable assumption is that half of these children will form new households, bearing in mind culturally women tend to move away on marriage and men tend to stay in close proximity to their families on marriage. The model therefore assumes that 50% of children will form households when they reach 18 and that these households remain in Nuneaton and Bedworth¹⁵. Analysis would suggest a total cultural need for 12 additional pitches over the period 2026/27-2036/37 (Table 6.2).

Table 6.2 Future pitch requirements in Nuneaton and Bedworth based on the assumption that 50% of children form households on reaching 18

Time period	No. children	Expected household formation
2026/27 to 2030/31	9	4
2031/32 to 2036/37	15	8
Total (2026/27 to 2036/37)	24	12

Planning Policy for Traveller Site definition

- 6.21 Analysis of household survey data establishes that from a total of 21 existing or emerging households who are planning to move :
- 1 household is exempt from the PPTS definition test because someone has a health issue which prevents them from travelling.
 - 4 households do not meet the PPTS travelling definition because they have not travelled in the past 5 years and do not intend to travel in the next 5 years.
 - 16 households meet the PPTS travelling definition.
- 6.22 Therefore 80% of respondents who are planning to move (either as an existing or emerging household) meet the PPTS travelling definition.

Overall plan period pitch need

- 6.23 Table 6.3 summarises the overall need for pitches across Nuneaton and Bedworth over the plan period to 2036/37. It presents the overall cultural need based on households identifying as Gypsy and Traveller and a ‘policy on’ PPTS need which is a subset of the cultural need and is based on those eligible households who meet the PPTS definition of need. Need has been assessed over a short-term 2021/22 to 2025/26 and longer-term 2026/27 to 2036/37

¹⁵ This approach has been tested at inquiry and the assumption has been corroborated by several Travelling interviewees

period. The overall need is 20 pitches of which 16 is PPTS need. The main driver of need in the first five years net in-migration and emerging households.

Table 6.3 Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37

	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Longer-term need		
<i>Over period 2026/7 to 2030/31 (B)</i>	4	3
<i>Over period 2031/32 to 2036/37(C)</i>	8	7
<i>Longer-term need TOTAL to 2036/37 (12 years) D=(B+C)</i>	12	10
NET SHORTFALL 2021/22 to 2036/37 (A+D) (11 years)	20	16

Potential capacity for Gypsy and Traveller pitches on existing sites

Turnover on sites

- 6.24 Turnover relates to the number of pitches that are expected to become available for occupancy. Analysis only includes expected turnover on public sites as this is referenced in (former) CLG guidance and more accurate data on changes in pitch occupancy is likely to be available. Although there is likely to be turnover on private sites, the ability of households to move onto private sites may be more restrictive (for instance the site may be restricted to a particular family) and less likely to be recorded.
- 6.25 Household survey data indicates that in the past 5 years to April 2021, 7 households moved onto vacant pitches on the Griff or an average of 1.4 each year. Based on 20 occupied pitches, this is a turnover rate of 7% each year.

Potential capacity for additional pitches on existing sites

- 6.26 There is no additional capacity on the existing county council site. Across three private sites, additional potential capacity has been identified through the household survey:
- Priv 3 Fellas Acre – 2 additional pitches through site expansion.
 - Priv 10 Winter Oak – 6 additional pitches through site intensification.
 - Priv 12 Sunrise cottage – 3 to 5 additional pitches through site intensification.

There is potential for an additional 11-13 pitches on existing private sites through expansion and intensification. The council should carry out further investigation and a technical assessment of the feasibility of increasing supply from these sites.

Impact of turnover and intensification on pitch need

6.27 Table 6.4 illustrates the impact of a pitch turnover on overall pitch need. This includes an allowance for anticipated turnover which result in all cultural, and therefore PPTS need, being met.

