

NBBC welcome speech.

Welcome and introductions

My name is Councillor Rob Roze I am Portfolio Holder for Planning and Enforcement for Nuneaton and Bedworth Borough Council. I would like to welcome the Inspectors, Mr Mike Worden and Ms Beverly Wilders, as well as all those attending these hearing sessions. The Council would like to thank at the outset all of those who have participated in the process by submitting their views on our Local Plan.

I would also like to take this opportunity to thank Helen Wilson, the Programme Officer, for her assistance and management of the examination process so far.

Sarah Matile and Jacqui Padbury will be the lead officers for the Council for these hearing sessions, along with Jade Bagley and Neil Glover. If you would direct your questions to the lead officers in the first instance and they may call for assistance colleagues and specialist consultants as and when you [the Inspectors] invite the Council to respond or to assist in your exploration of the Matters, Issues and Questions through these hearings.

Local Plan process

To introduce the Local Plan Review or what is known locally as the Borough Plan Review, I would like to provide some form of context. The Review before you is a Review of the Local Plan adopted in 2019. The current Plan was adopted in June 2019 and Members requested an immediate Review. The Review was broken down into a 'call for sites' and 'Issues and Options which was consulted on between June and August 2021 with almost a hundred responses. The 'Preferred Options' was consulted on between June and July 2022 with over a hundred responses and The 'Publication' was consulted on between September and October 2023 with approximately 70 responses.

The Plan Review was submitted to the Secretary of State on the 12th February 2024 and the examination hearings are scheduled for this week for block 1, block 2 is proposed to be in September and the final block to be held in October 2024 early

Reserve days have been added at the end of each block but will only be used if necessary and at the Inspectors' discretion.

The Borough Plan Review has looked at the 'Local Context' and the 'Key Issues' facing the Borough in order to inform its vision, objectives and Policies. The issues considered have looked at the local economy and looking at strengthening this; together with the regeneration of the Town Centres; looking at the local community issues including providing the right homes at the right time in the right place and the great need for affordable homes; below average (compared to the rest of Warwickshire) life expectancy and poor health issues. Finally looking at the issues facing the local environment such as improving open space and leisure facilities, looking at protecting the historic environment, overcoming the legacy of coal mining and looking at climate change mitigation and carbon neutrality.

Developmental needs have been considered along with providing school places, increasing health care, sustainable transport facilities and road infrastructure to ultimately provide sustainable communities and development and in the Borough. This approach is consistent with the NPPF paragraph 9.

The Review has identified the local context of the Borough in chapter 2, and key issues facing the Borough in chapter 3. These are used to set out an ambitious vision and strategic objectives in chapter 4. Chapter 6 provides a development strategy and relevant Policies, which is focused on delivering growth in a sustainable manner. This is then followed by Policies on the strategic and non-strategic allocations in chapter 7 and then addressing housing in chapter 8. Chapter 9 looks at employment and Town, district and local centres in chapter 10. Providing a healthy, safe and inclusive communities is provided in chapter 11. The local Policies looking at the natural environment is provided in chapter 12 and the built environment in chapter 13.

The Policies seek to manage development and protect the environment to ensure that the Borough Plan's vision can be delivered and seeks to adhere to national requirements including the NPPF and takes national legislation into local

requirements. For the purposes of this Review, the September 2023 NPPF is being used as reference.

The Borough Plan Review is a delivery document for the Council's Corporate Plan – [‘Building a Better Borough’](#). The policies within the Borough Plan Review support the Council's vision of the Borough being the place of choice to live, work and visit. In order to look at sustainable development the Review takes the urban dispersal methodology.

The Borough Plan Review is based on a comprehensive and robust evidence base. A number of detailed and technical assessments have been prepared to inform and justify the policies and proposals within this plan. All of the evidence base can be viewed on the Borough Council's website. A Sustainability Appraisal has been undertaken at each stage of the Borough Plan Review. This is to 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. Similarly, a Habitats Regulations Assessment has been undertaken at each stage. In addition, the Review is underpinned by an Infrastructure Delivery Plan to provide information about the infrastructure that needs to be delivered to support the policies and growth targets set in the Borough Plan Review. It outlines the sources of funding for projects and those who will be responsible for the delivery of the infrastructure.

Together, this will guide, change and support growth over a 15-year period from 2021 to 2038.

Duty to Cooperate

In relation to the Duty to Co-operate, this has been carried out throughout the preparation of the Borough Plan Review, the Council has positively engaged with organisations, statutory consultees and other relevant local authorities, under the duty to cooperate. Collaboration between the Council and other local authorities and infrastructure providers has been documented in the Duty to Cooperate Documents which can be found at [CD4] and through Statements of Common Ground which can

be found at [CD5 through to CD6.18}, demonstrating effective and on-going joint working and indicating cross boundary matters are being addressed and progressed.

The Local Plan has been shaped by actively listening to and engaging with local people, businesses, community groups and external stakeholders, including Duty to Co-operate bodies and statutory consultees throughout the process. The discussions have informed the approach to key issues and development of policies at each stage of the process.

The Council is confident that the Plan is 'sound'. The first requirement for this is that it is and 'Positively prepared', meaning that the Plan is prepared based on a strategy which seeks to meet objectively assessed needs; and is informed by agreement with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so.

The Council recognises that other Local Authorities in the area are only just reviewing their requirements for their next Local Plans and therefore the unmet need is undefined. The Council have therefore tried to foresee potential unmet needs of others. This is mentioned throughout the Councils response to the Matters, Issues and Questions, but particular reference is made to the response to Question 24.

