

Nuneaton and Bedworth Borough Council

Borough Plan Review (2021 - 2039)



Part B: Soundness

Response to Matter 2

Vision, Strategic Objectives and
Development Strategy

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Issue 1: Have the vision and strategic objectives been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?

Q20. Does the Plan set out an appropriate vision for the Borough based upon the evidence?

Answer

20.1. Core Document [CD1] and Evidence base [EB8] are applicable to this question.

20.2. The BPR [CD1] chapter 4 states the vision is as follows:

By 2039, Nuneaton and Bedworth Borough will be a place of sustainable economic growth with diverse job prospects, offering quality housing to meet all our residents needs and supported by an integrated infrastructure network. People in the Borough will live in healthy, safe and inclusive communities which provide opportunities for people to be active and healthy.

Nuneaton and Bedworth Borough will be a place where businesses want to invest and people want to live, work and visit. The natural and built environment of the Borough will be improved through greater sustainable transport options, more accessible and higher quality open spaces and leisure facilities, increased tree planting and reduced pollution levels, whilst conserving and enhancing the historic environment. The Borough will have addressed the climate change emergency as far as possible through the planning process.

20.3. The NPPF (September 2023) - paragraph 15 requires a:
‘positive vision for the future of each area..... for addressing housing needs and other economic, social and environmental priorities’
and paragraph 82(a) which:

‘set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth’.

It is considered that the vision provides the philosophy of what the Borough Plan is to achieve.

20.4. The vision and objectives have been created being mindful of: ‘Good Plan Making Guide Plan Making Principles for Practitioners’ (Planning Advisory Service - September 2014) (available at: [PAS Good Plan Making Guide \(local.gov.uk\)](https://www.local.gov.uk/sites/default/files/documents/principles-plan-making-local.gov.uk)) and ‘The Planning Advisory Service (Principles of Plan Making April 2013)’ (available at: [https://www.local.gov.uk/sites/default/files/documents/principles-plan-making-](https://www.local.gov.uk/sites/default/files/documents/principles-plan-making-local.gov.uk)

[ch-ff2.pdf](#)) this states (at the start of chapter 1 page 3), that the vision and objectives are required to:

- What is the broad philosophy of the plan? e.g. pro-growth; conservation-led?
- How is the plan going to approach current planning issues such as the duty to co-operate and planning positively for growth?
- Does the vision reflect the broader context of the council and form a reasonable basis for plan objectives?
- What is the scope and content of the plan objectives delivering the vision, and how locally distinctive are they?
- How are the plan objectives justified?
- Have there been early discussions with neighbouring authorities on the strategic context of the plan and fulfilling the demands of the duty to co-operate?

The vision identifies the local need for the: 'form and function of the area' required in both the 2013-chapter 1 page 3 first paragraph and 2014 paragraph 1.2 page 5 guidance.

- 20.5. The vision has considered the evidence base from 'The local context of the Borough' Chapter 2, of the BPR [CD1] paragraphs 2.13 and 2.14 pages 5 and 6 recognises the Borough has high levels of deprivation, crime rates and life expectancy compared to the rest of Warwickshire and indeed the country.
- 20.6. The BPR then takes this 'local context' and in chapter 3 identifies 'the key issues facing the Borough'. Paragraphs 3.1 to 3.5, pages 7-10 have the issues broken down into the following themes: local economy, community and local environment. This is then précised into the vision and which mirrors the 2013 guidance in its bullet points in page 4, which requires that the vision and objectives provide a clear view of what the economic, physical and social aspects that the Plan needs to cover.
- 20.7. In terms of the local economy in chapter 3 of the BPR, paragraph 3.3 pages 7 and 8 identify the lack of knowledge-based employment opportunities (in order to promote well paid jobs); the large amount of out commuting from the area, and areas within the Borough (and the disparity of) in terms of deprivation for which the Borough includes a number of Warwickshires and England's most deprived Wards (available at: [Exploring local income deprivation \(ons.gov.uk\)](#)). This is mentioned in the BPR 'Local context of the Borough' paragraph 2.13 and 2.14 page 5 and within 'Issues associated with the local economy paragraph 3.3 page 7 and is also mentioned in the BPR in the evidence base for Policy H2 paragraph 8.22 page 108 and within Policy E1 – Nature of employment growth of the BPR, paragraph 4 page 121 and supporting text 9.10 page 123.
- 20.8. Paragraph 3.4 page 9 of the BPR looks at the issues associated with the local community including the likely demographic growths, below average life expectancy, links to poor health, poor air quality and high crime. The vision has taken these issues and requires sustainable and diverse economic

growth, quality housing for all needs and health and safe inclusive communities with opportunities to be active and healthy.

- 20.9. The final issues in chapter 3 of the BPR identifies issues with the local environment and built heritage and Council declared climate emergency. See paragraph 20.12 below and paragraph 3.5 page 10 of the BPR.
- 20.10. The vision recognises this by looking for improvements to the natural and built environment such as how open spaces will make the area more attractive for living, working and visiting the Borough. Encouraging sustainable transport will reduce the reliance on the car, which will reduce pressure on the road network and will also encourage more walking and cycling which will improve the health of the Borough and reduce pollution.
- 20.11. The guidance requires that the Council priorities are served in the vision of the BPR. Paragraph 1.7 of the BPR refers to; 'Building for a Better Borough 2022' (available at: [Building a Better Borough | Corporate plan | Nuneaton and Bedworth Borough Council](#)), this adopted Corporate Council Document breaks down the strategies into living, working and visiting the Borough. These elements are similarly taken to form the vision.
- 20.12. The second paragraph of the vision identifies the need for investment in the Borough, this can partly be achieved by agreeing development targets above the needs as suggested in 'Towards a Housing Requirement for Nuneaton and Bedworth' (Iceni 2022) [EB8] and by making the Borough attractive for businesses to invest in the Borough.
- 20.13. The second paragraph of the vision also promotes the requirements of NBBC's declared climate change emergency from the 4th December 2019 which required a cross party climate working group which also looks at making the Council carbon neutral by 2030 (available at: [- 1 - \(nuneatonandbedworth.gov.uk\)](#) page 63).
- 20.14. In terms of duty to cooperate, this has been given its own section in chapter 1 of the BPR. [CD1] paragraph 1.11, page 2.
- 20.15. The NPPF (September 2023) paragraph 22 and PAS 2013 guidance chapter 1 first paragraph page 3 requires the Plan to look forwards for at least 15-20 years (from adoption), which the Plan proposes to do. Refer also to MIQ's answer to Question 14. Both the 2013 'setting the vision and objectives' page 3 and 2014 guidance paragraph 1.1 page 5 states that the vision should be aspirational but realistic based on current trends and aspects of population and economy. It is considered the BPR vision meets with this.
- 20.16. The 2014 guidance paragraph 1.2, requires that 'community involvement should be central to developing the vision. The vision provided in the Issues and Options Document available at: [Borough Plan Review- Issues & Options \(nuneatonandbedworth.gov.uk\)](#) (paragraph 2.1 page 2 and Preferred Options available at: [Borough Plan Review - Preferred Options - FINAL 09.06.2022.pdf \(fs-filestore-eu.s3.eu-west-1.amazonaws.com\)](#) paragraph 4.1

page 11 have been amended over time which is due to the responses from the public to these consultations this is available at: [responses-received-to-the-issues-and-options-consultation-and-officer-responses](#) and [preferred-options-responses-and-officer-comments-2023-\(nuneatonandbedworth.gov.uk\)](#) as well as evolving legislation such as for climate change.

- 20.17. The 2013 guidance page 4 last bullet and 2014 paragraph 1.2 page 5 require that the plan objectives must be compatible with the sustainability objectives in the Sustainability Appraisal (SA) work including the Scoping Report. The SA Scoping report (February 2021) is available at: [Borough Plan Review - Issues and Options | Nuneaton and Bedworth Borough Council](#).
- 20.18. The Scoping Report paragraph 1.4, pages 1 and 2 identifies the Borough has a diverse economy which is mostly the business or manufacturing sector and as having the highest deprivation in Warwickshire. It also refers to the lower-than-average life expectancy and lack of Green Flag Aware green spaces. These together with other issues are identified in the BPR Review [CD1] chapter 3 page 7-10 for the issues facing the Borough and which threads into the vision and objectives. The Scoping Report: table 2 pages 5-8 provides the International/European, National, Subnational and Local Policies plans and programmes that the BPR needs to consider.
- 20.19. In conclusion, it is considered that the vision sets out an appropriate and positive vision for the future of the Borough. The vision is based upon the evidence base that was used to source the local issues including housing needs, whilst proactively encouraging sustainable economic growth, social and environmental priorities and philosophy of what the plan is to achieve based on the corporate objectives and issues facing the Borough.

Q21. Are the vision and strategic objectives justified, have they been positively prepared, and do they accord with the evidence and national policy?

Answer

21.1. Core Document [CD1] is the main document for this Question but [CD21] is also referred to. The Answer also refers to Evidence Base Documents [EB6], [EB7.1], [EB8], [EB10], [EB16.1-EB16.7], [EB17.1-17.37], [EB11] and [EB13].

21.2. The BPR [CD1] states the strategic objectives are as follows:

Strategic objective 1: Economic growth

To use economic growth to regenerate the Borough, including town centres, and raise its profile as a more attractive place to live, work and invest in.

Strategic objective 2: Employment opportunities

To seek employment opportunities that will support the diversification of the Borough's economy and improve job opportunities for residents.

Strategic objective 3: Town Centres

To develop town centres so that they offer a mix of uses that retains their primary function for retail but diversifies this to include residential, commercial and leisure uses in order to improve their vibrancy, vitality and ensure their long-term sustainability.

Strategic objective 4: Housing

To provide a steady and adequate level of suitable housing which meets the needs of existing and new residents.

Strategic objective 5: Infrastructure

To ensure that all new development and investment contributes to a significant improvement in infrastructure and facilities that serve the Borough.

Strategic objective 6: Sustainable, healthy and safe communities

To improve public transport, cycling and walking networks and promote and support healthier choices and environments by increasing open space and leisure access, and reducing crime.

