

# NBBC Borough Plan Examination

## Matter 1 Hearing Statement on behalf of Richborough

**Issue 2 - Does the Sustainability Appraisal (SA) adequately assess the environmental, social and economic effects of the Plan in accordance with the legal and national policy requirements?**

***5. Has the SA properly assessed the likely significant effects of all reasonable alternatives?***

- 1.1 Nuneaton and Bedworth Borough Council (NBBC) identified seven alternative strategies for the delivery of housing and tested these through the Sustainability Appraisal (SA).
- 1.2 These included housing requirements ranging from 646 dpa to 712 dpa and spatial strategies which included an urban focus, rolling forward the existing approach, as well as the addition of new Strategic Sites.
- 1.3 Paragraph 7.3.1 of the SA acknowledges that continuing the existing strategy in the Adopted Borough Plan would in most respects have neutral effects because there would be little change, although *“it could be negative in terms of housing as several of the strategic sites have not come forward readily”*.
- 1.4 Two of the alternatives (Options 3b and 5b) proposed directing further growth to strategic locations north of Nuneaton. Whilst these two options perform relatively well in the overall assessment provided in Table 7.1, it was noted that minor negative effects are recorded in respect of ‘Economic Factors’ and ‘Air Quality’ topics. For both topics it was judged that whilst large scale growth proposed to the north of Nuneaton is relatively close to the main centre within Nuneaton and enjoys relatively good access via the A5 and A444 to the rest of the Borough, it is fairly distant from the main strategic employment locations in the south of the Borough and therefore not optimal in terms of addressing some of the accessibility issues currently experienced with respect to employment sites.
- 1.5 This ignores the fact that the northern part of Nuneaton is in close proximity to major employment sites in Hinckley and Bosworth, including MIRA Technology Park, Dodwells Industrial Estate and the approved employment development at Padge Hall Farm (181,800 sqm of B2, B8 uses). MIRA Technology Park is over 58 hectares in size and is home to over 35 companies and is recognised as a centre of excellence in transport R&D. It is also identified as one of the eleven largest employers<sup>1</sup>.
- 1.6 Paragraph 6.8 of the Publication Version supports Policy DS2 in respect of Settlement hierarchy and roles and states (emphasis added):

*“In considering the roles of the settlements, 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. To the south of the Borough there is the city of Coventry and to the north of the Borough the A5 corridor and its surrounding settlements.”*

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<sup>1</sup> Warwickshire Skills and Employment Factsheet for Nuneaton & Bedworth Borough (2023)

- 1.7 Paragraph 2.5 of the Publication Version notes that *“the town centre of Nuneaton also provides a significant number of jobs”*, all of which would be in easy reach of development to the north of Nuneaton.
- 1.8 There would be no negative effects from future residents travelling to work in these areas. It is therefore clear that the SA has undertaken the assessment on the basis that NBBC is an isolated ‘island’ authority rather than considering that the Borough forms part of a wider economy and that arbitrary council boundaries don’t inform decisions on where people live and work.
- 1.9 On this basis, Option 3b and 5b have been wrongly assessed and should have been scored neutral for Air Quality and moderate positive for Economic Factors. This changes the balance of the overall assessment and may have impacted on strategic decision making.

***7. Is it clear how the SA has influenced the Plan and the choice of spatial strategy? Does it support the spatial strategy or is there anything in the SA which indicates that changes should be made to the Plan?***

- 1.10 The selected strategic option is Urban Dispersal (Option 1), whilst Option 5 comprises a hybrid option which includes dispersal, but with a strategic focus. Option 5a includes a strategic site to the west of Nuneaton and Option 5b to the north of Nuneaton, as distinct variations. Table 1 of the SA specifically acknowledges that these two options would provide flexibility in delivery of housing.
- 1.11 At Appendix A, the SA considers all seven of the alternatives against the ten SA Topics in more detail. The positive effects of Options 5a and 5b (combined), particularly across SA Topics 1 (Economic Factors), 2 (Social Factors), and 4 (Population and Human Health) are identified and include the following:
- Uplift in housing delivery would be beneficial for the Borough;
  - Additional growth is likely to generate more housing options in the market including more affordable housing which will help attract workforce to the area
  - Higher level of growth likely to increase housing choice including the delivery of affordable housing;
  - New Infrastructure;
  - Improve place-making which could potentially help to deter crime
  - Increased community benefits such as green space, improved sustainable transport options, recreational facilities, as well as shops and services.
  - Enhanced healthcare provision.
- 1.12 It is clear therefore that Option 5 is likely to address several of the economic and social issues which have been identified with the selected option and by representations made by Richborough, including those within our Matter 2 Statement. The assessments at Appendix A of the SA are clear that Option 5 addresses several of the negative impacts identified with both Option 1 and Option 3.
- 1.13 As noted in our response to question 32, there is limited evidence to demonstrate why alternative options have been discounted.

- 1.14 Further consideration should be given to the spatial strategy and specifically the identification of viable and deliverable strategic sites and benefits they can bring to the Borough.
- 1.15 Paragraph 32 of the NPPF is clear that Local plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements, and this should demonstrate how the plan has addressed relevant economic, social and environmental objectives. The current approach is not sound as it not justified, effective, positively prepared or consistent with national policy.

#### **Issue 4 - Has the Plan been prepared in accordance with other legal and procedural requirements?**

##### ***14. The Plan period is 2021-2039. Is this sufficient and in accordance with national policy?***

- 1.16 Paragraph 22 of the NPPF makes specific reference to timeframes for development plans and states:
- “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.”*
- 1.17 According to the latest LDS produced by NBBC in December 2023 (CD17), adoption of the Plan is likely to occur in December 2024 (subject to no Main Modifications consultation), which is well into the monitoring year, 2024/2025.
- 1.18 This scenario wouldn't allow for a full fifteen year plan period at the point of adoption and the timetable is considered severely optimistic in any case. It is noted that Table 1 of the LDS highlights that adoption by December is a *“prediction only - dependent on Planning Inspectorate's work programme”*.
- 1.19 In light of this, Richborough is of the view that the Borough Review will need to plan further ahead than 2039 in order to ensure that the Plan meets the requirements of Paragraph 22. Furthermore, given that Hearings for several of the key strategic matters have been deferred to later in 2024, it is considered likely that adoption will now not take place until after 31 March 2025, which will be into the following monitoring year, 2025-2026. In that scenario, the trajectory and plan period for the Borough Plan Review will then need to be extended to 2041 to ensure it looks ahead a full 15 year period from adoption (2025/26 - 2040/41).
- 1.20 To ensure the Plan is positively prepared a modification to the plan period will need to be reflected in the supporting evidence base in respect of employment and residential land requirements. Richborough is of the view that the strategic policies should be amended to look ahead to 2041 at the earliest, which would mean planning for additional dwellings.

#### **Contact**

Mike O'Brien  
mike@pinnacleplanning.co.uk