Table 6.4 Addressing Gypsy and Traveller pitch need		
Nuneaton and Bedworth	Cultural need	Of which: PPTS NEED
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Anticipated minimum turnover on council site (B)	7	7
Potential intensification/expansion of existing sites (C)	6	6
Residual need 2021/22 to 2025/26 after turnover and potential intensification/expansion (D) = A-B-C	-5 Need met	-7 Need met
Longer-term need 2026/27 to 2036/37 (E)	12	10
Anticipated minimum turnover on council site (F)	15	15
Potential intensification/expansion of existing sites (G)	5	5
Residual need 2025/26 to 2036/37 after turnover (H) = E-F-G	-8 Need met	-10 Need met
Residual need 2021/22 to 2036/37 after turnover and potential pitch development considered (I) = D+H	-13 (Need Met)	-17 Need met
Summary	Cultural need	Of which: PPTS NEED
Plan period Authorised Pitch Shortfall (2021/22 to 2036/37) (J = A+E)	20	16
Anticipated minimum turnover on council site (K) = B+F	22	22
Potential intensification/expansion of existing sites (L)=C+G	11	11
Residual need 2021/22 to 2036/37 after turnover (M=J-K-L)	-13 Need met	-17 Need met

Tenure preferences

- 6.28 Respondents planning to move and form new households were asked to consider their preferred tenure of pitches (social rented or private). Responses tended to relate to their current place of work, with social renters preferring council sites and those on private sites seeking private site options.

Transit requirements

- 6.29 There are a number of ways to delivery temporary places where Travellers can stop whilst passing through a local authority area. These include transit pitches, stop over places and negotiated stopping arrangements¹⁶.
- 6.30 Transit sites are permanent sites intended for temporary use by Gypsies and Travellers. The length of stay is usually limited to a maximum of three months. In terms of pitches, 'Designing Gypsy and Traveller Sites: Good Practice Guide' (CLG, 2008) states:
- Size of pitch – sufficient to accommodate two touring caravans, two parking spaces and private amenities;
 - Amenities should include electricity supply, toilet, wash basin and shower with hot and cold water supply for each pitch;
 - Depending on the level of use, portable facilities may be more appropriate, particularly if the sites are empty for lengthy periods of time and therefore at risk of vandalism.
- 6.31 A temporary stop over area is land which can be used on a temporary basis if unauthorised encampments occur or likely to occur. They can be fields, areas of hardstanding or a mixture of both. Temporary facilities can be provided when the temporary stop over is in use, for instance portable toilets and rubbish collection.
- 6.32 Negotiated stopping involves councils making an agreement with Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary but usually include the provision of portaloos, waste disposal, water; the length of the agreement can vary but tends to be around 28 days; and users agree to comply with rules for behaviour and use of the site.
- 6.33 Data on unauthorised encampment activity helps to establish the extent to which transit provision is needed.
- 6.34 The Gypsy and Traveller Liaison Office at Warwickshire Police provided a useful overview of unauthorised encampment activity across the borough which is now set out.

¹⁶ See <https://www.negotiatedstopping.co.uk> for more information

“Nuneaton and Bedworth have experienced a significant number of unauthorised encampments over the last few years, in the main these have been on the highway or on NBBC owned land. A small number have been on private land. Numbers of encampments and their general size has reduced over the last year and this is partly due to several families roadside acquiring land to settle. Last year saw the lowest number of encampments in Nuneaton and Bedworth at 12 compared to 24 in 2019 and 33 in 2018.

One of the main challenges is identifying land where negotiated stopping or transit provision can be offered for short stays and facilities provided. Another challenge is the political element that tries to influence the way that unauthorised encampments are dealt with contrary to the protocol.

Where disruptive groups trespassing on a highway there are currently limited powers available to expedite evictions. However consultation with government is in process and anticipated that further powers to deal with this will be brought into play in the near future. This will most likely provide additional powers under the criminal justice and public order act.”

- 6.35 A majority of household respondents (56.3%, base=32) said there was a need to provide places where people can stop whilst travelling.
- 56.2% (base=32) said transit pitches are needed, with 7 respondents saying up to 10 are needed and 3 more than ten, with council ownership favoured.
 - 43.8% (base=32) said stop over places are needed, with 6 respondents saying up to 10 are needed and 1 saying more than ten, with council ownership favoured.