Strategic objective 7: Historic and natural environment

To ensure that new development sustains and enhances the historic and natural environments.

Strategic objective 8: Climate change

To address climate change by driving sustainability in all new development

- 21.3. Similarly to the vision, the objectives come from the issues of the Borough identified within the BPR [CD1] chapter 3, pages 7-10. The objectives are broken into themes comprising of economic growth, employment opportunities, town centres, housing, infrastructure, sustainability, health and safe communities, historic and natural environment, and climate change.
- 21.4. Being positively prepared in the NPPF (September 2023) is referred to in paragraph 16 which states that to be 'prepared positively' the plan should be 'aspirational but deliverable', and paragraph 35 of the NPPF states that:
 'a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs (footnote 19); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;'
 The footnote refers to paragraph 21 as using a 'clear and justified method'. Paragraph 82a of the NPPF requires that a:
 'clear economic vision and strategy which positively and proactively encourages sustainable economic growth'.
 This also mirrors NPPF paragraph 127. In the PAS 2014 guidance (see Answer 20 for the links to the guidance) paragraph 0.3 page 3, refers to being positively prepared as having regard to objectively assessed needs.
- 21.5. It is considered that the objectives are aspirational but deliverable and positively prepared as they meet the areas objectively assessed needs. In terms of meeting other areas unmet needs, there have been no specified requests for unmet need from other Local Authorities at this stage. However, the Council's housing requirement is providing a buffer of flexibility e.g. 2,450 extra homes, please refer to the response to question 27. In terms of employment, the Local need is 47.7ha but the BPR [CD1] is proposing an additional 19.4ha of B8 land in Policy DS3 - Overall development needs, page 18 for strategic requirements. The West Midlands Authorities, including Nuneaton and Bedworth Council have commissioned a study into strategic employment sites in the area. The findings from this study have not yet been published. Therefore, in order not to delay the BPR, the Council have already requested a Main Modification [CD21] for Policy DS8 Review to state:
 'The Council is working with other local authorities in the West Midlands region and the West Midlands Combined Authority to identify the land need for large scale industrial and logistics. Following publication by NBBC of a West Midlands Strategic Employment Land Needs Study, the Council will continue to work with other West Midlands local authorities to meet the identified need.'
 The proposal to meet unmet housing and employment need for neighbouring authorities is referred to in MIQ's in various Questions, refer to Answers to Questions 14 and Answers to Questions 24 and 37. However, to ensure unmet need is included in the objectives, please refer to the suggested Modification referred to in Answer 23.

- 21.6. There are eight 'Strategic objectives' of the BPR [CD1] outlined on pages 11 and 12, these refer to 'economic growth' and raising the Boroughs profile; the diversification of the job and 'economy opportunities'; the need to bolster the 'town centres' including looking at their function which has changed over time; to provide suitable 'housing' and ensure that 'infrastructure' and facilities are invested within and by improving public transport; walking and cycling networks and supporting 'sustainable, healthy and safe communities' such as providing healthier choices and environments by improving open space and leisure and decreasing high crime. Strategic objective 7 refers to the need for the 'historic and natural environment' to be sustained and enhanced and the final objective refers to 'climate change' by driving sustainable development.
- 21.7. Strategic objectives 1, 2 and 3 come from the BPR 'Issues associated with the local economy' pages 7. and 8. Strategic objective 4 comes from the 'Issues associated with the local economy' and 'Issues associated with the local community' pages 8 and 9. Strategic objectives 5 and 6 come from 'Issues associated with the local community' and Strategic objectives 7 and 8 stem from the 'Issues with the local environment' pages 9 and 10.
- 21.8. The Good Plan Making Guide Plan Making Principles for Practitioners' (September 2014) (see Answer 20 for the links to the guidance) paragraph 1.6 page 6 states that:
 'objectives should flow from the critical issues you have identified and support the delivery of the spatial vision.'
 The guidance suggests that the objectives stem from a quantitative and qualitative data including the Council's priorities. The BPR [CD1] has been based on numerous Policies, Plans and Programmes and England Indices of Deprivation (Warwickshire County Council – Warwickshire Insights (available at: [Warwickshire Insights - InstantAtlas Warwickshire](#)).
- 21.9. Over the time the BPR has been progressing, the local evidence base work has been updated including for sub regional and local needs. This includes the 'Nuneaton and Bedworth Housing and Economic Development Needs Assessment' (HEDNA) (2022) [EB6]; 'Coventry and Warwickshire Housing and Economic Development Needs Assessment' (Iceni - 2022) [EB7.1]; and 'Towards a Housing Requirement for Nuneaton and Bedworth' (Iceni 2022) [EB8]. The Council also instigated a local 'Employment Land Review and Portfolio' (Iceni 2023) [EB10] for the Borough and consideration has also been given when drafting the BPR to combined emerging regional employment work. Similarly, a joint sub regional 'Strategic Flood Risk Assessment Level 1' (JBA 2022 and 2023) [EB16.1 to EB16.7] has been carried out which was taken further by a Level 2 (JBA 2023) [EB17.1 to EB17.37] for the Borough. This included climate change modelling. Similarly, the Borough has completed a 'Strategic Transport Assessment' (WCC 2023) [EB13] and 'Retail, Leisure and Office Study update' (Cushman and Wakefield 2022) [EB11]. These relate to all of the Strategic objectives.
- 21.10. The Review also considers regional and local work or projects such as the Sustainable West Midlands (Environment Agency 2021) available at: [WMCA](#)

[Sustainability Benchmarking Report Sep 2018 Final.docx](#) (sustainabilitywestmidlands.org.uk) and Transforming Nuneaton and Bedworth available at: [Transforming Nuneaton | Major projects | Nuneaton and Bedworth Borough Council](#). Updated statistics such as ONS 2022/2023 and DLUC English Indices of Deprivation 2019 (IoD2019) available at: [The English Indices of Deprivation 2019 \(publishing.service.gov.uk\)](#), and new legislation such as: 'A Green Future and Environment Act, (DLUCH 2021 available at: [25 Year Environment Plan - GOV.UK \(www.gov.uk\)](#)), National Design Guide available at: [National design guide - GOV.UK \(www.gov.uk\)](#) and Code (DLUCH 2021 available at: [National Model Design Code - GOV.UK \(www.gov.uk\)](#)) have been included with the iterations of the BPR and its vision and Strategic objectives 3, 4, 6 and 8.

- 21.11. The Council has Corporate Documents such as: Building for a Better Borough (2022) (available at: [Building a Better Borough | Corporate plan | Nuneaton and Bedworth Borough Council](#)) This fits in with all of the Strategic objectives. The Council's Climate Change Emergency Declaration (available at: [\(- 1 - nuneatonandbedworth.gov.uk\)](#) Minute CL46 page 63 and subsequent working group which links with Strategic objective 8 of the BPR.
- 21.12. The Director of Public Health Warwickshire Annual Report (WCC 2023) available at: [Director of Public Health annual reports – Warwickshire County Council](#)) pages 26 to 28 has been published and reiterates that life expectancy in the Borough is poor and is not improving and in fact declining for males, and includes statistics on other health matters comparing NBBC to other areas of Warwickshire. This report provided a Red Amber Green table, at page 32 showing that NBBC are predominantly red or amber in the majority of indicators reviewed. The Report, page 31 refers to a Joint Strategic Needs Assessments for Warwickshire which have been carried out available at: <http://www.warwickshire.gov.uk/joint-strategic-needs-assessments-1/thematic-needs-assessments-previous-annual-updates/1> for various thematic needs assessments including health behaviours, lifestyles, places and communities and working parties have been instigated for a number of issues. This is linked with Strategic objective 6 of the BPR.
- 21.13. The requirements for using the data and work from the Joint Strategic Needs Assessment was mentioned at the Issues and Options stage by Public Health at Warwickshire County Council Response available at [responses-received-to-the-issues-and-options-consultation-and-officer-responses \(nuneatonandbedworth.gov.uk\)](#) reference number 90 and in the Preferred Options by Bedworth and District Horticultural Council available at: <https://www.nuneatonandbedworth.gov.uk/downloads/file/595/preferred-options-responses-and-officer-comments-2023-> reference 202.24.
- 21.14. One group that has been set up from the joint Strategic Needs Assessment work includes a Warwickshire North Place Partnership Delivery Group, which brings together several departments of Local Authorities; Warwickshire County Council; Coventry and Warwickshire Integrated Care Board (ICB);

Warwickshire Community and Voluntary Action Group; George Eliot Hospital and other local groups, which meet regularly to discuss health issues in the wider area. Again, this is linked with Strategic objective 6 of the BPR.

- 21.15. A Levelling Up agenda was approved for the Borough at Cabinet on the 6th December 2023 available at: [Download%20the%20Agenda%2C%20reports%20and%20appendices \(nuneatonandbedworth.gov.uk\)](https://nuneatonandbedworth.gov.uk/Download%20the%20Agenda%2C%20reports%20and%20appendices) agenda item 8 page 90, and has been established for tackling inequalities, building community power, increasing social mobility and creating sustainable futures and prioritising the 17 Lower Super Output Areas (LSOAs) in the area.
- 21.16. The objectives for the Levelling Up agenda are for growth and learning, health and wellbeing, crime and community pride, skills and working. These tie in with the Strategic objectives of the BPR numbers 1, 2 and 6. These objectives also lead into work on NBBC Playing Pitch and Outdoor Sports Strategy (NBBC 2023) available at: [playing-pitch-strategy-and-action-plan-2023-2038- \(nuneatonandbedworth.gov.uk\)](https://nuneatonandbedworth.gov.uk/playing-pitch-strategy-and-action-plan-2023-2038-) and the Allotment Strategy and Open Space Strategy 2012-2022 available at: [Appendix A Allotment Strategy 2017 Revisions \(nuneatonandbedworth.gov.uk\)](https://nuneatonandbedworth.gov.uk/Appendix%20A%20Allotment%20Strategy%202017%20Revisions) and currently being updated the Warwickshire, Coventry and Solihull Sub Regional Green Infrastructure Strategy (Warwickshire Museum and Natural Environment 2013) available at: [a\) \(warwickshire.gov.uk\)](https://warwickshire.gov.uk/a) also consideration has been given to: 'Health and high cost of living in Warwickshire' (WCC 2022) available at: [Health and The High Cost of Living. Warwickshire Director of Public Healths Review 2022 \(warwickshire.gov.uk\)](https://warwickshire.gov.uk/Health%20and%20The%20High%20Cost%20of%20Living%20Warwickshire%20Director%20of%20Public%20Health%20Review%202022)
- 21.17. As previously stated, the vision has changed over the plan making period to include responses from the public. The Strategic objectives have largely remained the same but as health and mortality rates are worsening in the Borough, reference to this has specifically now been mentioned in objective 6. This was identified by consultee responses at the Preferred Options such as George Eliot Hospital Trust response reference 6.1, National Highways response reference 10.1, NHS Coventry and Warwickshire ICB response reference 12.1, Bedworth and District Horticultural Council response reference 202.2 to 202.7, available at: [preferred-options-responses-and-officer-comments-2023- \(nuneatonandbedworth.gov.uk\)](https://nuneatonandbedworth.gov.uk/preferred-options-responses-and-officer-comments-2023-)
- 21.18. In conclusion, it is considered that regard has been given to national Policy, County-wide and local evidence and policy-based documents to ensure the vision and objectives have been justified, positively prepared and in line with evidence and national policy.