The Plan provides a headroom of 2,450 dwellings to contribute to potential unmet needs of other Authorities. This recognises that meeting unmet needs will support additional population and workforce growth in the Borough. This principle has been accepted in Examinations in other Local Authorities in this Housing Market Areas (such as North Warwickshire and others such as Melton. This uplift could contribute to meeting unmet needs from the sub-region if this was to arise. This has been provided for in Policy DS2 – Overall Development in setting a provision.

In relation to economic needs, the sub-regional HEDNA outlines a need for 606ha (subsequently reviewed by Iceni to 436ha, which with the inclusion of a 5-year margin equates to a need of 551ha) of strategic B8 land to meet the needs to 2041. Notwithstanding the recommendations of the sub regional HEDNA regarding location

of strategic B8 sites, an indicative contribution of 19.4ha has been identified and met in the employment within the land supply of the Review within Policy DS3 and DS5.

The Council through Icenl consultancy has produced an explanatory note regarding the Council's contribution towards strategic B8 need. The Borough's contribution to the overall strategic need is based on analysis of the breakdown of the completions considered in forecasting the overall needs and what proportion would be strategic B8 development and thus contributing towards the overall sub-regional need.

The West Midlands Authorities, (of which Nuneaton and Bedworth Council is a non-constitutional member), have commissioned a study into strategic employment sites in the area. However, this study has not yet been published. Therefore, the Council has taken the pragmatic approach of recommending a Main Modification [page 16 of CD21] to the Inspectors for Strategic Policy DS8 – Review, which inserts a reference to the strategic employment land need being reviewed, if necessary, following publication by the Council of a West Midlands Strategic Employment Land Needs Study. Currently, the sub region has proposed to produce a paper to align the findings regarding strategic employment sites, between the Coventry and Warwickshire sub regional HEDNA and the West Midlands Strategic Employment Sites Study (WMSESS).

Additionally, the Council have recommended a further Modification to the Inspectors to include within the vision to show that the Plan will address identified unmet needs.

The second requirement for soundness is that the Review has to be 'justified', by taking an appropriate strategy and taking into account the reasonable alternatives, based on proportionate evidence. The Council's answers to the Matters, Issues and Questions number 30 refers to the development strategy.

The development strategy has been informed by technical evidence including the 'Sustainability Appraisal Report' (2023) [CD7.2] as well as other documents including the Borough wide and sub-regional Housing and Economic Development Needs Assessments [EB6 and EB7 respectively]; Towards a Housing Requirement for

Nuneaton' [EB8]; the 'Viability Appraisal' [CD10] and 'Infrastructure Delivery Plan' [CD9.1].

The Issues and Options consultation document set out the starting point in developing the strategy to identify the issues that needed to be considered in reviewing the policies in the adopted Borough Plan 2019; and the options that were available to address these. The Council consulted on options relating to employment, Green Belt, housing, net zero carbon emissions, town centre and transport as well as other matters such as infrastructure.

The Issues and Options document was supported by an Interim Sustainability Appraisal Report. The SA assessed the vision and objectives and the policy options. This showed that some options performed better than others in terms of their sustainability. Locating new residential development within existing settlement boundaries was the most sustainable option and in relation to the location of future employment areas all options came out generally as negative. The findings of the Sustainability Appraisal informed the preparation of the Preferred Options document.

In accordance with the Framework, policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It goes on to state strategic policies should set a clear strategy for accommodating objectively assessed housing needs in a way that makes as much use as possible of previously developed land. This is the approach taken forwards in the Review.

The preferred development strategy reviewed the adopted Plans Strategic and non-Strategic sites and the likely delivery of these sites. This necessitated the removal of previous strategic sites Policy HSG4 being 'the Woodlands' (part of which is currently being considered under the Appeal process) and Policy HSG7 'east of Bulkington' which has now actually received outline approval with Reserved Matters pending. Therefore, this site has now been included in the committed housing figures. These sites have been replaced in the Borough Plan Review by non-strategic sites some of which will help to deliver the regeneration of the Towns and provide sustainable sites in the urban centre.

The Council therefore considers the development strategy is soundly based; 'positively prepared' and 'justified'. The development strategy accords with national policy, in particular in taking a brownfield first approach. Notwithstanding this, the Plan positively seeks opportunities to meet the development needs in the Borough unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the Framework and which is consistent with paragraph 11 of the NPPF. Therefore, overall, the development strategy accords with the Framework.

The third requirement for soundness is that the Review must be 'Effective', meaning that the Plan is deliverable over its period (in this case 15 years), and is based on effective joint working on cross-boundary strategic matters, this approach has already been discussed.

The final requirement for soundness is that the 'Review must be consistent with national policy', meaning that the Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy. As states, the brownfield first approach is consistent with national policy. Policies have been assessed against the Planning Advisory Service Local Plan toolkit and the Council's response to the Matters, Issues and Questions have again reviewed the Policies and some further Modifications have been recommended to the Planning Inspectors and which can be found in Examination Document [NBBC/6] which is an addendum to the original recommended Modifications which can be found at the Core Documents [CD21 and CD22]

Summary and conclusion

To conclude, the Council considers that the Borough Plan Review provides a sound and positive strategy for achieving sustainable development and meeting the Borough's identified needs and unmet needs of others up until 2039. We therefore welcome this public examination process.