Statement on behalf of the Claimant
Sarah Matile
Second Statement
Exhibits 'SM1-SM3'
Dated: 20th October 2026

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: QB-2019-000616

BETWEEN :

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

Claimants

– and –

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

Defendants

SECOND WITNESS STATEMENT OF SARAH MATILE

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

1. I make this witness statement in support of the Claimants' application for the renewal of the injunction order of the Honourable Mrs Justice Obi dated 3 December 2025 for a further 12 months. I make this statement to explain to the Court the position with the First Claimant's supply balance of residential and permanent Gypsy and Traveller pitches in its administrative area.

2. The facts and matters set out by me in this witness statement are either known by me directly and are true or are known by me indirectly and are believed to the best of

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knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was produced following correspondence with Claimants' legal representatives.

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

<u>The Local Plan</u>

Assessed Need

4. The Council's Borough Plan Review was adopted on 10th December 2025 and covers the plan period 2021 – 2039. I exhibit a copy of the Borough Plan at **SM/1.** Policy DS4 – Overall development needs and Policy H3 – Gypsies and Travellers in the Borough Plan Review refer to the requirements set out in Strategic Policy GT1 (Overall Need) of the Gypsy and Traveller Site Allocations Development Plan Document (GTSA DPD) and that the provision is expected to be delivered in line with the GTSA DPD.

5. The Council's GTSA DPD **SM/2** was adopted on 17th January 2024 and covers the plan period 2021 to 2037**.** To support the production of the GTSA DPD, the Council commissioned an updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) in 2021 **SM/3**.

6. The 2021 GTTSAA indicates that by 2036/37, 20 new pitches will be required, comprising 16 for people defined as Gypsies and Travellers and a further 4 for a cultural need. No transit pitches are required. For clarity, I reproduce GTSA DPD Table 1: Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37.

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

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

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

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Table 2 – Addressing Gypsy and Traveller Pitch Need

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

8. Therefore, as demonstrated above, and set out within paragraph 3.6 of the GTSA DPD, whilst turnover is one element of supply that can be relied upon to meet some

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

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

- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025/26; and

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

Location of Sites

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

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

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

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

National Policy Context

13. At the time the 2021 GTTSAA was prepared, accommodation needs were assessed having regard to the planning definitions and policy requirements contained within the Planning Policy for Travellers Sites (PPTS). The GTSA DPD was prepared and subsequently adopted on this basis. For clarity, the need identified in the Council's 2021 GTTSAA reflects the definition in the PPTS 2024 revision (which revision expanded the definition of Gypsy and Traveller following developments in case law).

14. On 17 August 2026, the Government published a revised National Planning Policy Framework (NPPF). The revised NPPF superseded the 2024 PPTS and incorporated national planning policy relating to Gypsies, Travellers and Travelling Showpeople directly within the NPPF.

15. The Council commissioned consultants to undertake an update to the GTTSAA 2021 to support the preparation of the new Local Plan and reflect the changes to the NPPF. At the time of writing, the updated GTTSAA is being prepared and is anticipated to be completed by the end of December 2026. Once completed, it will form part of the evidence base to inform the Council's new Local Plan, which in accordance with the Local Plan Timetable will be adopted by April 2029.

Statement of Truth

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

Signed: Sarah Matile

Sarah Matile
Date: 20th October 2026

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KING'S BENCH DIVISION

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(2) Warwickshire County Council

Claimants

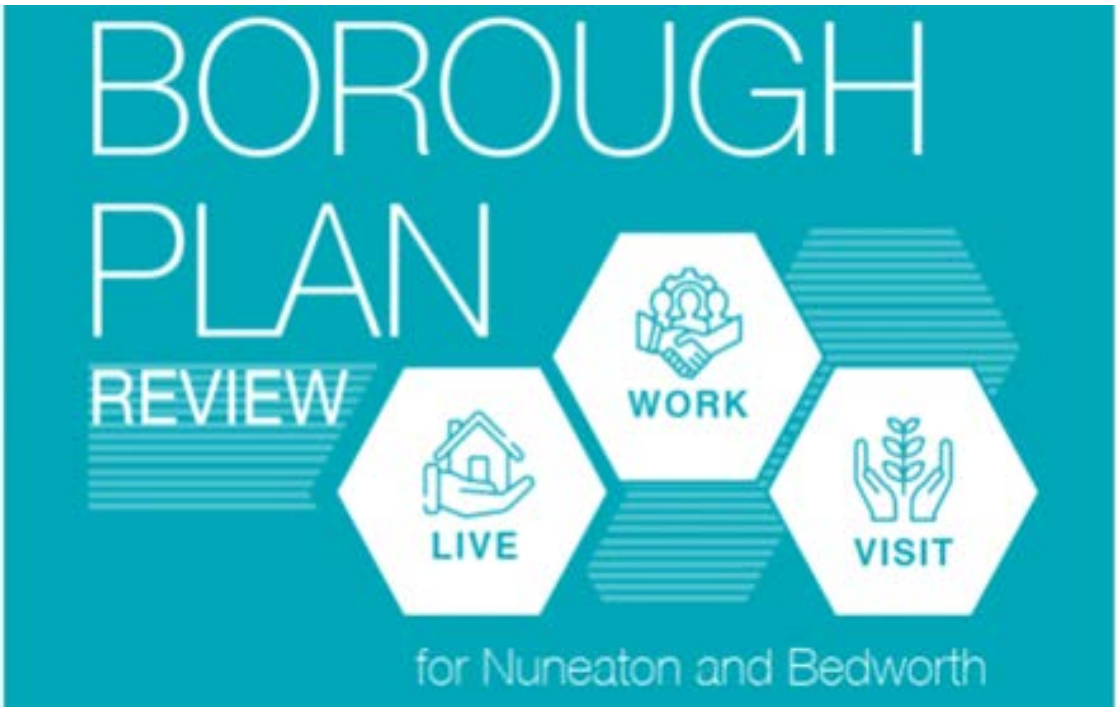
– and –

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

Defendants

Exhibit 'SM1'

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Nuneaton and Bedworth Borough Council

Borough Plan Review

2021-2039

Nuneaton & Bedworth
United to Achieve

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1.0 Introduction

What is the Borough Plan Review?

1.1 The Borough Plan Review is the key document that provides the framework to guide future development in Nuneaton and Bedworth Borough up to 2039. It will influence what development will take place, how much and where it will be located within the Borough. It sets out an ambitious vision and strategic objectives, followed by a development strategy for the Borough which is focused on delivering growth in a sustainable manner. It includes thematic policies for managing development and protecting the environment to ensure that the Borough Plan's vision can be delivered.

1.2 The Borough Plan Review includes a number of measures to monitor the progress being made in achieving the strategic objectives of the plan on an annual basis.

1.3 Once adopted, the Borough Plan Review will replace the current Borough Plan, which was adopted in 2019 and guides development in the Borough up to 2031. The Borough Plan Review seeks to review and where relevant update all the policies within the adopted Borough Plan as well as create new policies. A list of all the adopted policies within the Borough, which are proposed to be replaced or deleted once the Borough Plan Review is adopted, is set out within Appendix A.

Context for the Borough Plan Review

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

National Planning Policy Framework and Planning Practice Guidance

1.5 The National Planning Policy Framework (NPPF) (2023) sets out Government policy on planning matters, seeks to create sustainable communities and foster sustainable development. The policies in the NPPF provide the national framework within which local policy should be prepared. The Planning Practice Guidance (PPG) provides, among other things, direction in preparing evidence to inform the Borough Plan Review. The Borough Plan Review has been prepared in accordance with the NPPF and PPG.

The Council's Corporate Plan

1.6 The Borough Plan Review is a delivery document for the Council's Corporate Plan – 'Building a Better Borough'. The policies within the Borough Plan Review support the Council's vision of the Borough being the place of choice to live, work and visit.

Evidence

1.7 The Borough Plan Review is based on a comprehensive and robust evidence base. A number of detailed and technical assessments have been prepared to inform and justify the policies and proposals within this plan. All of the evidence base can be viewed on the Borough Council's website.

Strategic Environmental Assessment and Sustainability Appraisal

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

Infrastructure Delivery Plan

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

Duty to cooperate

1.10 Introduced through the Localism Act 2011, the duty to cooperate is a legal requirement of the plan making process. The NPPF states that, "Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries". Throughout the preparation of the Borough Plan Review, the Council has positively engaged with partner organisations, such as statutory consultees and other relevant local authorities, under the duty to cooperate. Collaboration between the Council and other local authorities and infrastructure providers, is documented through Statements of Common Ground, demonstrating effective and on-going joint working and indicating cross boundary matters are being addressed and progressed. These documents also identify relevant strategic matters which will be addressed in the Borough Plan Review.

Preparation of the Borough Plan Review

1.11 The process of reviewing the Borough Plan began in 2021 and has been broken down into a number of stages, which are as follows:

- Issues and Options - this document was the first stage of the process consulted on between June and August 2021. It set out the issues facing the Borough and presented a range of options to address them.

- Preferred Options – this document was consulted on between June and July 2022 and sets out the Council's preferred approach to addressing the strategic issues facing the Borough. This included specific locations and sites to address the future development needs and planning policies of the Borough.

- Publication - this document was consulted on between September and October 2023. The Regulation 19 stage was the final consultation stage before the plan was submitted and sent for examination.

- Submission - the Borough Plan Review was submitted to the Secretary of State for Housing, Communities and Local Government on 12th February 2024.

- Examination in Public hearing sessions - July, September and October 2024.

Development plan documents

1.12 The development plan documents for the area of Nuneaton and Bedworth Borough Council constitute the following documents:

- Borough Plan: 2021-2039
- Gypsy and Traveller Site Allocations DPD: 2021-2037
- Warwickshire Minerals Local Plan 2018-2032
- Warwickshire Waste Core Strategy Adopted Local Plan 2013-2028

2.0 Local context of the Borough

2.1 The Borough of Nuneaton and Bedworth is most famous for being the birthplace of the author George Eliot (Mary Ann Evans). It is one of five Boroughs/districts within Warwickshire. It is the smallest in size, at 7,895 hectares, but has the third largest population at 134,200 (2021)[1]. Largely urban in character, the Borough has two market towns - Nuneaton and Bedworth, as well as the large village of Bulkington to the east of Bedworth. Several smaller settlements are located in the south of the Borough between Bedworth and Coventry.

2.2 The Borough is located between Coventry and Hinckley, and benefits from good road links. Nuneaton and Bedworth are both easily accessible from the M6, which gives access to the M1, M5, M42 and the M69. The A5 runs along the northern boundary of the Borough and the A444, A4254 and the B4114 are the major routes within the Borough. The Borough is a 19-minute drive to Birmingham International Airport and a 37-minute drive to Nottingham East Midlands Airport.

2.3 Nuneaton is also well connected by the rail network. Nuneaton has direct links to London (60-80 minutes) via the West Coast mainline, alongside Birmingham, Leicester, Cambridge and Stansted Airport. A branch line also provides direct services from Nuneaton, Bermuda Park and Bedworth stations to Coventry Arena, Coventry and Leamington Spa. As part of the NUCKLE[2] north-south rail project, facilities at Bedworth Station have been improved and a new station has been created at Bermuda. The vision for the NUCKLE project is to improve services from hourly to half hourly services between Coventry and Nuneaton.

2.4 Historically, industries in the Borough included coal mining, other extractive industries and heavy engineering. The Borough still has a high proportion of employees working in manufacturing compared to the Great Britain average[3]. Other significant employment sectors are wholesale and retail trade, and human health and social work[4]. In terms of the business base of the Borough's local economy, micro enterprises make up 89%, small enterprises 9%, medium enterprises 1.5% and large enterprises 0.5%[5].

2.5 Most employment is concentrated on a number of industrial estates. The main sites are at Attleborough Fields, Bayton Road, Bermuda and Prologis Park but smaller estates are located across the Borough. The town centres of Nuneaton and Bedworth also provide a significant number of jobs.

2.6 Nuneaton Town Centre is the main retail and commercial centre serving the whole Borough as well as further afield, whereas Bedworth Town Centre serves a more local role. Nuneaton Town Centre includes the Ropewalk and

[1] Office for National Statistics (2023). *How life has changed in Nuneaton and Bedworth: Census 2021.*
[2] SLC Rail (2018). *Coventry to Nuneaton Upgrade.*
[3] Office for National Statistics (2022). *Labour Market Profile – Nuneaton and Bedworth.*
[4] Office for National Statistics (2022). *Labour Market Profile – Nuneaton and Bedworth.*
[5] Office for National Statistics (2022). *Labour Market Profile – Nuneaton and Bedworth.*

Abbeygate shopping centres, the Borough's main library, council offices and railway station. Bedworth Town Centre has a large superstore, independent shops and branches of high street stores, a library, emergency services, the Civic Hall and Bedworth Arts Centre. In addition to the town centres are a number of district and local centres supporting smaller neighbourhoods.

2.7 Bermuda Park to the south of Nuneaton provides a multiplex cinema, bowling alley and other leisure facilities. In terms of sports facilities, The Pingles Leisure Centre and Etone Sports Centre are noteworthy facilities, both located in Nuneaton. Bedworth also has a leisure centre and a number of local facilities and sports pitches which provide places for sport and exercise. Other key community facilities include the George Eliot Hospital and North Warwickshire and Hinckley College.

2.8 There are over 500 hectares of accessible green space in the Borough. Notable parks in the Borough include Riversley Park, Miners Welfare Park and Whittleford Park, all of which are destination parks, serving the whole Borough. A number of smaller community and local parks also serve the open space needs of local communities.

2.9 The Borough contains the only European designated site (Special Area of Conservation) in Warwickshire at Ensor's Pool. This and Griff Quarry are both Sites of Special Scientific Interest (SSSI). There are also locally designated wildlife sites and areas of ancient woodland. Additionally, three local nature reserves are located at Ensor's Pool, Galley Common and Bedworth Sloughs.

2.10 Historic legacies of the coal mining industry are present within the Borough, along with the historic transport network of the Coventry and Ashby de-la-Zouch canals. The canals are heritage assets in their own right, as well the buildings and structures that are closely associated with them[6]. They form recreational green and blue links and wildlife corridors along with the disused Nuneaton Ashby Railway (Weddington Walk) through the centre, east and north of the Borough.

2.11 The River Anker, River Sowe, Harrow Brook, Wem Brook, Breach Brook and Change Brook act as the main rivers flowing through the Borough.

2.12 Located in the Borough is Arbury Hall, a Grade I listed building with grounds which are classified as Grade II* registered park and gardens. The Arbury Estate also contains a number of other listed buildings and structures. Overall, the Borough contains 92 listed buildings and has five conservation areas which are located in Abbey, Nuneaton Town Centre, Bedworth Town Centre, Bulkington Village and at Hawkesbury Junction. There are also two scheduled monuments, one at the Moated Site at Exhall Hall and the other at Nuneaton Priory.

2.13 Nuneaton and Bedworth has the highest levels of deprivation across Warwickshire and ranks as the 101st most deprived local authority district

[6] Nuneaton and Bedworth Borough Council (2023). *Conservation.*

nationally (out of 317)[7]. Within Nuneaton and Bedworth there is also a divide between the east and west, with the most deprived areas located in the west. Five Super Output Areas within Nuneaton and Bedworth are in the top 10% most deprived nationally[8]. Bar Pool North and Crescents is in the top 3% deprived Super Output Areas in England[9].

2.14 Specific areas where the Borough falls behind the Warwickshire average include deprivation, crime rates and life expectancy[10]. This has resulted in a significant gap separating Nuneaton and Bedworth from the rest of the county.

[7] Ministry of Housing, Communities and Local Government (2019). *England indices of deprivation 2019.*
[8] Ministry of Housing, Communities and Local Government (2019). *England indices of deprivation 2019.*
[9] Ministry of Housing, Communities and Local Government (2019). *England indices of deprivation 2019.*
[10] Warwickshire County Council (2022). *Warwickshire Insights.*

3.0 Key issues facing the Borough

Background

3.1 This section summarises the key issues and challenges within the Borough. The Borough Plan aims to address these issues in order to achieve its vision for Nuneaton and Bedworth by 2039.

3.2 One of the fundamental issues that policy makers, including all Local Authorities, face over the coming years is resilience and adaptation to climate change alongside measures to protect and improve the environment[11]. This includes achieving carbon neutrality by 2050, improving air and water quality, sustainable use of resources and promoting nature recovery. Whilst national legislation is still emerging on this, 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 this current time) that this is to be treated as a key thread running throughout its policies. This includes consideration of the climate change risks and opportunities, identified within the region, to align policies where appropriate with the regional Climate Change Adaptation Plan[12].

Issues associated with the local economy

3.3 The following issues have been identified:

- The population and the number of households is growing, and this is projected to continue[13].
- There are fewer knowledge-based employment opportunities. If this does not change, there will be fewer jobs in the future and more people will have to look for work outside the Borough.
- A large number of residents commute out of the Borough each day to work in Coventry, Leicestershire and elsewhere in Warwickshire[14].
- Within the Borough there is a divide between the east and west, with the most deprived areas located in the west.
- Household earnings are lower than the Warwickshire average[15]. This contributes significantly to poverty and deprivation.

[11] HM Government (2018). *A Green Future: Our 25 Year Plan to Improve the Environment and Environment Act (2021).*
[12] Sustainable West Midlands (2021). *Climate Change Risk Assessment and Adaptation Plan 2021-2026.*
[13] Warwickshire County Council (2022). *Warwickshire Insights.*
[14] GL Hearn (2016). *Employment Land Study: Nuneaton and Bedworth Borough Council - Final Report.*
[15] Warwickshire County Council (2022). *Warwickshire Insights.*

- Access to some employment sites such as Attleborough Fields, Prologis and other employment sites outside the Borough is difficult without a car.
- Car ownership in the Borough is lower than the Warwickshire average[16]. Improvements in public transport along the north-south corridor are required to improve accessibility to job opportunities.
- Some residents have a poor skills base. 28% of those of working age have no qualifications at all[17].
- There is a need to tackle low aspirations in parts of the Borough as this can limit educational achievement and contribute to low wages, deprivation and a dependency on benefits.
- The quality and diversity of retail provision in Nuneaton is limited. The town has a strong market but the challenge will be for it to remain attractive and competitive in the future in the face of growing online retail.
- Nuneaton does not have a strong evening or night-time economy, with a relatively limited offer in terms of restaurants and bars. There is limited transport provision after 6pm.
- Office provision in Nuneaton is limited, basic and is reducing economic opportunities in the town centre. There are also few residential properties in the town centre which affects the town's diversity and vibrancy.
- Bedworth Town Centre struggles to compete for retail trade and its office sector is small. This is due to its proximity to the larger centres of Coventry and Nuneaton. The town centre has little residential or leisure provision other than the Civic Hall, and therefore the evening economy is weak. The ways in which Bedworth can best compliment Nuneaton, in the future, needs to be addressed.
- The quality, popularity and variety of retail provision offered, at local and district centres, varies greatly.
- Traffic congestion is high across the Borough and Nuneaton has experienced the highest rate of traffic growth across Warwickshire[18]. Particular problems occur on the A444, The Long Shoot (A47), Lutterworth Road (B4114), Camp Hill/Tuttle Hill (B4114) and Coventry Road (B4109).

Issues associated with the local community

3.4 The following issues have been identified:

- The current housing stock is predominately semi-detached and terraced.
- The mix of housing tenure, types and sizes for different parts of the Borough is uneven.
- Population and household projections suggest an on-going need for family accommodation[19].

[16] Warwickshire County Council (2022). *Warwickshire Insights.*
[17] Warwickshire County Council (2022). *Warwickshire Insights.*
[18] Warwickshire County Council (2011). *Warwickshire Local Transport Plan 2011-2026.*
[19] Iceni Projects (2022). *Towards a Housing Requirement for Nuneaton and Bedworth.*

- There is a need to cater for an increasing number of young people and older people living on their own. There is a particular need for housing options to enable older people to live independently[20].
- The areas around Bulkington and the south-west of the Borough are not well served by green corridors. This reduces biodiversity and opportunities for leisure activities in these areas.
- Access to some leisure facilities is restricted for people without a car. Public transport to Bermuda Park, for instance, is limited and there are no segregated cycle paths within the site.
- Life expectancy is lower than the Warwickshire average[21]. Links can be made to poor health, lack of physical activity and obesity, all of which are high in the Borough.
- Investment has taken place to bring 85% of homes in line with the Decent Homes Standard[22] but there are still homes which need to be upgraded.
- Improvements to provide more walking and cycling networks, cycle parking facilities, pedestrian priority areas and crossing facilities along with the need to address issues such as the frequency, reliability, integration and cost of public transport, is required to facilitate benefits to the environment and health.
- Air Quality Management Areas (AQMAs) are designated at the Leicester Road Gyratory and at Central Avenue/Midland Road in Nuneaton.
- Previous development has not always been well designed. Too much development in the past has failed to positively contribute to the character of the area or to local distinctiveness.
- Crime is the highest in Warwickshire[23].

Issues associated with the local environment

3.5 The following issues have been identified:

- Extreme weather events, such as those experienced in Warwickshire in 1998, 1999, 2005, 2007, 2008 and 2012, are becoming more frequent (Climate Change predictions, including the UK Climate Projections 2018 (UKCP18), refer to the likely increase in temperatures and warmer wetter winters and drier summers).
- If future growth needs to be accommodated outside the existing urban areas, this has the potential to impact on sensitive landscapes and biodiversity.
- The legacy of coal mining, quarrying and heavy engineering has had a negative impact on the landscape. The Borough has over 100 hectares of derelict land and more than 3,000 potentially contaminated sites.
- There are a limited number of historic buildings of national importance but many others are important to local history.

[20] GL Hearn (2013). *Coventry and Warwickshire Joint SHMA: Executive Summary.*
[21] Warwickshire County Council (2022). *Warwickshire Insights.*
[22] Nuneaton and Bedworth Borough Council (2017). *Nuneaton and Bedworth Housing Strategy 2017-22.*
[23] Warwickshire County Council (2022). *Warwickshire Insights.*

- Some built heritage has suffered from poor quality modification and a lack of maintenance and repair. Two listed buildings are on Historic England's Buildings at Risk Register[24].
- On 4th December 2019, the Council declared a climate emergency.

[24] Historic England (2023). *Search the Heritage at Risk Register.*

4.0 Vision and strategic objectives

Vision for the Borough

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.

The Borough is committed to working with neighbouring authorities; authorities within the sub and wider region and infrastructure providers to ensure that the region thrives cohesively socially, economically and environmentally.

Strategic objectives

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

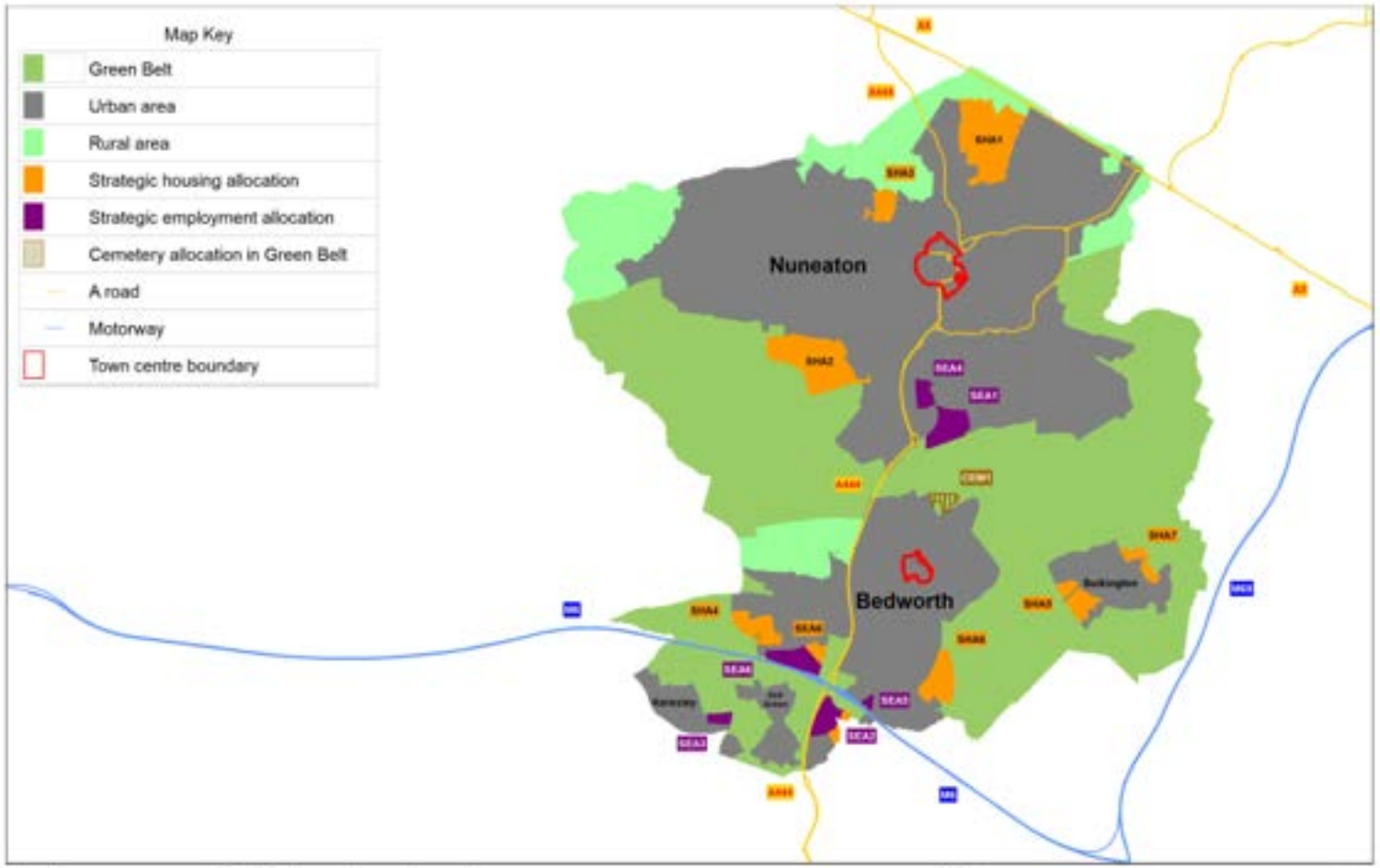
To ensure that new development sustains and enhances the historic and natural environments.

Strategic objective 8: Climate change

To address climate change by driving sustainability in all new development.

5.0 Key diagram

Borough Plan Review Key Diagram



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6.0 Development strategy

6.1 The following policies set out the strategic development strategy and general principles for the growth of the Borough through to 2039. The policies will enable the delivery of the overarching vision for the Borough and strategic objectives of the plan.

Strategic Policy DS1 – Delivering sustainable development

The Council will require development to contribute towards the creation and maintenance of sustainable places, mitigate and adapt to the adverse effects of climate change and reducing carbon emissions. To achieve this, development should:

- Re-use previously developed land and re-use buildings as a sustainable option, where applicable.
- Be of high quality, relative to its use and locality.
- Use natural resources prudently.
- Be supported by infrastructure provision.
- Encourage car-free neighbourhoods and sustainable modes of travel.
- Maximise opportunities to enhance and expand the natural and built environment, in line with policies in this plan.

When considering development proposals, these 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 material considerations indicate otherwise. In determining applications, consideration should be given, where relevant, to adopted Supplementary Planning Documents.

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

6.2 The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth. Sustainable development is at the heart of local planning and the Borough Council has a key role to play in

reducing carbon emissions, seeking improvements in the quality of the built, natural and historic environment and managing and adapting to changes in the Borough, such as new housing, economic requirements and associated infrastructure. For example, the Borough Plan Review prioritises the re-use of previously developed land and sustainable development through the settlement hierarchy approach, demonstrated in Strategic Policy DS2 – Settlement hierarchy and roles.

6.3 Local plans and development strategies must be positively prepared, justified, effective and consistent with national policy. This policy underpins the Borough Plan Review and sets out the key development principles against which development proposals will be assessed.

6.4 Both national policy and the Borough Plan Review are clear that new developments must take into account the implications of climate change. The protection of grasslands and the planting of trees and orchards are recognised and encouraged in this plan. However, other carbon zero initiatives may be equally important, including the retention of existing trees. The future maintenance of these trees should also be considered. Whilst there is no doubt that tree and orchard planting can provide a number of benefits, the habitat value of the land has to be considered first, as this could potentially have more value than tree planting. This is also required within the Council's Open Space SPD but no target requirements have been set in order that good value habitat is not sacrificed. This is to ensure each site is assessed on a site-by-site basis.

6.5 The protection and enhancement of the historic environment is recognised and encouraged in this plan.

Strategic Policy DS2 – Settlement hierarchy and roles

The hierarchy of the Borough's settlements are:

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

The majority of new development over the plan period will be directed to Nuneaton as the primary town. Development will be directed to other settlements, at a scale that reflects the role and function of the settlement and its order in the hierarchy, as well as the settlement's ability to accommodate change.

Within existing settlements, the re-use of previously developed land will be encouraged for new development and schemes will be supported where underutilised land and/or buildings are brought into a more efficient use.

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

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

6.6 A key priority for the development strategy is to direct growth to the most sustainable locations which make full use of public transport, walking and cycling.The strategy comprises of those strategic sites within the Borough Plan (2019) which were allocated and are still considered deliverable within this plan period with the non-strategic sites being delivered on previously developed land, promoting urban dispersal and prioritising brownfield land first in accordance with national policy.

6.7 A settlement hierarchy study of Nuneaton and Bedworth proposed a settlement hierarchy for the Borough. The order of the hierarchy is set out within the policy. This was based on an analysis of the size of each settlement in the area, accessibility to a range of services and facilities, as well as public transport provision. The report places Nuneaton at the top of the hierarchy, as the most sustainable settlement in the Borough, whilst Bedworth and Bulkington have a secondary and tertiary role respectively.

6.8 In considering the roles of the settlements, it is also necessary to consider the wider context in which the Borough is located. Of particular relevance is the close proximity of other settlements outside the Borough boundary. To the south of the Borough there is the city of Coventry and to the north of the Borough the A5 corridor and its surrounding settlements.

6.9 The principles for determining where new development will take place and what development is acceptable inside and outside of the settlement boundaries have been formed following careful consideration of the issues for the Borough and the identified strategic objectives. As part of the plan making process the settlement boundaries have been reviewed and where necessary amended in line with the methodology set out in the Settlement Boundary Paper (2023). Within the Borough, settlement boundaries define Nuneaton, Bedworth, Bulkington, Ash Green/Neal’s Green and Keresley.

Borough Plan objectives

6.10 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.
- Strategic objective 3.
- Strategic objective 4.

Evidence base

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

- Nuneaton and Bedworth Borough Council (2023). *Accessibility and Settlement Hierarchy Study 2023.*
- Nuneaton and Bedworth Borough Council (2023). *Housing and Employment Land Availability Assessment.*
- Nuneaton and Bedworth Borough Council (2023). *Settlement Boundary Paper.*

Delivery mechanisms

6.12 The delivery mechanisms for this policy are as follows:

- Delivery of urban sites for employment and housing.
- Delivery of strategic sites for employment and housing.
- Delivery of new district centres where appropriate.
- Set up and monitor a phasing and delivery strategy to ensure a five-year supply and delivery of the housing target for the plan period.
- Work in partnership with landowners and agents.

Monitoring

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

Monitoring ref	Indicator	Target
DS2a	The amount of employment land and housing completions by settlement.	Scale of development in settlements proportional to position in settlement hierarchy.
DS2b	Development outside defined settlement boundaries.	Zero new unallocated development (except those considered acceptable in the policy) outside development boundaries.

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

Strategic Policy DS3 – Overall development needs

By 2039, as a minimum, the following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough:

- 9,810 homes based on 545 dwellings per annum.
- 66.45ha of employment land for local industrial and distribution/warehousing development (including 5.35ha for replacement provision).
- 2ha of employment land for office space.
- 19.4ha of employment land for strategic B8 warehousing and distribution development.

A further 5.6ha of land will be allocated as future cemetery land (burial space) (allocation CEM1) to meet the Borough's needs up to 2039 and beyond.

For Gypsy and Traveller pitches and Showperson plots, reference should be made to the requirements set out in Strategic Policy GT1 (Overall Need) of the Gypsy and Traveller Site Allocations Development Plan Document (DPD) (adopted in 2024).

Housing land

6.14 The starting point for determining the housing target for the Borough is the NPPF and the associated PPG. The NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for.

6.15 The 'standard method', set out in the PPG, utilises the 2014 household projections over a 10-year period and applies the most recent affordability ratios. In December 2020, the PPG was updated to apply a 35% uplift to the 20 most populated urban authority areas in England. Coventry, who are a neighbouring authority, is subject to the 35% uplift. The 'standard method' figure for Nuneaton and Bedworth Borough is 421 dwellings per annum which incorporates the affordability ratios released in March 2024.

6.16 The Preferred Options document identified a housing target of 9,690 dwellings (646 dwellings per annum). These figures were derived from the draft Nuneaton and Bedworth Housing and Economic Development Needs Assessment (HEDNA) (May 2022) which was prepared by Iceni to support the Preferred Options consultation and was calculated using an 'alternative standard projection' based on more detailed analysis of household projections and demographics. The detailed analysis undertaken by Iceni considers that recent population growth is higher for Nuneaton and Bedworth Borough than reflected in the 2014 based household projections. Given that concerns had been raised regarding the accuracy of the Office for National Statistic's population estimates for Coventry, leading to the population being overestimated, the analysis in the draft HEDNA utilises dwelling completions since 2011 and data from the Patients Register to derive the figure of 646 dwellings per annum.