Q22. What does 'a steady and adequate level of suitable housing' mean in the context of strategic objective 4?

Answer

- 22.1. Reference is made in this Answer to Cored Document [CD1] and Evidence Base Documents [EB6] and [EB8].
- 22.2. Paragraph 8(a) of the NPPF states that sustainable development relies on:
'ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'.
Whilst paragraph 8(b) states that:
'..that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs'
Paragraph 23 of the NPPF also refers to;
'bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period,'
- 22.3. Strategic objective 4, mirrors the NPPF. The wording 'steady and adequate' means that delivery is over time and of the right tenure and size. The Council has found historically that the Strategic Allocations have naturally come forwards at different times and therefore build out rates have been staggered. It is noted, that given the nature of this plan, being a review, many of the strategic allocations have either commenced or are due to commence shortly. Therefore, the majority of growth will come forward in the short term (0-5 years) and medium term (6-10 years). The housing trajectory is currently being updated to incorporate the latest monitoring data and projections and therefore it may vary from that provided in Appendix B (page 209 of CD1). However, the Council is committed to ensuring a steady and adequate level of housing is provided throughout the plan period.
- 22.4. The 'Building for a Better Borough 2022' (available at: [Building a Better Borough | Corporate plan | Nuneaton and Bedworth Borough Council](#)) which is an adopted Corporate Council Document and which states on page 4, titled 'Enable appropriate housing development':
'We will seek to provide the right homes, with the right services, in the right places, to meet the needs of our residents.'
Therefore, again Strategic objective 4 mirrors the Corporate Policies.
- 22.5. Nuneaton & Bedworth Housing & Economic Development Needs Assessment Final Report [EB6] (Iceni May 2022) in paragraphs 6.3 refers to projections over set timeframes and thus predicting a household growth per year.

‘Towards a Housing Requirement for Nuneaton and Bedworth (2022)’ [EB8] paragraph 6.6 page 37 states that:

‘The Planned Economic Growth Scenario would require the delivery of around 545 dpa over the period modelled (2021-39) to support the Borough’s economy and align planning for homes, jobs and infrastructure.’

The Report concludes by recommending in paragraph 6.8 page 37 that:

‘6.8 The evidence thus provides clear justification that the Council should plan for higher housing provision than the minimum housing need (409-437 dpa), and Iceni recommends provision of a housing target of around 545 dpa as necessary to positively support economic growth, the sustainable regeneration of the Borough’s Town Centres, and the delivery of affordable housing.’

- 22.6. The HEDNA approach has been fed into Policy DS3 – Overall development needs for 545 dpa. whilst Policy H1 – Range and mix of housing and Policy H2 – Affordable housing, provide details of the tenure and mix of housing.
- 22.7. Household growth; population rise and affordable housing needs are not instant and at the start of a plan period but change over time. Infrastructure delivery also needs to take account increases over time as infrastructure such as roads, schools and Doctors would be overwhelmed if housing delivery was all at once. Similarly, employment needs to come forwards on a staggered basis to provide employment opportunities over time. It also means that saturation/competition does not stifle the market and means that sites are not mothballed or put aside for land banking.
- 22.8. It is therefore considered that the Strategic objective for ‘a steady and adequate level of suitable housing’ is consistent with the Framework and Corporate Policies and that ensuring the right tenure and size is an appropriate way to fulfil the needs of the Borough.

Q23. Do the vision and strategic objectives have regard to and provide for the development needs of the area as well as any identified unmet needs in neighbouring areas?

Answer

- 23.1. Reference is made in this Answer to Core Document [CD1] and [CD8] and Evidence Base Documents [EB1], [EB2.1], [EB2.2], [EB2.3], [EB6], [EB7.1], [EB7.2], [EB10] and [EB11], [EB12], [EB14];[EB15], [EB16.1 – EB17.36]; [EB19], [EB20] and [EB21].
- 23.2. The vision sets out that the development needs of the area for sustainable economic growth, quality housing and integrated infrastructure and a health, safe and inclusive communities. The second part of the vision refers for the need for business investments, great sustainable transport and better-quality open space and leisure facilities whilst addressing the need for planning for climate change. These are transferred into Policies DS1 – Sustainable development, DS3 Overall development needs, DS4 – Residential allocations and DS5 Employment allocations. The principles of development for the sites are within the individual strategic and non-strategic policies whilst the need for housing is provided in the Housing Policies H1 to H5. Employment need is provided in the employment Policies E1 and E2 and Town Centre need in Policy TC1 to TC3. The needs in terms of creating a healthy safe and inclusive community are within Policies HS1 to HS7. Climate change is addressed in the Natural environment Policies NE1 to NE5 and BE2 – Sustainable design and construction. Strategic objective 7 is dealt with in Policy BE4 – Valuing and conserving our historic environment.
- 23.3. The Strategic objectives look at the need for the area; 1 and 2 look at the need for economic growth and employment opportunities, whilst the needs of the town centres are provided in objective 3. With housing, infrastructure and sustainable and healthy communities addressed in 4, 5 and 6. Planning for climate change for the area is provided in Strategic objective 8.
- 23.4. The basis and reasoning for the vision and strategic objectives of the BPR [CD1] page 11 onwards in terms of the development needs of the area have been discussed in answers to MIQ's Questions 20 and 21 and which have been based on chapter 2, the 'Local' context' page 4 onwards of the BPR [CD1] and chapter 3 'key issues facing the Borough' page 7 onwards. These have been assessed on statistics for the area but also corporate and wider objectives such as 'Building a Better Borough' available at: [Building a Better Borough | Corporate plan | Nuneaton and Bedworth Borough Council](#), The Council's 'Climate Change Emergency Declaration' available at ([- 1 - \(nuneatonandbedworth.gov.uk\)](#)) Minute CL46 page 63 and for health by 'The Warwickshire Annual Report' (WCC 2023) available at: [Director of Public Health annual reports – Warwickshire County Council](#).

- 23.5. The evidence base including the; 'Coventry and Warwickshire Housing and Economic Development Needs Assessment' (HEDNA) (Iceni 2022) [EB7.1] and summary; 'Coventry and Warwickshire Housing and Economic Development Needs Assessment' – 'Executive Summary' (Iceni 2022 [EB7.2] have looked at the needs as a sub region whilst; 'Nuneaton and Bedworth Housing and Economic Development Needs Assessment (Iceni 2022) [EB6] and for a more holistic and more up to date approach; 'Towards a Housing Requirement for Nuneaton and Bedworth (Iceni 2022) [CD8] have been commissioned to calculate the need levels in the new plan period. 'The Review of Nuneaton and Bedworth Employment Land Portfolio' (Iceni 2023) [EB10] and 'Retail, Leisure and Office Study Update' (Cushman and Wakefield 2022) [EB11] have looked at employment, retail and health for the Borough.
- 23.6. The above documents have been used to establish the need which has led to the assessment and identification of the sites using the 'Housing and Economic Employment Land Availability Assessment' (HELAA) (2023) [EB2.1]; Appendix 2 – 'HELAA Housing Assessment' (2023) [EB2.2] and Appendix 3 – 'HELAA Employment Assessment' (2023) [EB2.3].
- 23.7. To bring the most relevant sites forward, the sites have undergone testing which includes but not exclusive to: Strategic Flood Risk Assessment work [EB16.1 – EB17.36]; ecology [EB15]; landscaping appraisals [EB19 and EB20] and heritage aspect work [EB21].
- 23.8. The Boroughs existing position including assets and infrastructure has been assessed, as well looking at the wider implications of new development to these such as evidence base work, for instance the Draft Playing Pitch and Outdoor Sports Strategy (2023) [EB14]; Air Quality Impact Assessment (2023) [EB12] and Accessibility and Settlement Hierarchy Study (2023) [EB1].
- 23.9. The above work together with the consultation comments at the various stages of the Plan making process has guided the wording of the Strategic and non-Strategic Policies. Policy DS1 – Sustainable development, page 14 sets out the strategic and local requirements in terms of sustainability and Strategic Policy DS2 – Settlement hierarchy and roles, pages 15 and 16 identifies that development should look at a settlement first approach for new development. Strategic Policy DS3 – Overall development needs, provides the minimum needs for housing, employment and cemeteries, pages 17 and 18.
- 23.10. 'The NPPF (Sept 2023) in paragraph 35a
'a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs²¹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;'

- 23.11 Similarly, Good Plan Making Guide Plan Making Principles for Practitioners' (Planning Advisory Service - September 2014) (see Answer 20 for the links to this guidance), principle 1 page 5 in the guide questions does state that:
'Have there been early discussions with neighbouring authorities on the strategic context of the plan and fulfilling the demands of the duty to co-operate?'
- Paragraph 1.2 of the guidance refers to the vision and objectives and states:
'progress of engagement ..under the duty to co-operate..to help shape the plan'.
- Likewise, paragraph 1.3 of the guidance refers to developing a vision:
'Reference to the wider context of the plan area, introducing the importance of links to and co-operation with neighbouring authorities.'
- 23.12. As stated previously in the answer to the MIQ's Question 20 the duty to cooperate; has been given its own section in chapter 1 of the BPR [CD1] paragraph 1.11, page 2. In terms of unmet need, this is Answered in Questions 21 and 24.
- 23.13. As the guidance makes specific reference to the inclusion of unmet need in neighbouring areas within the vision and strategic objectives, it is suggested that an additional Modification is proposed to add to the end of the vision:
The Borough is committed to working with neighbouring Authorities;
Authorities within the sub and wider region and infrastructure providers to ensure the region thrives cohesively both socially, economically and environmentally.
- 23.14. In conclusion, it is considered that the vision and objectives have regard to development needs of the area and by adding the additional Modification suggested in 23.13 this will ensure the vision and strategic objectives have regard to any potential unmet identified needs in neighbouring areas.