- 6.36 Regarding transit site provision, the Gypsy and Traveller Liaison Office at Warwickshire police commented:

“Like within the rest of the county, there is a need to provide transit provision for families who desire to travel to or through the borough and have nowhere else to set down for a short period effectively disadvantaging these recognised ethnic minority groups. It is recognised nationally and by government that Gypsies and Travellers have a right to a nomadic lifestyle, yet it becomes impossible for them to travel and set down with minimal provisions provided, meaning that families who wish to visit relatives or attend family or traditional events are forced to trespass. Transit provision would allow families to book on to established transit sites.

Transit provision also enables the ability for the police to instigate police powers under Sec 623A CJPO Act and enables the direction to groups who are occupying unsuitable land and having an evidenced negative impact on the local community to either accommodate the transit facility or vacate the county. This power is more effective than Sec 61 CJPO act that merely gives the police the power to move a group from a particular piece of land should it be proportionate.

Ideally a transit site with up to 15 pitches would suffice and should be located in an area that affords easy access to local facilities. The design and layout of such a site is something that needs to be considered carefully in the planning and consideration needs to be given to how the site will effectively be managed. With the relatively small number of transit sites nationally there are only a few that are effectively managed.”

- 6.37 Regarding stop over provision and negotiated stopping, the Gypsy and Traveller Liaison Office at Warwickshire police commented:

“Temporary stopping places or negotiated stopping are a priority across the county including in Nuneaton and Bedworth, they are something that is relatively cheap and simple to establish. The land should ideally be hard standing although this could include grassed areas during the summer period. Basic provisions would need to be supplied in fresh water, toilets and refuse disposal units.

Negotiated stopping places have been successful across other parts of the country and when choosing the right families and locating appropriately there are many benefits. Nuneaton and Bedworth have had unauthorised encampments with families that would have been suitable for this type of temporary accommodation.

The benefits including removing unauthorised encampment, meeting the needs of the families wishing to reside in the area temporarily and this includes effectively engagement from service providers to the families. It also provides an environment to help build community cohesion.”

- 6.38 Regarding barriers to delivering transit/stop over provision, the Gypsy and Traveller Liaison Office at Warwickshire police commented:

“The barriers to this provision is effectively political and based on negative perceptions of the Travelling community. This is understandable based on the continuous negative press that is afforded to a minority within this minority community.

Applications to transit provision are often objected to and it is difficult identifying suitable land to be put forward for this purpose. Land that is often identified is clearly not suitable.

A lack of understanding on the how to create and effectively manage a transit site is also a barrier but there are excellent examples of transit provision across the county that can be learnt from. I believe that within Warwickshire there is the skill and expertise to make negotiated stopping work.”

Nuneaton and Bedworth: Showperson plot requirements

- 6.39 There is currently one Travelling Showperson’s yard occupied by one family. The household living on the Travelling Showperson’s yard is actively engaged in Showperson related work and therefore all meet the PPTS definition.

- 6.40 The yard has 4 plots and only one is currently occupied. There is sufficient capacity on the yard over the plan period to 2036/37 for 3 additional households. Having spoken to the residents on the yard, the only emerging need will be from within the household and they could be accommodated on the yard. There is therefore no additional Showperson need in the borough.

Nuneaton and Bedworth: Bargee Travellers

- 6.41 The definition of Gypsy and Travellers includes Bargee travellers and therefore Councils have a duty to consider their needs. arc⁴ was made aware of at least one Bargee Traveller family living within Nuneaton and Bedworth in 2016. An interview ascertained that the household was licenced by the Canal and Rivers Trust as a ‘continuous cruiser’ and the following key points were made:
- Affordable permanent moorings are required by households choosing to live on waterways (priced at around £150 each month);
 - Having permanent mooring allows the potential for households to have a postal address (which is needed to access the electoral registration system, health service and the potential to improve credit worthiness); and
 - Improved service points including water, toilets, dustbins, shower facilities are required.
 - It was suggested that the residential use of canals should be acknowledged in the Local Plan and that there is a need for at least one affordable permanent mooring in the Borough¹⁷. It is therefore recommended that the Council:
 - liaise with the Canals and Rivers Trust and local marina owners to establish the practical steps and policy tools required to meet the needs of Bargee Travellers in the area;
 - explore the potential of establishing at least one affordable permanent mooring within Nuneaton and Bedworth;
 - relevant agencies and the Council should consider whether further facilities along canals should be encouraged to provide services to households using riverboats/barges as their living accommodation;
 - liaise with CRT to better understand the implications and enforcement of their policies, and where the Council and the CRT may be able to work together; and