6.17 In addition to the draft HEDNA (May 2022), the Council, alongside Coventry and Warwickshire authorities, appointed Iceni to prepare a sub-regional HEDNA to provide a more up-to-date assessment of local housing need for each authority. In accordance with the exceptional circumstances set out in PPG, the sub-regional HEDNA also derives away from the standard methodology and models new demographic projections which take into account the 2021 census data, across a 10-year period which allows for a longer economic cycle. The 2021 census data was not published at the time the Council consulted on its Preferred Options which is why a separate draft HEDNA (2022) was commissioned as well as the sub-regional HEDNA.

6.18 Using the trend-based projections, the housing need figure for Nuneaton and Bedworth Borough Council, in the sub-regional HEDNA, was calculated at 409 dwellings per annum. This figure is significantly lower than the figure consulted on at the Preferred Options stage. As set out in the sub-regional HEDNA report this is primarily due to the sub-regional HEDNA utilising the latest Census data which was released in June 2022. Therefore, the sub-regional HEDNA modelled the new demographic projections and assessed how the population is expected to change over time and applied these alternative projections, through the framework provided, to the standard method to deduce a figure of 409 dwellings per annum.

6.19 Table 2 shows this figure comparatively with the other authorities in the Housing Market Area and compared with the standard method requirement, as set out within the sub-regional HEDNA.

Local authority	Standard method annual requirement (2014 household projections with March 2024 affordability ratios)	Trend-based (taken from the sub-regional HEDNA)
Coventry	3,081	1,964
North Warwickshire	163	119
Nuneaton and Bedworth	421	409
Rugby	525	735
Stratford-on-Avon	553	868
Warwick	653	811

Table 2: Local Authorities' housing need within the Coventry and Warwickshire Housing Market Area.

6.20 The vision and strategic objectives articulated in the plan reflect the Council's ambitions in achieving sustainable growth and regeneration to become a thriving Borough where people want to live, work and visit. Given that the housing figure for the Borough in the sub-regional HEDNA is lower than both the standard method and the figure consulted on in the Preferred Options document, there was concern that this level of growth did not reflect the economic aspirations for the Borough over the plan period. The sub-regional HEDNA predicted that the Council will experience the lowest level of economic growth within the Housing Market Area. However, there is evidence which shows that the economy could perform more strongly and there is a strong justification, when reviewing the Council's strategies, including the Economic Strategy and Transforming Nuneaton Programme, for higher housing provision to align the strategies for homes and jobs within the Borough going forward.

6.21 Therefore, the Council commissioned Iceni to prepare a bespoke report 'Towards our Housing Requirement' to supplement and be read alongside the sub-regional HEDNA. The report considers the objectively assessed housing need set out within the HEDNAs as well as other considerations which may influence the Council's decision on an appropriate housing and employment requirement. These include the affordable housing need in the Borough and the delivery of affordable housing, which is influenced by the overall housing provision and development viability, the levelling up agenda to ensure opportunity for the north of the county, emerging strategies and potential issues of unmet housing need from other parts of the Housing Market Area.

6.22 The report models a Planned Economic Growth Scenario which would require the delivery of 545 dwellings per annum, over the plan period to 2039, to support the Borough's economy and align planning for homes, jobs and infrastructure. In accordance with national policy and PPG, where authorities can show an alternative approach identifies a need higher than using the

standard method, and that it reflects current and future demographic trends and market signals, then the approach can be considered sound as it will exceed the minimum starting point. This is the case for Nuneaton and Bedworth Borough Council.

6.23 A figure of 545 dwellings per annum over the plan period equates to 9,810 dwellings. This will comprise of housing completions in the plan period, housing allocations, existing sites with full and outline planning permission, prior notification/approvals, strategic and non-strategic housing allocations, with an allowance for windfall developments.

Housing delivery

6.24 As set out above, Nuneaton and Bedworth Borough will make provision for a minimum of 9,810 dwellings between 2021 and 2039. This equates to an annual requirement of 545 dwellings each year, which is the Borough's housing need as established within the report 'Towards our Housing Requirement'.

6.25 The delivery of housing development, for the plan period, is broken down through the following means for the plan period to 2039 (base date 31st March 2024):

Status	Total
Net Completions (1 April 2021 - 31 March 2024)	2,761
Committed supply of dwellings (at 1 April 2024)	3,100
Residual need for plan period	3,949
Strategic housing allocations	3,978
Non-strategic housing allocations	638
Borough Plan Review allocations	4,616
Windfall sites[25]	504
10% deduction for non-delivery on small sites	-18
Total Housing Supply[26]	10,963

Table 3: Housing delivery.

6.26 Table 3 demonstrates the provision of approximately 10,963 dwellings through the Borough Plan Review. Such supply is in excess of the minimum housing requirement of 9,810 homes within Strategic Policy DS3 – Overall Development Needs. This buffer provides flexibility in the housing supply across the plan period in the unforeseen event that some of the identified sites do not come forward as predicted.

[25] Windfall sites only include the years 2027/28 – 2039 to avoid double counting.

[26] Totals for strategic sites and non-strategic sites exclude C2 units and therefore include only 93 C3 units for SEA6 at Bowling Green Lane (allocation for 150 units) and 58 units for NSRA2 at Former Manor Park Community School (allocation for 123 units including extra care units).

6.27 In the three years prior to April 2024, the Council has delivered 2,761 new homes within the Borough, at an average rate of 920 dwellings per annum. Housing delivery has increased significantly since 2021. In the ten years before the plan period the average number of homes completed each year had been 424 dwellings. This increase in the number of homes completed annually is primarily due to a large number of strategic allocations, from the adopted Borough Plan 2011-2031, delivering homes in the early part of this plan period.

6.28 Phasing is one of the most important aspects of housing delivery to ensure that all the development which comes forward is sustainable. Given the cross over of this plan period with that of the previous Borough Plan, it is likely that the strategic housing allocations will continue to deliver in the earlier to middle years of the plan period. A housing trajectory of the anticipated completions of development is set out in Appendix B. The Council will regularly review its housing trajectory to ensure it is up-to-date and realistic in terms of delivery in accordance with national policy and PPG.

6.29 At the point of submission of the plan, for the five years 2023 – 2027, based on the projected completions in the trajectory, there is a 7.49 year supply (with a 5% buffer). This is justified given the plan seeks to ensure the continued delivery of strategic sites allocated within the adopted Borough Plan, of which the majority are either under construction, benefit from planning permission or are at an advanced stage in the application process. Therefore, it is realistic that the majority of strategic sites will deliver a significant number of units over the next five years.

Employment land

6.30 In May 2022 the Council published the Nuneaton and Bedworth Draft HEDNA[27] to inform the Borough Plan Review Preferred Options. The employment land need assessment was informed by work undertaken for the emerging subregional HEDNA. In line with the PPG[28], the assessment used a range of modelling techniques including labour trend models, floorspace trends informed by Valuation Office Agency statistics and completions data. In drawing conclusions, the assessment used the most appropriate modelling technique for different sectors. In the final analysis, the Draft HEDNA proposed for the period 2021-2039, a requirement for 82.5ha of employment land.

[27] Iceni Projects (2022). *Nuneaton and Bedworth Housing and Economic Development Needs Assessment.*

[28] Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2020). *Guidance.*

6.31 Iceni have modelled employment land needs over the proposed plan period. Economic forecasts project economic growth of almost £800m between 2021-2039, with an increase of 5,000 jobs in the Borough. This sees employment in the Borough recovering to pre-pandemic levels in 2024 and growing broadly in line with the long-term trends, with 3,800 jobs created between 2024-2039.

6.32 Iceni's analysis indicates a very strong demand for industrial and warehouse/distribution premises in the Borough over the plan period. Utilising a five-year 'completions trend' projection, this indicates a need of 35,300m^2 for industrial land and 293,900m^2 of warehousing/distribution land. Accounting for a 0.5 ratio of developable land for industrial land and a 0.4 ratio for warehousing and distribution, this delivers a total need of 7.1ha of industrial land and 73.5ha of warehousing/distribution, equating to an overall warehouse and industrial employment land need for Nuneaton and Bedworth Borough of 80.5ha, including a provision for strategic B8 need.

6.33 Iceni's analysis indicates relatively weak demand for office development in the Borough, with likely demand for occupation by small and medium sized enterprises. This is due to the availability of high quality office space in other authority areas, with limited demand and delivery of office space in the Borough over the last 10 years. Iceni's analysis estimates a potential office need for the Borough of 2ha up to 2039.

6.34 In November 2022 the Council published, alongside other Coventry and Warwickshire local authorities, a sub-regional assessment of the need for housing, economic growth potential and employment land needs[29]. The outcome of the sub-regional HEDNA for the employment land requirement in Nuneaton and Bedworth Borough was 47.7ha (2021-2041) or 69ha (2021-2050), significantly lower than that set out in the draft HEDNA. This was primarily due to release of the 2021 Census data and the completions data considering a 5-year period rather than 10 years as in the draft HEDNA. The sub-regional HEDNA, in addition, identifies a need for 606ha (subsequently reviewed by Iceni to 436ha) of land to 2041 to accommodate the need for growth of the strategic warehousing (Class B8) sector across Coventry and Warwickshire.

6.35 'Towards a Housing Requirement for Nuneaton'[30] was published alongside the sub-regional HEDNA and intended to be read alongside the findings of the sub-regional HEDNA. The report takes into account the findings from the Draft Nuneaton and Bedworth HEDNA and other relevant local considerations including the economic aspirations of the Borough which need to be considered in setting the housing and employment target. The report recommends the Draft HEDNA as a suitable basis for determining employment land need as it:

[29] Iceni Projects (2022). *Coventry and Warwickshire Housing and Economic Development Needs Assessment.*
[30] Iceni projects (2022). *Towards a Housing Requirement for Nuneaton and Bedworth.*

- Utilised more up-to-date employment completions data than the sub-regional.
- Allowed for the provision of strategic B8 warehousing and distribution.

6.36 'Towards a Housing Requirement for Nuneaton' followed the conclusions of the draft HEDNA, that 82.5ha of employment land would be an appropriate minimum level of provision, including contributing to the sub-regional need for strategic B8 warehousing and distribution development.

6.37 The NPPF[31] states that planning policies and decisions should recognise and address the specific locational requirements of different sectors including storage and suitably accessible locations. The PPG[32] also requires that authorities assess the stock of land for employment uses within the area, patterns of supply losses, evidence of growth, market demand and market failure.

6.38 To gain a greater understanding of employment requirements of different sectors and the current status of employment land, in May 2023 the Council commissioned Iceni Projects to review the employment land portfolio in the Borough[33]. The review assessed existing employment sites in the Borough to determine if the sites are of sufficient quality to serve the economic needs of the Borough for the duration of the Borough Plan, and if any employment land should be removed from the supply portfolio. The document also brought together the previous HEDNA studies to determine the need for employment land in the Borough and to segment the contribution of strategic B8, identified in the Draft HEDNA, and provide an indicative figure.

6.39 West Midlands Local Authorities, including Nuneaton and Bedworth, have commissioned a study into strategic employment sites in the area. The study does not attempt to override the local approach but to add value. The early findings of the West Midlands Strategic Employment Site Study identify two drivers of employment land need:

- Replacement of existing strategic employment sites due to physical and functional obsolescence.
- The need to accommodate growing traffic volumes over the long-term.
- Additional larger scale sites to meet modern industry requirements.

[31] Department for Levelling Up, Housing and Communities (2021). *NPPF.*
[32] Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2020). *Guidance – HEDNA.*
[33] Iceni Projects (2023). *Review of Nuneaton & Bedworth Employment Land Portfolio.*

6.40 The West Midlands Strategic Employment Site Study has not reached a stage where a strategic employment land figure can be established or attributed to a Local Authority. The review of Nuneaton and Bedworth Employment Land Portfolio Study assessed all employment sites in the Borough and considered employment sites which are physically or functionally obsolete. The identified sites have been removed from the employment land portfolio and added to the overall employment land need. The HEDNA and subsequent Employment Land Review identified an indicative figure for strategic B8 which will act in lieu of a growth figure yet to be established in the West Midlands Study.

6.41 Bringing together the various studies, the Employment Land Portfolio Study calculated, over the plan period 2021-2039, the employment land need as:

	Developable Land (ha)
Office needs	2
Local Industrial and Warehouse needs	61.1
Replacement provision for site losses	5.35
Minimum provision for strategic B8 needs	19.4
Total employment land needed (2021-2039)	87.85

Table 4: Employment land need (2021-2039).

Employment land supply

6.42 To understand the level of employment need in the Borough, the Council asked Iceni Projects to calculate the pipeline supply of employment land. The assessment considered:

- Employment land completed in 2021-22.
- Extant planning permissions.
- Supply from existing floorspace.
- Vacant plots within existing employment sites.
- Windfall potential.
- Extant Borough Plan allocation.

6.43 In assessing extant Borough Plan allocations, the analysis was able to consider the actual developable area from planning applications to ensure the figure was the most accurate available. Supply from existing floorspace factored a 7.5% vacancy rate to ensure there is a functioning market. Employment land completions utilised data from the Council's Authority Monitoring Report for the period 2021-22. Extant planning permissions

were considered to April 2022. The Council's monitoring data to April 2023 shows 34.2ha of these extant planning permissions and are under construction. The windfall assessment was based on Iceni's analysis of gross completions of employment land within the Borough over the last 10 years, with a 30% reduction to ensure delivery was not overly reliant on windfall and considered a reduced delivery period to ensure no overlap with extant planning permissions. The overall assessment concluded there is a total employment land supply of 107.05ha. Subsequent to the Employment Land Review the Council's Authority Monitoring Report to April 2023 shows there have been 2.12ha of employment land completions. The completions for 2023 totalled 1.25ha, which has been removed from extant planning permissions and added to the overall completions figure in the Table 5.

	Land (ha)
2021/22 - 2022/23 completions	2.33
Extant planning permissions - April 2023	34.48
Reuse of vacant floorspace	0
Vacant plots within employment areas	2.99
Extant allocations - April 2023	53.25
Windfall allowance	15.1
Total supply	108.15

Table 5: Employment land supply.

Supply demand balance

6.44 Calculating the identified employment land need and the supply position there is a surplus of 20.30ha of employment land.

	Land (ha)
Total employment land needed (2021-2039)	87.85
Total identified supply	108.15
Surplus	20.30

Table 6: Surplus employment land.

Further considerations

6.45 Office employment land need is modest and the viability for solely office-based schemes in the Borough can be challenging. Mixed use development in Nuneaton Town Centre, or standalone development on employment sites, are most likely to deliver office schemes. The Transforming Nuneaton scheme of a library and business centre could contribute towards office need. The site area totals 1.84ha and concerns the erection of 65 dwellings, a new library and business centre. An outline application has been submitted which is to be determined and so does not from part of the pipeline supply.

6.46 The strategic B8 need is being met through the Faultlands development, which is an allocated site. There are other allocations at Wilsons Lane, Prologis Extension, Coventry Road and Bowling Green Lane which could provide further large B8 units or smaller units for local warehouse or industrial needs. The details of these sites are set out in Strategic Policy DS5 – Employment Allocations.

6.47 The windfall allowance provides additional employment land to offer capacity/resilience should there be demand. It is likely that this will go towards meeting the needs of small to medium sized enterprises in the Borough.

Employment Trajectory

6.48 The Council will regularly review the employment trajectory and is informed by the findings of the Employment Land Review[34] and Housing and Economic Land Availability Assessment. An employment trajectory of the anticipated completions of development is set out in Appendix C. Delivery will not be consistent over the plan period as the proposed schemes tend to deliver large units. The positive progress regarding planning applications is reflected in the trajectory, with delivery anticipated in the short to medium term.

Gypsies and Travellers

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

6.50 The 2021 Gypsy, Traveller and Travelling Showperson Accommodation Assessment has been used to calculate the number of pitches and plots required between 2021/22 – 2036/37 and the Gypsy and Traveller Site Allocations DPD uses this as the basis for setting out the need and where the need will be met. The accommodation assessment will be updated every five

[34] Iceni Projects (2023). *Review of Nuneaton & Bedworth Employment Land Portfolio.*

years and these subsequent updates will be used to calculate the number of pitches and plots required in the future and, if necessary, these will in turn be used to update this separate DPD.

Cemetery Land

6.51 The Burial Space Capacity Data (November 2022) identified there is insufficient burial space capacity to meet the Borough's needs over the plan period. It is therefore proposed that land is allocated for burial space over the plan period and beyond. This is address further in Strategic Policy CEM1.

Borough Plan objectives

6.52 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.
- Strategic objective 4.

Evidence base

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

- Iceni Projects (2022). *Draft HEDNA for Nuneaton and Bedworth Borough*.
- Iceni Projects (2022). *Sub-regional HEDNA for Coventry and Warwickshire Local Authorities.*
- Iceni Projects (2022). *Towards a Housing Requirement for Nuneaton and Bedworth.*
- Iceni Projects (2023). *Review of Nuneaton & Bedworth Employment Land Portfolio.*
- Arc4 (2021). *Nuneaton and Bedworth Borough Gypsy and Traveller and Travelling Showperson Accommodation Assessment.*
- Cushman and Wakefield (2022). *Retail, Leisure and Office Study Update.*
- Nuneaton and Bedworth Borough Council (2022). *Burial Space Capacity Analysis.*
- Nuneaton and Bedworth Borough Council (2023) *Windfall Study.*

Delivery mechanisms

6.54 The delivery mechanisms for this policy are as follows:

- The Economic Development Strategy will include a work programme to assist in the delivery of strategic employment sites and town centre projects as well as proactively attracting investment.
- Gypsy and Traveller Site DPD (and as per any subsequent updates).
- Maintenance of a five-year supply and delivery of the housing target for the plan period.
- Work in partnership with landowners and agents.

Monitoring

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

Monitoring ref	Indicator	Target
DS3a	Housing completions.	545 dwelling completions per annum.
DS3b	Development of employment land.	87.85ha of land is developed for employment uses.
DS3c	Housing land supply.	Continuous five-year land supply of housing.

Table 7: Indicators and targets to be monitored for Policy DS3.

Strategic Policy DS4 – Residential allocations

The following strategic sites will be allocated for residential development and associated infrastructure uses, as shown on the proposals map. Further specific policies for each of the strategic allocations are detailed within Chapter 7.

Strategic Allocations for Housing Land

Strategic Housing Allocation (SHA)	Site Name	Approximate Dwellings
SHA1	Top Farm	1,700
SHA2	Arbury	1,525
SHA3	Tuttle Hill	350
SHA4	Hospital Lane	445
SHA5	West of Bulkington	375
SHA6	Hawkesbury Golf Course (remaining land)	176
SHA7	East of Bulkington	230
Adjacent to the employment allocation (SEA6)	Bowling Green Lane	150 (including extra care units, remainder as employment)
Adjacent to the employment allocation (SEA2)	Wilsons Lane	73 (remainder as employment)
Total Strategic Allocations		**4,403**

Along with the Strategic Development Allocations listed above and identified on the policies map, the following non-strategic sites are allocated for residential development within the plan period. Each of the non-strategic housing sites have site specific considerations, which are outlined in the supporting text below.

Non-strategic Allocations for Housing Land

Non-strategic Residential Allocation (NSRA)	Site Name	Approximate Dwellings
NSRA1	Former Bedworth Rugby Club, Smarts Road, Bedworth	122
NSRA2	Former Manor Park Community School, Nuneaton	123 (including extra care units)
NSRA3	West of Coventry Road/Wilsons Lane, Exhall	95
NSRA4	Vicarage St Development Site, Nuneaton	60
NSRA5	Land rear of Burbage Lane	46
NSRA6	Land at Bucks Hill, Nuneaton	40
NSRA7	Abbey Street, Nuneaton	30
NSRA8	Land rear of Lilleburne Drive and Willow Close, Nuneaton	29
NSRA9	Former New Inn Public House, Bulkington	42
NSRA10	Land at Bermuda Road, Nuneaton	25 (or potentially 60 extra care units)
NSRA11	Upper Abbey Street, Nuneaton	22
NSRA13	Armson Road, Exhall	15
NSRA14	Mill Street/Bridge Street, Nuneaton	15
NSRA15	Bennetts Road, Kerseley	10
Total Non-strategic Allocations		**674**

The housing trajectory, for the plan period, can be found in Appendix B.

6.56 The non-strategic development sites allocated for housing, through Policy DS4 – Residential Allocations, are detailed below. The following supporting text for each non-strategic allocation site is guidance only (they are not policy requirements).

NSRA1: Former Bedworth Rugby Club

- Site Area: 3.7ha.
- Approximate Dwellings: 122.
- Alternative Site Reference: EXH-1.

NSRA1



- The site is a former playing field and other leisure uses, located to the east of Bedworth Road and is currently under construction for 122 dwellings.

- The Strategic Flood Risk Assessment (SFRA) Level 2 (August 2023) provided for the Borough Plan Review required the site to undergo a full Level 2 assessment. The site is within Flood Zones 1 and 2 and the report states that safe access and egress will need to be demonstrated in flood events and that site drainage proposals should avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be considered as part of the further site-specific flood-risk assessment that will be required with any planning application. The Report concluded that Sequential and Exception Tests are required for this site.

NSRA2: Former Manor Park Community School

- Site Area: 2.3ha.
- Approximate Dwellings: 123 (including extra care units).
- Alternative Site Reference: ABB-4.



- The site is a former community school located in a primarily residential area. It adjoins Beaumont Road and Vernons Lane.

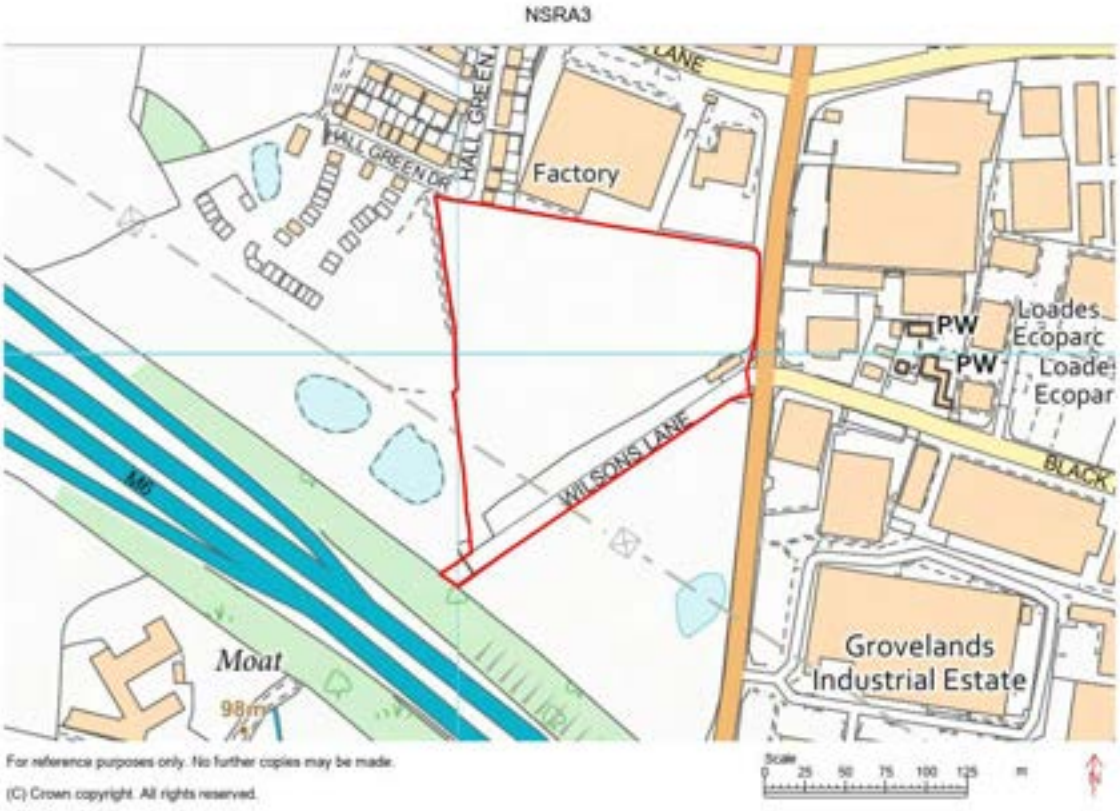
- Opportunity exists to create a new positive frontage to Vernons Lane, retain views from the north of the site towards Mount Judd, retain established trees and boundary hedges wherever possible, ensure development is sensitive to its location adjacent to the conservation area, that development reflects the characteristics of the surrounding townscape and that built development sits outside the small area of flood zone located in the south of the site.

- Development should seek to avoid any loss of trees covered under the Tree Preservation Order on the site (reference TPO 1.19).

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

NSRA3: West of Coventry Road/Wilson Lane

- Site Area: 2.9ha.
- Approximate Dwellings: 95.
- Alternative Site Reference: EXH-3.



- The site is located to the south of Bedworth and formed part of HSG6 – School Lane in the Borough Plan (2011-2031), which was adopted in 2019.

- Opportunities exist to retain established trees within any proposed development and retain and enhance existing hedgerows. Where development is required to be set back from electricity pylons in the south of the site, this space could be used to establish a landscape buffer to include retained and proposed planting. Finally, woodland and tree planting could be included to reduce the development's prominence within the landscape.

- The SFRA Level 2 (August 2023) report, provided for the Borough Plan Review, flags the site as at low flood risk and there are no areas within Flood Zones 2 or 3. However, the Report identifies there is some minor surface water ponding and the report states that safe access and egress will need to be demonstrated in flood events. This document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application.

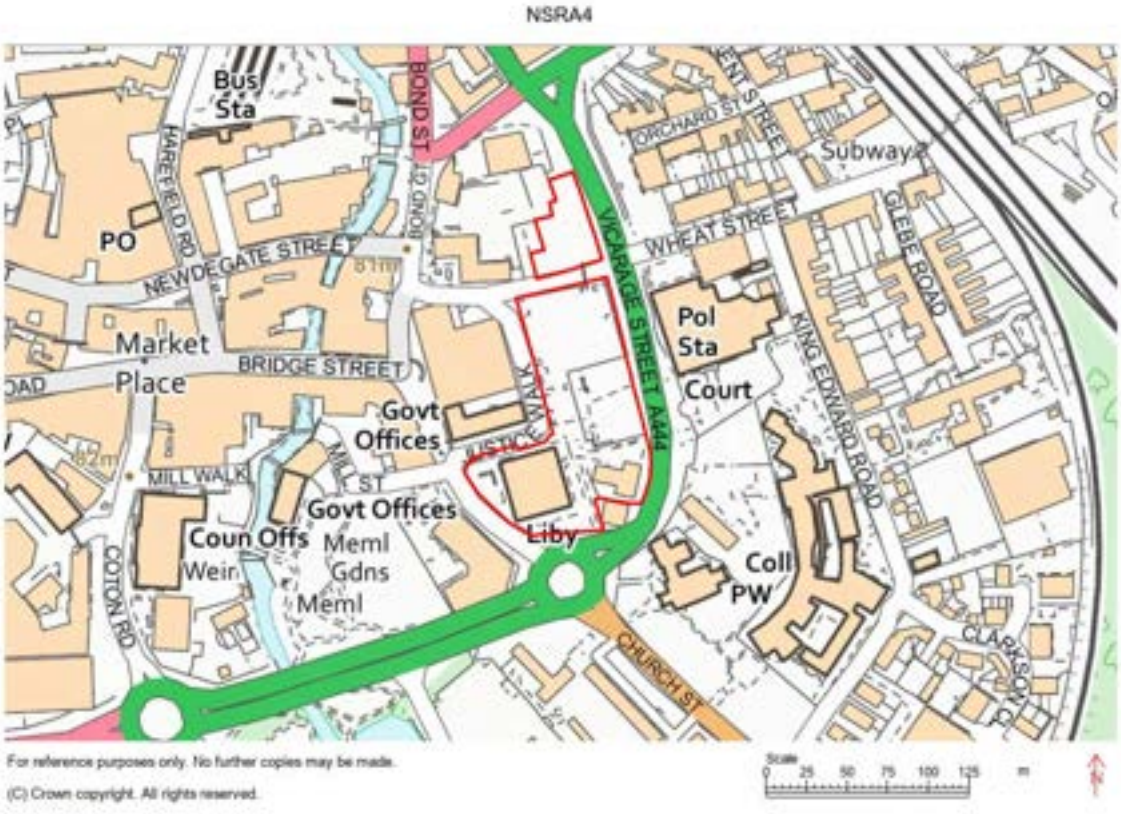
- Responses from the Infrastructure Delivery Scheme (IDS), for the Borough Plan Review, include requirements for contributions specific to HSG6 (which this site was previously within):

  - Contributions to National Grid for the site to pay for 11kV, 33kV and 132kV diversions and new primary substation.
  - The provision and contribution of formal and informal open space and new cycle linkages to Heckley Recreation Ground, central ponds and habitat, alongside the provision of the associated landscape buffer along the southern edge of the site, together with enhancements to existing hedgerows on the site.
  - Provision or contributions to a MUGA, playing pitches, Heckley Recreation Ground community park and Miners Welfare Park, towards the management and enhancement of the retained biodiversity areas and towards proposed informal open space for management and maintenance arrangements.
  - A financial contribution towards primary education at local schools (expansion required for Newdigate Primary School). Additionally provision for early years, secondary (expansion of Ash Green School), SEND and post-16 as required.
  - GP expansion at Bedworth for 0.82 GPs and likely extension to Bedworth Health Centre, Leicester Road Surgery or Old Cole House Surgery Park Road.
  - Provision/contribution to play areas, MUGA and playing pitches.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

NSRA4: Vicarage Street Development

- Site Area: 1.2ha.
- Approximate Dwellings: 65.
- Alternative Site Reference: ABB-8.



- The site consists of Nuneaton Library, car parks and vacant land. The site is bound by the A444 to the south and east, Leicester Road to the north and Justice Walk to the west.

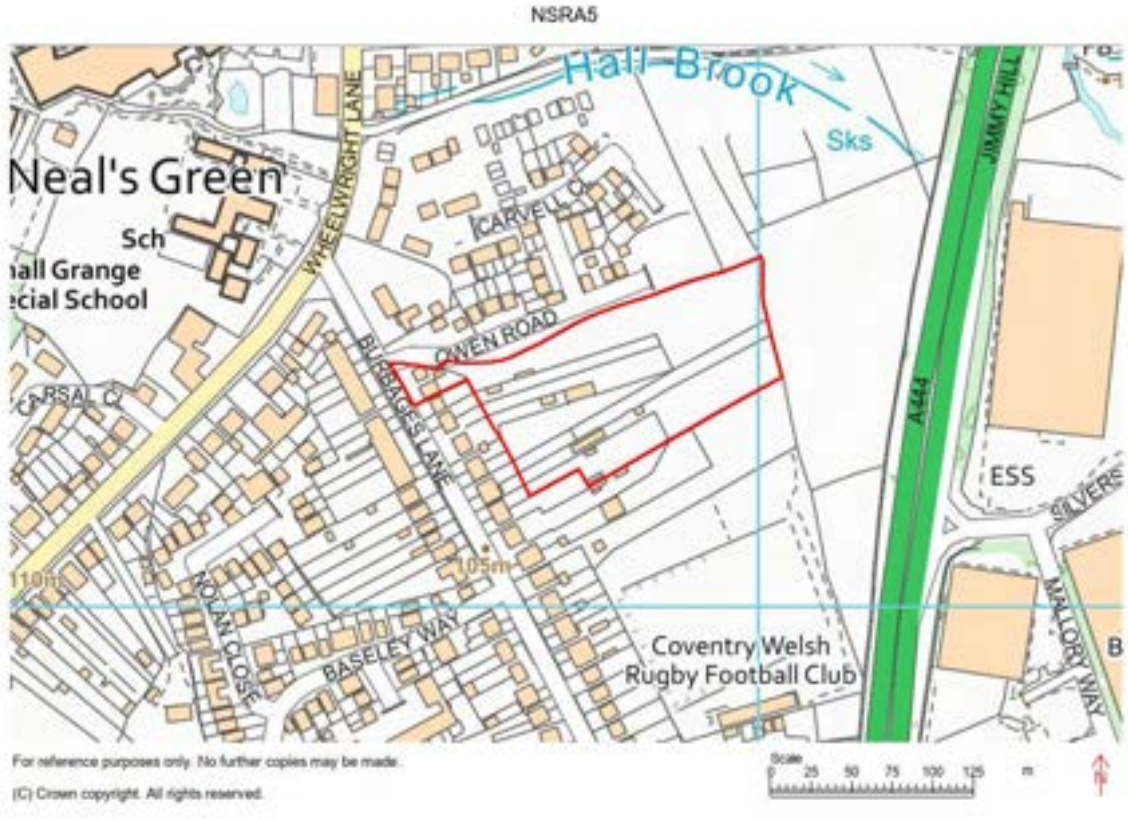
- The site has significant potential to connect the existing green infrastructure, from the south and west, to the north leading to the railway station and the ecological corridor of the rail network. Landscaping will be important to achieve biodiversity net gain as well as meet urban climate change mitigation objectives. Such features may include green roofs and walls.

- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zones 1 and 2. The Report referred to fluvial flooding and ponding in flood events. The Level 2 Assessment concluded that site drainage proposals should demonstrate the requirements for safe access/egress including allowances for climate change, and that drainage must avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be considered as part of the further site-specific flood-risk assessment that will be required for any planning application. The Report concluded that a Sequential Test is required for this site.

- Development on the site has the potential to affect heritage assets including archaeological remains and any planning application will need to be accompanied by a Heritage Impact Assessment.