Q24. Does the Plan address/meet any identified unmet needs in neighbouring areas? If not, why not?

Answer

- 24.1 Reference is made in this Answer to Core Document [CD1] and [CD21] and Evidence Base Documents [EB7.1] and [EB8].
- 24.2. Nuneaton and Bedworth Borough Council lies within the Coventry and Warwickshire Housing Market Area (CWHMA). As set out in response to MIQ Question 3, as part of the Duty to Cooperate the Council has worked closely with neighbouring authorities throughout the plan making process, and the authorities collectively commissioned a sub-regional HEDNA to be prepared by Icenl (November, 2022) [EB7.1]. Each of the neighbouring authorities are at different stages of the plan-making process, and following the publication of the sub-regional HEDNA no authority has yet published a preferred options or Regulation 19 Plan, therefore, no neighboured authority has identified what their own supply position and consequently any unmet needs are.
- 24.3. Towards a Housing Requirement for Nuneaton (TAHR) [EB8] justifies a housing requirement figure of 545 dwellings per annum to support planned economic growth (aligning the strategy for homes and jobs), as well as sustainable town centre regeneration and affordable housing delivery. The housing requirement is above the need figure established in the sub-regional HEDNA. As discussed further in response to MIQ Question 37, in relation to additional job growth and unmet needs, Paragraph 4.37 of the report confirms that this figure:
- ‘...provides headroom to contribute to unmet needs arising from other areas in the context in which the additional jobs growth envisaged would still be accommodated within the overall housing need identified in the sub-regional HEDNA’.
- 24.4. The Council thus intended to provide headroom of 2,450 dwellings to contribute to meeting unmet needs through setting the housing requirement at this level. This recognises that meeting unmet needs will support additional population and workforce growth in the Borough. This principle has been accepted both in other Local Authorities in this Housing Market Areas (such as North Warwickshire ¹) and others (such as Melton BC ²).
- 24.5. The additional job growth identified does not result in additional housing need for the sub-region. The uplift could contribute to meeting unmet needs from sub-region, if this was to arise, however the unmet need is currently undefined. Therefore, Policy DS2 – Overall Development in setting a provision

¹Report on the Examination of the North Warwickshire Local Plan, Paragraph 131, <https://www.northwarks.gov.uk/downloads/file/281/local-plan-2021-inspectors-report>

² Report on the Examination of the Melton Local Plan, Paragraph 32 https://www.meltonplan.co.uk/files/ugd/c2f881_0a3d8c450c7c4b8798fa6175c56c639b.pdf

of 545 dwellings per annum has the potential to accommodate unmet housing needs arising from the sub-region.

- 24.6. 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. Paragraph 11.26 concludes that the focus of strategic B8 growth will continue in the north and west of the sub-region and it is advisable to coordinate an assessment of suitable sites at a sub-regional level. However, the paragraph goes on to say it would not be appropriate to simply replicate past development patterns in respect of the spatial distribution of development by local authority. Accordingly, paragraph 11.25 states that there is potential over concentration of B8 development in the north/west of the sub-region. The potential for other corridors within the sub-region is noted, particularly in South Warwickshire, to play a greater potential role in providing strategic B8 development than they have historically. Notwithstanding the recommendations of the HEDNA regarding location of strategic B8 sites, an indicative contribution of 19.4ha has been identified and met in the employment land supply.
- 24.7. The Council has asked Iceni consultancy to produce an explanatory note regarding the Council's contribution towards strategic B8. The full note is attached to this document, but states in summary that The Sub-Regional HEDNA identified a floating requirement for strategic B8 development across the sub-region of 551ha. The Nuneaton and Bedworth 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 so contribute towards the overall sub-region need.
- 24.8. The West Midlands authorities, including Nuneaton and Bedworth Council, have commissioned a study into strategic employment sites in the area. Given that this study has not yet been published, the Council suggests a Main Modification [page 16 of CD21] to 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. At the time of writing, the sub region has proposed to produce a paper to align the findings regarding strategic employment sites, between the Coventry and Warwickshire HEDNA and the West Midlands Strategic Employment Sites Study (WMSESS).
- 24.9. In conclusion, the vision is proposed to be updated to show that the Plan will address identified unmet needs (although no Local Authority has yet confirmed what this will be) of neighbouring areas and this is provisioned for within the Policies of the BPR in Strategic Policy DS3 – Overall development needs and Policy DS8 – Review.



Title: **Headroom for Unmet Housing Needs & Strategic B8 Employment in the Nuneaton & Bedworth Borough Plan Review**

From: Icen Projects

Date: 11/06/2024

This note gives clarification regarding information presented in the evidence documents 'Towards a Housing Requirement for Nuneaton and Bedworth (TAHR) (2022) and Review of Nuneaton and Bedworth Employment Land Portfolio (ELP) (2023). Specifically, the note addresses the following:

1. Housing – Nuneaton and Bedworth Borough Council (NBBC) strategy for economic growth within the local plan, how this has influenced the housing requirement, and the resultant 'headroom' to contribute unmet housing need in the sub region.
2. Employment – The contribution NBBC makes towards Strategic B8 employment land need.

Housing

There is a difference between a housing requirement (or target) and the housing need position. The N&B Borough Plan Review sets a housing requirement above the housing need, as set out in the sub-regional HEDNA, to align its strategies for homes and jobs, support town centre regeneration and the delivery of affordable housing.

The housing requirement figure of 545 dwellings per annum was established in TAHR and is greater than the Coventry and Warwickshire sub-regional HEDNA housing need figure for Nuneaton and Bedworth of 409 dwellings per annum. This equates to an additional 2,450 dwellings over the plan period which equates to headroom to contribute to unmet housing needs.

Planned Economic Growth Scenario

The housing need established in TAHR is determined from conclusions drawn from the Planned Economic Growth Scenario which assess economic growth initiatives to determine their impact on housing need. The report took the economic projections in the Sub-Regional HEDNA as a starting point but then overlaid the growth which could be expected from key development sites and town centre regeneration, the result of which was to raise the scale of jobs growth expected from 5,000 to 8,500 jobs; and the resultant housing needs position to 545 dpa. The key paragraph in the report is 4.37 which addresses housing need in the sub region is reproduced below:

The additional housing provision over and above the Borough's local housing need figure of 409 dpa would provide 'headroom' to contribute to unmet needs arising from other areas in a context in which the additional jobs growth envisaged herein would still be accommodated within the overall housing need identified in the sub-regional HEDNA. This as a contribution to meeting unmet need from other

areas would support workforce growth within the Borough and could therefore contribute to and support the Borough's economic growth."

Paragraph 4.37 confirms **the additional housing growth identified does not increase the overall sub regional housing need**. It is anticipated the additional jobs growth will attract housing need to Nuneaton and Bedworth from elsewhere in the sub-region and so support economic growth in the Borough.

To date, the NBBC has not received any formal requests from authorities within the HMA to accommodate any unmet need. The proposed housing requirement in the Borough Plan Review is set above that identified in the sub-regional HEDNA, providing headroom of 2,450 dwellings towards meeting potential unmet housing need, which is likely to be necessary as neighbouring authorities progress with their local plans.

Paragraph 4.37 also confirms that notwithstanding the potential positive impacts of the economic growth envisaged in the document, that the additional housing need will nevertheless contribute towards unmet need. It is expected that the additional housing would support the regeneration of the Borough's town centres by increasing the baseline population; and support the delivery of affordable housing.

The Planned Economic Growth scenario therefore provides a basis for meeting unmet need which is based on sustainable patterns of development.

Demographics

The demographic analysis within the TAHR should be understood as a sensitivity analysis which seeks to test the realism of this level of housing provision against demographic trends.

Whilst the sub-regional HEDNA was based on 10 year migration trends, the TAHR analysis shows that using a 5 year trend would result in higher housing need. The sensitivity analysis undertaken in TAHR estimates migration over the 2015-20 period. This results in a higher starting point net migration to the Borough and a higher household growth of 445 per annum. With the 23% affordability uplift applied (based on the 2021 affordability ratios) a housing need for 549 dpa is generated. The figure is similar to the 545 dpa proposed in the Planned Economic Growth Scenario and confirms this level of housing provision is credible.

Similarly analysis of completions trends indicates it is realistic; with the 545 dpa figure sitting between the 10 year average delivery (481 dpa) and 5 year average (633 dpa).

Employment

The Sub-Regional HEDNA identified a need for NBBC (2021-41) of 47.7 ha, but then identified a further floating requirement for strategic B8 development across the sub-region of 551 ha. The local needs position was based on the CE economic forecasts for offices, and 2011-19 completions trends for industrial, together with a margin.

For the purpose of the N&B Borough Plan it is however necessary to consider all employment uses, including strategic B8, and to align the position with the plan period (to 2039). It also made sense to have regard to the latest data. The Nuneaton & Bedworth Draft HEDNA identified a need across employment uses of 82.5 ha for the Borough over the plan period (2021-39) on this basis.