¹⁷ Existing moorings can be viewed at <https://canalrivertrust.org.uk/directory> but these are primarily aimed at leisure use rather than for long-term residential use

7. Conclusion and response

- 7.1 This concluding chapter provides a brief summary of key findings and recommendations.

Current accommodation

- 7.2 There are well-established Gypsy and Traveller communities living in Nuneaton and Bedworth. Culturally appropriate provision includes one county council site (with 25 pitches) and 12 private authorised sites (with 41 pitches). There is one Travelling Showperson yard (4 plots).

Future residential need

- 7.3 The Local Plan should recognise an overall cultural need for 20 pitches of which 16 is from households who meet the PPTS household definition over the period to 2036/37. However, anticipated turnover on The Griff and the potential expansion and intensification of existing private sites is expected to meet the identified need.
- 7.4 The level of turnover on The Griff should be monitored through site management data. The Council should also carry out technical appraisals of the expansion/intensification of existing sites to confirm that additional pitches can be delivered.
- 7.5 The analysis would indicate there is no overall strategic need for additional sites. It is however recommended that the Local Plan sets out criteria-based policies to inform future planning applications for small private sites.
- 7.6 Although there is no additional need for Travelling Showperson plots, it is recommended that the existing yard is safeguarded for Travelling Showperson use.

Transit site/stop over need

- 7.7 There is currently no provision to address transit need but given unauthorised encampment activity, the Council will need to consider appropriate responses. These include transit pitches, stopover places and negotiated stopping arrangements. The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. The need to identify land for negotiated stopping¹⁸ is a priority.

¹⁸ See <https://www.negotiatedstopping.co.uk> for further details

Future updating

- 7.8 It is recommended that this evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth.

Appendix A: Gypsy and Traveller Fieldwork Questionnaire

	Date and Time			
	Site Reference			
	Address			
	General Data Protection Regulation (2018) and Data Protection	GDPR came into effect from 25th May 2018. This provides new rights for EU citizens to control personal data held about them by organisations		
		This study is being done for Nuneaton and Bedworth Borough Council to identify if there is a need for more residential pitches and transit provision in the area. A report will be prepared based on the findings of these surveys. The information you provide will not be used for any other purpose.		
		The information you provide will not be used to identify you personally, will be kept strictly confidential		
		Can you please say if you are happy to carry on with the questionnaire on this basis?	Yes	No
1	Pitch/Property Type (and tenure if B&M)			
2	No. Statics/mobiles/chalets or bricks and mortar			
3	No. tourers/caravans			
4	Description of pitch occupancy			
5	No. households			
6	No. concealed households			
7	No. doubled up hhs			
8	Anyone else use this pitch as their home? If so, who			
9	Household characteristics			
		Gender	Age	Relationship to respondent
	Respondent			
	Person 2			
	Person 3			
	Person 4			
	Person 5			
	Person 6			
	Person 7			
	Person 8			
10	Ethnicity			
11	How many bedspaces are there on your pitch?			
12	Overcrowding of home	Y / N		
13	Overcrowding of pitch	Y / N		
14	Thinking back to when you were 15, were you living on a site, on the roadside or living in bricks and mortar housing	S, R, B&M		
15	Where were you living? Record district/settlement name			