NSRA5: Land rear of Burbages Lane, Ash Green

- Site Area: 1.6ha.
- Approximate Dwellings: 47.
- Alternative Site Reference: EXH-8.



- The site comprises of a pasture enclosed by hedges and trees, along with part of the rear residential gardens of properties off Burbages Lane.

- Where possible existing established trees, particularly to the site boundaries, should be retained, and enhanced planting to site boundaries, especially to the eastern boundary, should be implemented to strengthen the settlement boundary. The existing public right of way should be incorporated into the layout of any proposed development.

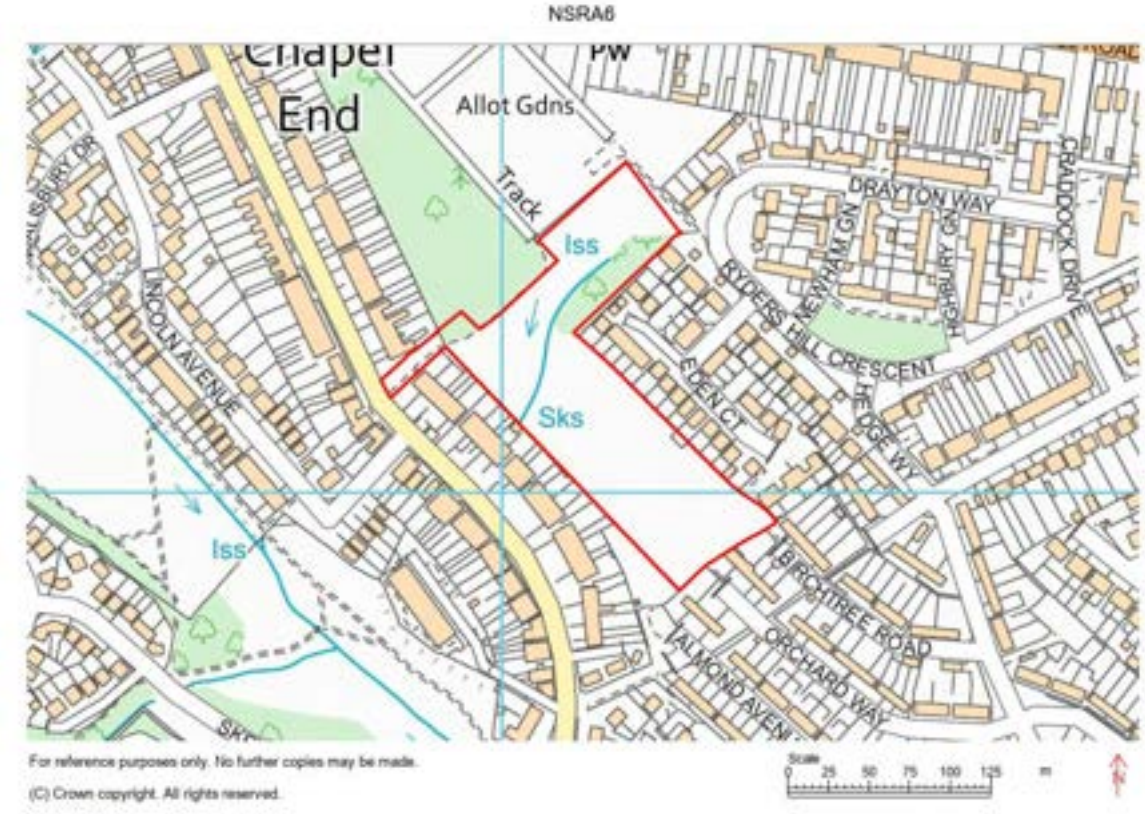
- It will be important to establish the size of the slow worm population and how these important and rare species in Warwickshire can be protected and enhanced on the site and in the wider environment.

- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, flags the site as at low flood risk. The site is within Flood Zone 1. The Report identified some ponding during flood events which could limit access/egress to the site. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

NSRA6: Land at Bucks Hill, Nuneaton

- Site Area: 1.9ha.
- Approximate Dwellings: 40.
- Alternative Site Reference: CAM-1.



- The site is situated between Bucks Hill Road and Eden Court in the Chapel End areas of Nuneaton.

- Given the topography of the site careful consideration needs to be given to the design of any development.

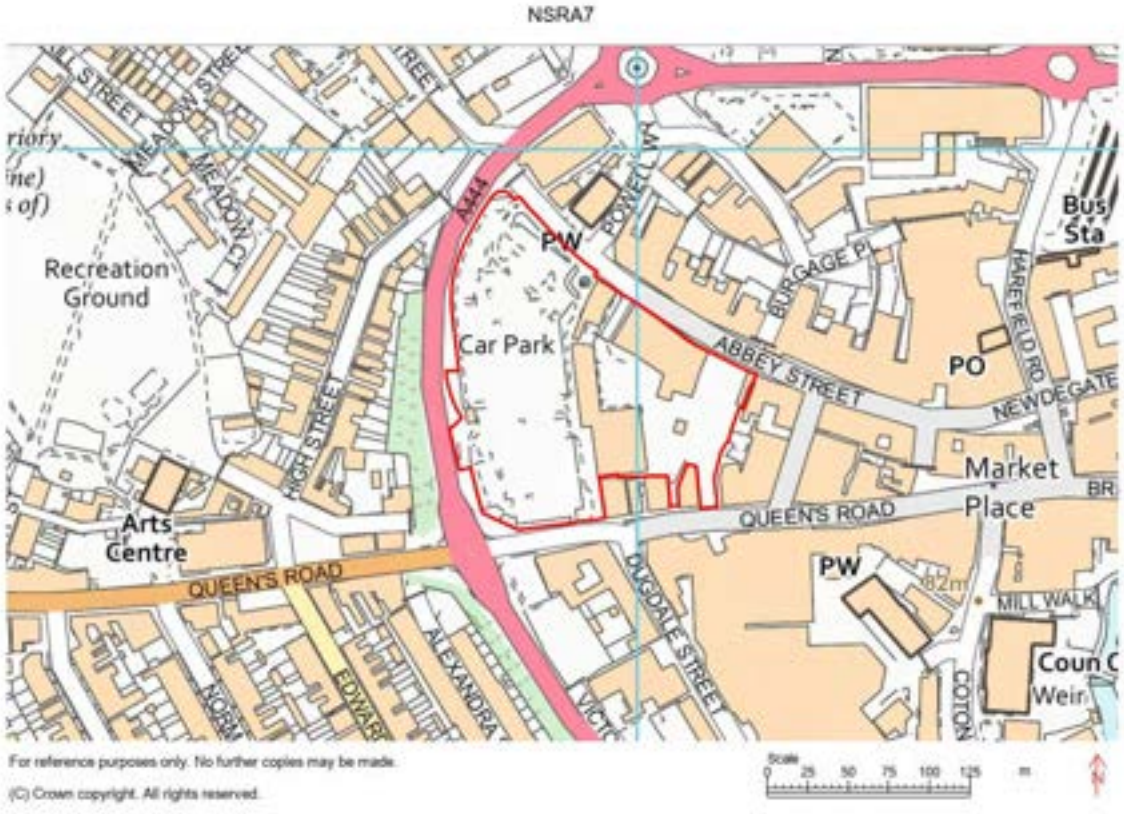
- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zone 1, but the report flags the site as having some surface water risk and ponding during flood events. Site drainage proposals should address the requirements for access routes, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime. The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding. The document

should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

NSRA7: Abbey Street, Nuneaton

- Site Area: 2.4ha.
- Approximate Dwellings: 30.
- Alternative Site Reference: ABB-6.



- The site is located in Nuneaton Town Centre between Abbey Street and Queen's Road and is bound to the west by the A444. The land comprises of a car park, commercial buildings and underdeveloped land.

- In accordance with the hybrid permission (Application Reference: 03765) the site will be developed in phases, with the third phase comprising of 30 residential units expected to be delivered later in the plan period.

- The site presents the opportunity to green the urban fabric of Nuneaton through landscaping. Such opportunities include green roofs, landscape planting and green walls. The site presents the opportunity to link the Nuneaton Recreation Ground with the town centre, and potential to link with the urban renewal project further to the east.

- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zones 1, 2 and 3 and the report flags the site as having some ground, fluvial and surface water risk and ponding and a small section is within the Environment Agency Flood Warning Area. Site drainage proposals should address the requirements for access routes, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime. The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

- Development on the site has the potential to affect heritage assets and any planning application will need to be accompanied by a Heritage Impact Assessment.

NSRA8: Land rear of Lilleburne Drive and Willow Close

- Site Area: 2.1ha.
- Approximate Dwellings: 29.
- Alternative Site Reference: GAL-7.



- The site is located on the north-west edge of Nuneaton town and lies on the border between the administrative boundaries of Nuneaton and Bedworth and North Warwickshire.

- The access to the site is located within the North Warwickshire Council boundary.

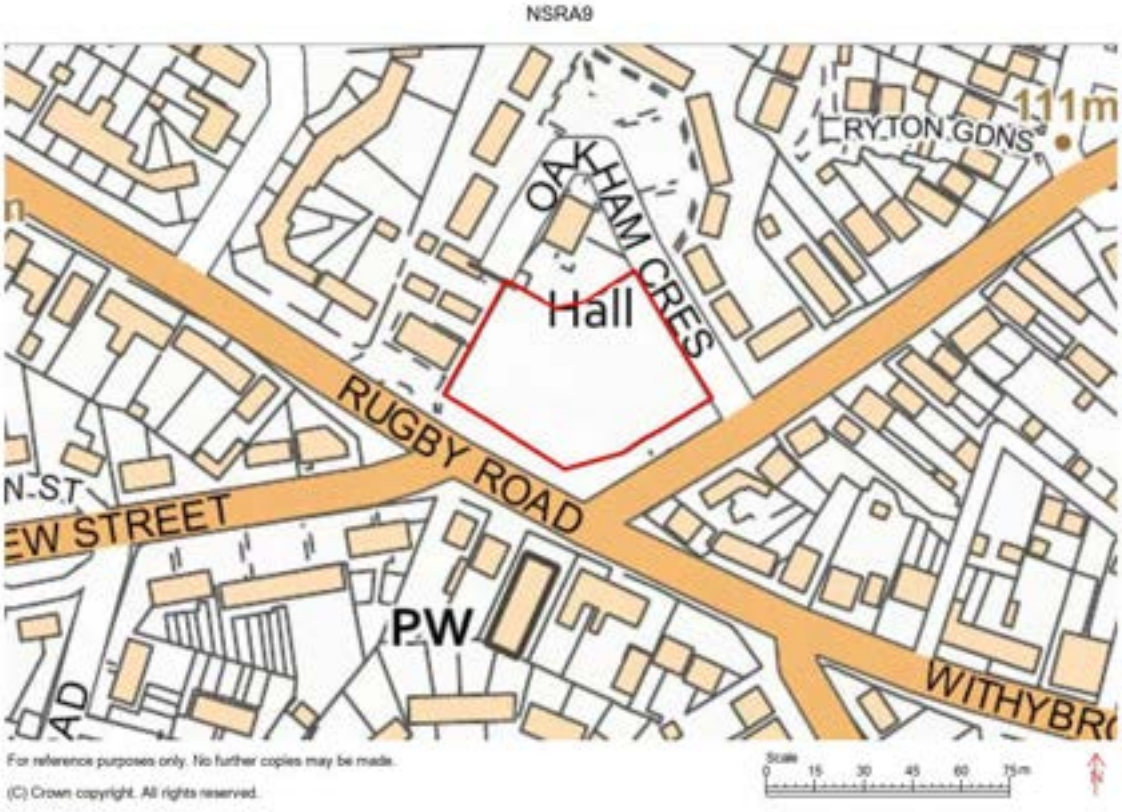
- Opportunities exist to set development back from Bar Pool Brook to protect its function as a wildlife corridor and to continue a sense of undeveloped character along the valley bottom. The existing public right of way should be retained and integrated within any proposed development and existing vegetation should be retained wherever possible. New tree planting should be used to soften the appearance of any development, complementary habitats should be provided adjacent to Bar Pool Brook and any open space proposed, within the site, should link harmoniously with that at Nuneaton Common.

- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zones 1, 2 and 3 and the report flags the site as having some fluvial flood risk and significant surface water. The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

NSRA9: Former New Inn Public House, Bulkington

- Site Area: 0.3ha.
- Approximate Dwellings: 42.
- Alternative Site Reference: BUL-9.



- The site is located in the urban area of Bulkington bound by Rugby Road and Wolvey Road to the south and Oakham Crescent to the north.

- The site benefits from a previous consent for 44 dwellings (Application reference: 035641) which has been partially implemented and so remains extant.

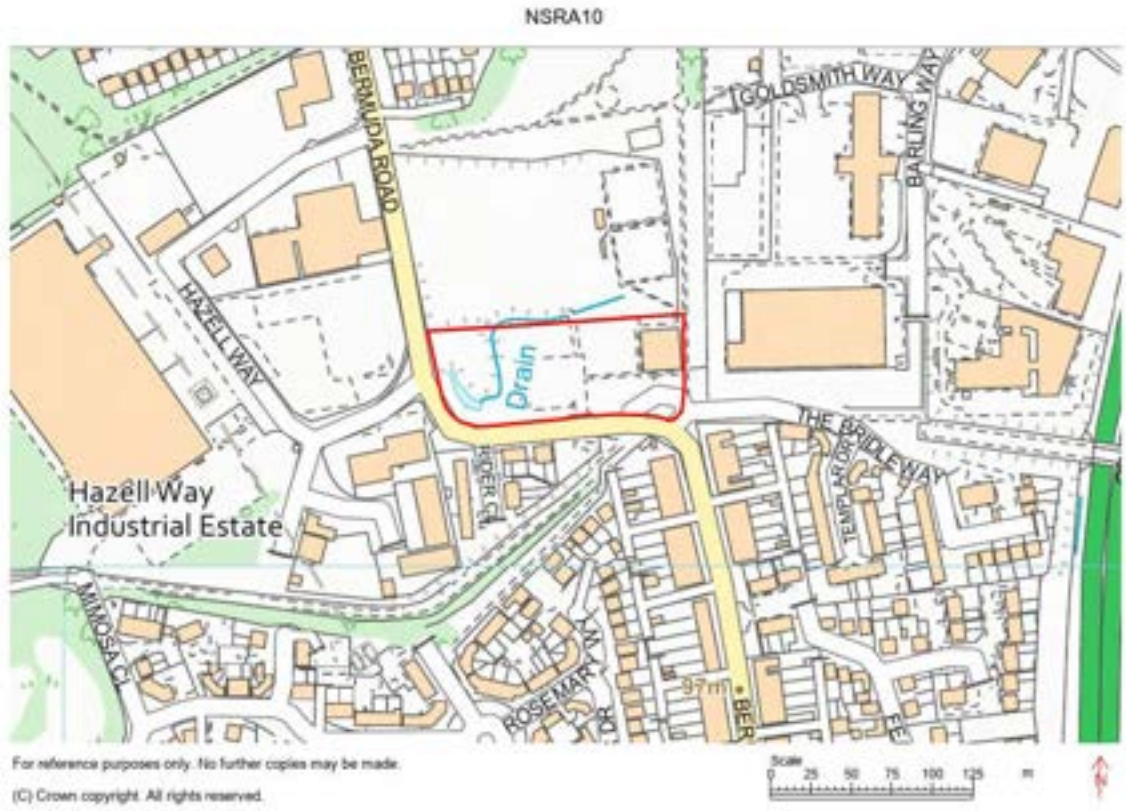
- The site will need to be developed in a sensitive manner to ensure biodiversity net gain.

- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, flags the site as having some significant surface water risk even though the site is within Flood Zone 1. The provisions for safe access and egress must address the potential increase in severity and frequency of flooding, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be

referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

NSRA10: Land at Bermuda Road, Nuneaton

- Site Area: 0.9ha.
- Approximate Dwellings: 25 (or potentially 60 extra care units).
- Alternative Site Reference: ARB-1.



- The site is partially community use and partially vacant land. Due to previous land uses in the area (Bermuda Landfill Site - a former landfill site that accepted waste material) there may be potential for landfill gas to be generated. Developers may be required to carry out a comprehensive risk assessment due to the risks the former landfill site poses. The local authority's Environmental Health and Building Control departments would wish to ensure that any threats from landfill gas have been adequately addressed in the proposed development.

- The site has planning consent for a GP surgery (Application reference 031064). Development on this site would need to demonstrate that delivery of a medical centre is not viable.

- The Phoenix Centre will be retained, and car parking reconfigured to accommodate new residential development or potentially extra care units.

- Any re-provisioning of car parking should not take place on the adjoining playing field land nor should the proposed residential development prejudice the use of the playing field site.

- Opportunities exist to retain existing drainage features and associated vegetation in the west of the site. New hedgerows should be introduced to the site to provide structure to the landscape and new habitats and linkages should be provided to the public right of way to the east and open space to the north. Any open space or car park within the development should have pedestrian links to community facilities to the north and appropriate landscape treatment.

- The site has local ecological value, that if managed sensitively, has the potential to become of county importance in the short-term. The Bermuda Phoenix Recreation Ground also has this potential.

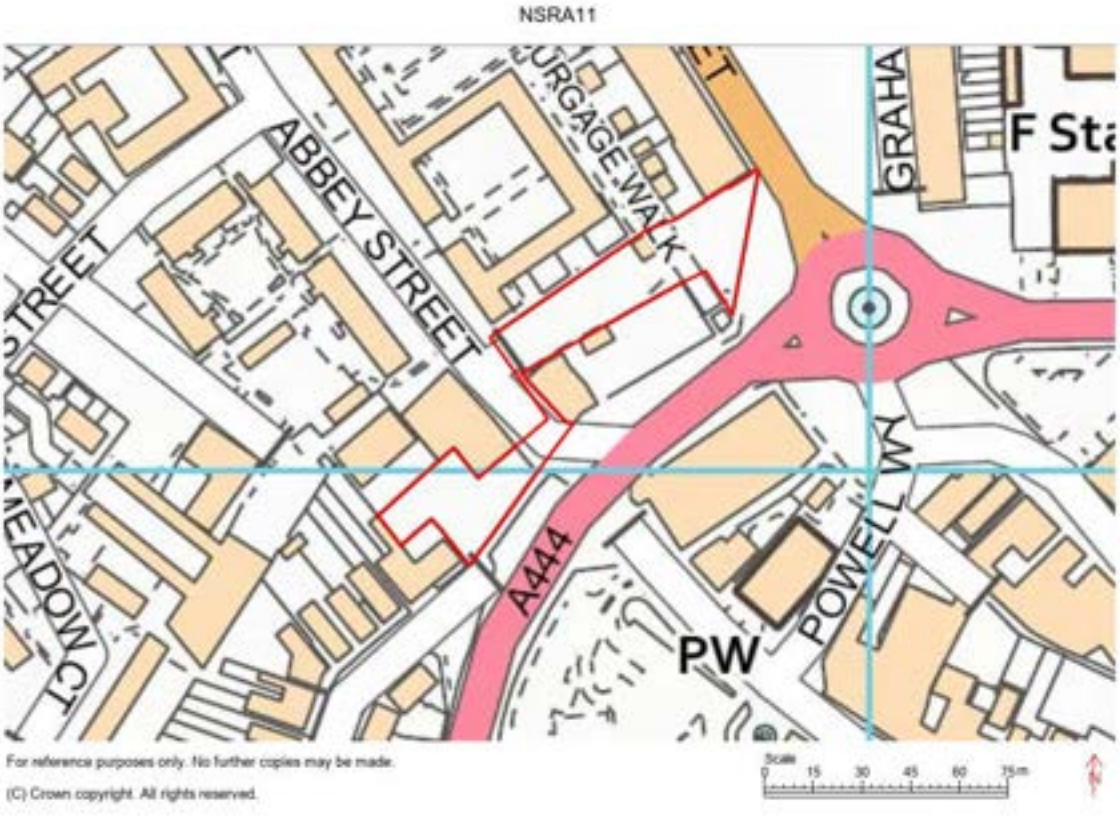
- Maintain and enhance the connectivity between Harefield Lane with the Bridleway.

- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. This was due to its proximity to Griff Brook (which currently has no hydraulic modelling) and cumulative impact with the Strategic Housing Allocation of the Arbury site (SHA2). The site is within Flood Zone 1. The Report flags the site as having surface water risk for some annual exceedance probabilities. The Report also states that safe access and egress will need to be demonstrated in the 1% AEP plus climate change surface water and fluvial events and that site drainage proposals should address the requirements for access routes, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

NSRA11: Upper Abbey Street, Nuneaton

- Site Area: 0.2ha.
- Approximate Dwellings: 22.
- Alternative Site Reference: ABB-5.



- The site comprises Upper Abbey Street car park and undeveloped land.

- Any development on this site will need to deliver biodiversity net gain and this could be achieved through soft landscaping and enhancing connections with Abbey Green Park and Nuneaton Recreation Ground.

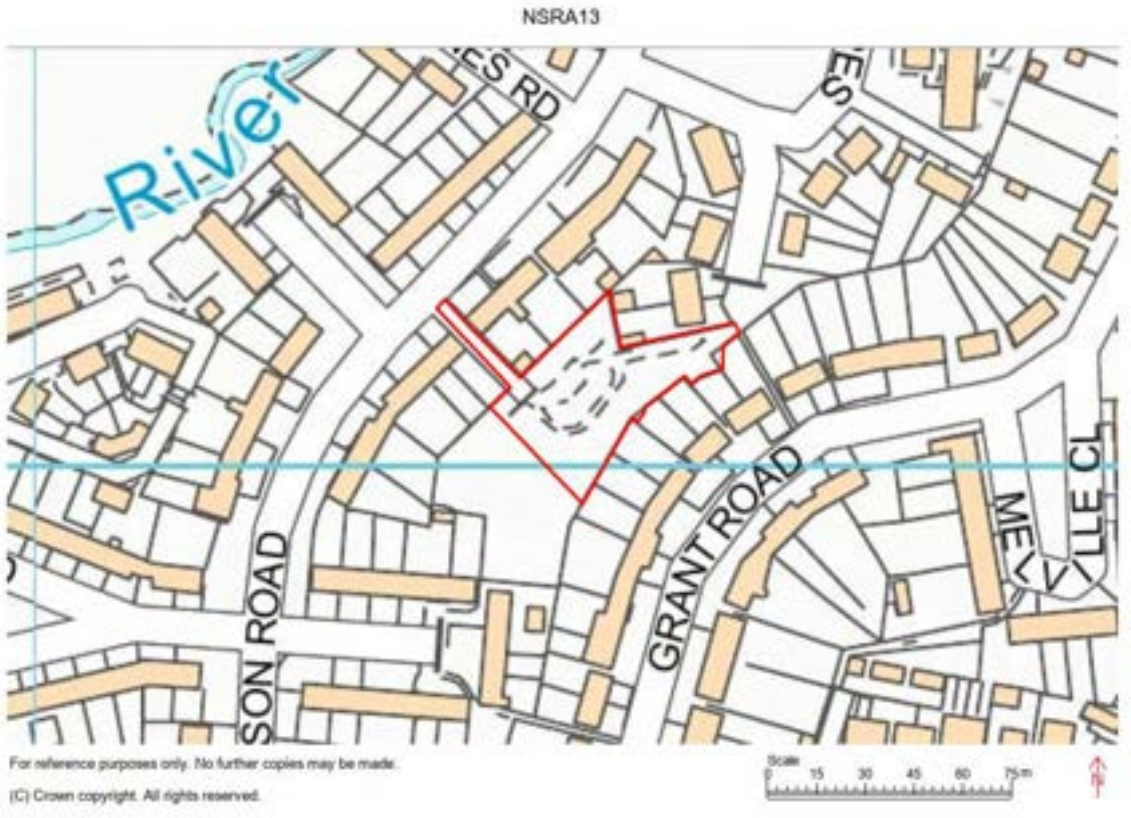
- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, flags the site as at lower risk and was not taken forwards for a full level 2 assessment. The site is within Flood Zone 1. However, the Report flags that during some flood events access/egress to the site may be limited and recommends that this is considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The SFRA Level 2 (August 2023) should be considered when completing the further assessment required with any formal application.

- Development on the site has the potential to affect heritage assets and any planning application will need to be accompanied by a Heritage Impact Assessment.

- Reference to NSRA12 was removed following submission of the Borough Plan Review.

NSRA13: Armson Road, Exhall

- Site Area: 0.2ha.
- Approximate Dwellings: 16.
- Alternative Site Reference: EXH-2.

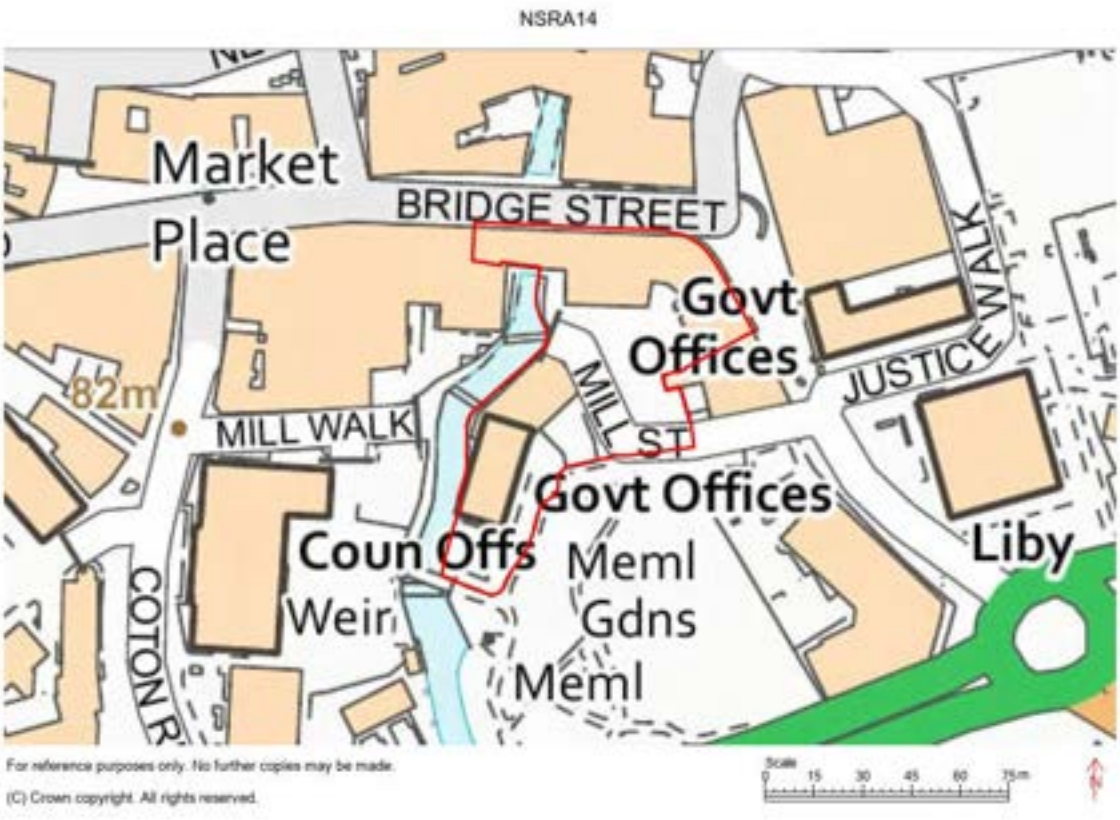


- The site currently comprises of residential garage parking.
- There is an opportunity to increase the biodiversity of the site and create a green lung within the Grant Road area.
- The SFRA Level 2 (August 2023), provided for the Borough Plan Review, flags the site as at lower risk and was not taken forwards for a full level 2 assessment. The site is within Flood Zone 1. The Report identifies, at some flood events, there is some minor surface water ponding on the site and a flow path that may limit access/egress to the site. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

NSRA14: Mill Street/Bridge Street, Nuneaton

- Site Area: 0.5ha.
- Approximate Dwellings: 15.
- Alternative Site Reference: ABB-7.



- The site is located within Nuneaton Town Centre and partially lies within the conservation area. The site could form part of a mixed-use scheme which incorporates commercial and residential development.

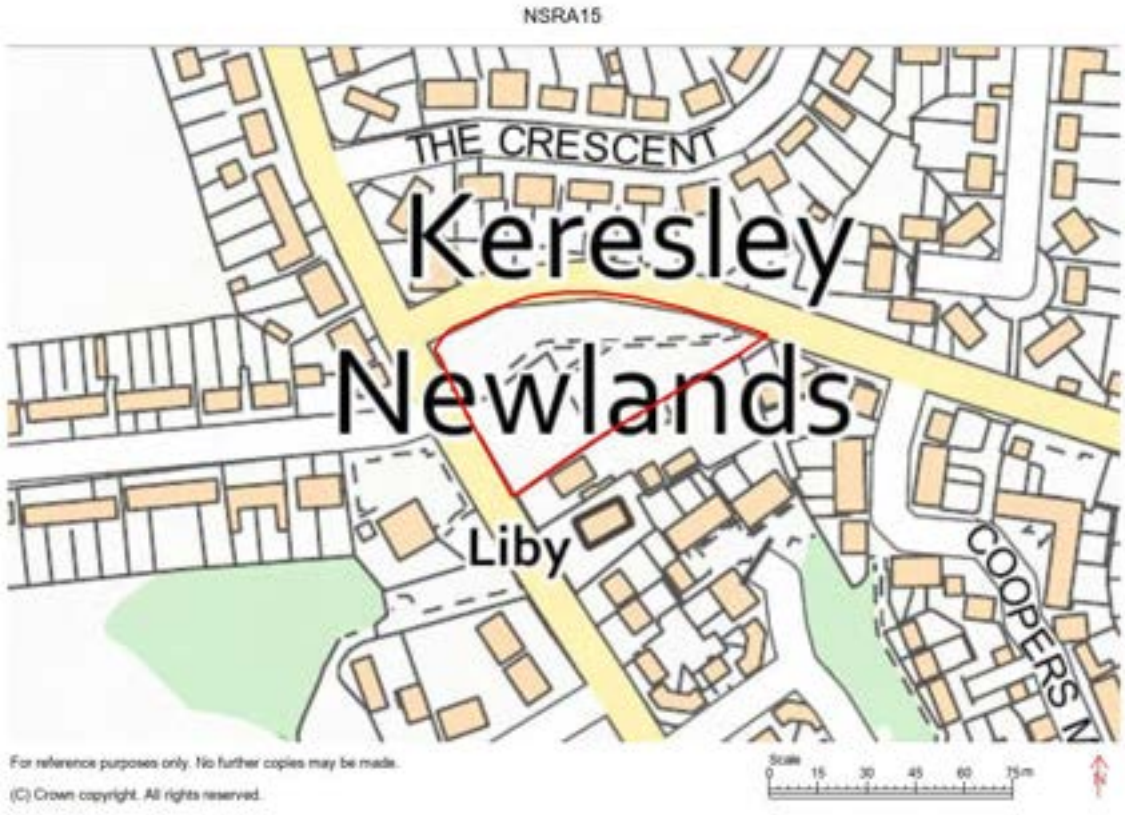
- The site has the potential to compliment the River Anker and memorial gardens through the incorporation of green landscape features including green walls and green roofs.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

- Development on the site has the potential to affect heritage assets and any planning application will need to be accompanied by a Heritage Impact Assessment.

NSRA15: Bennetts Road, Keresley

- Site Area: 0.4ha.
- Approximate Dwellings: 10.
- Alternative Site Reference: EXH-14.



- The site is vacant land. There are a number of Tree Preservations Orders within the site.

- The site should continue to act as a stepping stone to connect with gardens and open spaces within Keresley to the east, and Bunsons Wood and the wider countryside to the west.

- The SFRA Level 2 (August 2023) report, provided for the Borough Plan Review, flags the site as at low flood risk and within Flood Zone 1. This document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application.

- The site has been identified as having archaeological potential and any planning application will need to have regard to this and may need to be accompanied by archaeological reports.

Borough Plan objectives

6.57 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.
- Strategic objective 4.

Evidence base

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

- Iceni Projects (2022). *Draft HEDNA for Nuneaton and Bedworth Borough*.
- Iceni Projects (2022). *Sub-regional HEDNA for Coventry and Warwickshire Local Authorities.*
- Iceni Projects (2022). *Towards a Housing Requirement for Nuneaton and Bedworth.*
- Nuneaton and Bedworth Borough Council (2022). *Nuneaton and Bedworth Authority Monitoring Report 2021/22.*
- Nuneaton and Bedworth Borough Council (2023). *Housing and Employment Land Availability Assessment.*

Delivery mechanisms

6.59 The delivery mechanisms for this policy are as follows:

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

Monitoring

6.60 The indicator and target that will be monitored for this policy is outlined in Table 8.

Monitoring ref	Indicator	Target
DS4a	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report.	All dwellings completed.

Table 8: Indicator and target to be monitored for Policy DS4.

Strategic Policy DS5 – Employment allocations

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

Strategic Employment Allocation	Site Name	Site Ref	Size (ha)
SEA2	Wilsons Lane	EMP2	19.09
SEA3	Prologis Extension	EMP3	3.58
SEA4	Coventry Road, Nuneaton	EMP4	9.59
SEA6	Bowling Green Lane	HEA-1/HEA-2	20.99

The wider Bermuda Park area, south of Nuneaton, including Faultlands and SEA4, is an employment location of regional significance for inward and local investment.

6.61 Of the 6 employment allocations in the Preferred Options Borough Plan, SEA1 (Faultlands) and SEA5 (School Lane/Longford Road) are under construction and form part of the pipeline supply.