The Employment Land Portfolio Study, which included a review of employment sites in the Borough, breaks down this needs position in Table 6.3:

Disaggregation of Employment Land Need for Nuneaton and Bedworth, 2021-39

	Hectares
Office Need	2.0
Local Industrial & Warehousing Need	61.1
Strategic B8 Need (min)	19.4
Total	82.5

The contribution to the strategic need is based on analysis of the breakdown of the completions considered in forecasting overall I&L needs and what proportion would be of strategic B8 development.

The Nuneaton and Bedworth Housing and Economic Development Needs Assessment (HEDNA) (2022) and ELR thus identify an indicative and minimum figure of 19.4 ha for strategic B8 needs. The figure is based on the completions data in determining the need and is consistent with the sub regional HEDNA growth period. It is set out in Table 4 within the Plan.

NBBC Borough Plan period is determined by the evidence base and covers 2021-2039. Informed by the work undertaken by Iceni, NBBC are of the view that the provision of SEA 1 Faultlands meets the indicative need for strategic B8 as confirmed in Strategic Policy DS5 – Employment allocations.

The ELR, undertaken by Iceni, confirms reserved matters applications for the site were approved in Spring 2022. The site was under construction in October 2022 for strategic B8 development, with 1 million sq.ft delivered as two warehouses for 3PL provider Rhenus Warehousing Solutions. NBBC monitoring confirms the site will be recorded as complete in the 2024 AMR. As the site was completed three years after the employment land need was established (using data to March 2021), and within the plan period, the site forms part of the committed supply.

The stance towards Faultlands is consistent with the draft West Midlands Strategic Employment Sites Study in which the site is identified as a commitment. The WMSESS identifies 1305 ha of commitments. The Faultlands site (EMP1) comprises 26 ha of land as part of this.

The sub-regional HEDNA approach identifies a gross requirement for strategic B8 development. Existing commitments and extant allocations can be subtracted from this. It is not the amount of new land that will need to be brought forward in plans – to calculate this existing consents or local plan allocations would first need to be discounted to consider what additional provision is necessary.

The draft WMSESS identifies strategic employment commitments across the West Midlands region. Specifically, it notes the supply of strategic sites (+25ha) as well as commitments that are facilitating extensions of existing strategic sites.

The table below sets out those sites in the Coventry and Warwickshire sub region which contribute towards strategic industrial or warehouse (B2 or B8) need. This is considered accurate to end monitoring year 22/23. This is not all expected to be delivered as strategic B8 development, and some is permitted for B2 / manufacturing only (such as Coventry Airport, Prospero Ansty or land at Gaydon). Equally some has an open B-class consent which is would support non-strategic development. However it does show that there is some provision on existing, committed sites which would contribute towards meeting the 551 ha strategic B8 need identified in the Coventry and Warwickshire sub regional HEDNA.

Supply Position – Strategic Sites (B2 or B8)

Local Authority	No of Sites	Supply (Ha)
Coventry	1	25
Rugby	5	137
North Warwickshire	4	59.5
Nuneaton and Bedworth	2	31.9
Stratford-on-Avon	1	100
Warwick	2	302.4
Total	15	655.8

In acknowledgement that the WMSESS has not yet been published, the Council has suggested a main modification to Strategic Policy DS7 – 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.

Key points:

- The Borough Plan Review is setting the housing requirement above the housing need. In doing so it provides headroom to meet unmet needs in due course.
- Economic growth initiatives identified will attract housing need from within the sub-region. The Council's intention is to increase the share of sub-regional need met within the Borough. However, this does not increase the overall housing need in the sub-region. It provides headroom for unmet housing need.
- The demographic sensitivity analysis and past completions show that the level of housing provision in the Plan is reasonable, and the market can be expected to support its delivery.
- Provision for strategic B8 warehousing/ logistics development is provided by the Faultlands employment site which forms part of the commitments to be delivered within the plan period. The approach is consistent with the WMSESS which identifies sites with planning permission or under construction as commitments.
- Existing consents and/or local plan allocations will need to be considered when determining the amount of additional strategic B8 employment land allocations required.

Q25. Is it necessary for the Plan to consider the release of Green Belt land to meet identified development needs? ³

Answer

- 25.1. Reference is made in this Answer to Core Document [CD1].
- 25.2. As the approach for allocating land for the BPR was 'urban dispersal' which provided sufficient land for the Plans requirements no Green Belt release was necessary and it was therefore unnecessary to look at the exceptional circumstances which sets such a high bar for release.
- 25.3. The vision of the BPR [CD1] refers to sustainable economic, housing, transport and other infrastructure to meet people's needs. It also identifies that communities need to be healthy, safe and inclusive with increased open space and leisure facilities. The BPR has taken the approach that development should firstly be considered within existing settlements boundaries with a priority towards use of previously developed land or brownfield land. This is consistent with paragraph 119 of the NPPF that states: 'Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'
- 25.4. The above approach also means that the allocated sites are considered to be sustainable development.
- 25.5. Strategic Policy DS6 – Green Belt provides information for how the BPR will treat any development in Green Belt. However, it does not refer to any Green Belt release as this is not required.
- 25.6. Land was released from Green Belt in the previous Local Plan and is referred to within Policy DS7 – Green Belt page 41 of the Borough Plan 2011-2031 available at: [Adopted Borough Plan \(2011-2031\) | Borough Plan | Nuneaton and Bedworth Borough Council](#) Five of these sites have not been taken forwards to the BPR [CD1] but are committed sites within the Council's trajectory. Ten of the existing sites have been brought forwards as strategic or non-strategic sites as part of the BPR. The principle of their removal from Green Belt has been identified and tested within the previous adopted Local Plan.
- 25.7. Similarly to the adjacent existing cemetery, the proposed extension to the cemetery forming Strategic Policy and allocation CEM1, pages 100 and 101 of the BPR is within Green Belt. It is not proposed to remove the land from

³ This question relates to the vision and strategic objectives. Any statement made in response to it should not therefore refer to omission sites.

Green Belt as cemeteries and burial grounds are referred to as an exception within the NPPF paragraph 149.

- 25.8. In conclusion, as the proposed housing need is lower than that in the adopted Borough Plan, and adequate employment sites have also been allocated without the requirement of Green Belt release, no Green Belt is proposed to be released for the BPR. Similarly Green Belt release is not required for the cemetery site as it meets the exception tests of Green Belt defined in the NPPF.

Q26. Is there a need to re-designate previously allocated sites as Green Belt? If not, is this decision supported by robust evidence?

Answer

- 26.1. Reference is made in this Answer to Core Document [CD1]. And Evidence Base document [EB5]
- 26.2. Two previously designated sites have been taken out of the BPR; this is HSG4 Woodlands and HSG7 East of Bulkington.
- 26.3. For the sake of the BPR former Strategic Allocation HSG4 is not within Green Belt but was previously released from land designated as 'countryside' in the Local Plan 2004.
- 26.4. The East of Bulkington (HSG7) was previously Green Belt which was released for the 2019 adopted Local Plan in Policy DS7 – Green Belt, page 41 of the Borough Plan 2011-2031 available at: [Adopted Borough Plan \(2011-2031\) | Borough Plan | Nuneaton and Bedworth Borough Council](#) Notwithstanding this, the site has now obtained Outline Planning consent.
- 26.5. The current adopted Borough Plan (2019) was supported by the 'Joint Green Belt Study' which was undertaken in 2015 available at; [Green Belt | Nuneaton and Bedworth Borough Council](#). This assessed all Green Belt parcels in the sub-region and the contribution they made to the five purposes of Green Belt set out in national policy. During the current BPR process a full Green Belt Review was scoped out as unnecessary since no land was proposed to be released from Green Belt. However, a new 'Green Belt Technical Report' (Arup, March 2023) [EB5] has been undertaken to see if there were exceptional circumstances as part of the Review process to designate HSG4 and HSG7 as Green Belt.
- 26.6. The 'Green Belt Technical Report' in section 6.5 pages 25 and 26 suggests that:
'using the Joint Green Belt Study assessment methodology to both sites, Site HSG4 scores 13/20 and Site HSG7 scores 12/20. Paragraph 3.23 of the Joint Green Belt Study explains that the scores against the criteria were combined to generate a total score for each parcel. Based on paragraph 4.22 of the Joint Green Belt Study, Sites HSG4 and HSG7 would be described as 'mid-performing' Green Belt sites which score 'moderately well against Green Belt purposes.' The sites do not significantly contribute to preventing the merging of neighbouring towns (Purpose 2) and they make no contribution to protecting the setting and special character of historic towns (Purpose 4).'
- This then states:
The benefits of designating both sites as Green Belt would therefore be very localised, predominantly focused on restricting sprawl and safeguarding the countryside in this location,..... Furthermore, by

designating Site HSG4 as Green Belt, it would appear as an islanded pocket of Green Belt land given that the surrounding area immediately to the north and west of the site is not currently designated as Green Belt.Overall, whilst designating the sites as Green Belt could result in some very localised benefits, with both sites scoring moderately well against Green Belt purposes, given there is no development pressure in these areas at present, it is difficult to demonstrate a necessity for Green Belt.'

26.7. The conclusion on page 28 of the Report states that:

'In conclusion, whilst designating the sites as Green Belt would not have any negative consequences for sustainable development, it is not possible to demonstrate that normal development management policies would not be adequate, and that there is a necessity for Green Belt. Furthermore, although it could be argued that the reduced housing requirement, combined with the deliverability and viability issues on Sites HSG4 and HSG7 represent a major change in circumstances, there are no case studies where this justification has been successfully applied. Overall, it is not possible to meet all of the criteria set out in paragraph 139 in order to demonstrate an exceptional circumstances case.'

26.8. The final recommendation in the report was that the Policy wording set within DS3 – Development was retained in the Publication version to resist development outside of the settlement boundary. This is indeed the case, although the wording is now within Policy DS2 - Settlement hierarchy, page 15 of the BPR [CD1].

26.9. In conclusion, it is considered that the 'Green Belt Technical Report' (Arup March 2023) [EB5] provides robust evidence so as not designate deallocated sites HSG4 and HSG7.