Travelling questions					
	In 2015, the Government changed its definition of Gypsies and Travellers for planning purposes. To be recognised as a Gypsy Traveller you or someone in your household has to travel. I'm now going to ask a few questions about whether you or someone in your household travels				
16	In the last year have you or someone in your household travelled	Y / N			
17	Previous to the last year, did you or someone in your household travel?	Y / N			
18	Reason(s) for travelling				
19	Please describe when and where do you travel? (if relevant)				
20	Do you or a member of your household plan to travel next year?	Y / N			
21	Do you think you or a member of your household will travel in the next two to five years?	Y / N			
22	What reasons do you or your household have for not travelling now or in the future?				
Where you plan to live in the future					
23	Are you planning to move to another place to live in the next 5 years?	Y / N			
24	Why are you planning to move ?				
25	Where are you planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where), Bricks and Mortar housing)				
26	What type of dwelling (caravan, trailer, chalet, house, flat, bungalow)				
If in B&M housing					
27	If you live in bricks and mortar housing, are you happy to live here or would you prefer to live on a pitch?	Happy Here / Prefer pitch			
28	If you would prefer to live on a pitch is this because you have a 'cultural aversion' to living in bricks and mortar (this means it affects your mental health and makes you unhappy/ depressed)	Y / N			
Emerging households					
29	Emerging households: Are there any people in your household who want to move to their own pitch in the next 5 yrs?	Y / N			
		HH1	HH2	HH3	HH4
30	Where are you planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where), Bricks and Mortar housing)				
31	What type of dwelling (caravan, trailer, chalet, house, flat, bungalow)				
32	Have they travelled / plan to travel	Y/N	Y/N	Y/N	Y/N
33	If living in bricks and mortar do you have a 'cultural aversion' to living in bricks and mortar? (this means it affects your mental health and makes you unhappy/ depressed)	Y/N	Y/N	Y/N	Y/N
Additional residential pitches					
34	Scope to expand site (extend the boundary of the site)	Y / N			
35	No. additional pitches				
36	Scope to intensify pitches (put more pitches on the existing site)	Y / N			
37	No. additional pitches				
38	Are there any vacant pitches on the site which could be used by another family? If so how many pitches				
39	In general, is there a need for more authorised pitches (for people to live on all the time?) in this district?	Y / N			
40	If so, how many are needed?				
41	Who should own them (Council, people from the Traveller Community, non-Travellers)				
42	Do you own any land or know of anywhere within the district which could be considered for development as a site?				

Transit and temporary stopover need			
43	Is there a need to provide places where people can stop whilst travelling through the district? This can include transit pitches or stopover places	Y / N	
44	Is there a need for transit pitches (for people stopping over temporarily) in the district? A transit pitch is intended for short-term use and usually includes space for two caravans, parking space and access to electricity, a toilet, washing facilities	Y / N	
45	If so, how many are needed?		
46	Who should manage them (Council, Traveller Community)		
47	Where should they be located?		
48	Is there a need for stopover places? A stopover place is land which can be used on a temporary basis and usually include access to porta-loos, waste disposal and water	Y / N	
49	If so, how many are needed?		
50	Who should manage them (Council, Traveller Community)		
51	Where should they be located?		
Residential history			
52	How many years have you lived here?		
Routing	If more than five years	Go to Q58	
	If five years or less	Go to Q53	
53	Where did you move from? (District)		
54	Were you living on a Private Site, Council Site, Roadside or Bricks and Mortar housing?		
55	When you moved here, was the pitch vacant, a brand new pitch or had the pitch been created by dividing up an existing pitch?		
56	What were the reasons for moving here?		
57	Did you already have a connection with the area (e.g. family or friends living here; or you used to live here?)		
Support needs			
58	Is there a need for your home to be adapted in any way?	Go through list of adaptations	
59	Are you or someone in your household in need of any support because of health reasons?	Go through list of support	
60	IF RELEVANT: Do you need any support with the education of your child(ren)	Go through list of support	
61	IF RELEVANT: Do you require any support with job-related training	Go through list of support	
Final questions			
62	Is there anything else you'd like to tell us about your housing or support needs?		
63	Do you know anyone in bricks and mortar housing looking to live on a pitch? If so, can you provide contact details		

Note: A similar questionnaire was prepared for Travelling Showpeople, replacing 'pitch' with 'plot' and 'site' with 'yard'

Appendix B: Glossary of terms

Caravans: Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.