Borough Plan objectives

6.62 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.
- Strategic objective 4.

Evidence base

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

- Iceni Projects (2023). *Review of Nuneaton & Bedworth Employment Land Portfolio.*
- Iceni Projects (2022). *HEDNA for Nuneaton and Bedworth Borough*.
- Nuneaton and Bedworth Borough Council (2021). *Nuneaton and Bedworth Authority Monitoring Report 2020/21.*
- Coventry and Warwickshire Local Enterprise Partnership (2018). *Updated Strategic Economic Plan.*
- Nuneaton and Bedworth Borough Council (2023). *Draft Economic Development Strategy.*

Delivery mechanisms

6.64 The delivery mechanisms for this policy are as follows:

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

Monitoring

6.65 The indicator and target that will be monitored for this policy is outlined in Table 9.

Monitoring ref	Indicator	Target
DS5a	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report.	87.85ha of land is developed for employment uses.

Table 9: Indicator and target to be monitored for Policy DS5.

Policy DS6 – Green Belt

Development in the Green Belt

To ensure the Green Belt across the Borough continues to serve its fundamental aim and purpose, and maintains its essential characteristics, it will be protected by restricting development to only that which is considered by national planning policy as not inappropriate Green Belt development, except where very special circumstances can be demonstrated.

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

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

6.66 Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt which was initially established in 1975 and covers almost 1,500sq.m. surrounding the Black Country, Coventry, Birmingham and Solihull. The Borough contains large amounts of Green Belt land, most of which is located to the south of Nuneaton, and also surrounds the main areas of Bedworth, Bulkington and Ash Green.

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

6.68 The five key purposes of Green Belts are:

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

Alterations to the Green Belt boundary

6.69 Alterations to the Green Belt boundary are only approved in exceptional circumstances and must be done during the local plan making process.

6.70 For the adopted Borough Plan (2019), Green Belt release was considered necessary to meet the overall housing and employment needs determined at the time. The objectively assessed need for the Borough, which was informed by demographic based need, supporting economic growth, improving affordability and accommodating overspill from Coventry's unmet need, delivered an average housing need figure of 735 dwellings per annum. Based on the limited capacity/few approved planning applications available and the need to deliver a sustainable development strategy for the Borough with the Coventry overspill, the Inspector considered that there were exceptional circumstances to justify Green Belt release at the time. The main evidence base used to base decisions on Green Belt release was the Joint Green Belt Study, which assessed all Green Belt parcels in the sub-region and the contribution they made to the five purposes of the Green Belt as set out in national guidance.

6.71 Sites that were released from the Green Belt through the 2019 Borough Plan offer significant housing and employment capacity for the Borough Plan Review plan period. Having regard to those sites, existing permissions, sites submitted through the Call for Sites process and the up-to-date assessment of housing need, it is considered that exceptional circumstances do not exist to justify further Green Belt release.

6.72 One of the sites to the east of Bulkington, released from the Green Belt through the adopted Borough Plan, is no longer proposed to be allocated for residential development as part of the Borough Plan Review. A New Green Belt Technical Report has been prepared to establish whether there are exceptional circumstances to justifying the designation of sites removed from the Green Belt as part of the Borough Plan as Green Belt. The report concluded that in line with national policy no exceptional circumstances can be demonstrated to create new Green Belt given that the development management policies within the adopted plan, which are retained in the Borough Plan Review, are sufficiently strong to resist development outside of settlement boundaries. Therefore, it is not proposed that the Green Belt boundaries around Bulkington are altered as Strategic Policy DS2 – settlement hierarchy and roles, which sets the parameters for acceptable development located inside and outside of settlement boundaries, will apply to any development proposals.

Development in the remaining Green Belt

6.73 Inappropriate development is harmful to the Green Belt and should not be considered except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

6.74 Types of development that may not be deemed inappropriate within the Green Belt include those which are considered essential to:

- Agriculture and forestry.
- Cemeteries and burial grounds.
- Allotments.
- Outdoor recreation and outdoor sport.
- Extensions or alterations to buildings that would not result in disproportionate additions to the original building.
- The replacement of a building, provided that the new building is for the same use, is not materially larger than the one that it replaces and will have no greater impact on the openness of the Green Belt.
- Limited infilling in villages or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), providing no greater impact on openness.

Borough Plan objectives

6.75 This policy delivers the following Borough Plan objectives:

- Strategic objective 7.
- Strategic objective 8.

Evidence base

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

- LUC (2015). *Joint Green Belt Study.*
- Nuneaton and Bedworth Borough Council (2016). *Strategic Housing Land Availability Assessment.*
- Arup (2023). *New Green Belt Technical Report.*

Delivery mechanisms

6.77 The delivery mechanisms for this policy are as follows:

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

Monitoring

6.78 The indicator and target that will be monitored for this policy is outlined in Table 10.

Monitoring ref	Indicator	Target
DS6a	Number of applications granted planning permission in Green Belt land although considered inappropriate development unless very special circumstances are demonstrated.	Zero.

Table 10: Indicator and target to be monitored for Policy DS6.

Policy DS7 – Monitoring of housing delivery

The Council will monitor the delivery of housing and publish progress against the trajectory. Where the annual delivery rate is less than 75% of the annualised requirement for three consecutive years, then the Council will take the necessary action to address any shortfall. Such action may include (but are not limited to):

- Working with developers and site promoters, particularly of the two largest strategic sites, to review the requirements and phasing of infrastructure provision, where such re-phasing would assist with viability.
- Working with developers, site promoters and other interested parties to help unlock potential sources of funding for identified infrastructure.
- Considering the use of compulsory purchase powers to help address known land acquisition issues.
- Working with developers, land owners and other interested parties to assist in bringing forward non allocated sites in the borough which would accord with the strategic policy framework in the Plan.
- Bringing forward an early review of the Plan in accordance with Policy DS8.

Policy DS8 – Review

The Council will carry out a complete review of the Plan's policies and publish its conclusions at least every five years in accordance with national planning policy and guidance.

An earlier review may be commenced where one or more of the following circumstances apply:

- Significant changes to national planning policy and guidance;
- Significant changes to local circumstances including a change in local employment or housing need based upon updated evidence published or accepted by the local authority;
- Significant local, regional or national economic changes;
- The need to address housing delivery in accordance with the triggers and criteria set out in Policy DS7;
- Any other changes which would render the plan, or part of it, significantly out of date.

In the event of the Plan not providing adequate provision for any future established unmet need within the Coventry and Warwickshire sub-region, the Council will commence work immediately with the authorities in the sub-region and where necessary will instigate a separate Development Plan Document to address agreed unmet needs.

6.79 The Council acknowledges that there could be changes to Local Plan guidance and regulations which may see the need for an early review of this plan, or that such a review could be required because of planning circumstances in the Coventry and Warwickshire Housing Market Area. Current Government guidance requires that plan reviews should be completed no later than five years from plan adoption.

6.80 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.

7.0 Strategic allocations

7.1 Policies have been developed for each of the strategic site allocations to outline the specific requirements at each site. A strategic policy also outlines the requirements which apply to all strategic site allocations.

7.2 The site-specific policies establish a strategic context for planning applications and set a baseline position in terms of assessing future schemes which will contain more detailed proposals.

7.3 They also ensure that development is brought forward in a strategic and comprehensive manner. Alternative solutions and land use arrangements may come forward as part of the planning application process, but these should explain the reasons for any significant differences in approach.

7.4 The site-specific policies establish the following matters for each site:

- Land uses.
- Development principles.
- Infrastructure delivery.
- Form of development.

7.5 The work undertaken to prepare the strategic policies has identified the key infrastructure and amenity requirements for each of the sites and the outcomes of this have been summarised within the policies. The infrastructure provision has been informed by discussions with key stakeholders and service providers such as Warwickshire County Council's Education and Highways departments, Nuneaton and Bedworth Borough Council and the NHS Coventry and Warwickshire Integrated Care Board (ICB). The IDP sets out details on these on-site items and the cumulative impact of development which will be expected to be fulfilled by each site.

7.6 Detailed site concept plans exist for some of the strategic sites and should be used in conjunction with the policies where relevant. In addition, after the adoption of the Borough Plan Review, the Council's SPDs will be reviewed, but in the interim they remain valid and are relevant to the strategic sites where they are consistent with new Borough Plan policy.

Strategic Policy SA1 – Development principles on strategic sites

Proposals on all strategic sites will meet the following requirements:

1. Landscape features and blue infrastructure should be incorporated into the scheme design and areas of open space, rather than separate areas of isolated green space, existing internal hedgerow trees, hedgerows and specimen trees should be retained and enhanced as well as habitat corridors and green infrastructure pedestrian/cycle routes. Development should provide appropriate trees including street trees, orchards of mixed native species and make use of stepping stones to provide a wider connection for habitat in relation to trees, wooded areas and grassland.
2. Existing watercourses and drainage ditches, which can provide vital corridors for wildlife and be useful in providing available outfalls of surface water connections, to avoid future connections into the combined sewer network, should be protected.
3. Appropriate siting of built form to create variation and use of varied materials to further breakup the mass of development in views.
4. Maximise the use of sustainable materials including green roofs and living walls.
5. Heritage assets should be conserved and where possible enhanced, with focus placed on the assets most at risk from neglect, decay or other threats.
6. Potential Local Wildlife Sites (pLWS)[35] within or affecting the site will be surveyed for their ecological importance against the Guidance for the Selection of Local Wildlife Sites. Designated LWS will be surveyed and protected, commensurate with their quality to safeguard the criteria for which they were designated and thereby maintain their contribution to supporting a functional Green Infrastructure throughout the borough, county, sub-region and nationally.
7. Areas of high distinctiveness (value 6) should be retained and where possible enhanced[36]. Section 106 financial contributions may be required for long-term management.
8. Existing public rights of way must be incorporated into green/open space networks wherever possible and new pedestrian and cycle links should be included to provide linkages to the wider area. If these cycle links require the use of the existing adopted highway or are to be offered for highway adoption, these should accord with Warwickshire County Council's design guide and current national guidance. Secure cycle parking and shaded areas, to allow cooling for users, should also be provided.
9. Doors and windows to housing should seek to overlook streets and public spaces in order to provide natural surveillance.

[35] THE GREEN BOOK Guidance for the Selection of Local Wildlife Sites in Warwickshire, Coventry and Solihull Local Wildlife Sites Project Habitat Biodiversity Audit (HBA) Warwickshire Wildlife Trust Ecological Services available at: Guidance Note on Application of Site Selection Criteria (warwickshire.gov.uk). Page 138 provides guidance notes for any planning application/development that is likely to impact on a pLWS.

[36] Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull, Warwickshire Wildlife Trust and Ecological Services (2022). *Nuneaton and Bedworth Borough Council Ecology and Geodiversity Assessment (EGA) Borough Plan Publication Version.*

10. On sites where ridge and furrow is present, green spaces should be positioned so as to retain these areas wherever possible.
11. Community, sport, physical activity, play and open space facilities should relate well to each other and to existing areas, and the new facilities and spaces should be safe, convenient, accessible, well designed, easy to maintain and function well. Proposals shall be assessed against Sport England's Active Design Guidance and its checklist. A completed checklist to demonstrate compliance with the Design Guidance will be required with any application submission.
12. New proposals will need to ensure that the development includes fundamental mitigation for climate change, carbon reduction leading to neutral carbon emissions by 2050 and for a nature recovery strategy.
13. In the event of a part submission of a strategic site, the proposal will need to illustrate that the applicant has worked with owners of the other parts of the allocation in order to ensure the entire site will ultimately provide a cohesive scheme, including contiguous linkages without ransom strips to ensure the allocation can be provided in their entirety. Any infrastructure provided within a staged submission such as road widths and visibility splays must be suitable for the provision of the entire allocation.
14. Loading areas and car parks within service bays on employment sites will need to be sited a minimum distance of 50m away from residential properties or any other sensitive noise receptors, unless it can be demonstrated that a reduced distance would not give rise to unacceptable levels of noise and disturbance.
15. In determining applications, consideration should be given to adopted relevant Supplementary Planning Documents (SPD) including Concept Plan SPDs and Design Codes for the sites.
16. Where financial contributions are sought, these should be justified and compliant with the CIL Regulations.

In terms of criterion 7 and 8 - Where protection, retention and enhancement is not possible, this must be clearly demonstrated by supporting information (including survey work).

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

Landscape and open space

7.7 The Council's adopted open space and green infrastructure SPD will provide a basis for open space, landscape and biodiversity requirements[37]. The development of each of the strategic allocations will seek to incorporate existing landscape features into areas of open space where possible. Retention of existing boundary woodland, trees and hedgerows will form a base to enhance site landscape buffers where proposed.

[37] Nuneaton and Bedworth Borough Council. *Adopted Borough Plan (2011-2031).*

7.8 Existing features, green spaces for landscaping and informal open space will be incorporated into each of the proposed housing allocations. The usable green space will be located to provide areas of either community parks or local parks, linked by a network of footpath and cycle routes. Areas with biodiversity value should be protected, buffered from noise and busy through flow, to retain ecological functionality.

Edge treatments

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

Biodiversity

7.10 Existing high quality biodiversity features will be retained and enhanced as part of the overall development of each of the strategic sites, including financial contributions for long-term management. Development proposals being brought forward on each of the strategic allocations, will be accompanied by an ecological assessment that will confirm how each site will deliver a minimum of 10% net biodiversity gain and will make use of Warwickshire County Council's biodiversity offsetting metrics until such time this is superseded by the mandatory use of the national metrics.

7.11 The development of each of the strategic allocations will seek to create areas of greenspace to enhance existing habitats on the site. Sustainable drainage system (SuDS) features should also be utilised as potential wildlife habitat.

Footpaths and cycleways

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

Movement and highway access, including wider road improvements

7.13 Planning must support a pattern of development which facilitates and promotes the use of sustainable modes of transport. The Strategic Transport Assessment (2023), prepared by Warwickshire County Council, is a document which considers the potential impacts of all proposed strategic housing and employment allocations within the Borough until 2039. This assessment sets out a number of strategic road improvements for each of the strategic allocations and/or the local area.

7.14 The submission of a transport assessment will be required as part of any planning application to develop each of the strategic allocations, alongside some of the non-strategic residential sites. The transport assessment will also identify what measures will be taken to deal with the anticipated transport impacts of the scheme, and to improve accessibility and safety for all modes of travel, maximising alternatives to the car such as walking, cycling and public transport.

7.15 Any transport improvements/upgrades required by the Strategic Transport Assessment or transport assessment will be secured by planning condition attached to the grant of any planning permission. The development of each of the strategic allocations may also be expected to contribute financially towards wider road improvement schemes, proposed within the Borough, during the development plan period, in order to ensure that the local highway network is able to accommodate all strategic housing and employment sites.

Surface water drainage and flooding

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

7.17 All of the sites have undergone a SFRA Level 2 (August 2023) as part of the Borough Plan Review.

Community, sports and physical activity facilities

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

7.19 These facilities will include, but are not limited to, local centres, community halls, sports and physical activity facilities, play and open space provision and playing pitches within the Council's Open Space Strategy and Playing Pitch and Outdoor Sports Strategy.

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

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

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

Education requirements

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

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

Safety and security

7.25 Design has a crucial role in delivering a safe and secure environment in residential areas. Natural surveillance should be provided in the form of doors and windows to housing overlooking streets, public spaces and parking areas, with the creation of an environment which is legible to residents and visitors alike. Existing and proposed footpaths shall be clear and legible to promote their active use.

7.26 Evidence must be submitted regarding how the principles of Secured By Design have been incorporated into the design (both residential and commercial applications).

Noise and air quality

7.27 The development of each of the strategic allocations will need to take account of potential noise from neighbouring uses and road traffic noise. The precise nature of noise mitigation measures on each site will be established through the undertaking of a Noise Impact Assessment. Air quality mitigation will be required as per the outcomes of the assessment and requirements within the Council's adopted Air Quality SPD[38].

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

Housing densities

7.29 The dwelling numbers for each site are based on an overall net density of 35 dwellings per hectare of the developable land on each site. Some of the site-specific policies have noted where alternative densities would be suitable due to site specific circumstances.

[38] Nuneaton and Bedworth Borough Council (2020). *Air Quality SPD.*

Collaboration

7.30 Strategic sites that are to be developed in separate parcels or phases; in different land ownership; or to be developed by more than one developer, must demonstrate that a collaboration agreement has taken place between the parties. This is to evidence 'equalisation' between the owners/phases, to ensure that on-site requirements and infrastructure facilities such as schools, open space, parks and affordable housing are shared equally across the phases. Collaboration will need to prescribe the rules of engagement between owners/developers. The possible methods for this are:

- A legal equalisation agreement between the parties, to ensure the provision of onsite infrastructure and affordable housing is distributed fairly across the site.
- A land pooling trust involving the landowners transferring land into a trust with shares in proportion to their original ownership.

7.31 The approval of a masterplan for the entire site at the initial outline stage, with demonstration of a formal agreement between all participants on the land involved.

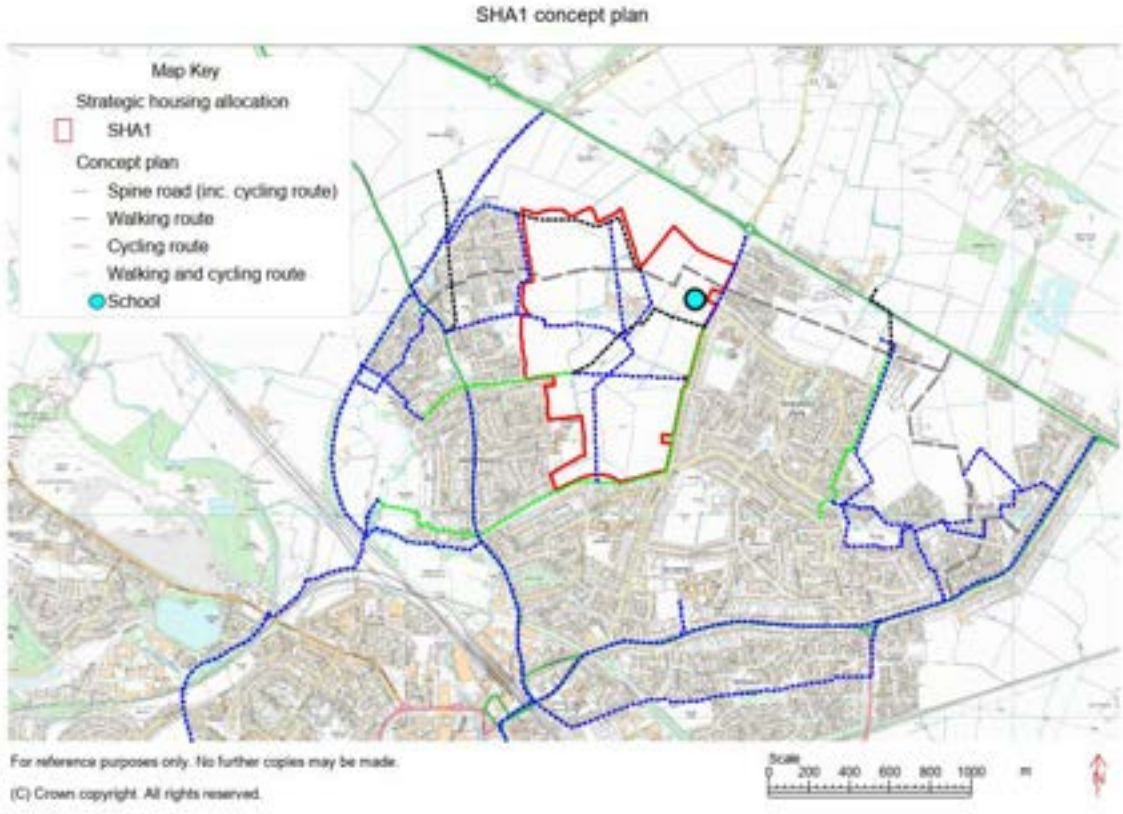
Compliance with other policies

7.32 Strategic sites will need to meet all the other policies within the Borough Plan Review Document which includes, but is not exclusive, to the requirements in policies H1, H2, H4, H5 and BE3.

Strategic Policy SHA1 – Land at Top Farm, North of Nuneaton

Introduction

7.33 Strategic housing allocation SHA1 is a sustainable and deliverable urban extension to Nuneaton. The site covers approximately 94ha, adjoining the northern edge of Nuneaton in the Weddington area of Nuneaton. The site forms part of the wider HSG1 'North of Nuneaton' allocation in the extant 2019 Borough Plan which is allocated for 4,419 dwellings. The concept plan for HSG1 is shown below. The vast majority of the other HSG1 land parcels already benefit from planning permission, with some now under construction.



Strategic Policy SHA1 – Land at Top Farm, North of Nuneaton

Strategic housing site SHA1 will be developed for a mix of residential, schools, district centre and community uses.

Key development principles

1. Provision of approximately 1,700 dwellings in a mix of dwelling types and sizes.
2. Potential on-site GP surgery or financial contribution to new GP practice to serve the north Nuneaton area.
3. Provision of a district centre including community facilities.
4. Provision of a three 2 form entry primary school (approximately starting at 210 pupils increasing to 420 pupils) and funding for early years.
5. Financial contribution towards and provision of a new secondary school, pre-school and possible SEND provision located off Higham Lane.
6. Financial contribution and land for community use sports provision to include grassed football pitches for youth/junior provision with changing facilities, full-sized floodlit 3G-AGP (Football Association 3G Register specification) artificial grassed pitch, community grass pitches, indoor court sports hall, changing facilities, indoor health and fitness facility and dance studio.
7. Accessible cycling routes to the school site from housing developments, with secure cycle storage facilities for community use.

8. Provision of formal and informal open space areas throughout the site to complement and enhance existing landscape features and to deliver surface water improvements.
9. Provision of a large area of public open space in a north-south spine to provide ecological connections and corridors through the site.
10. Provision of public open space adjacent to and serving as an extension to Coronation Walk Park and to Community Park.
11. Provision of new equipped areas of play including MUGA, a central Neighbourhood Equipped Area of Play (NEAP), Locally Equipped Areas of Play (LEAP) and MUGA.
12. Provision of land for new allotments towards the south-west of the site.
13. Financial contribution towards appropriate management and maintenance of play and open space.
14. Financial contribution towards the upgrading of play facilities and link to the Change Brook Open Space (may require culvert + new play area).
15. Financial contributions towards sport and physical activity based on the requirements of the Council's Playing Pitch and Outdoor Sports Strategy and Indoor Sports Facility Needs Assessment and Strategy for pitch sport improvements works, including off-site swimming pool provision, cycling facilities at Bedworth Physical Activity Hub, rugby pitch provision at Nicholas Chamberlaine School and community centre, outdoor tennis facilities and athletics facility at Pingles, Nuneaton.
16. Provision of a strategic access road/spine road through the site, with integrated footway and cycleway provision across the strategic site.
17. Provision of on-site bus infrastructure and contribution to secure diversion of local bus services to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.
18. Transport improvements/upgrades required to alleviate impacts of the development including along Higham Lane, A47 Hinckley Road, Weddington Road, the A5 and the Long Shoot.
19. Contributions to the extension of the Nuneaton/Hinckley to MIRA cycle route in order to link to Mancetter, Atherstone, Birch Coppice and Tamworth.
20. Financial contributions towards Borough-wide strategic highway infrastructure works identified within the Nuneaton area.
21. Contribution to local sewage network improvements to improve biological treatment capacity to accommodate the development.
22. Contributions to infrastructure requirements for Warwickshire Police where this is justified and compliant with CIL Regulations.

Form of development

23. Incorporate the Change Brook and existing public right of way (N29) within the green/open space network.
24. Local informal public open space along the northern edge of the development along with appropriate landscape treatment. Dwellings should address the open space from the south.
25. Use lower densities and 1 - 2 storey dwellings toward the northern edge of development with a maximum height of 3 storeys, located toward the existing urban edge.
26. Lower densities concentrated toward the new urban edge.

27. Retain visual presence of historic farmsteads (particularly from the urban edge) and where possible retain a buffer of fields in order to preserve the isolated character.
28. A historic building appraisal will need to be undertaken where development will affect a historic farmstead.
29. The southern boundary should complement the Coronation Walk that adjoins the boundary.
30. Green spaces should reflect the irregular field patterns and boundaries.
31. Ponds should be retained and more created, to secure the adjacent great crested newts population. These ponds should be connected using suitable habitats such as sustainable urban drainage features, hedgerows and their margins.
32. Enhance the National Cycle Route 52/Weddington Country Walk Local Wildlife Site with regards to access, ecological function and historic setting.
33. There is strong east-west connectivity along various hedgerows within the proposed area, and these should be retained and enhanced in order to form green infrastructure corridors throughout the site.
34. Protected species surveys will be required, with their habitat requirements retained, as well as their connectivity enhanced within any development layout.
35. Development should come forward in accordance with the HSG1 concept plan above, as well as the extant HSG1 Concept Plan SPD.

7.34 The SHA1 site will deliver approximately 1,700 new dwellings in a mix of sizes and tenures. The site is currently in single ownership and adjoins a number of sites with planning approvals for new houses accessed off Weddington Road to the west and Higham Lane to the east. The policy seeks to ensure that the development of the allocation, whilst the subject of individual applications, will be brought forward in an integrated manner in order to deliver wider community and infrastructure benefits for existing and future residents in the north Nuneaton area.

7.35 The site benefits from outline permission for residential dwellings, a mixed-use district centre with community and/or health centre uses, a primary school plus land safeguarded for a secondary school and 6th form, green infrastructure, open spaces, children's play areas, allotments and drainage (Application reference 035279 – November 2022). The site will be delivered on a phased basis throughout the plan period, with construction commencing in 2024.

Transport and access

7.36 A new distributor link road through the allocation will be provided to include primary access points from Higham Lane through to Weddington Road. This should be delivered in line with the indicative route shown on the above concept plan. The start and end points have already been provided as part of extant planning permissions in these areas. New bus infrastructure will also be required. The width of the main distributor road within the development site must be sufficient to cater for two-way bus movement, in order to allow effective penetration of the site. The distributor road should ensure that:

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

7.37 The Transport Modelling Report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of the site is expected to contribute financially towards the Nuneaton area road improvement schemes, set out in the Transport Modelling Report, via planning obligation.

School provision

7.38 A key aspect of the allocation will be the delivery of new amenity facilities, including school provision to meet the educational needs of future residents and existing residents in the north Nuneaton area.

District centres

7.39 The proposed allocation will bring forward a district centre. The centre will provide important local services/facilities (including GP provision) for residents and, in turn, reduce the need to travel.

Open space and green infrastructure

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

Flood risk

7.41 The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zones 1, 2 and 3. The Report states that safe access and egress will need to be demonstrated in the 1% AEP plus climate change fluvial and surface water flood events with the flood-risk assessment required as part of planning applications for the site. The document should be referred to with any formal planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

Historic Environment

7.42 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring high for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

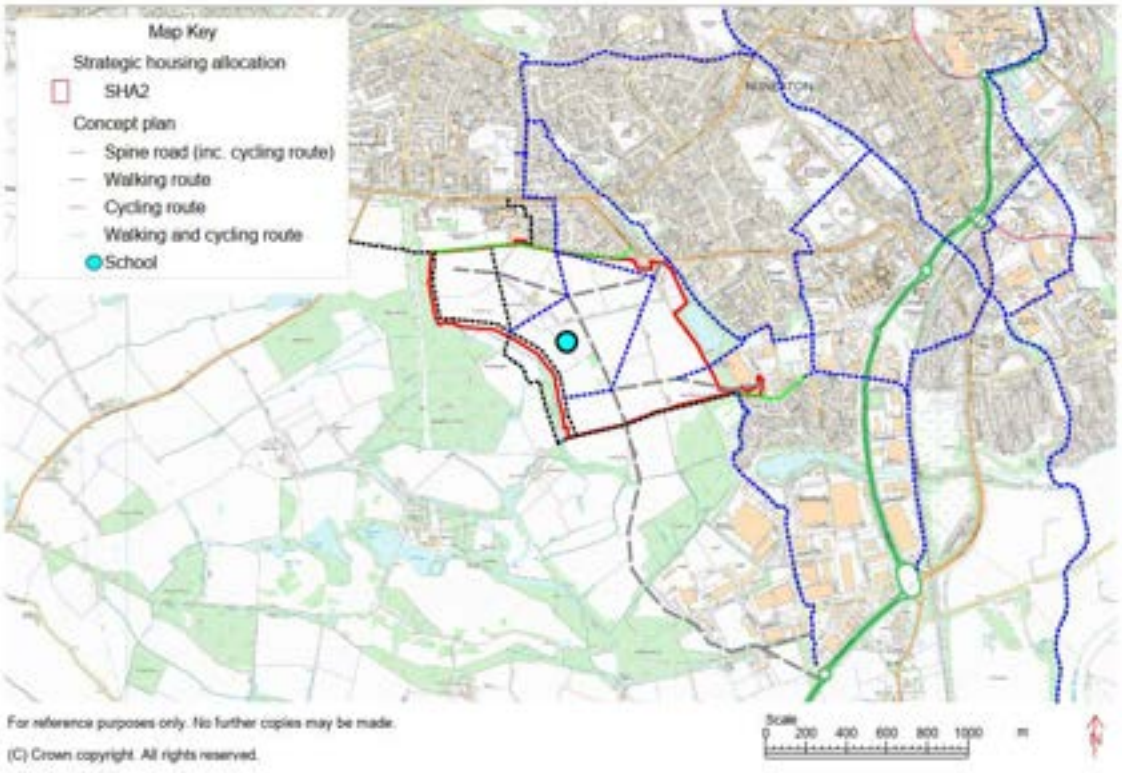
7.43 There is potential for any development on this site to impact on archaeological features Therefore, evaluative archaeological recording documentation is likely to be required for any formal planning application. The content of this documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Strategic Policy SHA2 – Arbury

Introduction

7.44 Strategic housing allocation SHA2 (Arbury) is located on the southwestern boundary of Nuneaton and forms part of the Arbury Estate. The strategic site covers approximately 86ha and is bordered by residential buildings to the north and east, with undeveloped areas of the Arbury Estate and park to the west and south.

SHA2 concept plan



Strategic Policy SHA2 – Arbury

Strategic housing allocation SHA2 will be developed for a mix of residential, schools and community uses.

Key development principles

1. Provision of approximately 1,525 dwellings in a mix of dwelling types and sizes.
2. Financial contribution to the NHS Coventry and Warwickshire ICB including extension to GP Surgeries.
3. Provision of a local centre, including community facilities.
4. Community Park, Ballcourt MUGA and older and younger children's equipped play provision (including the proposed strategic play area) to be provided, forming an open space and habitat corridor linking Ensor's Pool and the Local Wildlife Sites to the south, as well as appropriate management and maintenance arrangements.
5. Provision of a distributor link road through the site with integrated footway/cycleway provision in accordance with the concept plan. The distributor link road will need to secure a connection that links the site to the A444.
6. Provision of a 1 form entry primary school but capable of expansion to 2 forms of entry (420 pupils) and funding, including provision for early years, secondary, SEND and post-16.
7. Provision of footway/cycleway linkages to the existing footway/cycleway network, including linkage to Bermuda Road bus stops and Bermuda Park Station. This is to provide a tarmac fully lit sustainable link route constructed to Highways adoptable standards (cycle provision to LTN1/20 guidance and include visibility splays) and which may be requested to be offered for adoption. The route and its lighting will need to be designed to demonstrate that there is no impact (using measures to prevent light spill) to the adjacent sensitive areas/habitats including Local Wildlife Sites and bat migration/feeding corridors.
8. Enhancement of Harefield Lane to reach the Bermuda Village area to the east, as well as contributions towards links to the north and east, mapped in the Cycle Network Development Plan.
9. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
10. Financial contributions towards Borough-wide strategic highway infrastructure works identified within the A444 corridor.
11. Contributions to infrastructure requirements for Warwickshire Police where this is justified and complaint with the CIL Regulations.
12. Contribution to local sewage network improvements to increase capacity, improvement to the local network to reduce impact on hydraulic performance and improve biological treatment capacity to accommodate the development.
13. Provision of allotment site extension and facilities.
14. Provision or financial contributions towards sport and physical activity based on the requirements of the Council's Playing Pitch and Outdoor Sports Strategy and Indoor Sports Facility Needs Assessment and Strategy for pitch sport improvements, including off-site swimming pool provision, cycling facilities at Bedworth

Physical Activity Hub, rugby pitch provision at Nicholas Chamberlaine School and community centre, outdoor tennis facilities and athletics facility at Pingles, Nuneaton.

15. An asset management plan for The Arbury Estate which includes measures to be taken and commitments to the repair and maintenance of the Park Farmhouse, Tea House, Bath House and Arbury Mill.
16. A landscape buffer is required to the western edge of the development.