Issue 2: Has the development strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base, and is it consistent with national policy?

Q27. Does the development strategy in general, and Strategic Policy DS3 incorporate sufficient flexibility within it? Particularly with regard to the potential for unmet housing and employment need arising from neighbouring areas in the future?

Answer

- 27.1. Yes, the development strategy comprises of eight policies which together seek to ensure flexibility over the plan period. Strategic Policy DS1 – Sustainable Development sets out how the Council will seek to secure sustainable development, with Strategic DS2 – Settlement Hierarchy and roles outlining the Borough's settlement hierarchy and the distribution of growth. This policy is flexible as it does not stipulate a specific quantum of growth to settlements within the Borough but instead seeks to ensure development is directed at an appropriate scale which reflects the role and function of the settlement. The policy seeks to prioritise the re-use of previously developed land and supports the principle of new development within settlement boundaries subject to there being a positive impact on amenity, the surrounding environment and local infrastructure. The policy outlines the criteria for unallocated development outside of settlement boundaries.
- 27.2. Strategic Policy DS3 – Overall Development Needs sets out the housing and employment need for the Borough over the plan period. The policy explicitly states the housing and employment figures are a minimum thus providing flexibility. Table 2 on Page 19 of the BPR [CD1] compares the local housing need and trend-based sub-regional Housing and Economic Development Needs Assessment (HEDNA) requirements, these are for 442 and 409 dwellings per annum respectively. The proposed housing requirement in Strategic Policy DS3 of 545 dwellings per annum has been positively prepared. It is based on the recommendations of 'Towards a Housing Requirement for Nuneaton' (TAHR) [EB8] this is set at considerably more than the quantum of growth identified by the Sub Regional HEDNA.
- 27.3. It is not known what level, if any, of unmet housing and employment need will arise from neighbouring areas in the future. The issue of unmet need is a factor in the proposed higher housing requirement as explained in paragraph 4.37 of TAHR [EB8]:

‘the additional housing provision over and above the Borough’s local housing need figure of 409 dpa would provide ‘headroom’ to contribute to unmet needs arising from other areas in a context in which the additional jobs growth envisaged herein would still be accommodate within the overall housing need identified in the sub-regional HEDNA.’

Thus, the proposed housing requirement includes flexibility to accommodate unmet needs arising from neighbouring areas in the future. This is discussed further in response to MIQ’s Question 24 and Question 37.

- 27.4. In addition to proposing a higher growth figure for the Borough, the BPR [CD1] identifies a supply of housing and employment land in excess of the figures identified in Strategic Policy DS3 which comprises of 9,810 dwellings and 87.85 ha of employment land. The Development Needs and Supply Background Paper [CD15] provides the most up to date figures on supply and supersedes those in Table 3 and Table 4 of the BPR, and subsequently the Council have made a suggested Main Modification⁴ (March 2024 page 4) [CD21]. In relation to housing there is a surplus of 1,712 dwellings and for employment land a surplus of 20.30 hectares. This provides sufficient flexibility in the unforeseen event that some identified sites do not come forward as predicted but also in terms of potentially contributing towards unmet needs of other Local Authorities if required.
- 27.5. Further, Strategic Policy DS8 – Review sets out the circumstances in which the plan will be reviewed, this includes for any reason that would render the plan, or part of it, significantly out of date. The Council has suggested a main modification to this policy [page 16 of CD21], which inserts a reference to the strategic employment land need being reviewed following publication by the Council of a West Midlands Strategic Employment Land Needs Study (currently being carried out). Therefore, there is flexibility to review policies if circumstances with regards to the unmet needs of neighbouring authorities change which would then render the plan or part of it significantly out of date.
- 27.6. Additionally, as set out in response to MIQ’s question 4 at paragraph 14.4, whilst not allocated for development within the BPR, there are further longer-term opportunities due to additional land referred to in Policy SHA3 – Land at Tuttle Hill (Judkins Quarry). The supporting evidence paragraph 7.62 page 73 [CD1] refers to the wider site beyond the proposed red line (of the proposed allocation) being brought forwards for further housing and employment. The Strategic Transport Assessment carried out for the BPR included modelling for the wider site.
- 27.7. In conclusion, for the reasons set out above, the Council considers there is sufficient flexibility within the development strategy, particularly in relation to

⁴ These figures may be amended due to additional evidence-based work on housing supply being undertaken by the Council.

the potential for unmet housing and employment need arising from neighbouring areas in the future.

Q28. Strategic Policy DS1 requires all new development to contribute towards the need to achieve net zero carbon emissions. Does the Plan make it clear how this would be achieved?

Answer

- 28.1. Yes, chapter 3 'key issues facing the Borough' as set out in Paragraph 3.2 of the BPR [page 7 of CD1], discusses the background to key issues in relation to achieving carbon neutrality by 2050 it states:
 '... the reviewed Borough Plan treats this as integral to all policies. As such, rather than these issues being dealt with by a standalone policy or development planning document, the Council has taken the opinion and decision (at the current time) that this is to be treated as a key thread running throughout its policies.'
- 28.2. Consequently, Strategic Policy DS1 sets out the overarching policy ambitions to achieve sustainable development. This is then supported by broader set of policies which set out the requirements for development to contribute towards the need to achieve net zero carbon emissions, these include, Policy BE2 – Renewable and low carbon energy, BE3 – Sustainable design, Strategic Policy SA1 – Development Principles and Policy NE2 – Open space and playing fields.
- 28.3. Paragraph 6.4 page 15 of the supporting text to Policy DS1 explains how in taking account the implications of climate change the protection of grasslands and planting of trees and orchards within new developments are encouraged within the plan as well as the retention of existing trees. This is then referenced within Strategic Policy SA1 – Development Principles on strategic sites, which sets out under criteria 2, that landscape features and blue infrastructure should be incorporated into schemes and development should provide appropriate trees including street trees and orchards.
- 28.4. Policy BE2 – Renewable and low carbon energy requires new development to make use of sustainable transport, sustainable materials, minimise waste materials and make use of low carbon technologies, renewable energy and energy efficiently measures. Policy BE3 – Sustainable design and construction lists the criteria all development proposals must meet including maximising energy efficiency to meet the optional higher standard for Building Regulations in regard to energy use.
- 28.5. Policy NE2 – Open space and playing fields sets out criteria which will help contribute towards the need to achieve net zero carbon emissions including the need for new development to provide areas of tree planting and creating new open spaces.
- 28.6. In conclusion, when considered holistically, the policies within the plan seek to ensure that all new development contributes towards achieving net zero

carbon emissions. Further information in relation to the BPR aiming to achieve carbon neutrality by 2025 is set out in the response to MIQ's Question 16 of Issue 4, Matter 1.

Q:29 Part four of Strategic Policy DS1 sets out the approach to planning applications and refers to various policy, guidance and material considerations. Having regard to s38(6) of the 2004 Act which gives primacy to the development plan, is the wording used sound?

Answer

- 29.1. Section 38(6) of the Town and Country Planning Act 2004 states that regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts and the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 29.2. In relation to this, part four of Policy DS1:
‘planning applications that accord with national policies and the policies in this Borough Plan Review (and where relevant), with policies in neighbourhood plans, other adopted Development Plans and adopted supplementary planning documents (SPDs) (or as per any subsequent updates) will be supported unless material considerations indicate otherwise.’
- 29.3. Having reviewed the policy wording in line with Section 38(6), to be consistent with national policy and therefore sound, the Council suggests a main modification to the wording of part four of Strategic Policy DS1 to read:
‘Planning applications will be determined in accordance with policies in this Borough Plan Review (and where applicable, with the other adopted Development Plan Documents and neighbourhood plans) unless materials considerations indicate otherwise. In determining applications, consideration should be given, where relevant, to adopted Supplementary Planning Documents.

Q30: Has the development strategy been fully informed by the SA and other evidence? Is it soundly based? Does it accord with the Framework?

Answer

- 30.1. 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].
- 30.2. As set out in the Issues and Options consultation document (May 2021), the starting point in developing the strategy for the BPR [CD1] was to identify the issues that need to be considered in reviewing the policies in the adopted Borough Plan 2019 and the options that are available to address these issues. 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 (May 2021) (available online at [Borough Plan I&O SA Report \(nuneatonandbedworth.gov.uk\)](https://nuneatonandbedworth.gov.uk/BoroughPlanI&OSAReport)). The vision and objectives of the Issues and Options were assessed against the SA objectives. The policy / proposal options were then assessed against the SA objectives. The assessment of options showed that an option or options perform better than others in terms of their sustainability, for example in relation to the location of future housing, of the three options appraised, option 1 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.
- 30.3. In accordance with paragraph 119 of the Framework, planning 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 forward in the Preferred Options consultation document (June 2022) which set out the preferred development strategy for the BPR [CD1].
- 30.4. The preferred development strategy comprised of maintaining the existing strategic allocations which had been assessed as deliverable and replacing those proposed to be deallocated with sustainable sites in the urban centre. This was informed by evidence, including the Nuneaton and Bedworth

HEDNA (2022)⁵ [EB6] which identified the quantum of development over the plan period of 646 dwellings per annum; SHLAA (2021) which assessed the suitability; availability and achievability of those sites promoted for development; HRA and the Second Interim Report: Regulation 18 SA which appraised reasonable alternatives both in terms of broad locations of housing growth and overall quantum. These documents are available on the Council's website available at: [Borough Plan Review - Issues and Options | Nuneaton and Bedworth Borough Council](#)