CJ&POA: Criminal Justice and Public Order Act 1994; includes powers for local authorities and police to act against unauthorised encampments.

CRE: Commission for Racial Equality.

DCLG: Department for Communities and Local Government; created in May 2006. Responsible for the remit on Gypsies and Travellers, which was previously held by the Office of the Deputy Prime Minister (O.D.P.M.).

Gypsies and Travellers: Defined by DCLG *Planning policy for traveller sites* (August 2015) as “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”. The planning policy goes on to state that, “In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances”.

Irish Traveller: Member of one of the main groups of Gypsies and Travellers in England. Irish Travellers have a distinct indigenous origin in Ireland and have been in England since the mid nineteenth century. They have been recognised as an ethnic group since August 2000 in England and Wales (*O’Leary v Allied Domecq*).

Mobile home: Legally a ‘caravan’ but not usually capable of being moved by towing.

Pitch: Area of land on a Gypsy/Traveller site occupied by one resident family; sometimes referred to as a plot, especially when referring to Travelling Showpeople. DCLG *Planning policy for traveller sites* (August 2015) states that “For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment”.

Plot: see pitch

PPTS: Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions)

Roadside: Term used here to indicate families on unauthorised encampments, whether literally on the roadside or on other locations such as fields, car parks or other open spaces.

Romany: Member of one of the main groups of Gypsies and Travellers in England. Romany Gypsies trace their ethnic origin back to migrations, probably from India, taking place at intervals since before 1500. Gypsies have been a recognised ethnic group for the purposes of British race relations legislation since 1988 (*CRE V Dutton*).

Sheds: On most residential Gypsy/Traveller sites 'shed' refers to a small basic building with plumbing amenities (bath/shower, WC, sink), which are provided at the rate of one per pitch/plot. Some contain a cooker and basic kitchen facilities.

Showpeople: Defined by DCLG *Planning policy for traveller sites* (August 2015) as “Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”.

Site: An area of land laid out and used for Gypsy/Traveller caravans; often though not always comprising slabs and amenity blocks or ‘sheds’. An authorised site will have planning permission. An unauthorised development lacks planning permission.

Slab: An area of concrete or tarmac on sites allocated to a household for the parking of trailers (caravans)

Stopping places/stopover sites: A term used to denote an unauthorised temporary camping area tolerated by local authorities, used by Gypsies and Travellers for short-term encampments, and sometimes with the provision of temporary toilet facilities, water supplies and refuse collection services.

Tolerated site: An unauthorised encampment/site where a local authority has decided not to take enforcement action to seek its removal.

Trailers: Term used for mobile living vehicles used by Gypsies and Travellers; also referred to as caravans.

Transit site: A site intended for short-term use while in transit. The site is usually permanent and authorised, but there is a limit on the length of time residents can stay.

Unauthorised development: Establishment of Gypsy and Traveller sites without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve ground works for roadways and hard standings. People parking caravans on their own land without planning permission are not Unauthorised Encampments in that they cannot trespass on their own land – they are therefore Unauthorised Developments and enforcement is always dealt with by local planning authorities enforcing planning legislation.

Unauthorised encampment: Land where Gypsies or Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks, fields, etc.) and constitute trespass. The 1994 Criminal Justice and Public Order Act made it a criminal offence to camp on land without the owner’s consent. Unauthorised encampments fall into two main categories: those on land owned by local authorities and those on privately owned land. It is up to the land owner to take enforcement action in conjunction with the police.

Wagons: This is the preferred term for the vehicles used for accommodation by Showpeople.

Yards: Showpeople travel in connection with their work and therefore live, almost universally, in wagons. During the winter months these are parked up in what was traditionally known as ‘winter quarters’. These ‘yards’ are now often occupied all year around by some family members.