Form of development

17. Provision of a landscape buffer on the southern and western edge of the site.
18. Improvements to the urban edge through, and use of, a woodland planting belt in order to screen the urban edge. New woodland should be buffered on its eastern side by open space, which the existing houses should face.
19. Utilise woodland planting elsewhere within the new development, with particular consideration given to views from Centenary Way and the existing residential urban edge.
20. Broadleaved woodland should have a minimum buffer of 30m of appropriate habitat in order to safeguard their integrity from imposed health and safe management (tree fall), garden floral escapes and garden refuse tipping.
21. Incorporate Centenary Way and watercourses within the open space framework.
22. Higher density housing should be concentrated toward the current urban edge.
23. Use a maximum building height of two storeys, with the aim of screening views of the urban edge entirely behind woodland.
24. Development should be of a height and density which can be screened by the existing planting within and around the registered park and gardens.
25. Any lighting should not exceed the height of the development and should be designed with regards to minimising light pollution.
26. Ensor's Pool should have a minimum buffer zone of 100m as well as any appropriate mitigation measures in order to ensure that the hydrological pathways to the pool are not compromised.
27. All new housing and employment allocations with piled foundations or basements, within 1km of Ensor's Pool Special Area of Conservation, should undertake a hydrogeological study to confirm that it will not affect groundwater flows or quality at the Special Area of Conservation.
28. Create a significant area of grassland habitat between Ensor's Pool and Bermuda Clay Pits in order to strengthen a south-north national flow around the west of Nuneaton.
29. All ponds within the development should be subject to a Local Wildlife Site survey in co-ordination with great crested newts, white-clawed crayfish and water vole surveys. Additionally, protected species surveys for bats, hedgehog, lizards and grass snake, plus surveys for birds and important invertebrates as well as plants should be undertaken.
30. Areas of high distinctiveness (values 4 to 6) should be retained.
31. Enhancements to the footpath along Harefield Lane towards Seeswood Pool.
32. Creation of a footpath link to Ensor's Pool from Harefield Lane.
33. Access to any development within the strategic site should avoid approaching the site from the north. No access should be taken from North Drive, and

designs should avoid introducing new approaches parallel to North Drive which would detract from its prominence.

34. As part of any design proposals, suitable measures should be specified to protect Spring Kidden and North Woods ancient woodlands from any significant impact.
35. Development will be required to come forward in accordance with the concept plan above.
36. Development proposals must submit a comprehensive masterplan for the site.
37. Development proposals should comply with the requirements of the latest adopted Concept Plan SPD and Arbury Design Code SPD.

7.45 The site will deliver approximately 1,525 new dwellings in a mix of sizes and tenures. The allocation is within a freehold ownership, however the land for the link through to Hazel Way is under a separate long leasehold agreement. The site is expected to be delivered through an over-arching outline permission.

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

Landscape and open space

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

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

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

7.50 A Landscape Visual Impact Assessment will be required to be submitted with any planning application.

Historic environment

7.51 Any development should take the opportunity to secure an asset management plan for The Arbury Estate which includes detailed measures for the repair and maintenance of Park Farmhouse and the Tea House, both Grade II* listed buildings, included on the heritage at risk register. Consideration for the repair and maintenance of the Bath House and Arbury Mill should also be undertaken.

7.52 Alternatively, a listed building heritage partnership agreement could be agreed in relation to Park Farmhouse and the Tea House. Any heritage partnership agreement would not replace a requirement to prepare an asset management plan for The Arbury Estate, unless the heritage partnership agreement would do the same.

7.53 Arbury Hall registered park and garden is located to the west of the strategic site, with the western boundary of the strategic site located between approximately 60m, at its closest point, and 600m, at its furthest point, from the eastern boundary of the registered landscape. This park and garden form the focus of the Arbury Hall Estate which includes numerous listed buildings. Ensor's Pool special area of conservation adjoins the eastern boundary.

7.54 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium under the sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets and medium for archaeological potential. There is potential for any development on this site to impact on the historic environment.

7.55 A Heritage Impact Assessment is therefore required to be submitted with any formal planning application for this site to consider the potential impacts on designated and non-designated heritage assets (to include evaluative archaeological recording likely in the form of evaluation trenching). The content of this documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Transport and access

7.56 A new distributor link road through the allocation will be provided to include primary access points on Heath End Road and Walsingham Drive. New bus infrastructure will also be required. No access will be taken from North Drive and detailed site layouts will avoid introducing new approaches parallel to North Drive which would detract from its prominence.

7.57 The Transport Modelling Report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to SHA2 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of SHA2 is expected to contribute financially towards the A444 corridor road improvement schemes, set out in the Transport Modelling Report, via planning obligation.

Flooding

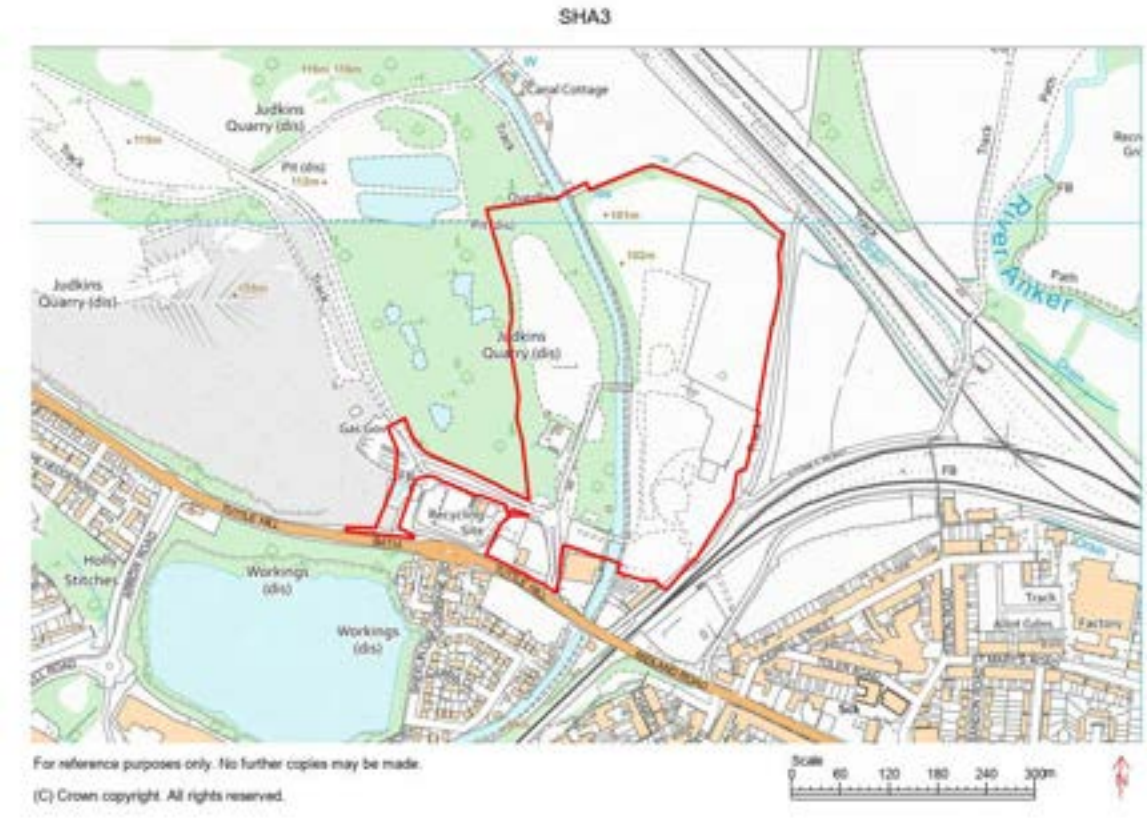
7.58 Developers should consider reservoir flooding during the planning stage, using the Environment Agency's reservoir inundation mapping. Where possible, developers should consider using areas at possible risk as public open space.

7.59 The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zones 1, 2 and 3. The Report states there is a small area at risk of fluvial flooding, flow paths, ponding and surface water flooding in some flood events. The Report also stated that safe access and egress will need to be demonstrated in the 1% AEP plus climate change surface water and fluvial events as part of any planning application. This Level 2 document should be considered as part of the further site-specific flood-risk assessment that will be required with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

Strategic Policy SHA3 – Land at Tuttle Hill (Judkins Quarry)

Introduction

7.60 Strategic housing allocation SHA3 is a sustainable and deliverable housing allocation in the Camp Hill area of Nuneaton. The site encompasses HSG11 to the east of the canal which was allocated for 200 dwellings in the extant 2019 Borough Plan. Once the Borough Plan Review is adopted, this previous allocation will be included in strategic housing allocation site SHA3.



Strategic Policy SHA3 – Land at Tuttle Hill (Judkins Quarry)

Strategic housing allocation SHA3 will be developed for a mix of residential uses.

Key development principles

1. Provision of approximately 350 dwellings in a mix of dwelling types and sizes.
2. Financial contribution to the NHS Coventry and Warwickshire ICB.
3. Financial contribution to off-site play and open space at Sandon Park/Stanley Road and to Whittleford Park, as well as appropriate management and maintenance arrangements and provision of on-site play area for under 12s.
4. Financial contributions would be sought in order to expand existing primary and secondary school places. Additionally provision for early years, SEND and post-16 as required.
5. Replacement bridge or bridges across the canal will be required at the developer's expense. The applicant should have early discussions with the Canal and River Trust (any works will require the express consent of the Trust to ensure that the works will not affect the canal structure). Provision will need to be made by the developer to provide pedestrian and cycle access to the tow path from the site.
6. Provision of one or more new access points onto Tuttle Hill, as well as improvements to the existing access in order to provide segregation between proposed and existing uses.
7. Financial contributions towards a full specification cycle path along Stoney Road using the railway underbridge to link to the NCN52 and Sandon Park/Weddington Meadows play and open space.

8. Financial contributions to A5 corridor cycle improvements for the extension of the Nuneaton/Hinckley to MIRA cycle route in order to link to Mancetter, Atherstone, Birch Coppice and Tamworth.
9. Financial contributions towards Borough-wide strategic highway infrastructure works identified within the Nuneaton area.
10. Financial contribution towards local bus services, including new bus infrastructure if required, based on dialogue with Warwickshire County Council and bus operators.
11. Provision/financial contributions towards sport and physical activity including play areas, MUGA and playing pitches.
12. Financial contributions will be required to upgrade the towpath surface in the area.
13. Contributions to infrastructure requirements for Warwickshire Police where this is justified and compliant with the CIL Regulations.

Form of development

14. Retain and enhance the wooded character of Coventry Canal, including new planting close to the industrial areas through taller hedgerows and linear woodland. New woodland should be linear and along field margins, reducing the prominence of the development from the wider landscape to the north.
15. Retain views towards the man-made mound (Mount Judd) as a feature and landmark within the landscape.
16. Development should use the canal as the key reference and focal point to the design and should take the opportunity to improve the setting of the canal, which should include better public access and interpretation.
17. Retention and enhancement of green infrastructure along the canal and disused railway corridors so that they remain as wildlife corridors.
18. Protected species surveys will be required at the site.
19. Retention and enhancement of areas of biodiversity value where possible, with appropriate biodiversity offsetting provision where necessary.
20. Enhance accessibility and the structural condition of heritage assets along Coventry Canal including retention of the heritage buildings including the locally listed beehive kiln[39].
21. New housing should address the canal. A detailed light contour map, of proposed lighting, will be required to ensure no light spill to the canal wildlife corridor, alongside a construction management plan to reduce the effects of the development on the Coventry Canal. This should include sufficient evidence that the stability of the canal infrastructure, including the cutting, will not be affected during or after construction.
22. Enhancements to canal towpath.
23. Building heights nearest the canal should be limited to 2 storeys in order to limit their visual impact above and through the canal-side woodland corridor.

[39] Nuneaton and Bedworth Borough Council (2012). *Local Heritage Assets - Criteria for Assessment and Identification.*

7.61 Strategic housing allocation SHA3 is allocated for approximately 350 dwellings. The site comprises previously disturbed former mining land associated with the adjacent Judkins Quarry. Both land parcels are considered deliverable. The land to the west of the canal includes part of the designated Judkins Quarry Local Wildlife Site, which supports a number of valuable habitats and species including great crested newts. This will be a constraint for site delivery, with the proposal required to demonstrate that impacts have been avoided, mitigated or compensated as a last resort under Policy NE3. The land to the east of the canal is of less ecological value.

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

7.63 The site is understood to be in two ownerships, but the landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site infrastructure requirements.

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

Transport and access

7.65 The principal access to the site will be via the existing quarry entrance onto Tuttle Hill located to the west of the canal. Following discussions with the highway's authority, a secondary access onto Tuttle Hill will also be required to provide segregation between proposed and existing uses, to accommodate the level of traffic that will be generated from the proposed dwellings and to provide a safe pedestrian route away from the HGVs associated with the existing uses. Access to the land to the east of the canal will be via the existing quarry land only and will require the construction of a new link bridge over the canal. The opportunity for this bridge to form a green link across the site, and linking to existing public rights of way, should be considered.

7.66 Previous transport modelling, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to SHA3 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of SHA3 is expected to contribute financially towards the Nuneaton area road improvement schemes, set out in the Transport Modelling Report, alongside contributing to any other improvements that will be required, via planning obligations.

Canal improvements

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

Flooding

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

7.69 The SFRA Level 2 (August 2023) provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zone 1, but the report flags the site as having some ground and surface water risk and ponding. Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime. The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

Future Development Potential

7.70 There is potential for land at the wider Judkins Quarry (adjacent the allocated site) to come forward for development within the plan period. The site presents a unique opportunity for the re-development of a major brownfield site, within the Borough, to deliver a mix of uses including housing and employment land to meet the longer term needs of the Borough beyond the plan period. Given the historic use of the site, there is a significant amount of remediation and mitigation required, before the site could come forward for development. Therefore, whilst the land is not allocated within the plan for development, the Borough Council are supportive of initiatives which would help redevelop the site in the longer term. Investment opportunities are being investigated with Partner organisations to open up this land for development.

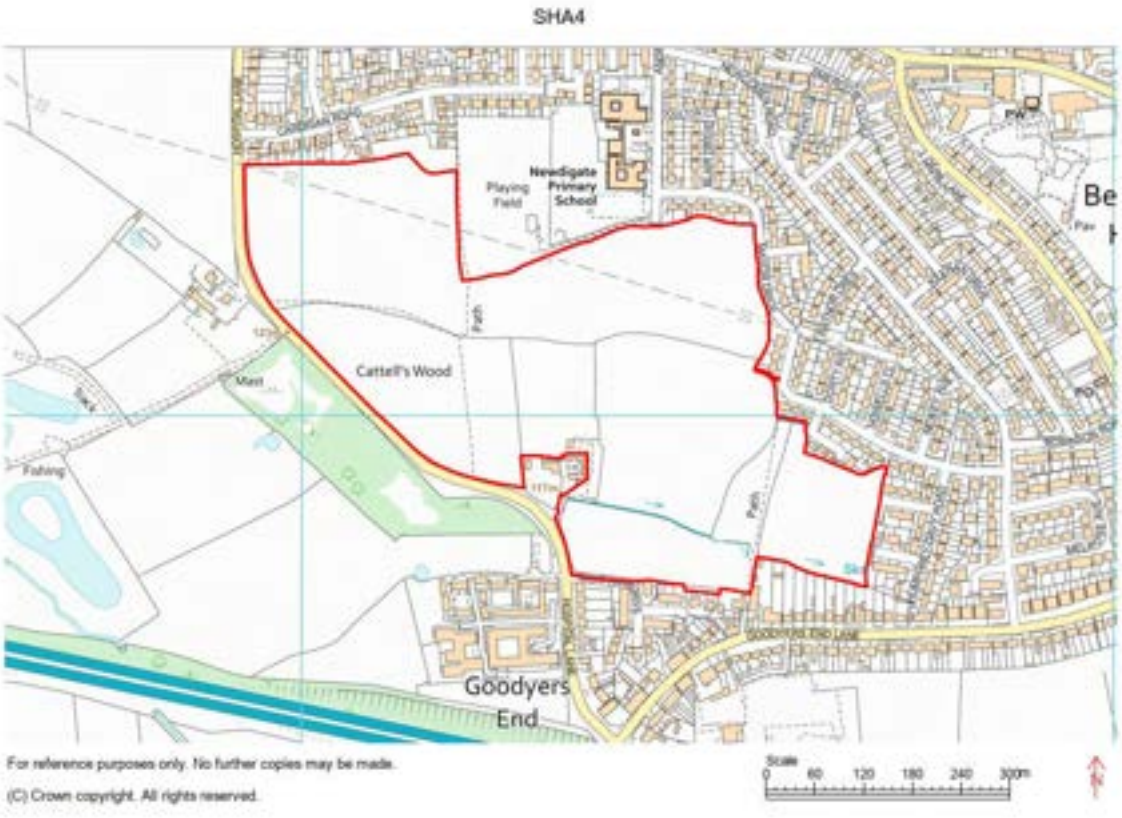
Contamination

7.71 The nature of the site and adjacent land use means that contamination, landfill gas, odour and noise will need to be considered as part of any formal planning application. For information part of the site is included within the Environmental Permit area associated with an active landfill known as Judkins Landfill Phase 3 (EP reference EPR/JP3033YQ). The Applicant is therefore advised to have discussions with the Environment Agency prior to the submission of any formal planning application.

Strategic Policy SHA4 – Hospital Lane

Introduction

7.72 Strategic housing allocation SHA4 is a sustainable and deliverable extension to Goodyers End, on the western edge of Bedworth. The site was previously allocated as HSG5 in the 2019 adopted Borough Plan for at least 398 units and has since obtained outline planning permission for 455 dwellings (Application Reference 039049).



Strategic Policy SHA4: Hospital Lane

Strategic housing allocation SHA4 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of approximately 455 dwellings in a mix of dwelling types and sizes.
2. Potential on-site GP surgery or financial contribution to a new GP or expanded surgery in the western Bedworth area (Goodyers End, Newdigate, Bedworth Woodlands).
3. Provision of outdoor green gym, as well as older and younger equipped children's play facilities.
4. Play and open space are to be provided with appropriate management and maintenance arrangements.
5. Financial contribution towards the upgrading of the existing sports pitches and play facilities at Anderton Road, Heath Road/Newtown Road, facilities at Newdigate Recreation Ground and Miners Welfare Park. Provision of play area, MUGA and playing pitches and financial contributions towards sport and physical activity based on the requirements of the Council's Playing Pitch and Outdoor Sports Strategy and Indoor Sports Facility Needs Assessment and Strategy for pitch sport improvements, including off-site swimming pool provision, cycle facilities at Bedworth Physical Activity Hub, Pingles athletic facility, rugby pitch provision at Nicholas Chamberlaine School and community centre and outdoor tennis facilities in Miners Welfare Park, Bedworth.
6. Financial contribution towards expansion of Newdigate Primary School by 15 places per year group – 105 places in total and provision for early years, secondary (expansion of Ash Green School), SEND and post-16 as required.
7. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.
8. Any transport improvements/upgrades required along Hospital Lane, Smorrall Lane, Goodyers End Lane and surrounding streets because of the development.
9. Financial contributions towards Borough-wide strategic highway infrastructure works identified within the Bedworth area, including improvement works to junction 3 of the M6.
10. Provision of a footway/cycleway network through the site and contributions to the wider cycle path network, including links towards Goodyers End and Bedworth Town Centre.
11. Contributions to infrastructure requirements for Warwickshire Police where this is justified and compliant with the CIL Regulations.
12. Provision of a new district centre.
13. Local sewage network improvements to improve capacity to accommodate the development.
14. Provision of wayleave for electricity pylons, which should consist of a corridor of open space between existing and new housing.
15. A strategy for responding to the National Grid gas transmission pipelines, present within the site, is required, demonstrating the National Grid Design Guide and Principles have been applied at the outline stage and how the impact of the asset has been reduced through good design. Contributions may be required towards upgrading the Langdale Drive Primary Substation.

Form of development

16. Maximum building height of 2 storeys, given the nature of existing built form.
17. Ensure new high quality houses face onto the northern side of Hospital Lane in order to form an attractive urban edge to southwest Bedworth.
18. A buffer of fields should be preserved so as to retain the isolated character of Moat Farm on Hospital Lane.
19. Retain and improve the hedgerows along the field edges and consider creating wildlife buffer strips along footpaths to improve connectivity.
20. The layout of the development should be designed to reflect the irregular field patterns and boundaries.
21. Provision of landscaping to the northern side of Hospital Lane in order to soften and limit views of the new urban edge.
22. Improve areas along the edge of the current built up area and proposed development site to maintain footpaths, scrubland and grassland areas to open countryside beyond Hospital Lane.
23. Retain public rights of way and complement with new pedestrian routes and links. Hospital Field Local Wildlife Site (rejected) should be considered as a biodiversity offsetting site for restoration as a community woodland or local nature reserve.
24. Incorporate a wildlife area for Newdigate Primary School at the southern end of the playing field which runs alongside a public footpath.

7.73 The site covers 22.4ha and is defined to the west by Hospital Lane and residential properties to the south, east and north. Newdigate Primary School and Anderton Road Playing Fields are also located to the north of the site.

7.74 The site will deliver approximately 445 new dwellings in a mix of sizes and tenures. The site is in a single ownership and is being delivered through an overarching outline permission.

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

District centre

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

School provision

7.77 Land adjacent to the existing Newdigate Primary School boundary will be retained to accommodate expansion of the primary school premises, if demonstrated necessary through discussions with Warwickshire County Council.

7.78 At secondary level, financial contributions are anticipated in order to expand existing secondary provision up to an additional 3.5 form entry. The contribution would be part of a pool of contributions from other strategic and non-strategic housing allocations, where pupils are expected to attend local secondary schools in the Bedworth/Ash Green area.

Footpaths and cycle routes

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

Transport and access

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

7.81 The Transport Modelling Report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to SHA4 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of SHA4 is expected to contribute financially towards road improvement schemes in the Bedworth area, as set out in the Transport Modelling Report, via planning obligation.

Flood risk

7.82 The SFRA Level 2 (August 2023) provided for the Borough Plan Review, flags the site as at risk of low flood risk, but ponding and flows outside the site during flood surface water events are likely to limit access/egress to the site. Consideration must be made to the nature of the risk and how safe access and egress can be provided during flood events (including an allowance for climate change), both to people and emergency vehicles with the further site-specific flood-risk assessment that will be required for the site with any planning application. The Level 2 Assessment should be referred to and be considered with any submission.

Historic Environment

7.83 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring high for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

7.84 There is potential for any development on this site to impact on archaeological features Therefore, evaluative archaeological recording documentation is likely to be required for any formal planning application. The content of this documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Strategic Policy SHA5 – West of Bulkington

Introduction

7.85 Strategic housing allocation SHA5 is a sustainable and deliverable extension on the western edge of Bulkington. The site was allocated as HSG8 in the adopted plan with a further parcel to the north for 495 dwellings (this parcel is now under construction).



Strategic Policy SHA5: Land West of Bulkington

Strategic housing site SHA5 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of approximately 375 dwellings in a mix of dwelling types and sizes.
2. Play and open space to be provided with appropriate management and maintenance arrangements.
3. Financial contribution towards the upgrading of sports facilities, MUGA and teenage play provision at Bulkington Recreation Ground, as well as financial contribution towards facilities at Miners Welfare Park in Bedworth, a destination park within the Council's Open Space Strategy.
4. Financial contribution towards community allotments.
5. Financial contribution towards primary education at Arden Forest Infant and St James Academy Junior schools to meet anticipated demand for school places. Additional provision for early years, secondary (to an additional 3.5 form entry), SEND and post-16 as required.
6. Bus infrastructure improvements within or adjacent to SHA5, with a potential contribution to secure diversion of frequent local bus services to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.
7. Any transport improvements/upgrades required for a right turn bay on the B4112 Nuneaton Road southbound approach to the B4112 Nuneaton Road/Weston Lane junction and along Bedworth Road, Coventry Road and surrounding streets as a result of the development.
8. Financial contributions towards highways infrastructure identified in the Strategic Transport Assessment for Bulkington.
9. Provision of a footway/cycleway network through the open space on the site, linking Coventry Road with Bedworth Road would be encouraged.
10. A toucan crossing on Bedworth Road between the northern parcel and the housing development north of Bedworth Road.
11. Financial contributions towards the development of a dedicated cycle path along the B4029 between Bulkington and Bedworth.
12. Potential local sewage network improvements to improve capacity to accommodate the development, subject to discussions with Severn Trent Water.
13. Financial contributions towards sport and physical activity based on the requirements of the Council's Playing Pitch and Outdoor Sports Strategy (2023) and Indoor Sports Facility Needs Assessment and Strategy for pitch sport improvements, including off-site swimming pool provision, cycling facilities at Bedworth Physical Activity Hub, Pingles athletics facility, rugby pitch provision at Nicholas Chamberlaine School and community centre and outdoor tennis facilities in Miners Welfare Park, Bedworth.
14. Financial contribution towards community facilities including potentially a new build large multipurpose room and store at Bulkington Village Centre.
15. Financial contribution for primary medical care to be given to the NHS Coventry and Warwickshire ICB.
16. Contributions to infrastructure requirements for Warwickshire Police where this is justified and compliant with the CIL Regulations.

Form of development

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

19. Creation of substantial hedgerows with hedgerow trees along the western and southern boundary (to be maintained as a Green Belt defensible boundary).
20. The hedgerows provide ecological links from Bulkington Recreational Ground and the railway line, and thereafter into the countryside. These features should be safeguarded and strengthened.
21. Enhancement of linear woodland along the railway line.
22. Conserve and enhance the pattern of small and medium sized fields bounded by intact hedgerows where possible.
23. Retain and enhance field ponds through incorporating them into a network of interconnected open spaces and undertake related protected species surveys including for great crested newts.
24. Creation of a green corridor along public right of way (B41) as part of an interconnected network of open spaces.
25. All site boundaries should be enhanced through new planting of trees whilst maintaining adequate distances from housing, and all veteran hedgerows should be retained and surveyed prior to development. Species rich hedgerows should be incorporated within areas of open space.
26. Development proposals should be in accordance with the extant HSG8 Concept Plan SPD and ensure access arrangements, including widths of access points and spine roads, are sufficient to ensure the delivery of all of the sites. Any links must also be contiguous to the adjacent development parcel, as far as reasonably practicable.

7.86 The site covers 18.2ha and is being brought forward as five separate parcels, with each of the parcels at differing stages of the planning process, ranging from outline permission to being under construction. The site will deliver approximately 375 new dwellings in a mix of sizes and tenures.

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

Open spaces

7.88 Formal and informal public open space will be concentrated along the western edge of SHA5. These spaces would contain new combined pedestrian and cycle routes in order to create green routes for pedestrians, cyclists and wildlife. Play provision will need to be delivered in accordance with the Open Space and Green Infrastructure SPD.

Footpaths and cycle routes

7.89 Linkages between the northern and southern parcels should be explored to ensure a comprehensive and integrated redevelopment of the strategic housing site, and to provide permeability through the development, however, this involves third party land not included in the allocation.

7.90 In order to improve connectivity, a 3m wide combined footpath and cycleway will be provided from within the areas of open space, in order to create new car-free green routes through the site. The routes will link Coventry Road with Bedworth Road. A new toucan crossing on Bedworth Road will allow

pedestrians and cyclists to cross Bedworth Road between the northern and central parcels of SHA5.

7.91 SHA5 is expected to contribute financially towards the development of a dedicated cycle path along the B4029 Bedworth Road between Bulkington and Bedworth. This will encourage new residents to access Bulkington District Centre, Bedworth Town Centre and Nicholas Chamberlaine School via alternative car-free modes of transportation.

7.92 Off-site works include upgrading the existing sports facilities and teenage play provision at Bulkington Recreation Ground and the improvement of facilities at Miners Welfare Park in Bedworth.

School provision

7.93 Educational contributions will be sought to ensure that the expansion and reorganisation of both Arden Forest Infant and St James Academy Junior schools are appropriate in order to meet demand. At secondary level, financial contributions are anticipated in order to expand existing secondary provision up to an additional 3.5 form entry. The contribution would be part of a pool from other strategic and non-strategic allocations in the Bedworth and Bulkington area, where pupils are expected to attend local secondary schools in the Bedworth/Ash Green area.

Transport and access

7.94 Primary access for vehicles will be provided from Bedworth Road for the northern parcel of the site. The southern parcel of SHA5 has two potential access points from Coventry Road. Additional secondary vehicular accesses are possible from Leyland Road (southern parcel). Contributions towards highway improvements and bus infrastructure will be sought.

7.95 The Transport Modelling Report, commissioned by Warwickshire County Council, set out a number of strategic road improvements in close proximity to SHA5 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of SHA5 is expected to contribute financially towards road improvement schemes in the Bedworth area, as set out in the Transport Modelling Report, via planning obligations.

Flooding

7.96 The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zone 1. The Report states there is likely to be some surface water and flows during flood events. Safe access and egress will need to be demonstrated in the 1% AEP plus 40% climate change surface water event. Site drainage proposals should address the requirements for access routes, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be

referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

Historic Environment

7.97 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

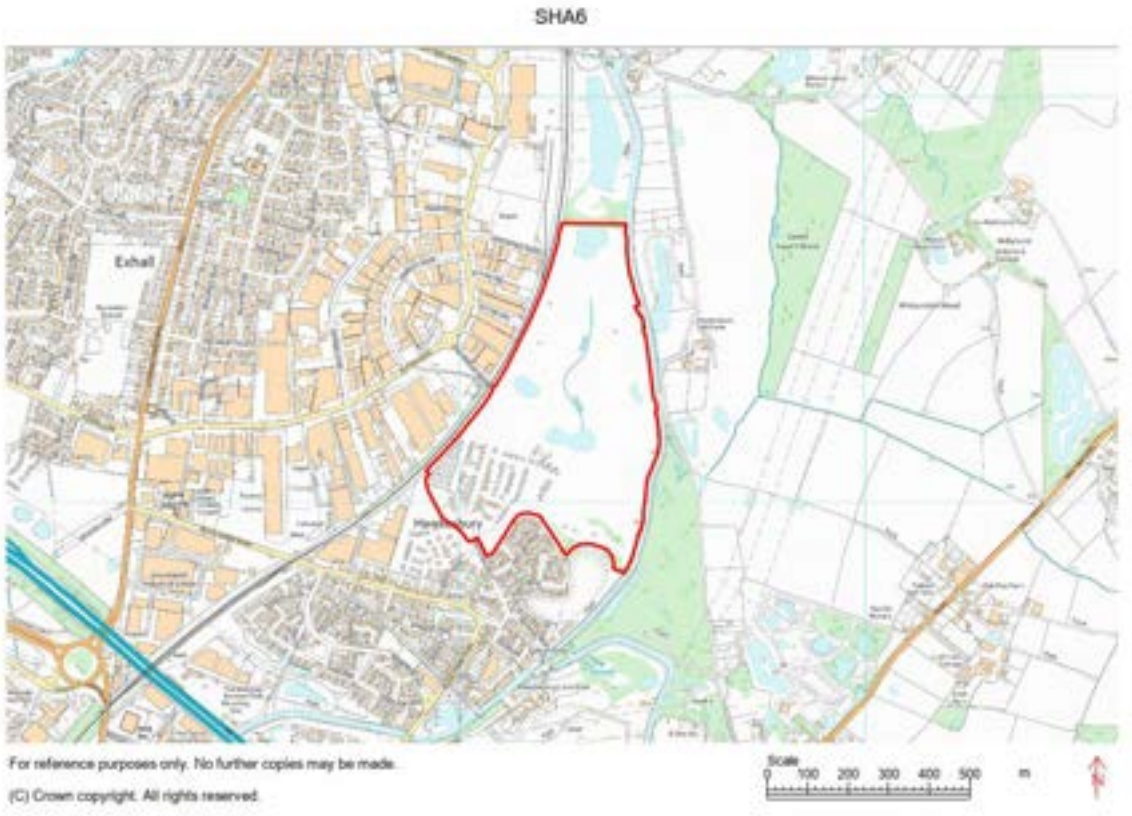
7.98 There is potential for any development on this site to impact on archaeological features. Therefore, evaluative archaeological recording likely in the form of trenching is likely to be required for any formal planning application. The detail of such documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Strategic Policy SHA6 – Land at former Hawkesbury Golf Course

Introduction

7.99 Strategic housing allocation SHA6 is a sustainable and deliverable urban extension to Bedworth. The site was allocated in the adopted Borough Plan as HSG12 for 380 dwellings.

7.100 The site is being brought forward by two separate developers. The western parcel is under construction for 204 dwellings (Application reference 036870) and the eastern parcel has consent to deliver 176 dwellings (Application reference 037807).



Strategic Policy SHA6: Land at former Hawkesbury Golf Course

Strategic housing site SHA6 will be developed for a mix of residential and community facilities.

Key development principles

1. Provision of approximately 176 dwellings in a mix of dwelling types and sizes (accounting for approval 036870 for 204 dwellings).
2. Provision of a community building.
3. Financial contributions to Warwickshire County Council, towards the provision of the expansion of primary and secondary school places (expansion of Ash Green School), post 16 SEND facilities and increase of early years/pre-school provision.
4. Provision of public open space, including a public park around the existing and proposed pools.
5. Accessible cycle routes and footpaths to neighbouring facilities, including schools.
6. Provision of allotments.
7. Financial contributions towards appropriate management and maintenance of the public open space.
8. Provision/financial contribution towards sport and physical activity including MUGA and playing pitch provision.
9. Financial contribution towards bus services in the area, based on dialogue with Warwickshire County Council and bus operators.

10. Transport improvements/upgrades to local and wider strategic highway infrastructure.
11. Provision of a new cycle/footbridge crossing the canal north of Hawkesbury Junction to facilitate the extension of NCN52 along the canal towpath and into site SHA6. Improvements should then follow, to the towpath between Hawkesbury Junction and the bridge, provided to a standard appropriate to encourage greater use by cyclists.
12. Contributions to local sewage network improvements to improve capacity to accommodate the development, subject to discussions with Severn Trent Water.
13. Contributions to infrastructure requirements for Warwickshire Police where this is justified and compliant with the CIL Regulations.
14. Contributions to health care facilities at George Eliot Hospital and improvement and/or extension of primary medical care facilities within the ICB identified Bedworth Primary Care Network (Based on 212 dwellings).
15. Provision towards a library service point.