- 30.5. Table 6.1 of the SA [CD7.2] (also shown in response to question 32) sets out the seven growth options which were considered reasonable and were appraised to inform the Preferred Options consultation. Please refer to question 32 for further details regarding the assessment of reasonable alternatives. In accordance with Paragraph 140 of the Framework, Green Belt which states that boundaries should only be amended when exceptional circumstances are fully evidenced and justified; Green Belt release along with low growth options were scoped out as unreasonable alternatives.
- 30.6. By way of summary, the SA showed that continuing with the existing strategy of the adopted Local Plan in most respects would have neutral effects but could be negative in terms of housing, as several of the strategic sites had not readily come forward. In, Option 1 for urban dispersal the effects were mixed, there were benefits in terms of housing and the location of development being able to support access to services and to help benefit areas in need of regeneration. The two options regarding alternative strategic locations for growth at Galley Common and North Nuneaton perform similarly to one another however Galley Common is likely to lead to more significant negative effects given the sensitivity of the land in this location. These options performed worse with regards to several sustainability factors when compared with urban dispersal. However, were less likely to lead to negative effects in terms of cultural heritage compared to urban dispersal. The remaining options all show an increase in growth overall (712 dwellings per annum) as such, there are positive effects for social and economic factors however negative effects regarding factors such as material assets.
- 30.7. Therefore, the Council considered these outputs of the SA and evidence base, as well as the strategic ambitions of the Borough such as through the Transforming Nuneaton programme and concluded the preferred option was an urban dispersal approach to deliver a quantum of 646 dwelling per annum. This option comprises of de-allocating two strategic sites in the adopted Borough Plan (HSG4 Woodlands and HSG7 East of Bulkington) and for additional sites to be allocated in the urban (primarily focused within Nuneaton) area to substitute for the de-allocation of these strategic sites. This seeks to deliver a brownfield first approach to maximise use of underused or vacant sites within the urban area before looking at countryside areas. This

⁵ The Nuneaton and Bedworth HEDNA was an interim report to inform the Preferred Options consultation prior to the publication of the sub-regional HEDNA.

approach is consistent with national policy including paragraph 119 of the Framework, and which accords with the vision and objectives of the plan and provides flexibility in supply.

- 30.8. In accordance with paragraph 81 of the Framework, planning policies should help create the conditions in which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth. Through the Issues and Options consultation, options were explored in the event that new employment land would be needed to be identified and released, as referred to in the response to Question 5. However, taking direction from 'Towards a Housing Requirement for Nuneaton & Bedworth' [TAHR] (2022) [EB8] and the Review of 'Nuneaton and Bedworth Employment Land Portfolio' (2023) [EB10], the Council determined that the Borough has a healthy surplus of employment supply to meet identified needs and this would largely be met through existing commitments / plan allocations.
- 30.9. In November 2022, following the Preferred Options consultation, which took place between June and July 2022, the Council published the sub-regional HEDNA [EB7.1] and TAHR [EB8]. This resulted in the overall recommended quantum for development being lower than that which was consulted on at the Preferred Options stage (545 dpa as opposed to 646 dpa). However, the TAHR considered a Plan period starting from 2021 as opposed to 2024, accordingly, the Council amended the period, starting from 2021 when the review commenced and to align with the evidence base. The timeframe for the plan period is discussed further in response to MIQ Question 14, at paragraph 14.2. Therefore, the overall quantum of new homes to be delivered over the plan period is very similar to that consulted on at the Preferred Options stage, 9,810 dwellings as opposed to 9,690 dwellings.
- 30.10. In terms of alternative distributions of development at the scale of growth stated above, and as set out in paragraph 8.2.2 of the SA [CD7], given the range of strategic options and reasonable site options which had been tested at the Preferred Options stage, there were no further strategic alternatives to test.
- 30.11. As part of the appraisal to inform the Publication version of the Plan, the SA goes on to test the draft Plan (as a whole) to include the existing allocations of HSG4 and HSG7 which would result in the overall scale of growth being higher under this option compared to the draft BPR. This is discussed further in the response to MIQ's Question 31, Issue 1, Matter 2.
- 30.12. The development strategy seeks to prioritise brownfield land where available and deliver the housing and employment provision required to meet the Borough's need and ensure the Borough can grow in a sustainable manner. This has been informed by the findings of evidence-based documents including the Viability Appraisal [CD10] and the IDP [CD9.1] as well as other evidence-based documents. These documents have fed into the production of the plan and the policy requirements, to ensure the proposed strategy and site allocations are viable and deliverable. Therefore, as demonstrated above, the

development strategy has been fully informed by the SA and other evidence-based documents.

- 30.13. The Council considers the development strategy is soundly based. As set out above, it is positively prepared as it seeks to meet the area's objectively assessed needs as set out in 'Towards a Housing Requirement for Nuneaton and Bedworth' [EB8] which complements the findings of the sub-regional HEDNA [EB7] and considers the findings of the draft HEDNA [EB6].
- 30.14. As discussed further in the responses Matter 3, question 37, the strategy attracts housing need from within in the sub region, which is likely unmet need. The development strategy is justified as reasonable alternatives have been taken into consideration based on proportionate evidence and it is effective as it seeks to deliver the quantum of development over the plan period.
- 30.15. The Compliance Statement [CD4] explains how cross-boundary matters have been dealt with, specifically within section 16 page 27 onwards. Some of these matters have been outlined, discussed and evidenced within Statements of Common Ground [CD6.1- CD6.18]. These have been agreed upon by the Council and Local Planning Authorities; prescribed bodies; key organisations and the landowners / promoters of strategic and non-strategic housing and employment allocations within the BPR. The development strategy accords with national policy, in particular in taking a brownfield first approach. Therefore, overall, the development strategy accords with the Framework.

Q31: Is the site selection process clear and suitably robust, supported by the SA and other evidence, with particular regard to the proposal to not allocate some sites that are allocated in the adopted Plan?

Answer

- 31.1. The starting point for the site allocation process, following a Call for Sites and the Issues and Options consultation (May 2021) was to review those sites allocated in the adopted Plan. The review was to determine if the adopted strategy was being delivered as envisaged and to align the site selection with the overall development requirements.
- 31.2. The Issues and Options consultation document (May 2021), identified that of the 12 strategic housing allocations, three had no application(s) submitted. It outlined the need to consider various spatial options for delivering future housing need which cannot be accommodated within the existing allocations or permitted sites, or if certain allocations are no longer suitable or deliverable. The Issues and Options consultation was supported by an interim SA.
- 31.3. Following the Issues and Options consultation, the Council sought to identify a preferred approach to housing delivery which includes site allocations. The Council utilised the findings of the interim Nuneaton and Bedworth Housing and Economic Development Needs Assessment (HEDNA) (2022) [EB6] which identified a housing requirement of 646 dwellings and from there proceeded to identify several reasonable options to deliver the housing requirement. The housing supply for each of these options comprised of commitments, windfall assumption, 10% deduction for non-delivery on small sites and existing strategic allocations in the adopted Borough Plan that were still considered appropriate and deliverable. The strategic options for the residual supply were then appraised by the SA. The Council identified the urban dispersal approach as its preferred approach. This approach sought to deallocate HSG4 Woodlands and HSG7 East of Bulkington given both of these allocations had been identified as having potential deliverability issues and replaced these with non-strategic sites in the urban area.
- 31.4. At the point in time the Preferred Options document was prepared, with the focus being on ensuring deliverability, there was no indication that an application on HSG4 Woodlands, which was in two separate ownerships would be forthcoming. For the strategic allocation to be delivered in full, significant infrastructure, such as a new A444 on/off slip road would be required and there was no indication when this would happen or how it would be funded. Therefore, due to viability and achievability concerns, this site was proposed to be de-allocated on the basis of no comprehensive scheme for the development of the wider site coming forward.

- 31.5. With regards to HSG7 East of Bulkington, whilst there was a pre-application submission, it suggested that due to ransom strips, it was unlikely that the site could be bought forward in the plan period, therefore it was proposed to be de-allocated. It is noted however, that these issues have been rectified and HSG7 was granted outline planning permission on the 3rd October 2023 for 230 dwellings (Application Reference: 039005) and therefore whilst not allocated for development, will form part of the Council's committed housing supply.
- 31.6. To aid the decision-making process with regards to site allocations, a range of site options were identified by the Council following a Call for Sites exercise. These sites were tested through the SA process and appraised as part of the SHLAA (2021). The methods are suitably robust and based on the application of quantitative criteria to ensure consistency. The findings of these evidence base documents helped identify those sites which were considered suitable, available, and achievable for development. In accordance with the preferred strategy, as set out in Strategic Policy DS2, the priority was to allocate the majority of development over the plan period to Nuneaton as the primary town and encourage the re-use of previously developed land for new development within existing settlement boundaries. The plan does not propose any Green Belt release.
- 31.7. Following the Preferred Options consultation, the sub-regional HEDNA [EB7.1] and TAHR [EB8] were published. As set out in the response to MIQ's Question 30 in Issue 1, Matter 2, whilst the figure was lower than that consulted on at the Preferred Options stage, the overall quantum of development given the plan period had been amended remained fairly aligned. However, this presented an opportunity to review to ensure all the strategic and non-strategic allocations were deliverable in accordance with the latest available evidence-based documents.
- 31.8. To support the Regulation 19 publication version of the BPR [CD1], the Council produced a Housing and Economic Land Availability Assessment [EB2.1-EB2.3]. This comprises of a HELAA report which documents the approach towards assessing sites and identifying those which are suitable, available, and achievable for development. This includes a housing assessment matrix, which supersedes the 2021 SHLAA (available on the Council's website: [Borough Plan Review - Preferred Options | Nuneaton and Bedworth Borough Council](#)) and also includes an employment assessment matrix. Any new sites submitted during the Preferred Options consultation were assessed at this stage and also tested through the SA process.

- 31.9. It was at this stage, the SA also sought to test the alternative option of proceeding with the draft BPR but also allocating HSG4 Woodlands and HSG7 East of Bulkington. The summary of appraisal and rank of performance taken from Table 10.1 and Table 10.2 of the SA findings is shown below for ease and concludes that the draft Plan is considered to perform preferably with regards to 4 of the SA topics, with the alternative option most preferable with regards to 3 topics.