Form of development

16. Retention of the valuable existing natural landscape, ponds and trees.
17. Dwellings should address areas of open space both formal and in formal, as well as the canal, where appropriate and make use of the opportunities the canal can provide. Canalside housing should be a traditional design, no more than 2 storeys high and face the canal across gardens, access drives and canalside landscaping. A 10m building-free buffer zone should also be provided along the canal frontage.
18. Protected species are likely to be found on site, and surveys will be required, with any habitat requirements retained and connectivity enhanced, within any development layout.
19. Development shall not occur within the prescribed easements around mine shafts on the site.
20. Any proposed development should look to enhance and expand on the Bayton Road Lakes Local Wildlife Site.
21. Any proposed development should look to enhance the canal to the east and enable connectivity to Hawkesbury Spinney and Old Tip Local Wildlife Site.
22. Any proposed development should look to enhance the railway linear corridor to the west..

7.101 The overall site covers 29ha to the south-east of Bedworth and runs alongside the Coventry Canal. The red line plan shows the site in its entirety, which includes the western parcel, which is already under construction.

Footpaths and cycleways

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

Landscape and open space

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

School provision

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

Sport and physical activity

7.105 Developers are encouraged to engage in dialogue with the Borough Council to determine what level of contributions are required towards improvements to sport and physical activity.

Transport

7.105 The site will require two points of access from the strategic road network and will be accessed from Sephton Drive. Financial contributions towards strategic highway improvements and bus infrastructure will be sought, recognising that the implications for the wider highway network will involve consideration of relevant junctions within the wider B4113 Longford Road corridor. This will require dialogue with Warwickshire County Council and Coventry City Council, as the relevant authorities responsible for the corridor.

Flooding

7.106 The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zone 1. The report flags the site as having some surface water flood risk. Site drainage proposals should address the requirements for access routes, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime. The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that both Sequential and Exception Tests are required for this site.

Historic Environment

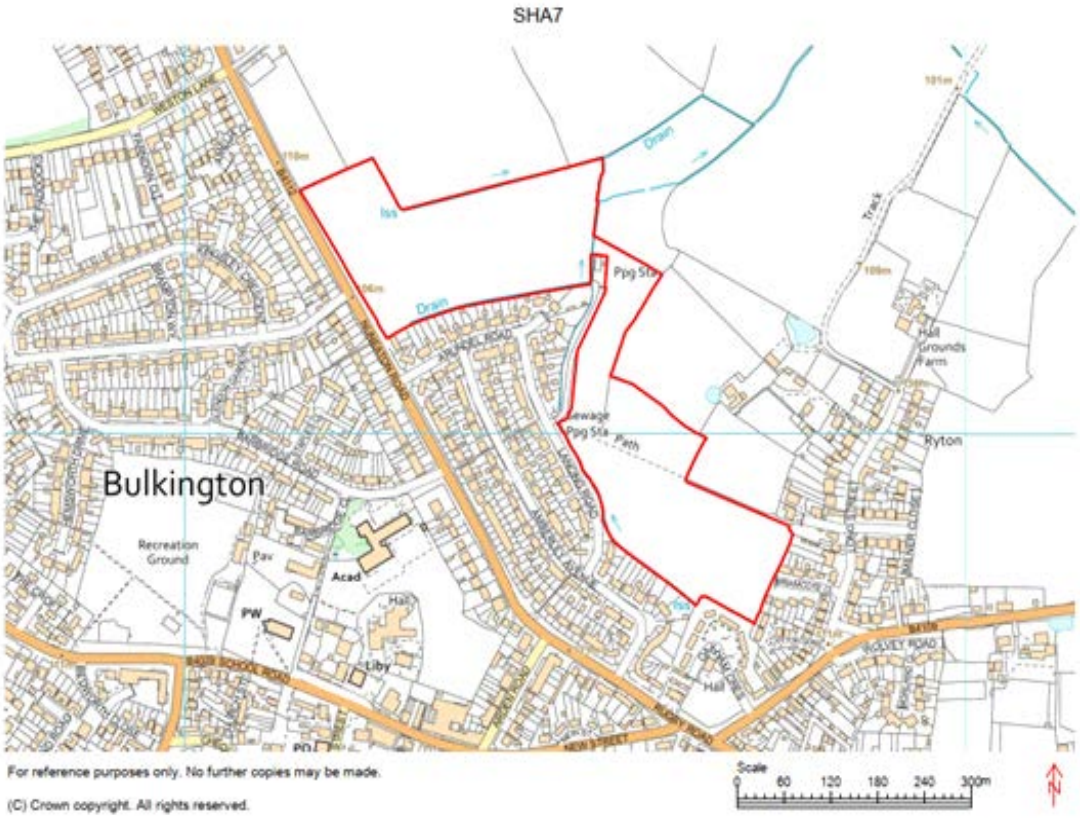
7.107 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

7.108 There is potential for any development on this site to impact on archaeological features. Therefore, evaluative archaeological recording likely in the form of trenching is likely to be required for any formal planning application. The detail of this documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Strategic Policy SHA7 - East of Bulkington

Introduction

7.109 Strategic housing allocation SHA7 is a sustainable extension to the East of Bulkington. The site was allocated in the adopted Borough Plan as HSG7 for at least 169 dwellings.



Strategic Policy SHA7: East of Bulkington

Strategic housing site SHA7 will be developed for a mix of residential and community uses.

Key development principles

1. Provision of approximately 230 dwellings in a mix of dwelling types and sizes.
2. Play and open space, including younger children's play, to be provided with appropriate management and maintenance arrangements.
3. Financial contribution towards the upgrading of sports facilities and teenage play provision at Bulkington Recreation Ground and financial contribution towards facilities at Miners Welfare Park in Bedworth.
4. Financial contribution towards primary education at Arden Forest Infant and St James Academy Junior schools in order to meet anticipated demand for school places.
5. Financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry.
6. Bus infrastructure improvements adjacent to SHA7 with a potential contribution to secure diversion of frequent local bus services in order to access the strategic housing allocation, based on dialogue with Warwickshire County Council and bus operators.
7. Any transport improvements/upgrades required along Nuneaton Road, Lancing Road, Bramcote Close and surrounding streets affected as a result of the development. The main access points are likely to be from Nuneaton Road and Lancing Road.
8. Financial contributions towards highways infrastructure identified in the Strategic Transport Assessment for Bulkington.
9. Provision of footpaths/cycleways through the open space on the site, including linking the existing public footpath on the southern parcel of the site with the northern parcel, and through the development area to Nuneaton Road.
10. Financial contributions towards the development of a dedicated cycle path along the B4029 between Bulkington Village Centre and Bedworth, and towards links to Bulkington Village Centre and Nuneaton.
11. Suitable sewage connection to the existing foul drainage network.
12. Financial contributions towards sport and physical activity.
13. Financial contribution toward community facilities.
14. Financial contribution for primary medical care to be given to NHS Coventry and Warwickshire Integrated Care Board.

Form of development

15. Maintain and enhance vegetated boundaries that front onto the wider rural area (to be maintained as Green Belt defensible boundaries).
16. Provide an open space corridor incorporating the public right of way with specimen trees and small groups of trees interspersed amongst grassed areas and wildflower meadows.

17. Provide street trees to the internal road network.
18. Enhancement of the brook which follows the south-western boundary.

7.110 Strategic housing allocation SHA7 is a sustainable and deliverable extension on the eastern edge of Bulkington. The strategic land allocation covers 10.29 ha. The site will deliver approximately 230 new dwellings in a mix of sizes and tenures. The site is in a single ownership and is expected to be delivered through an overarching outline permission, which has been granted.

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

7.112 Residential development will be focussed in the northern and southern part of the site, with formal and informal open space in the centre. A landscape belt will run along the northern edges of SHA7.

Footpaths and cycleways

7.113 Footpath/cycleway access is proposed through the informal open space, in order to create a green route linking the northern and southern parcels. This route will run from the existing public footpath, through the informal open space, and into the northern parcel of SHA7. The route will continue to Nuneaton Road as part of the housing development in order to improve connectivity through the site.

7.114 SHA7 is expected to contribute financially towards the development of a dedicated cycle path along the B4029 Bedworth Road between Bulkington and Bedworth, as well as towards Bulkington Centre and Nuneaton. This will encourage new residents of SHA7 to access Bulkington District Centre, Bedworth Town Centre and Nicholas Chamberlaine School via alternative car-free modes of transportation.

School provision

7.115 Education contributions will be sought to ensure that the expansion and re organisation of both Arden Forest Infant and St James Academy Junior schools are appropriate to meet demand in tandem with the proposed strategic housing site to the west of Bulkington (SHA5). At secondary level, financial contributions are anticipated in order to expand existing secondary provision up to an additional 3.5 form entry. The contribution would be part of a pool including SHA4 and SHA5, where pupils are expected to attend local secondary schools in the Bedworth / Ash Green area.

Transport and access

7.116 Primary access for vehicles will be provided from Nuneaton Road for the northern parcel of the site. The southern parcel of SHA7 has two potential access points from Lancing Road and Bramcote Road. Contributions towards highway improvements and bus infrastructure will be sought.

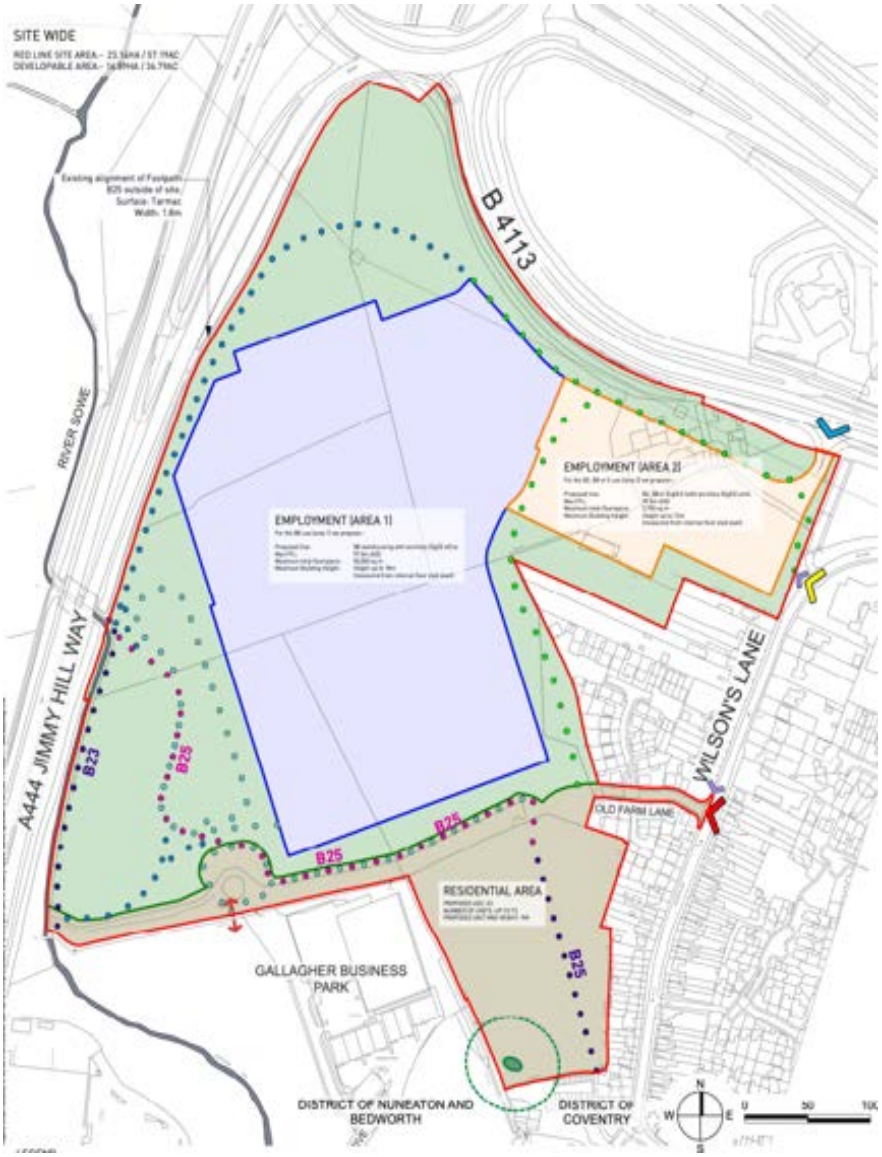
7.117 The transport modelling report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to SHA7 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan Review. The development of SHA7 is expected to contribute financially towards road improvement schemes in the Bedworth area, as set out in the transport modelling report, via planning obligation.

7.118 **(Policy SEA1 has been removed from the Borough Plan Review due to the site being under construction).**

Strategic Policy SEA2 – Wilsons Lane

Introduction

7.119 Strategic site SEA2 will contribute to meeting the strategic employment needs of the Borough, job creation objectives of the Borough Plan Review and the delivery of new homes in a mixed-use allocation.



Strategic Policy SEA2: Wilson Lane

Strategic employment site SEA2 will be developed for employment, comprising use classes E(g) (ii and iii), B2 and B8, as well as residential uses.

Key development principles

1. Provision of approximately 19.09ha of employment land.
2. Provision of approximately 73 dwellings in a mix of dwelling types and sizes.

Employment

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

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

Housing

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

6. Transport improvements and upgrades required along Wilsons Lane, including the junction with the A444, and appropriate provision for pedestrians and cyclists.
7. Play and open space to be provided with appropriate management and maintenance arrangements, or a financial contribution towards the upgrading of local play/sports facilities.
8. Financial contribution towards expansion of existing primary school provision (not currently required under outline 037237) and secondary school places at Ash Green School. Additional provision for early years, SEND and post-16 as required.
9. Financial contributions towards Borough-wide strategic highway infrastructure works.
10. Potential local sewage network improvements in order to improve capacity to accommodate the development, subject to discussions with Severn Trent Water.
11. Contribution towards the delivery of Sustrans' proposal to provide an enhanced cycle route along Coventry/Longford Road.
12. Financial contribution for primary medical care to be given to the NHS Coventry and Warwickshire ICB.

Form of development

13. Locate larger B2 and B8 uses to the west of the landscape corridor on the lower ground, with smaller scale development on the more visible higher ground next to the housing site and existing residential development on Wilsons Lane.
14. Scale and massing of building form, around the eastern edge of site, should demonstrate that there would be no material detrimental impact caused, on existing residential amenity.
15. Retain areas of ridge and furrow, within open spaces, where possible.
16. Retain and enhance the pond to the south of the site.
17. For the housing sites, provide appropriate tree planting in the street scene and rear gardens, to help the development integrate into the landscape.
18. Provide an appropriate landscape treatment to the eastern boundary of the site with a mix of open ground, shrubs and trees in order to provide a mix of open and filtered views westwards across the River Sowe Valley.
19. Seek to retain the section of public right of way routed through the middle of the site within a landscape corridor (with appropriate tree and shrub planting and open ground) and maintain views from the public right of way towards the western side of the River Sowe Valley, or if necessary, appropriately divert the public right of way along a route that does not materially inconvenience the public.
20. Provide ecological enhancements and maintenance to the River Sowe and its floodplain, in the south-west corner of the site, as well as a vehicular access route to Sowe Meadows Local Wildlife Site to allow maintenance of the site's wildflower meadows.
21. Where possible, retain and strengthen the central hedgerow in order to maintain an east-west network of green infrastructure, or if necessary, compensate any loss in hedgerow through extensive replacement planting on the site.
22. Provide a wayleave for the electricity pylons through the site.
23. A strategy for responding to the National Grid gas transmission pipelines, present within the site, is required, which demonstrates the National Grid Design Guide and Principles have been applied at the outline stage and how the impact of the asset has been reduced through good design.
24. The Environment Agency, Warwickshire County Council Flood Risk Management and Coventry City Council require the site to provide a betterment for flood relief downstream by providing additional rainwater storage within the site.
25. Protected, UK Priority, rare and endangered species surveys will be required where there is a reasonable likelihood of their presence. Where their presence is found or suspected their populations will be protected and where possible enhanced, during and after development. Developments that look to provide species provision into the development will be encouraged.

7.120 The strategic allocation is located in the south of the Nuneaton and Bedworth Borough area to the south-east of the M6 and A444 junction. An overhead power line runs in a west-east direction across the northern part of the site.

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

7.122 The site is 23ha and will deliver a local growth point including approximately 73 dwellings and 19.09ha of employment uses over the plan period, with integrated landscaping, open space and drainage mitigation. The final net figure will be determined by the design and layout of the site.

7.123 Residential development will be focussed to the south-eastern part of the site, adjacent to the existing residential areas. The remainder of the site will be brought forward for employment uses, open space, SuDS, biodiversity and flood betterment mitigation.

7.124 Where possible, ancillary offices E(g) should be focused on the eastern part of the site, adjacent to the existing and proposed residential properties. B2 and B8 uses will be focussed on the western part of the site. Any proposed B2 or B8 uses that are located towards the eastern part of the site, adjacent to existing residential properties, should demonstrate that there would be no material detrimental impact causes to residential amenity. Scheme layouts need to take into consideration potential stand-offs and easements associated with the overhead power line, and early discussions with National Grid are essential in informing any detailed layout, but it is considered that parking and storage areas will be provided in the vicinity of the power line.

7.125 The ODPM Circular 2006/5: Biodiversity and geological conservation makes it clear that protected species are a material consideration, and surveys will be required where there is a reasonable likelihood of their presence. It will be expected that species information is acquired from the Warwickshire Biological Record Centre to inform relevant applications and is used to inform any species surveys. The Council will expect species surveys with the submission of an application for validation. Conditions for surveys will only be used in exceptional circumstances.

7.126 Financial contributions have already been secured via the consent of outline planning permission reference 037237. However, in the event that a new outline application is submitted for the residential element, contributions may be required towards the expansion of the existing primary school provision, as the current circumstances may change.

Transport and access

7.127 It has been agreed with the highways authority that separate access points will be created for the proposed employment and residential uses on the site. All HGV parking and servicing areas, associated with the employment uses on the site, will be accessed via a new entrance onto the B4113. The final junction solution will be agreed following the completion of a transport assessment.

7.128 Access to the residential areas will be via a new access point onto Old Farm Lane. The existing pedestrian access to public footpaths B23 and B25 will be retained. Contributions towards associated improvements to Wilsons Lane, the B4113 and bus infrastructure will be sought.

7.129 The Transport Modelling Report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to the site in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of the site is expected to contribute financially towards road improvement schemes in the Bedworth area, as set out in the Transport Modelling Report, via planning obligation.

Flooding

7.130 The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The majority of the area is in Flood Zone 1 but adjacent to the river the site is within Flood Zone 2 and Flood Zone 3. The Report states that fluvial, surface flood risk and ponding across the site is considered to be low, but increasing in flood events and an appropriate assessment of the groundwater regime should be carried out at the site-specific Flood Risk Assessment (FRA) stage. Development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime. The report also states that safe access and egress must be demonstrated especially with the likely increase in severity and frequency of flooding. Development must avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be referred to and be considered as part of the further site-specific flood-risk assessment that will be required for the site with any planning application. The Report concluded that Sequential and Exception Tests are required for this site.

Historic Environment

7.131 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium for all, or parts of the site for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

7.132 There is potential for any development on this site to impact on archaeological features. Therefore, evaluative archaeological recording likely in the form of trenching may be required with any formal planning application if the previously submitted archaeological information is deemed to be inadequate. The detail of the documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Strategic Policy SEA3 – Prologis extension

Introduction

7.133 Strategic employment site SEA3 comprises of an extension to an existing employment park and will contribute to meeting the strategic employment needs of the Borough and job creation objectives of the Borough Plan Review.



Strategic Policy SEA3: Prologis Extension

Strategic employment site SEA3 will be developed for employment, comprising use classes E(g) (ii and iii), B2 and B8 uses.

Key development principles

1. Provision of approximately 3.58ha of employment land.
2. Crushed stone public footway from Pilgrims Walk to New Road/country park, running along the eastern side of the site.

Form of development

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

5. Habitat creation, enhancement and subsequent sympathetic management, along the northern, western and southern boundaries to maintain and increase suitable breeding and terrestrial habitats for great crested newts, and to provide sustainable habitat connectivity with Prologis Country Park (Local Wildlife Site) to the east/south-east:
   a. Retention of existing waterbody (southern boundary) and creation of new waterbodies.
   b. New hibernacula.
   c. Management of retained grassland; and
   d. Access roads to have appropriate connective measures for amphibians to allow their safe passage along the southern boundary.
6. Retention of existing surfaced path to the New Road.
7. Crushed stone public footway from Pilgrims Walk (at south-west corner of site) to existing surfaced path linking to New Road and the Prologis Country Park (at north-east corner of site).
8. Vehicular access to be provided from Pilgrims Walk.
9. Building height to be restricted to 15m to ridge closest to the western boundary.
10. Loading area to be positioned so as to not face onto residential properties and car parking spaces to be at least 50m away from neighbouring residential properties.
11. Suitable sewage connection to the existing foul drainage network.
12. Provision of an integrated surface water management scheme.

7.134 The site is located to the north of Plot H, at Prologis Park, and its southern boundary borders Pilgrims Walk, which also serves Plot H. It mainly comprises poor semi-improved grassland, together with plantation woodland along the northern and southern boundaries, including a pond to the south.

7.135 The site will deliver approximately 3.58ha for employment uses, including access, parking, servicing and landscaping/habitat enhancement. The final net figure will be determined by the design and layout of the site. The final scheme layout will need to provide a wayleave for the overhead power lines.

Biodiversity

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

7.137 The SEA3 site itself includes a small pond which supports breeding great crested newts, and to ensure that the favourable conservation status of the local great crested newt population is maintained, the site will require on-site mitigation and additional off-site mitigation in the adjacent country park.

7.138 Beyond the mitigation measures for great crested newts, development of SEA3 may result in an overall loss of habitat, but much of this will be poor semi-improved grassland of low biodiversity distinctiveness. However, to ensure

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

Transport and access

7.139 Access to the site will be via the existing road infrastructure within Prologis Park (Winding House Lane/Central Boulevard) with access points taken from Pilgrims Walk. Existing footpath routes will be retained. There is potential for separate access points for HGVs and cars. However, this needs to take existing landscape and ecological constraints into account.

7.140 The Transport Modelling Report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to SEA3 to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan Review. The development of SEA3 may be expected to contribute financially towards the A444 corridor road and Bedworth area improvement schemes, set out in the Transport Modelling Report, via planning obligation.

Historic Environment

7.141 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium for all, or parts of the site for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

7.142 There is potential for any development on this site to impact on archaeological features. Therefore, evaluative archaeological recording likely in the form of trenching is likely to be required with any formal planning application, if any previously submitted archaeological information is deemed to be inadequate. The detail of the documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Strategic Policy SEA4 – Coventry Road

Introduction

7.143 Strategic employment site SEA4 will contribute to meeting the strategic employment needs of the Borough, as well as the job creation objectives of the Borough Plan. The site is located on the south-eastern edge of the Hill Top area of Nuneaton and comprises derelict land formally in use as the Griff granite quarry.

SEA4



Strategic Policy SEA4: Coventry Road

Strategic employment site SEA4 will be developed for employment uses comprising use classes E(g) (ii and iii), B2 and B8.

Key development principles

1. Provision of approximately 9.59ha of employment land.
2. Upgrade of existing access onto Coventry Road (B4113).
3. Financial contributions towards Borough-wide strategic highway infrastructure works identified within the A444 corridor.
4. Financial contributions to deliver bus/rail interchange facilities on St Georges Way in the vicinity of Bermuda Park Rail Station - including real time passenger information to support improved bus access to the Bermuda residential area and employment sites.
5. Financial contribution towards the delivery of biodiversity enhancements on land to the south of Centenary Way (Griff Hollows Local Wildlife Site), as well as biodiversity offsetting.
6. Financial contribution towards feasibility studies to investigate the possibility of reopening the culverted Griff Brook.
7. Financial contribution towards delivery of an area wide green infrastructure SPD (or equivalent) that promotes species movement along identified green corridors.
8. Suitable sewage connection to the existing foul drainage network.

9. Creation of cycle path link between Bermuda Station and Coventry Road, as well as contributions to a crossing point for Coventry Road, where sought and justified, and contributions to the Bermuda Connectivity Project.
10. Reinforce connectivity through the creation of footpath and cycle connections through the site from Coventry Road B4113 to the Griff Brook to the north and the canal towpath to the east.
11. Any contamination from previous uses on the site is to be sustainably mitigated.
12. Parts of the site are on areas of floodplain and any development should have regard to this and to the risk of fluvial flood risk.

Form of development

13. Provision of landscape screening along the northern, eastern, western and southern boundaries.
14. Broadleaved woodland should be retained and restored where possible.
15. Smaller scale (and height) development (similar scale to the adjacent Bermuda Industrial Estate) will be located nearer to the residential edge to the north and east.
16. Shorter side or gable end of building form to front onto Centenary Way in order to reduce perceived effects of scale and massing of any proposed development on any retained public open space.
17. Use of colour graduation on elevations from darker colours to base, and lighter colours nearer to rooflines in order to better integrate development into the landscape.
18. Maintain an open corridor to the south of the site accommodating Centenary Way, with appropriate tree and shrub planting in order to limit effects to views along this public right of way.
19. Opportunities to improve the heritage features of the area and their link to the work of George Eliot should be pursued where possible. The Canal and River Trust requires that opportunities are given to restore part of the industrial heritage of the locality and re-establish the canal branch through the site, linking it to the remaining portion to the east.
20. Areas of high distinctiveness should look to be preserved to form part of a network of natural habitats. Habitat connectivity to the south should be maintained and enhanced to allow connections to the wider Local Wildlife Site, including along the southern boundary of the site.

7.144 Land directly to the south of SEA4 was part of the Griff granite quarry and was extensively quarried throughout the late nineteenth and early twentieth centuries. The site is now restored and designated as the Griff Hollows Local Wildlife Site. The Centenary Way long distance footpath crosses the south of the site. Griff Brook runs, in culvert, parallel with Centenary Way.

7.145 The site will deliver approximately 9.59ha gross (8.6ha net) for employment uses, including parking and servicing areas. The site is in two ownerships, but all landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site

infrastructure requirements. The final net figure will be determined by the design and layout of the site.

Local Wildlife Site and biodiversity

7.146 Land to the south of the developable area of SEA4 forms part of the Griff Hollows Local Wildlife Site. The site is being brought forward for development in combination with on and off-site ecological mitigation as well as wider biodiversity enhancement. This will result in the enhancement of the habitat connectivity of the Griff Hollows Local Wildlife Site and will create wider linkages to Bermuda Balancing Lake Local Wildlife Site and Coventry Canal. A key element of this will be the reopening of the culvert to enable mammals to connect along ecological corridors. The Griff Hollows Local Wildlife Site should be re-surveyed and this should include the water vole survey project being undertaken by Warwickshire Wildlife Trust.

Transport

7.147 The Transport Modelling Report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to SEA4 in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of SEA4 is expected to contribute financially towards the A444 corridor road improvement schemes, set out in the Transport Modelling Report, via planning obligation.

Historic environment

7.148 SEA4 and its surrounding area is associated with the works of the writer George Eliot. Development of SEA4 provides an opportunity to improve this association and establish connections of the Griff Hollow area to the former section of the canal branch. This could be achieved via the following:

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

7.149 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium for all, or parts of the site for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

7.150 There is potential for any development on this site to impact on archaeological features. Therefore, evaluative archaeological recording likely in the form of trenching is likely to be required with any formal planning application. The detail of such documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Flooding

7.151 The SFRA Level 2 (August 2023) provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zones 1, 2 and 3. Modelling used for the Level 2 states that the site is at very low risk of fluvial and surface water flooding, but which increases with flood events. Access and egress to the site is limited due to the surrounding environment, access of Coventry Road shows there is some flood exceedances in the area. Therefore, safe access and egress will need to be demonstrated in flood events plus climate change, fluvial and surface water events. Site drainage proposals should address the requirements for access routes, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be considered as part of the further site-specific flood-risk assessment that will be required for any planning application. The Report concluded that a Sequential Test is required for this site.

Contamination

7.152 The Environment Agency has advised that their records show that parts of the site include a former quarry, historic landfill and floodplain along the southern site boundary. Therefore contamination, landfill gas and fluvial run off will need to be considered as part of any formal planning application. The Applicant is therefore advised to have discussions with the Environment Agency prior to the submission of any formal planning application.

7.153 Supporting documents will be required to demonstrate how contamination from previous uses is to be mitigated.

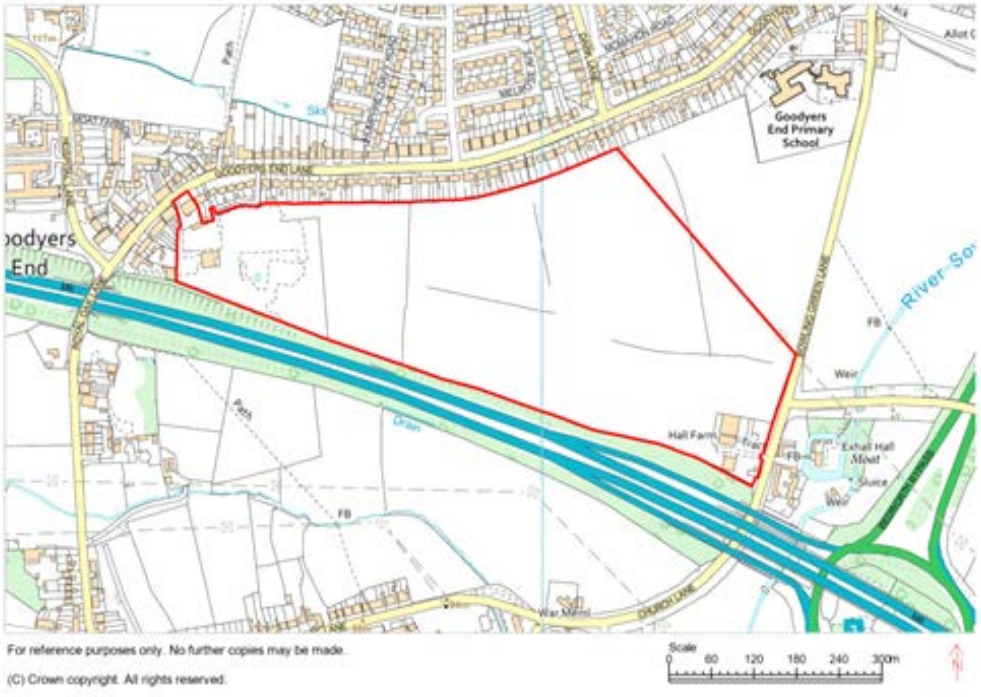
7.154 **(Policy SEA5 has been removed from the Borough Plan Review due to the site being under construction).**

Strategic Policy SEA6 – Bowling Green Lane

Introduction

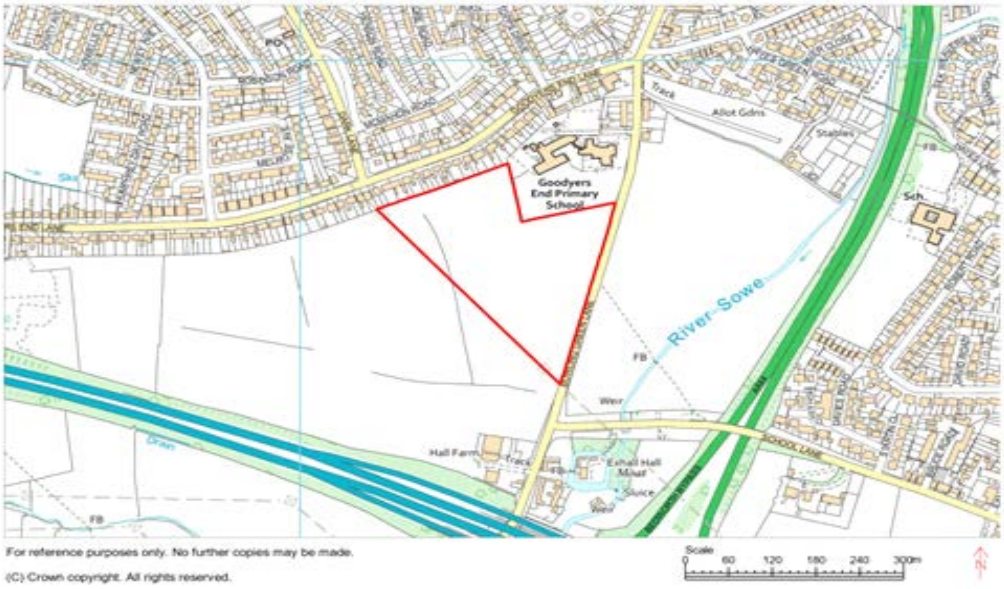
7.155 Strategic employment allocation SEA6 will contribute to meeting the strategic employment needs of the Borough, as well as the job creation objectives of the plan, delivering some residential dwellings to contribute towards the Borough's needs.

SEA6 employment area



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SEA6 residential area



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Strategic Policy SEA6: Bowling Green Lane

Strategic employment site SEA6 will be developed for employment uses comprising use classes E(g)(ii and iii), B2 and B8 and residential uses.

Key development principles

1. Provision of approximately 20.99ha of employment land.
2. Provision of approximately 7ha of land to deliver approximately 150 dwellings (including extra care units).
3. Provision of a new junction or junctions onto Bowling Green Lane to serve the residential development element of SEA6. The employment site is to be served by the provision of a new junction onto Bowling Green Lane at the School Lane junction, with associated traffic lights and any transport improvements/new junctions and upgrades required along Bowling Green Lane and School Lane (in conjunction with both the development on School Lane and either by agreement with the landowner or securing the transfer of the land to the highway authority to facilitate the use of highway powers for land outside of the School Lane site. The developer will be expected to submit for agreement an HGV routing strategy which will show HGVs accessing/egressing the site from the School Lane direction and avoiding the local schools on Bowling Green Lane, Ash Green Lane and Wheel wright Lane).
4. Financial contributions towards Borough-wide strategic highway infrastructure works, identified within the Bedworth area, and provision of a cycle network within the site, including contributions to links beyond the site to residential areas and toward Bedworth Town Centre.
5. Developer contribution towards local bus service(s) to serve the employment site in order to enhance accessibility for local residents.
6. Developer delivery, or contribution, as agreed within Warwickshire County Council, to secure provision of bus infrastructure to complement the point above.
7. Suitable sewage connection to the existing foul drainage network.
8. Contributions to infrastructure requirements for Warwickshire Police where this is justified and compliant with the CIL Regulations.

Form of development

9. Provision of landscape buffer along northern boundary (minimum width of 15m) and western boundary.
10. Ecological enhancements to existing boundary on southern and eastern edges of the site.
11. Provision of enhanced buffer in the south-eastern corner to protect the setting of the Exhall Hall scheduled monument and listed buildings, as well as ensuring that the scale of development does not detract from the prominence and importance of the listed buildings.
12. Retain existing hedgerows and trees as part of the green infrastructure for any development. Enhance existing hedgerows with new planting where they have become fragmented. Seek to retain the public right of way within a landscape enhancement area either side of the route in order to form a

strategic landscaping area through the centre of the site. Or, if necessary, appropriately divert the public right of way along a route that does not materially inconvenience the public.

13. Protected species assessment of areas of tall ruderal around field gate.
14. Habitat adjoining the motorway should be retained as an important wildlife corridor.
15. Provision of landscape screening consisting of small groups of specimen trees interspersed amongst grassed areas and wildflower meadows.
16. New development should be accompanied by woodland and tree planting to reduce its prominence within the landscape. Opportunities should be taken to enhance the urban edge through planting new trees and woodland.
17. Scale and massing of building form around northern edge of site should be reduced due to proximity to residential properties.
18. Orientate employment buildings to limit visual effects.
19. Explore opportunities to retain views towards Bedworth Water Tower.

7.156 The site is located on the south-western edge of Goodyers End. The allocation is triangular in shape and defined by Bowling Green Lane to the east, Goodyers End Lane to the north and the M6 to the south. The land slopes gradually from north to south. A public right of way links Bowling Green Lane with Goodyers End Lane, following the site's southern boundary before crossing the site in a north-westerly direction. A 400kV overhead line crosses the north-eastern part of the site in a north-west to south-east direction.

7.157 The site comprises 26ha of open land and will deliver 20.99ha for employment uses, including parking and servicing areas, and approximately 5.3ha for the residential uses.

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

Transport and access

7.159 Primary access for vehicles to the employment parts of the site will be provided from a new signalised junction on Bowling Green Lane, together with any upgrades required along Bowling Green Lane and School Lane (in conjunction with the new residential development on School Lane). Should a secondary access be required to serve the areas reserved for employment uses, this should be served from Goodyers End Lane, and should be limited to provide access for emergency vehicles, car parking, and cycle and pedestrian linkages. All HGV parking and delivery areas are to be served from the primary access point leading from Bowling Green Lane. The residential parts of the allocation should be served by its own access(es) from Bowling Green Lane.

7.160 The Transport Modelling Report, commissioned by Warwickshire County Council, sets out a number of strategic road improvements in close proximity to the site in order to mitigate potential cumulative impacts of all proposed strategic housing and employment allocations within the Borough Plan. The development of the allocation is expected to contribute financially towards the corridor road improvement schemes in the Bedworth area, as set out in the Transport Modelling Report, via planning obligation.

Flooding

7.161 The SFRA Level 2 (August 2023), provided for the Borough Plan Review, required the site to undergo a full Level 2 assessment. The site is within Flood Zone 1. The Report states there is no fluvial risk and surface water flood risk, to most of the site, is shown as very low but modelling shows that ponding and ground water risk is increased in flood events. A culvert in the area could pose a threat if blocked. The Report suggests an appropriate assessment of the groundwater regime should be carried out at the site-specific Flood Risk Assessment (FRA) stage. The Report states that development proposals at the site must address the potential changes associated with climate change and be designed to be safe for the intended lifetime. The provisions for safe access and egress must also address the potential increase in severity and frequency of flooding in the 1% AEP plus 40% climate change surface water event. Site drainage proposals should address the requirements for access routes, avoid impeding surface water flows and preserve the storage of surface water to avoid exacerbation of flood risk in the wider catchment. The document should be considered as part of the further site-specific flood-risk assessment that will be required for any planning application.

Treatment of boundary edges

7.162 The Ecological Report carried out for the Local Plan Review (July 2022) (EMP7 page 8) specifically refers to 30m buffers to woodland and 5m to hedgerows and 8m to wetland; all of which are either features of the southern or the eastern boundary of the western third of the employment part of SEA6.

Historic Environment

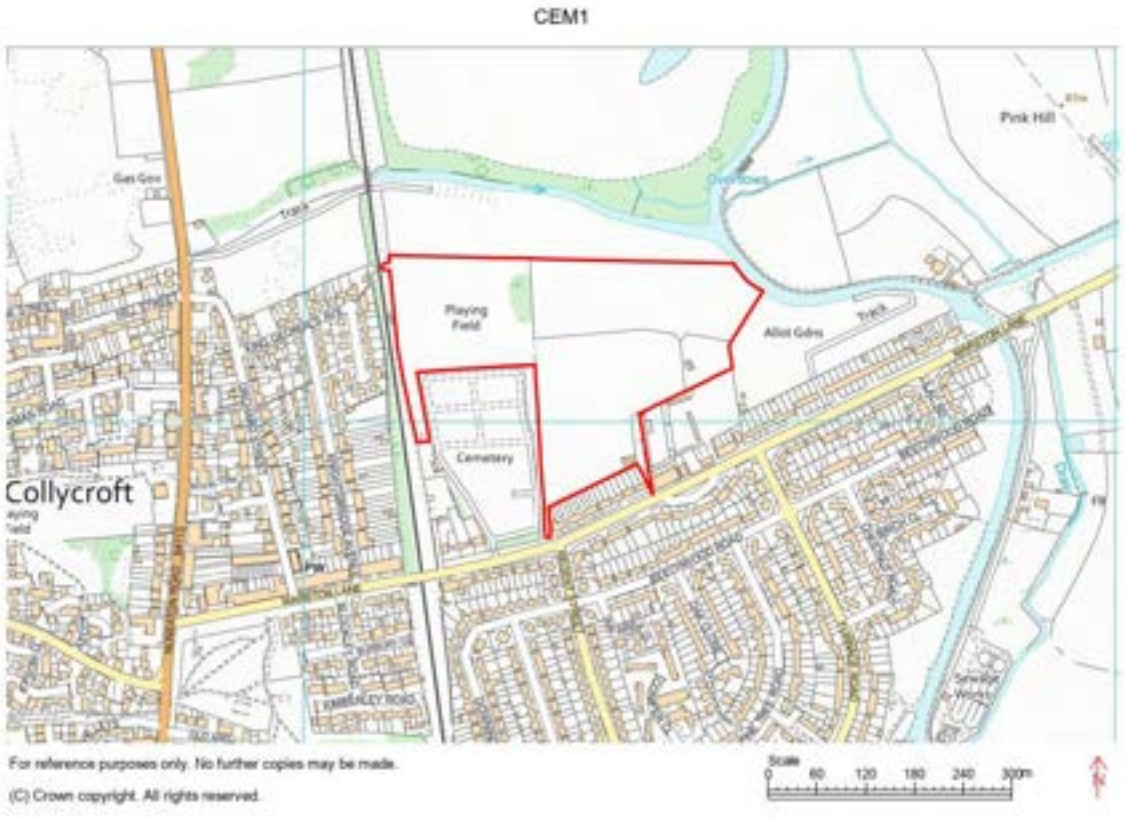
7.163 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium for all, or parts of the site for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

7.164 There is potential for any development on this site to impact on archaeological features. Therefore, evaluative archaeological recording likely in the form of trenching may be required with any formal planning application if existing information is deemed to be insufficient. The detail of the documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

Strategic Policy CEM1 – Land north of Marston Lane, Bedworth

Introduction

7.165 To ensure that there is sufficient burial space to meet the Borough's need up to 2039 and beyond, it is necessary to safeguard land for use as cemetery burial grounds.



Strategic Policy CEM1 – Land north of Marston Lane, Bedworth

Allocation CEM1 will be safeguarded for use as cemetery burial grounds to serve the Borough's long-term burial needs. Alternative green-belt compatible uses that preserve the openness of the Green Belt, such as playing pitch provision, will be considered acceptable where they will facilitate the development of the wider land allocation for burial space.

Key development principles

1. Phasing of the development commencing from the north of the site.
2. Provision of a suitable stand-off of at least 10m from the Coventry Canal. This buffer is to be planted with native species in order to enhance the benefits of the canal as a wildlife corridor.
3. Retention of existing hedgerows and hedgerow trees where possible.

4. Sensitive design and location of ancillary infrastructure (e.g. roads, pathways etc) in order to preserve the openness of the Green Belt.
5. Due to the nature of the proposed development on the site, advice will need to be sought from the Environment Agency before a formal planning application is submitted.

7.166 Latest evidence shows that there is around 7 years' worth of operational burial space left in the Borough. Therefore, additional provision is required.

7.167 In the event that the existing playing pitch provision, immediately north of Marston Lane Cemetery, is required to be used to deliver burial space in the short-term, the use of the CEM1 land to deliver alternative playing pitch provision will be consider an acceptable use. However, this should be delivered prior to the loss of the existing playing field site, to the north of Marston Lane Cemetery, unless it can be clearly demonstrated that the use is no longer required in the area. Consideration should also be given to visitor parking, in relation to any increase in playing field provision in terms of size and/or use for formalised sports facilities. This can be provided on or off-site.

Environmental Protection

7.168 The Environment Agency advise:

7.169 "For any formal planning application submission, a minimum tier 1 hydrogeological risk assessment will need to be undertaken, including a water features survey. Where the tier 1 risk assessment shows that there is a need for more detailed assessment (i.e.the best practice controls cannot be met) a tier 2 risk assessment may be required.

7.170 For information refer to the Environment Agency's guidance: 'Cemeteries and burials: prevent groundwater pollution'. https://www.gov.uk/guidance/cemeteries and-burials-prevent-groundwater-pollution

7.171 To ensure the site is an appropriate use of the land, all burials shall be:

- A minimum of 250m from a potable groundwater supply source
- A minimum of 30m from a watercourse or spring
- A minimum of 10m from any field drain
- A minimum of 1m above the highest annual groundwater level

7.172 This will ensure the protection of the quality of controlled waters in the local area, specifically the secondary aquifer and adjacent waterbodies. Refer to position statement L3 of The Environment Agency's approach to groundwater protection (publishing.service.gov.uk).

7.173 For information on Environment Permits and the approach to protecting groundwater from cemetery developments read, "Protecting groundwater from human burials" on the .GOV.UK website. This explains the basics of why

cemeteries have the potential to cause groundwater pollution and introduces the regulatory framework that cemeteries sit within. Burials of human remains (other than the burial of human ashes from crematoria) within cemeteries are "groundwater activities" as defined in paragraph 3 of Schedule 22 to the Environmental Permit Regulations (EPR).

7.174 The EPR provides a tool for the Environment Agency to use in its regulation of groundwater activities. The level of regulatory control that we apply to new cemetery developments is proportionate to the level of risk the cemetery poses to the environment. As a result of the EPR amendments, there are now 3 tiers of regulatory control:

- Exemptions (low risk)
- Standard Rules Permit (medium risk)
- Bespoke Permit (high risk)

7.175 A new cemetery development is defined as:

- A cemetery development requiring planning permission under section 57 of the Town and Country Planning Act 1990 which was granted on or after 2 October 2023.
- An extension to a cemetery requiring planning permission under section 57 of the Town and Country Planning Act 1990 which was granted on or after 2 October 2023.

7.176 New cemetery developments that can meet 14 exemption conditions will be exempt from the requirement of an environmental permit. Further details on the exemption conditions can be found at: Low environmental risk cemeteries: exemption conditions - GOV.UK (www.gov.uk).

Historic Environment

7.177 This site has been identified in the evidence base work for the Borough Plan Review titled Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) as scoring medium for all, or parts of the site for archaeological potential and medium for sensitivity scoring for the contribution of the proposed allocation to the significance and setting of known heritage assets.

7.178 There is potential for any development on this site to impact on archaeological features. Therefore, evaluative archaeological recording likely in the form of trenching is likely to be required with any formal planning application. The detail of the documentation will need to be discussed with Warwickshire County Council Museums and Archaeology prior to any submission. For more information on heritage impacts refer to Nuneaton and Bedworth Local Plan Review – Heritage Site Assessment (June 2022) and Policy BE4.

8.0 Housing

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

Policy H1 – Range and mix of housing

General Market Housing

Development is required to provide an appropriate mix of housing types and sizes based on the need and demand identified in the most up-to-date HEDNA or equivalent. There is currently an imbalance of dwelling types within the Borough which the Council will seek to re-address by actively promoting the delivery of housing schemes, where the mix of housing tenures, types and sizes proposed, aligns with the identified needs and demands of the Borough, in the most up to date HEDNA or equivalent, as well as the characteristics of the surrounding area[40].

Homes for older people

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

Other specialised housing

Development proposals for specialised housing and care accommodation will be supported where a local need can be demonstrated.

Self-build and custom build homes

Development proposals for self-build and custom build homes will be supported, subject to compliance with the development plan policies as a whole.

8.2 The NPPF indicates that the Council should plan for a mix of housing based on current and future demographic trends, market trends, the needs of different groups in the community and for new and flexible working practices. The Council should identify the size, type and range required by the local population over the plan period.

8.3 This policy gives guidance on the size and type of dwellings for general market housing, the housing needs of the older population and the population with specific needs.

General market housing

8.4 A range of types and sizes of housing is needed to redress imbalances of specific types and sizes in order to meet the needs of changing household structures and to meet the aspirations for the Borough.

40 Warwickshire County Council (n.d.) *Joint Strategic Needs Assessments.* Warwickshire County Council (n.d.) *Market Position Statements.*

8.5 The sub-regional HEDNA (2022) makes recommendations about the size of dwellings for market and affordable housing in the Borough, taking account of a range of factors that influence demand including demographic changes and market factors. It suggests the following requirements:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	10%	35%	45%	10%

Table 11: Market housing (%) – sub-regional HEDNA (2022).

8.6 In terms of market housing, the most significant demand is for two and three-bedroom properties, but it is acknowledged that in the market sector, households are able to buy or rent property of any size subject to what they can afford. Development proposals should deliver a housing mix in line with the recommendations in the most up-to-date version of the HEDNA.

8.7 In the past, the business community have raised concerns about the lack of 'executive' or 'aspirational' homes in the Borough, and the impact that this has on attracting potential business investors to the area. This is reflected in the comparatively low number of properties in higher council tax bands in the Borough, although housing developments in recent years have delivered more 3, 4 and 5-bedroom houses. Such housing will be considered favourably, provided that the mix of housing is within the ranges indicated in the HEDNA.

Older people

8.8 The number of older people, both in absolute numbers and as a proportion of the population, is increasing significantly and is expected to continue to do so. The draft HEDNA (May 2022) projects the following population changes in the Borough for those over 60.

	2021	2039	Change in households	% change
60-64	4,711	4,786	75	1.6
65-69	4,434	5,401	967	21.8
70-74	4,640	5,668	1,027	22.1
75-79	3,691	4,700	1,010	27.4
80-84	2,599	3,549	950	36.5
85 and over	2,090	3,620	1,530	73.2

Table 12: Projected population changes – Draft HEDNA (2022).

8.9 It is important to provide appropriate local housing options for an increasingly older population who may have poor health. Maintaining independence and giving people the choice to remain in their own homes is a national and local aim. Many will want to remain in their existing homes, but others may want to downsize to general market housing, or to use supported specialist housing such as sheltered housing, extra care housing or residential care.

8.10 In recent years, nationally there has been a move away from a reliance on residential and nursing care and a focus on providing households with care in their own home through the provision of care within general needs housing or extra-care housing. Extra care housing is safe, secure, well designed and attractive self-contained accommodation for older people aged 55 and over, who require varying levels of care and support, designed to enable them to live independently in a home environment. Therefore, these types of developments will be encouraged to consider any relevant technical guidance as part of any development proposals and are likely to need to comply with M4(3) higher Building Regulations standards.

8.11 Where evidence of local need and the needs of the potential occupants of a specific Specialised Supported Housing or Housing with Care development, indicate that M4(2) or a mix of M4(2) and M4(3) is appropriate, this may be considered.

8.12 The HEDNA provides an indicative assessment of specialist housing need for 2022 – 2023. It indicates that the Borough would need to make provision for 647 dwellings with support and 506 dwellings with care, which includes a higher affordable housing need in Nuneaton and Bedworth compared with the other Warwickshire authorities in the Housing Market Area. There is also a need for 503 additional nursing and residential care bedspaces. 'Policy H2 – Affordable housing' sets out the requirement for affordable housing provision and will apply to extra care housing.

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

People with a disability

8.14 Data from the 2011 Census indicates that the Borough has the highest proportion (35.4%) of households across Coventry and Warwickshire with one or more persons with a long-term health problem or disability. It is recognised that the level of people with health or disability problems is closely linked to the level of the older population, with 57.1% of the population aged 65 having a long-term health problem or disability within the Borough. 'Policy H5 - Accessible and adaptable homes' addresses the need for housing which is wheelchair accessible.

8.15 Proposals for accessible and adaptable buildings should consider information on local need presented in Warwickshire County Council's Joint Strategic Needs Assessments and Market Position Statement documents, or any equivalent up to date guidance, should be considered. Additionally proposals should consider any relevant technical guidance as part of any development proposals and are likely to need to comply with M4(3) higher Building Regulations standards.

Self and custom-built housing

8.16 In line with the Self-Build and Custom Housebuilding Act 2015, the Council maintains a register of sites suitable for self and custom-built housing. The Council will continue to maintain its register and support appropriate proposals to deliver service plots for self-build and custom build housing in sustainable locations.

Borough Plan objectives

8.17 This policy delivers the following Borough Plan objective:

- Strategic objective 4.

Evidence base

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

- Iceni Projects (2022). *Draft Nuneaton and Bedworth HEDNA.*
- Iceni Projects (2022). *Coventry and Warwickshire Sub-regional HEDNA.*

Delivery mechanisms

8.19 The delivery mechanisms for this policy are as follows:

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

Monitoring

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

Monitoring ref	Indicator	Target
H1a	Number of bedrooms in new dwelling completions.	Completions in line with percentages set out in the most recent HEDNA.
H1b	Number of dwellings completed to provide supported housing and care homes.	Completions to meet shortfall set out in the most recent HEDNA.

Table 13: Indicators and targets to be monitored for Policy H1.

Policy H2 – Affordable Housing Provision

On development sites which provide 15 or more homes, the Council will seek at least 25% of those homes to be affordable. For residential development sites that consist of between, 11 to 14 dwellings, a contribution of two affordable housing units will be required, irrespective of any demolitions.

Of the affordable housing dwellings provided, the exact tenure, size and mix should be identified through discussions with the local authority and informed by the Council's latest published housing need evidence.

The Council will require developments to incorporate and suitably integrate affordable and market housing to a high design standard.

All affordable housing must meet the requirement for 95% of new dwellings to be M4(2) compliant and 5% to meet the M4(3) Building Regulations standards. All affordable units must include private outdoor amenity space for each property.

All affordable housing need should be met on-site, unless it can be robustly justified that on-site provision is neither feasible nor viable. Where developers consider applying the affordable housing policy is unviable, or where it is considered that a different mix would better suit local needs and site-specific circumstances, evidence and a Viability Statement must be included with the planning application stating the reasons.

Exceptions

Outside of settlement boundaries, housing development, in addition to those allocated within the Borough Plan Review, will be supported on small rural exception sites, where affordable homes can be delivered to meet the needs of local people within the local community, where there is no conflict with other Borough Plan Review policies and the following criteria are met:

- The site is adjacent to existing settlement boundaries.
- The proposed development is considered suitable by virtue of its size and scale in relation to the surrounding settlement and its services and proximity to public transport links and infrastructure.
- The initial and subsequent occupancy of affordable homes is controlled through planning conditions and legal agreements, as appropriate, to ensure that the accommodation remains available in perpetuity to local people in affordable housing need.
- The majority of the homes provided are affordable and where an element of market housing is required to enable the delivery of significant additional affordable housing, the element of market housing is the minimum amount required to enable the delivery of the proposed affordable housing.

Proposals must consider how they accord with the requirements set out in the Council's latest Affordable Housing SPD.

8.21 The NPPF requires local planning authorities to deliver a sufficient supply of homes and states the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

8.22 The Coventry and Warwickshire sub-regional Housing and Economic Development Needs Assessment (HEDNA) (2022) updated the evidence in the Strategic Housing Market Assessment (2015) to provide the latest evidence for affordable housing need in the Borough.

8.23 The evidence shows that whilst the cost of private market housing and rents across the Housing Market Area are generally lowest in Nuneaton and Bedworth (and Coventry) there is still a significant affordable housing need in the Borough.

8.24 In addition, six of the eight super output areas in Warwickshire, ranked within the top 10% most deprived nationally, are located in Nuneaton and Bedworth[41]. Such high levels of disadvantage are reflected by the level of demand for Council owned housing in the Borough, which in July 2024 had a register of 4,000 applicants.

Proportion of affordable housing

8.25 The sub-regional HEDNA (2022) and Towards a Housing Requirement for Nuneaton (TAHR) (2022) findings suggest that across the Borough, there is a newly arising need for 391 affordable dwellings per year. To help meet this need it is therefore important that a proportion of all new housing developments are affordable, subject to feasibility and viability.

8.26 Work undertaken by DixonSearle Partnership in 2023 identified that an affordable housing target of 25% was viable on developments of 15 dwellings or more.

Affordable tenure split and housing mix

8.27 Affordable housing is defined as housing for sale or rent for those whose needs are not met by the market. The NPPF breaks this down into defined types including affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership.

8.28 Current evidence from the sub-regional HEDNA (2022), TAHR (2022) and the Council's Housing Register shows that there is a significant need for homes for affordable rent and such provision will be the Council's priority. This would not preclude the opportunity to provide the indicative levels of affordable home ownership products set out in national planning policy. To keep this policy up-to-date and flexible, it requires the tenure split and affordable housing mix to be informed by discussions with the local authority and based on the latest evidence published by the Council.

Rural exception sites

8.29 National planning policy allows new affordable housing to be permitted on rural exception sites to meet identified local needs. These sites would not normally be released for market housing and should seek to address the

[41] Warwickshire County Council (2022). *Indices of Multiple Deprivation 2019.*

affordable housing need of the local community. A small number of market homes may be permitted at the discretion of the Borough Council, where essential to enable the delivery of affordable units without grant funding. This would need to be supported by local housing need evidence. The provision of affordable housing on any 'exception sites' would need to continue in perpetuity and would prevent these sites becoming part of the private housing market over time.

8.30 To support the delivery of market homes on rural exception sites, an open book viability assessment should be submitted with the planning application. This will assist the Council in the decision-making process.

Affordable Housing SPD

8.31 The adopted SPD provides guidance on:

- The design and location of affordable housing on site.
- The provision of affordable housing that is not on site.
- The use of Section 106 agreements and/or the Community Infrastructure Levy (or any new mechanism that may come into force).

8.32 After the adoption of the Borough Plan Review, SPD's will be reviewed and updated but in the interim they remail valid where they are consistent with the Borough Plan Review policy.

Borough Plan objectives

8.33 This policy delivers the following Borough Plan objective:

- Strategic objective 4.

Evidence base

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

- Dixon Searle Partnership (2023). *Local Plan Viability Assessment*
- Iceni Projects (2022). *Nuneaton and Bedworth Draft HEDNA.*
- Iceni Projects (2022). *Nuneaton and Bedworth Coventry and Warwickshire Sub-regional HEDNA.*

Delivery mechanisms

8.35 The delivery mechanisms for this policy are as follows:

- Adopted SPD on affordable housing.

- Work with the Council's Housing team to seek to negotiate with developers for suitable tenure, types and sizes of affordable housing that are viable and meet current local need.

Monitoring

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

Monitoring ref	Indicator	Target
H2a	Number of affordable dwellings built each year.	Deliver affordable housing across the plan period in line with Policy H2.
H2b	Intermediate affordable housing completions.	Deliver intermediate dwellings in line with the provisions set out in the Affordable Housing SPD.
H2c	Percentage of affordable homes made available to be socially rented.	Deliver social or affordable rent dwellings in line with the provisions set out in the Affordable Housing SPD.

Table 14: Indicators and targets to be monitored for Policy H2.

Policy H3 – Gypsies, Travellers and Showpersons

Provision for Gypsy and Traveller pitches and Showperson plots, is expected to be delivered in line with the Gypsy and Traveller Site Allocations DPD.

8.37 The Council has a duty under the Housing Act 2004 to assess the accommodation needs of Gypsies and Travellers and to demonstrate how that need will be met.

8.38 The Government's Planning Policy for Traveller Sites (2015) document aims to ensure fair and equal treatment for Gypsies and Travellers in a way that enables their traditional and nomadic way of life, while respecting the interests of the settled community.

8.39 The 2021 Gypsy, Traveller and Travelling Showperson Accommodation Assessment showed a need to find an overall requirement for 20 permanent pitches for the period up to 2036/37 (at least 6 permanent residential pitches by 2025 and a further 5 between 2025 and 2037) and no need for transit pitches for the same period[42]. This need and how it would be met through the allocation of land for new pitches is set out in the separate Gypsy and

[42] Nuneaton and Bedworth Borough Council (2021). *Gypsy and Traveller and Traveller Showperson Accommodation Assessment 2021 Update.*

Allocations DPD. This separate DPD sets out a strategy for the location of new gypsy and traveller pitches.The accommodation assessment will be updated every five years and these subsequent updates will be used to calculate the number of pitches and plots required in the future and, if necessary, these will in turn be used to update the separate DPD.

Borough Plan objectives

8.40 This policy delivers the following Borough Plan objective:

- Strategic objective 4.

Evidence base

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

- Arc4 (2021). *Nuneaton and Bedworth Gypsy and Traveller and Travelling Show person Accommodation Assessment 2021.*

Delivery mechanisms

8.42 The delivery mechanisms for this policy will be as per the Gypsy and Traveller Site Allocation DPD.

Monitoring

8.43 The indicators and targets that will be monitored for this policy are provided within the Gypsy and Traveller Site Allocation DPD.

Policy H4 – Nationally Described Space Standards

All residential dwellings should comply with the Nationally Described Space Standards (NDSS), unless proven not to be feasible, including any dwelling which does not fall within a C3 use class; for example, extra care accommodation, assisted living housing or houses in multiple occupation; or from change of use or conversion.

Where this requirement is believed to be unviable, written robust justification as to why this policy cannot be achieved, should be provided to the Council.

8.44 The NDSS were first introduced in 2015 by the Department for Levelling Up, Housing and Communities, focusing on internal space standards within new dwellings. The standards can be viewed in the Technical Housing Standards (2015)[43] or the Council's Sustainable Design and Construction SPD (2020)[44]. Where assessment methods are changed or superseded, the appropriate replacement standards should be used.

8.45 The PPG states that where internal space standards are identified and justified by a local planning authority, the need, viability and timing of implementing these internal space standards should be considered.

8.46 In order to validate a planning application, relating to new residential development, the following should be submitted to the Council to ensure compliance with this policy:

- Unit numbers.
- Number of persons that can be accommodated (according to the number of single and double bedrooms).
- The number of floors in the dwelling.
- The minimum required floor space (according to the NDSS).
- The proposed floor space.

8.47 In terms of need, there has been growing public concern about the quality of new homes. House prices have risen in recent years, whilst a lack of choice and intense competition for new homes has become evident. Concerns have been raised regarding developers reducing dwelling sizes in order to maximise value. In response to these concerns the NDSS was introduced in 2015, representing a benchmark for all new dwellings across the country and across tenures. However, concerns regarding internal space standards have persisted since the introduction of the NDSS.

8.48 In 2015, RIBA undertook a study entitled Space Standards for Homes[45] which reported that half of all new homes remain 'too small' when measured against the minimum standards of the NDSS, whilst the size of 3 bedroom dwellings in the West Midlands averaged 85.7sq.m, 7.3sq.m. smaller than the recommended NDSS size of 93sq.m, and 2.3sq.m. smaller than the average for England of 88sq.m. Furthermore, in 2017 Julia Park[46] set out a comprehensive study of the importance of space in dwellings, reporting on the need for minimum space standards to ensure dwellings and bedrooms are large enough for the intended level of occupancy.

8.49 Focusing on the effects of space on health and wellbeing, the following themes were identified in several studies since 2015:

[43] Department for Levelling Up, Housing and Communities (2015). *Technical Housing Standards.*
[44] Nuneaton and Bedworth Borough Council (2020). *Sustainable Design and Construction SPD.*
[45] Royal Institute of British Architects (2019). *Space Standards for Homes.*
[46] Julia Park (2017). *One hundred years of housing space standards.*

- Mental health – There are strong links between small, cramped living conditions and poor mental health.
- Physical health – Studies have identified links between overcrowded housing and a number of health conditions.
- Family relationships – Stress and tensions between family members are worsened where insufficient space is available.
- Education – Adequacy of space helps children to engage in uninterrupted private study and achieve their potential.
- Work from home productivity – Adequacy of space helps with the effectiveness of working from home but also helps separate work and home life.
- Changing physical requirements over people's lifetimes – Homes need space to respond to changing needs and lifestyles. A 3-bedroom home with under-sized bedrooms may seem fine for pre-school children but turns out to be wholly inadequate for older children as the family matures.
- Aggressive and anti-social behaviour is associated with overcrowding.

8.50 From a health and wellbeing point of view, the need for minimum internal space standards, at a national level, is evident.

8.51 The Council's Borough Plan policies seek to maximise development potential and utilise available land in the most efficient way, whilst achieving sustainable development and respecting local character and heritage. However, it is also important to ensure that achieving higher density development does not compromise space standards and living conditions for residents. The Borough Plan Review sets a housing provision requirement of at least 9,690 homes to be brought forward, in the Borough, over the plan period to 2039.

8.52 Evidence on the Borough's objectively assessed housing need indicates that for market housing and affordable housing (affordable rent and shared ownership) the majority of future demand is likely to be for two and three bedroom homes (35% and 45% respectively) reflecting demand for housing from younger people and families. There is also likely to be some demand for medium sized homes from older households looking to downsize but still retain flexibility for friends and family to come and stay. The analysis also indicates that the demand for smaller one bedroom dwellings and four-bedroom dwellings is lower (10% in both cases). Therefore, the current development trends in the Borough indicate a need for strong policy to ensure that new residential development meets minimum internal space standards, as set out in the NDSS.

8.53 In terms of viability, this has been tested in the Viability Assessment, produced by DixonSearle Partnership (2023).

8.54 In terms of timing, the NDSS was first mentioned in Nuneaton and Bedworth's Sustainable Design and Construction SPD (2020) and during the Preferred Options stage of the Borough Plan Review, in June 2022. These documents set out the intention to introduce the NDSS in the Borough, as part of local planning policy. It is considered that the internal space standards will form part

of the reviewed Borough Plan, once adopted, and the requirement to comply with the NDSS will come into force in 2025. The Council considers this to provides a sufficient transition and notice period for developers, to consider the impacts of this new requirement in the Borough.

Borough Plan objectives

8.55 This policy delivers the following Borough Plan objective:

- Strategic objective 4.

Evidence base

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

- Department for Levelling Up, Housing and Communities (2015). *Technical Housing Standards.*
- Royal Institute of British Architects (2019). *Space Standards for Homes.*
- Julia Park (2017). *One hundred years of housing space standards.*
- DixonSearle Partnership (2023). *Viability Assessment.*

Delivery mechanisms

8.57 The delivery mechanisms for this policy are as follows:

- Consider preparing a Design Code SPD as per National design coding and guidance.
- Reference to the Council's Sustainable Design and Construction SPD (2020) in order to provide greater detail for developers and decision makers.

Monitoring

8.58 The indicator and target that will be monitored for this policy is outlined in Table 15.

Monitoring ref	Indicator	Target
H4a	Developers of new residential developments should submit a completed Sustainable Design and Construction Checklist (section 5 of the SPD) showing compliance with the NDSS.	100% of new residential developments comply with the NDSS.

Table 15: Indicator and target to be monitored for Policy H4.

Policy H5 – Accessible and adaptable homes

New major residential developments should include the following proportions of accessible and adaptable dwellings as defined in Part M Volume 1 of the Building Regulations[47]:

- 95% of all new dwellings should meet M4(2) standards.
- 5% of all new dwellings should meet M4(3) standards.

All new major residential developments should meet these M4(2) and M4(3) standards unless robust justification can be provided as to why these types of dwellings would be unviable or physically impossible, due to a lack of level access, on the development site (for example, due to steep topography or the cost of lift installation). Flood Risk Assessments should be utilised, in order to understand the most viable location of M4(3) dwellings, in areas of lowest flood risk, and how the safety of occupiers can be ensured.