SA Topic	1. The draft Plan		2. Urban dispersal plus HSG4 and HSG7	
1. Economic factors	Minor +ve		Minor +ve	
2. Social factors	Moderate +ve	Minor +ve	Moderate +ve	
3. Biodiversity	Minor +ve		Minor +ve	
4. Population and health	Moderate +ve	Minor +ve	Moderate +ve	
5. Soil	Moderate +ve		Minor +ve	
6. Water	Minor +ve		Minor +ve	
7. Air quality	Neutral		Neutral	
8. Climatic factors	Major positive ?		Major positive ?	
9. Material assets	Minor +ve		Minor +ve	
10.Cultural Heritage	Minor +ve	Minor -ve	Minor +ve	Minor -ve
11.Landscape	Minor +ve		Neutral	

Table 10.2: Rank of performance

SA Topic	1. The draft Plan	2. Urban dispersal plus HSG4 and HSG7
1. Economic factors	2	1
2. Social factors	2	1
3. Biodiversity	-	-
4. Population and health	2	1
5. Soil	1	2
6. Water	1	2
7. Air quality	1	2
8. Climatic factors	-	-
9. Material assets	-	-
10.Cultural Heritage	-	-
11.Landscape	1	2

- 31.10. Therefore, when considering the evidence, the Council decided to pursue the approach towards urban dispersal and allocate a range of strategic and non-strategic sites, comprising of 10 units or more dwellings, which are considered to be deliverable within the plan period to meet the needs of the Borough.
- 31.11. In conclusion, the Council considers that the site allocations set out in the Borough Plan Review [CD1] represent a robust and well considered package of sites that provide a solid basis for ensuring delivery of the Borough's overall housing equipment. All the proposed allocations have been subject to detailed evidence-base work to ensure they are deliverable. This also means that any

potential constraints have been subject to detailed analysis and where appropriate, mitigation strategies have been outlined and are included within strategic site policies under the form of development principles and forms of development and provided as development considerations for non-strategic allocations.

Q32. Have reasonable alternative been considered and clearly discounted on the evidence?

Answer

- 32.1. Yes. The focus of reasonable alternatives was based on matters running to the heart of the plan review where key strategic decisions had to be made by the Council, primarily comprising of reasonable alternatives for housing growth and overall need. The Interim SA to inform the Issues and Options consultation (available online at: [Borough Plan I&O SA Report \(nuneatonandbedworth.gov.uk\)](https://nuneatonandbedworth.gov.uk/BoroughPlanI&OSARreport)) set out alternatives should there be a need to provide additional employment land, which informed by the 'Review of Nuneaton and Bedworth Employment Land Portfolio' (2023) [EB10], the Council determines that the Borough has a healthy surplus of employment supply to meet needs and there are no further alternative sites that need to be considered. Further matters such as Green Belt release and low housing growth were scoped out as 'unreasonable alternatives' given there are sufficient sites within the urban area and the countryside to exceed identified housing needs in the Borough and it is unreasonable to plan for a level of housing that would not be likely to meet identified housing needs.
- 32.2. In the context of above, the Sustainability Appraisal [CD7.2] has robustly considered the reasonable alternatives to meet the Borough's development needs. To inform the Preferred Options consultation document, the SA appraised reasonable alternatives both in terms of broad locations of growth and overall quantum. The table below, taken from Figure 6.1 of the SA sets out the seven residual housing options which were considered reasonable.

Strategic option	Approx dpa	Assumptions
1.Urban dispersal	646 dpa	Two strategic sites in the adopted Local Plan would be de-allocated (HSG4 Woodlands and HSG7 East of Bulkington ²). Additional sites to be allocated in the urban area (primarily focused in Nuneaton) to substitute for the de-allocation of these strategic sites.
2.Existing strategy rolled forward	660 dpa	Strategic sites HSG4 and HSG7 would be rolled forward, meaning that no additional sites would need to be found to meet the housing requirement.
3a.Strategic focus (Galley Common)	680 dpa	Rather than substituting HSG4 and HSG7 with urban dispersal, growth could be directed to a new strategic location at Galley Common. There is an assumption that strategic growth would need to be at least 1000 dwellings to create the economies of scale required to support social and transport infrastructure improvements.
3b) Strategic focus (North of Nuneaton)	680 dpa	Rather than substituting HSG4 and HSG7 with urban dispersal, growth could be directed to further growth at the strategic location north of Nuneaton.
4) Increased dispersal in the urban areas	712 dpa	To increase flexibility and choice in housing delivery it is reasonable to test an option that involves additional site allocations throughout the urban areas. There are a range of sites available that could potentially be involved as illustrated on the accompanying map for this option.
5a) Dispersal plus strategic focus (Galley Common)	712 dpa	To increase flexibility in delivery, a mix of urban dispersal plus a strategic growth location at Galley Common could be pursued.
5b) Dispersal plus strategic focus (North of Nuneaton)	712 dpa	To increase flexibility in delivery, a mix of urban dispersal plus strategic growth north of Nuneaton could be pursued.

- 32.3. Table 7.1 of the SA sets out the appraisal of reasonable alternatives. In determining the Council preferred approach, the SHLAA (2021) assessed the sites promoted as part of the Call for Sites exercise. These sites were then assessed by the Sustainability Appraisal, this includes those sites which were carried forwarded into allocations as well as the discarded sites.
- 32.4. The Council's preferred approach was Option 1, 'urban dispersal'. Paragraph 7.5.1 of the SA outlines that whilst alternative options were considered by the Council, they were ruled out for a number of reasons, namely because the other options either involved allocating strategic sites (Option 2, Option 3 and Option 5), where evidence showed there may be issues in these sites coming forward without various mitigation being required which could impact the viability and deliverability of the sites or would involve releasing sites outside the urban area (Option 4). These options all resulted in a higher quantum of growth than set out in the draft HEDNA [EB6] which supported the Preferred Options documents.
- 32.5. Further evidence was prepared to aid the Regulation 19 Publication Version of Plan, this included as outlined in response to MIQ's Question 31, Matter 1, Issue 2 a further reasonable alternative including the allocation of HSG4 Woodlands and HSG7 East of Bulkington being tested through the SA, and where relevant, the housing and employment assessments were updated as part of the HELAA [EB2.2, EB2.3].
- 32.6. In conclusion, as outlined above, the reasonable alternatives have been considered throughout the plan making process and discounted based on the clear evidence that came out of the process.

Q33: Would the policies in the Plan, taken as whole, effectively implement the vision and strategic objectives?

Answer

- 33.1. Yes. The BRP [CD1] is intended to be read holistically, therefore the policies when considered together seek to implement the vision and strategic objectives set out in chapter 4 page 11 onwards of the BPR. The overarching vision is intended to be an aspirational but realistic outlook for the Borough by the end of the plan period. The eight identified strategic objectives flow from the vision and the policies are intended to enable the delivery of the strategic objectives and thus the vision.
- 33.2. The BPR [CD1] sets out which of the Borough Plan objectives are being met by each of the policies which provides the link between the objectives and implementation of these. Further details relating to the vision and objectives are set out in the response to MIQ Questions 20 and 21, Issue 1, Matter 2.

Q34: Is the overall level, pattern and distribution of development set out in the development strategy viable and deliverable in general terms?

Answer

- 34.1. Yes, in general terms, the overall level, pattern and distribution of development is viable and deliverable. The development strategy has been informed by a range of technical evidence which has contributed towards determining the overall proposed level and pattern of growth as well as the distribution of development through strategic and non-strategic allocations.
- 34.2. The allocated sites have been informed by technical evidence and site assessments to ensure any necessary mitigation is outlined within the policies and to ensure the sites are deliverable within the plan period.
- 34.3. The development strategy has been informed by the 'Viability Assessment' prepared by Dixon Searle Partnership [CD10]. The 'Viability Assessment' considers the cumulative effect of the policies in the BPR, which includes those strategic policies which set out the development strategy and finds the proposed policies are suitable in viability terms. The 'Viability Appraisal' also considers specific site allocations / strategic sites in order to consider the cumulative policy effects on sites that have a significant role in delivering the vision of the BPR. The assessment collectively investigates the potential viability and therefore deliverability of the BPR and its policies and obligations.

Q35. Does Strategic Policy DS6 deal with strategic matters, or does it deal with more detailed matters?

Answer

- 35.1. Policy DS6 – Green Belt page 50 has been categorised within the BPR [CD1] as a strategic policy and in a similar manner to the adopted Borough Plan is located within the development strategy chapter.
- 35.2. In accordance with Paragraph 104 of the Framework which states:
‘strategic policies should establish the need for any changes to any Green Belt boundaries...’
In contrast to the adopted Borough Plan, the BPR does not propose any alterations to the Green Belt boundaries within the Borough. The purpose of the policy is to guide development on sites within the established Green Belt and identify opportunities which enhance the beneficial use of the Green Belt.
- 35.3. Therefore, on reflection, the Council consider Strategic Policy DS6 deals with more detailed matters as opposed to strategic matters. Consequently, the Council suggest a main modification to this policy, to show that this is no longer categorised as a strategic policy and is instead a non-strategic policy.

Q36: Is Strategic Policy DS6 consistent with national policy? In particular, part three which relates to Green Belt purposes and openness?

Answer

- 36.1. Parts one, two and four of Policy DS6 – Green Belt reflect the wording of Policy DS7 in the adopted Borough Plan and the Council consider these aspects are consistent with national policy.
- 36.2. The first sentence in part three states:
‘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.’
Paragraph 138 of the Framework sets out the five purposes that the Green Belt serves. This wording remains unchanged from Policy DS7 of the adopted Borough Plan and therefore at the point of adoption was considered consistent with national policy.
- 36.3. The policy goes on to state:
‘any proposed development in the Green Belt will need to maintain openness and demonstrate compensatory improvements to the environmental quality and accessibility of the land.’
Paragraph 137 of the Framework states the essential characteristics of Green Belts are their openness and their permanence. Having reviewed this sentence, part one of the policy seeks to maintain the Green Belts essential characteristics by restricting development to that which is considered by national planning policy as not inappropriate development in the Green Belt. Planning Practice Guidance (Paragraph: 002 Reference ID: 64-002-20190722) states that authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land where it is has been demonstrated that it is necessary to release Green Belt land for development. The BPR does not seek to release land for development.
- 36.4. Having reviewed part three of this policy, the Council does not consider that this wording contributes anything further than what is set out within national policy and therefore to avoid confusion the Council suggest a main modification to delete this paragraph within Policy DS6 – Green Belt.