The mix, size, type and tenure of M4(3) dwellings should reflect the rest of the dwellings, to be brought forward on the development site, unless local need indicates otherwise.

M4(3) dwellings should normally be built to an 'adaptable' standard, unless the Council will be nominating an occupier, in which case they should be accessible for a wheelchair using occupier.

If the required number of M4(3) dwellings, to be built on a development site, produces an even quantity, half should be provided as affordable housing and half should be provided as market housing. Where an odd quantity is to be developed, affordable housing provision should be favoured – evidence indicates a higher need for wheelchair users in the social sector (50% for affordable and 19% for market[48]). For example, if 15 M4(3) dwellings are proposed, 7 should be provided for market housing and 8 for affordable housing provision. This preference will be subject to the viability of the development.

Drawings must be submitted illustrating the M4(2) and M4(3) dwellings, including the adaptable or accessible measures implemented on-site, alongside their location on the development site.

8.59 The Council believes that people should have the opportunity to stay in their family homes for as long as possible. Making homes adaptable for changing and unforeseen circumstances provides families and individuals with the choice of staying in their existing home, whilst reducing the burden of excessively high building costs to retrofit properties, in order to meet such needs and reduce the need to relocate. .

[47] Department for Levelling Up, Housing and Communities (2021). *Approved Document M: access to and use of buildings, volume 1: dwellings.*
[48] Iceni (2022). *Coventry and Warwickshire Housing and Economic Development Needs Assessment.*

Part M Volume 1 of the Building Regulations: M4(2) Standards

8.60 In Nuneaton and Bedworth, 8.5% of people, classified as disabled under the Equality Act (2010), indicated that their day-to-day activities were limited a lot, in the 2021 Census[49], whilst 10.9% reported that their day-to-day activities were limited a little. Additionally, in Nuneaton and Bedworth Borough, 27% of households are home to 1 disabled person, under the Equality Act (2010), and 6.6% are home to 2 or more disabled people[50]. This compares to 25.7% and 6.8% respectively in Coventry and 25.4% and 6.6% in England. In August 2022, 2,819 people claimed Attendance Allowance, in the Borough, whilst 3,124 claimed Disability Living Allowance and 7,861 claimed Personal Independence Payment (January 2023)[51].

8.60 In 2023, 19.7% of Nuneaton and Bedworth's population was reported to be over 65[52]. This is projected to increase to 20.9% in 2030 and 21.9% in 2035 before slightly decreasing to 21.7% in 2043. It is becoming increasingly important to provide housing for older people, with life expectancies increasing and in turn, the quantity of older people in the population. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social and health care systems.

8.61 In 2011, 35.4% of Nuneaton and Bedworth Borough's households had at least one resident with a long-term limiting illness or disability compared with 29.8% for Warwickshire, 35.3% for the West Midlands and 32.7% for England[53]. Furthermore, large increases in the number of older people with dementia (increasing by 21%) and mobility problems (up 20%)[54] are projected between 2022-2032.

8.62 The data presented suggests that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings, as well as providing specific provisions for older persons housing. Given the evidence, the Coventry and Warwickshire HEDNA[55] suggested that the Council could consider requiring 95% of dwellings (of all tenures) to meet the M4(2) standards and 5% of homes to meet M4(3) standards. These are the standards required in this Borough Plan policy. Furthermore, in seeking M4(2) compliant homes, the Council should be mindful that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

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[49] Office for National Statistics (2023). *Census 2021 – Disability age standardised.*
[50] Office for National Statistics (2023). *Disability, England and Wales: Census 2021.*
[51] Stat-Xplore (2022). *Attendance Allowance, Disability Living Allowance and Personal Independence Payment* .
[52] Office for National Statistics (2020). *Census 2021 - Subnational population projections for England:2018-based.*
[53] NOMIS (2011). *Census 2011 – Long-term health problem or disability.*
[54] PANSI (2022). *Projecting Adult Needs and Service Information.*
[55] Iceni (2022). *Coventry and Warwickshire Housing and Economic Development Needs Assessment.*

Part M Volume 1 of the Building Regulations: M4(3) Standards

8.63 The English Housing Survey showed that in 2011/12 there was 184,000 households in England with a wheelchair user and the oldest person in the household was aged under 60[56]. In turn, the 2011 Census showed a household population of 40.6 million people aged under 60[57] and therefore, a base prevalence rate of 0.005 – essentially for every 1000 people aged under 60 there are around 5 wheelchair user households.

8.64 In Warwickshire, the estimated number of wheelchair users was 8,755 in 2022, projected to increase to 10,437 by 2032[58]. However, this does not indicate how many homes might be needed for this group – some households will be living in a home that is suitable for wheelchair use, whilst others may need improvements to accommodation or a move to an alternative home. The Coventry and Warwickshire HEDNA (2022)[59] suggests that the current annual need for wheelchair user homes, in Nuneaton and Bedworth, is 58 with a projected need of 35, for the period 2022-2032. This equates to 24.5% of Nuneaton and Bedworth's housing need.

8.65 The estimated need for wheelchair user homes, for 2022-2032, is projected to be 19% for market housing and 50% for affordable housing (affordable rent and shared ownership). This Borough Plan requires 95% of new residential developments to comply with M4(2) building standards and 5% with M4(3) building standards. In both the market and affordable sectors, dwellings should be delivered as M4(2) adaptable dwellings, unless the Council is nominating a potential occupier and then the dwelling should be made M4(3) accessible. It is recognised however, that this will not be possible on all development sites and this policy should be applied flexibly.

8.66 The Coventry and Warwickshire HEDNA[60] states that the Council could seek a requirement of 10-15% for M4(3) compliant dwellings, in relation to new market housing, whilst around a third of affordable housing could potentially meet this requirement. These figures reflect that not all sites would be able to deliver homes of this type but are shown to be higher than the requirements of this planning policy. The Borough Plan Review Viability Assessment (2023), produced by DixonSearle Partnership, analyses the viability of providing M4(2) and M4(3) compliant dwellings, on new residential developments. The Viability Assessment tested and found sound, a requirement of 95% M4(2) dwellings and 5% M4(3) dwellings. This policy (Policy H5) reflects the Viability Assessment's findings, ensuring the viability of this policy over the plan period.

8.67 Overall, this policy ensures that adaptable homes will be available for all individuals with a temporary or permanent physical impairment, providing people with choice, flexibility and independence, as well as promoting high quality and thoughtful housing design for the general population.

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[56] Ministry of Housing, Communities and Local Government (2013). *English housing survey 2011 homes report.*
[57] Office for National Statistics (2011). *2011 Census.*
[58] Iceni (2022). *Coventry and Warwickshire Housing and Economic Development Needs Assessment.*
[59] Iceni (2022). *Coventry and Warwickshire Housing and Economic Development Needs Assessment.*
[60] Iceni (2022). *Coventry and Warwickshire Housing and Economic Development Needs Assessment.*

Borough Plan objectives

8.68 This policy delivers the following Borough Plan objective:

- Strategic objective 4.

Evidence base

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

- Department for Levelling Up, Housing and Communities (2021). *Approved Document M: access to and use of buildings, volume 1: dwellings.*
- Office for National Statistics (2023). *2021 Census.*
- Office for National Statistics (2011). *2011 Census.*
- Ministry of Housing, Communities and Local Government (2013). *English housing survey 2011: homes report.*
- Iceni (2022). *Coventry and Warwickshire HEDNA Final Report.*
- Dixon Searle Partnership (2023). *Viability Report.*

Delivery mechanisms

8.70 The delivery mechanism for this policy is as follows:

- Confirmation of M4(2) and M4(3) standards implemented on-site, through supporting evidence and drawings submitted with the associated planning application.

Monitoring

8.71 The indicator and target that will be monitored for this policy is outlined in Table 16.

Monitoring ref	Indicator	Target
H5a	Drawings must be submitted illustrating the M4(2) and M4(3) dwellings, including the adaptable or accessible measures implemented, on any new major residential development, alongside their location on-site.	95% of new major residential dwellings for M4(2) and 5% for M4(3).

Table 16: Indicator and target to be monitored for Policy H5.

9.0 Employment

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

Policy E1 – Nature of employment growth

Applications for economic uses, focusing particularly on use classes E(g)(ii and iii), B2 and B8 on the strategic employment sites and the portfolio of existing employment sites will be approved subject to them satisfactorily meeting the policies in the plan. Applications which can demonstrate any of the following will be approved subject to them satisfactorily meeting the relevant policies in the Borough Plan:

1. Inward investment development, providing high quality and high-density employment opportunities.
2. Employment sectors in line with those prioritised in the Economic Development Strategy.
3. The generation of permanent jobs that will help diversify the local economy.
4. Major planning applications for new employment development (including change of use and the expansion of existing operations) should demonstrate how job opportunities arising from the proposed development will be made accessible to the Borough's residents, particularly those areas identified as the most income deprived in the Borough. In this regard applicants will be expected to give consideration to a range of measures including:
    a. Enhancement of the accessibility of the development to residents by a choice of means of transport.
    b. Developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.
    c. The provision of support to residents in applying for jobs arising from the development.
    d. The provision of training opportunities to assist residents in accessing employment opportunities and address skill deficits in the local population.
    e. Childcare provision which enables residents to access employment opportunities.
    f. Measures to assist those with physical or mental health disabilities to access employment opportunities.

E(g(i)) office proposals in the first instance should be directed to Nuneaton and Bedworth Town Centres. Ancillary E(g(i)) office proposals outside of these town centres, but within an employment site, will be approved subject to them satisfactorily meeting the relevant policies in the Borough Plan.

Where applications for non-B and E(g(ii and iii)) use class proposals are put forward on the portfolio of existing employment sites the following should be addressed:

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

Applications which include proposals for education establishments, that provide training opportunities to assist in up-skilling will be approved subject to them satisfactorily meeting the relevant policies in the Borough Plan.

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

9.2 Nuneaton and Bedworth Borough is a £2 billion economy which accounts for 7% of the Gross Value Added (GVA) of the sub-region of Coventry and Warwickshire. Since 2012 the GVA growth of the Borough has outperformed that of the Coventry and Warwickshire sub-region. Important sectors of the local economy are manufacturing, transport, warehousing, and retail. Manufacturing accounts for 22% of GVA within the Borough with similar contributions for logistics and retail[61].

9.3 The automotive sector has contributed 26% GVA growth over the 2012-19 period, highlighting the historic and geographical links the Borough has with the car industry. Other key growth areas in the period are public administration, education and health, utilities, motor vehicle trade and logistics[62].

9.4 The Borough had approximately 54,800 jobs in 2019 accounting for 10.4% of jobs in the sub-region. Manufacturing accounts for 11.2% of employment in the Borough. Compared to the sub-region there is a higher proportion of employment from public administration and health, possibly signifying a weaker private sector business base. Higher value service sectors are under-represented when compared to the sub-region, indicating the difficulty in attracting these sectors to the Borough from areas such as Coventry and Stratford-on-Avon. The under representation of these high value sectors affects the Borough's overall productivity performance.

9.5 GVA economic growth in the Borough has been strong. However, economic productivity is GVA per job of £36,800 which is the lowest in the region, with an overall average of £51,400[63]. This is a measure of the relative productivity of the local economy and quality of jobs. As such, a key focus for Nuneaton and

[61] Iceni Projects (2022). *Nuneaton and Bedworth Housing and Economic Development Needs Assessment Final Report.*
[62] Iceni Projects (2022). *Nuneaton and Bedworth Housing and Economic Development Needs Assessment Final Report.*
[63] Iceni Projects (2022). *Coventry & Warwickshire Housing & Economic Development Needs Assessment.*

Bedworth Borough Council is improving the socio-economic prospects of the Borough's residents through economic initiatives and the Council's revised Economic Development Strategy.

9.6 The type of growth that will deliver employment development is also significant for the Borough Plan. The Borough has high levels of out-commuting, an over dependency on manufacturing and distribution, as well as a low skills base.

9.7 The NPPF[64] states economic policies should have regard to Local Industrial Strategies and other local policies for economic development and regeneration. The Council has an adopted Economic Development Strategy which sets out the Council's vision, strategic objectives, and priorities for the Borough's economy. The document is currently being updated. The draft Economic Development Strategy identifies several key economic objectives which are addressed in the policy, these include:

- Assist local businesses to benefit from and adapt to central Government policies regarding CO_2 reduction.
- Promote a high level of connectivity including a strong transport network.
- Ensure a range of flexible industrial space is available balancing competing demands across industries.

9.8 The Council will also seek to attract wider investment through the Economic Development Strategy.

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

9.10 Economic disparity between the wards in the Borough is an issue to be addressed. According to the Office of National Statistics[65], in 2019 13.6% of the population of Nuneaton and Bedworth was income deprived. Of the 316 local authorities in England, Nuneaton and Bedworth is ranked 97th most income deprived. 15 of the 81 neighbourhoods in Nuneaton and Bedworth were among the 20% most income deprived in England. Conversely, 14 neighbourhoods were among the 20% least income deprived in England. The most income deprived neighbourhoods are located in the wards of Abbey, Camp Hill, Galley Common, Kingswood, Poplar and Wembrook. Therefore, the Council will seek to ensure applicants engage with local stakeholders and community groups and to actively promote vacancies and training opportunities in income deprived areas.

[64] Department for Levelling Up, Housing and Communities (2021). *NPPF.*
[65] Office for National Statistics (2021). *Exploring local income deprivation*.

9.11 Within the West Midlands Integrated Transport Authority's Strategic Transport Plan (2016), there are a number of policies promoting 'Economic Growth and Economic Inclusion'. These promote improvements in transport infrastructure including Rapid Transit, improved bus services and enhanced walking and cycling measures, alongside policies to improve junction pinch points. Investments in such infrastructure are considered throughout this plan and will serve new employment sites, to enable new travel demands to be met successfully through sustainable forms of travel. As such, new development must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks. Sustainable travel improvements will then allow employment sites to be developed, enabling new travel demands to be met by sustainable forms of travel.

9.12 In Nuneaton and Bedworth 35.4% of households have at least one resident with a long-term limiting illness or disability compared with 29.8% for Warwickshire, 35.3% for the West Midlands and 32.7% for England. In August 2022, 2,819 people claimed Attendance Allowance, in the Borough, whilst 3,124 claimed Disability Living Allowance and 7,861 claimed Personal Independence Payment (January 2023)[66]. The Council will encourage applicants to engage with local stakeholders and community groups to actively promote vacancies and training opportunities and assist those with physical or mental health disabilities in applying for vacancies.

9.13 The Town and Country Planning (Use Classes) Order 1987 was updated on 1 September 2020. Use classes were modified and the previous B1 uses can now be found in a more general commercial, business and service class, use class E. Within this new use class are retail and leisure uses, that by virtue of being in the same use class, could be converted to offices and vice versa. The Council will monitor the impact of the new use class regarding the amount of office space lost or gained. The removal of this permitted change may have to be considered to retain offices for that specific use in order to ensure that office availability is maintained[67].

Borough Plan objectives

9.14 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.
- Strategic objective 7.

[66] Stat-Xplore (2022). *Attendance Allowance, Disability Living Allowance and Personal Independence Payment*.
[67] Cushman and Wakefield (2022). *Retail, Leisure and Office Study Update.*

Evidence base

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

- Iceni Projects (2022). *Nuneaton and Bedworth Housing and Economic Development Needs Assessment.*
- Iceni Projects (2023). *Review of Nuneaton and Bedworth Employment Land Portfolio.*
- BBP Regeneration (2019). *Coventry and Warwickshire Sub-Regional Employment Market Signals Study.*

Delivery mechanisms

9.16 The delivery mechanism for this policy is as follows:

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

Monitoring

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

Monitoring ref	Indicator	Target
E1a	The number of applications granted in line with the Economic Development Strategy.	Zero applications conflicting with the Economic Development Strategy.
E1b	The number of applications granted for non-economic development uses on strategic employment sites.	Zero.
E1c	Jobs growth within the Borough by: • Use of national statistics to track the numbers employed. However, it should be noted that the data is out of date by around 2 years, and can be inconsistent, as the Government has recently changed the data source which is only published once a year. • Commissioning work to get more regular and up-to-date	Jobs growth over the plan period to be in line with 'Strategic Policy DS3 - Overall development needs'.

Monitoring ref	Indicator	Target
	data, benchmarked against other areas.	

Table 17: Indicators and targets to be monitored for Policy E1.

Policy E2 – Existing employment estates

The redevelopment and/or expansion of existing employment sites, listed in Table 18 (as shown on the policies map), for use class E(g)(ii) and B use classes will be supported.

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

The sites listed in Table 19 and shown in Appendix L (as well as on the policies map), will not be protected from non-economic development type proposals. These sites are considered acceptable for alternative uses during the plan period.

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

a. Is the site allocated for employment land?
b. Is there an adequate supply of allocated employment sites of sufficient quality in the locality (the relevant settlement within the Borough) to cater for a range of business requirements?
c. Is the site capable of being serviced by a catchment population of sufficient size?
d. Is there evidence of active marketing for a period of at least 24 months?
e. Could employment redevelopment be brought forward, taking account of site characteristics (including physical factors, accessibility and neighbouring uses) and would redevelopment be viable? If employment redevelopment is not viable, could mixed use redevelopment be brought forward?
f. If firms are likely to be displaced through redevelopment, is there a supply of alternative suitable accommodation in the locality to help support local businesses and jobs? Would this promote or hinder sustainable communities and travel patterns?

9.18 To support existing businesses located in the Borough, it is important to protect and enhance existing employment estates. In May 2023, as part of the 'Review of Nuneaton and Bedworth Employment Land Portfolio'[68], Iceni Projects assessed the employment sites in the Borough of 0.25ha and above. The assessment identified those employment sites which are fit for purpose over the plan period or require investment to remain part of the employment land portfolio, and those which should be removed from the portfolio. Those assessed as high quality estates or in need of investment, are identified as

[68] *Iceni Projects (2023). Review of Nuneaton and Bedworth Employment Land Portfolio.*

existing employment estates on the proposals map and are listed in Table 18. These sites will be given protection against non-economic type development. Estates identified as not being suitable for future employment purposes, listed in Table 19, will not be protected[69].

Site Reference - Review of Employment Land Portfolio	Site Name	Size of site (ha)
E1-E2	Pool Road	8.12
E3	Midland Road Network Rail	2.2
E7	Weddington Terrace	3.03
E8	Oaston Road	0.9
E9	Whitacre Road	9.88
E10	Attleborough Fields	32.56
E11	Hemdale Business Park	5.79
E13-E14	Trident Business Park	2.34
E15-E18	Caldwell & Shepperton	10.71
E19	Marston Jabbett	2.56
E20-E21	Bayton Road Industrial Estate	74.3
E22	Grovelands	7.22
E23	Black Horse Road	2.24
E24	School Lane	1.08
E25	The Moorings	3.64
E28	Gallagher Business Park	9.88
E29	Prologis Park	21.6
E30-E32	Bermuda Business Park	94.72
E31	Eliot Business Park	6.18
E33	Hazell Way	8.6
E34	Tenlons Road	4.14
E35	Haunchwood Park	6.19
E36	King Edward Road	0.73
E37	Justice Centre	1.25
E40	Hope Aldridge Business Centre	0.23
E41	Weddington Road	0.68
E42	Ashbrook Court	1.87
E43	Tuttle Hill	0.54
Total:		**323.18**

Table 18: Portfolio of protected existing employment estates.

[69] *Iceni Projects (2023). Review of Nuneaton and Bedworth Employment Land Portfolio.*

Site Reference - Review of Employment Land Portfolio	Site Name	Size of site (ha)
E4	Aston Industrial Estate	0.58
E5	Bath Road	0.57
E6	St Mary's Road	1.76
E12	Seymour Road	1.1
E26	Black Horse Road	0.23
E27	Hawkesbury Lock	0.28
E38	Anker Street	0.44
E39	Newtown Road, Bedworth	0.39
Total		**5.35**

Table 19: Employment estates suitable for alternative uses.

9.19 During the life of the Borough Plan, it was expected that approximately 5.35ha of employment land could be lost by 2039 as a consequence of this policy. Therefore, this was added to the allocation of the employment land target.

9.20 The NPPF states that policies should be "flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances"[70]. The policy allows for alternative uses on employment sites, that are not protected, in accordance with the Borough Plan. However, for proposals on protected employment sites for non-employment uses, the assumption is that these sites are protected. To assist in the determination of this, a number of criteria are contained within the policy which will assist in ensuring that employment estates maintain their employment integrity.

9.21 The Coventry & Warwickshire Sub-Regional Employment Market Signals Study[71] (2019) was commissioned to provide a high-level analysis regarding the market for employment land within the Coventry and Warwickshire sub-region. The Study recommended several key points which are addressed in the policy:

- Strengthening the rules such that policies across all authorities would prohibit a change of use from employment unless it can be evidenced.
- Consideration should also be given to improving/expanding existing estates, rather than a change of use.

9.22 When considering evidence of active marketing of employment sites, proposed for non-employment sites, there is a requirement for active marketing for two

[70] Department for Levelling Up, Housing and Communities (2021). *NPPF.*
[71] BBP Regeneration (2019). *Coventry and Warwickshire Sub-Regional Employment Market Signals Study.*

years. In addition, how the size and quality of space matches local demand should be demonstrated, taking account of market conditions and expected future trends.

Borough Plan objectives

9.23 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.

Evidence base

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

- Iceni Projects (2023). *Review of Nuneaton and Bedworth Employment Land Portfolio.*
- Iceni Projects (2022). *Coventry & Warwickshire Housing & Economic Development Needs Assessment.*
- Iceni Projects (2022). *Nuneaton & Bedworth Housing & Economic Development Needs Assessment*.
- Iceni projects (2022). *Towards a Housing Requirement for Nuneaton & Bedworth.*
- BBP Regeneration (2019). *Coventry and Warwickshire Sub-Regional Employment Market Signals Study.*

Delivery mechanisms

9.25 The delivery mechanisms for this policy are as follows:

- Component of the Council's Economic Development Strategy to cover:
  - Facilitation of improvement of existing employment estates in need of investment.
  - Assessment of sites in Table 19 for suitable alternative uses, and development of action plan to facilitate their re-use.
  - Five-yearly review of the Council's Employment Land Review, inclusive of business survey on issues affecting existing estates.

Monitoring

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

Monitoring ref	Indicator	Target
E2a	Monitor the loss of employment land to alternative uses and report annually through the Authority Monitoring	Qualitative monitoring will be undertaken through the Authority Monitoring Report. Consequently, the analysis of this monitoring

Monitoring ref	Indicator	Target
	Report. The indicator will be assessing: • Amount of appropriate economic development on estates (this would be in conformity with the policy). • Development approved which results in non-conformity with policy.	within the Authority Monitoring Report will determine the impact and effectiveness of the policy.
E2b	Monitoring of any new employment estates which should be protected from alternative uses – this will be reported through the Authority Monitoring Report.	There is no specific threshold determining what a new estate should be. However, anything below 0.25ha will not be considered a sufficient size for a new employment estate. The Authority Monitoring Report will report anything above this threshold and include analysis regarding the proposal.
E2c	Annual monitoring of losses to employment sites that are not to be protected. This will include a review of whether they are redeveloped in line with alternatives identified in the Economic Development Strategy.	All sites should be developed in line with Economic Development Strategy recommendations.
E2d	Monitor the supply and delivery of employment uses and report annually through the Authority Monitoring Report.	87.85ha of employment land over the plan period.

Table 20: Indicators and targets to be monitored for Policy E2.

10.0 Town, district and local centres

10.1 These policies outline the requirements in and around Nuneaton and Bedworth Town Centres.

Policy TC1 – Town centre requirements

Development within the town centres will need to support the aspirations of the Transforming Nuneaton[72] and Transforming Bedworth initiatives[73].

Use classes defined in Annex 2 of the NPPF[74] as 'main town centre uses' will be considered acceptable for the town centres.

This policy is to be read in conjunction with any future Town Centre SPDs.

Transforming Nuneaton and Bedworth initiatives

10.2 Nuneaton and Bedworth Borough Council and Warwickshire County Council are working together to deliver the regeneration and transformation of both Nuneaton and Bedworth Town Centres to achieve new mixed used development aimed at boosting economic growth in the town and providing new employment opportunities, using publicly owned land. This requires working closely with private and public sector partners, investors and developers to ensure it meets the ambitions of the towns. The vision, ambition and aspiration for Bedworth Town Centre may see a brand-new civic theatre and library built in the heart of the town, whereas for Nuneaton the vision is to provide a hotel, entertainment including a cinema, multistorey car park, food hall, public bars, restaurants and shopping areas, new college facilities and new living accommodation.

Town centre requirements

10.3 The NPPF states that planning policies should support the role of town centres, as well as setting out policies for the management and adaptation of town centres over the plan period.

10.4 The Council commissioned Cushman and Wakefield to undertake an updated Retail, Leisure and Office Study (2022). This took account of the latest data, trends and analysis covering issues such as the Covid-19 global pandemic, Brexit and more localised (sub-regional, Borough-wide and local) market trends and changes.

[72] Warwickshire County Council. *Transforming Nuneaton.*
[73] Nuneaton and Bedworth Borough Council. *Transforming Bedworth.*
[74] Department for Levelling Up, Housing and Communities (2021). *NPPF.*

10.5 For Nuneaton Town Centre, the study[75] identifies a need for 1,050sq.m. of convenience retail floorspace and predicts a potential loss of 3,100sq.m. of comparison retail floorspace, up to 2039. This indicates a need to reconsider the role and function of Nuneaton Town Centre and move away from more traditional comparison retail uses to ensure its future vitality and viability. The study also identifies potential to expand the food and beverage offer (including but not limited to pubs/bars and restaurants), within the Borough, potentially enhancing the night-time economy of Nuneaton Town Centre. Current provisions are mostly limited to independent cafes, takeaways and restaurants. However, recent demand has shifted to more experience-based activities, such as bars offering additional entertainment elements, e.g. bowling or golf, alongside 'pop-up' restaurants and street food traders/halls. Furthermore, the study states that the leisure offer in Nuneaton Town Centre could diversify, complementing the Transforming Nuneaton initiatives such as the Abbey Street development comprising of a hotel, cinema and food hall. In terms of office requirements, the study concludes that there is a requirement for high quality 'easy in/easy out' flexible office space for its existing small business population, to suit their operational needs, as well as more conventional 'front door' office space for local businesses/small and medium sized enterprises to grow into or consolidate. Cushman and Wakefield also conducted a household telephone survey, as part of the Retail, Leisure and Office study (2022), comprising of 1,203 telephone interviews across 12 catchment zones. Suggested improvements to Nuneaton's existing leisure offer by respondents, focused on providing more activities for children, enhancing greenspaces and facilitating more cafes, restaurants and bars.

10.6 For Bedworth Town Centre, the study identifies a slightly higher need for 1,550sq.m. of convenience retail floorspace and a potential predicted loss of 500sq.m. of comparison retail floorspace, up to 2039. Like Nuneaton, the study concludes that the town centre would benefit from a more comprehensive food and beverage offer, particularly to improve the night-time offer, as well as more activity or leisure-based uses to complement existing facilities. The future visioning work for Bedworth Town Centre should assist in enhancing Bedworth's leisure offer. In terms of office need, this was not specified for Bedworth given existing provision, but any additional office space could feasibly improve the vibrancy and vitality of the town centre. Suggested improvements to Bedworth's existing leisure offer, by respondents to the household telephone survey conducted, focused on providing more activities for children, enhancing facilities such as cafes, restaurants and bars and improving car parking facilities/lower charges.

[75] Cushman and Wakefield (2022). *Retail, Leisure and Office Study Update.*

Borough Plan objectives

10.7 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.
- Strategic objective 3.
- Strategic objective 5.
- Strategic objective 6.
- Strategic objective 8.

Evidence base

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

- Cushman and Wakefield (2022). *Retail, Leisure and Office Study Update.*

Delivery mechanisms

10.9 The delivery mechanisms for this policy are as follows:

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

Monitoring

10.10 The indicator and target that will be monitored for this policy is outlined in Table 21.

Monitoring ref	Indicator	Target
TC1a	Additional floor space for town centre uses.	Increase in E(a) (prior to 1 Sept 2020 use A1), E(c) (formally A2), E(g) (formally B1(a)) and community uses e.g. cinemas, concert halls etc (formally D2) floor space in Nuneaton and Bedworth Town Centres.

Table 21: Indicator and target to be monitored for Policy TC1.

Policy TC2 – Nature of town centre growth

Development principles

Development within Nuneaton and Bedworth Town Centres will be expected to create a more accessible, well-connected and well-designed centre, with particular emphasis on linkages by walking, cycling and public transport. New development, within the town centre, should mitigate and adapt for climate change; for instance, in response to potential for increased flooding and by reducing potential heat islands. Design that includes green areas for cooling, use of technology and materials for zero carbon emissions will be encouraged. Appropriate enhancements will be promoted and sought to build upon existing green infrastructure assets and these enhancements will complement existing natural and historic assets that help define the town centres' sense of place and overall brand and identity.

Developments relating to the evening and night-time leisure offer should demonstrate how they will create a safe and secure town centre environment.

Nuneaton and Bedworth markets should be retained and enhanced and where appropriate, new markets should be introduced in the Borough.

Defined town centres and primary shopping areas

The town centre boundaries and primary shopping areas of the town centres are to be protected as defined in Appendix E and Appendix F. The aim in defining boundaries will be to retain the predominance of town centre uses within these centres and sustain their primary shopping areas.

Proposals for use classes defined in Annex 2 of the NPPF[76] as 'main town centre uses' will be supported within the defined town centres providing the proposal does not detrimentally impact the primary shopping area (The Council are intending to provide an Article 4 Direction in the future, in order to be able to remove some prior notification applications for these areas). Other uses will be permitted within the town centres where they do not undermine or adversely impact, either individually or cumulatively, the vitality, viability, character of the area and overall vision for the town centres.

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

10.11 It is likely that a hybrid of town centre uses will be most appropriate in order to ensure the towns can readily react to the changes in trends and economy.

[76] Department for Levelling Up, Housing and Communities (2021). *National Planning Policy Framework.*

10.12 Planning policies should be positive, promote competitive town centre environments and encourage economic activity. Policies should be set for the management and growth of centres over the plan period. The town centre boundaries and primary shopping areas should be defined. It is important that needs for retail, including markets, leisure, office and other main town centre uses are met in full, and are not compromised by limited site availability.

10.13 The Retail, Leisure and Office Study (2022)[77] updates the previous Retail and Leisure Study Update (2014), Town Centre Office Requirements (2013) and the Convenience Goods Retail Study (2011). The study provides a more up-to-date strategic assessment of the quantitative and qualitative need for new retail (comparison and convenience goods) floor space, commercial leisure use and office space, in order to help maximise the potential of the Borough, particularly in terms of the main town centres. The updated study provides recommendations that reduce the figures provided, from previous studies to more realistic but still aspirational figures, in line with paragraph 16 of the NPPF.

Borough Plan objectives

10.14 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 2.
- Strategic objective 3.
- Strategic objective 5.
- Strategic objective 6.
- Strategic objective 8.

Evidence base

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

- Cushman and Wakefield *(2022). Retail, Leisure and Office Study Update.*

Delivery mechanisms

10.16 The delivery mechanisms for this policy are as follows:

- Prepare a Town Centres SPD in order to identify sites for development, identify specific requirements such as the design and infrastructure requirements and address the evening and night-time economy.
- Partnership working with developers and landowners to ensure delivery of the proposals in line with the SPD.
- Monitoring of the health of the town centres.
- Delivery of aspirations through the Economic Development Strategy[78].

[77] Cushman and Wakefield (2022). *Retail, Leisure and Office Study Update.*
[78] Nuneaton and Bedworth Borough Council (2016). *Economic Development Strategy.*

Monitoring

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

Monitoring ref	Indicator	Target
TC2a	Maintained or decreased vacancy levels.	Maintain a low rate of vacant retail premises in all centres.
TC2b	Town centre footfall.	Increase town centre footfall in both centres.

Table 22: Indicators and targets to be monitored for Policy TC2.

Policy TC3 – Hierarchy of centres (including district and local centres)

The hierarchy set out in Table 23 should be used to undertake any Sequential Assessments for town centre uses (including district and local centres).

Any new major residential development should be within:

1. 800m walking distance of a district or local centre (existing centre's threshold can be outside the Borough's administrative boundaries)[79]; and
2. 8 minutes motor vehicle drive time to a district centre. Applications must demonstrate this on the basis of:
   a. Post development impact.
   b. During peak drive time.

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

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

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

Type of centre	Name of centre	Function	Appropriate uses
Principal town.	Nuneaton.	Principal focus for shopping, leisure and business activity in the Borough.	• Retail E(a) to E(c) (formally A1, A2 and A3) and pub or drinking establishments

[79] Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2021). *National Design Guide.*

Type of centre	Name of centre	Function	Appropriate uses
			and takeaways (both now sui generis - formally A4 and A5). • Office. • Leisure. • Entertainment. • Hotels. • Restaurants/eating establishments. • Residential (in areas that conform with flood risk requirements). See 'Policy TC1 – Town centre requirements' and 'Policy TC2 – Nature of town centre growth' for more detail.
Town centre.	Bedworth.	Contribute to the main shopping facilities of the Borough. Specifically, the town centre should provide day-to-day shopping and commercial activity for Bedworth, as well as the immediate surroundings.	• Retail E(a) to E(c) (formally A1, A2 and A3) and pub or drinking establishments and takeaways (both now sui generis - formally A4 and A5). • Office. • Leisure. • Entertainment. • Residential. • Restaurants/eating establishments. See 'Policy TC1 – Town centre requirements' and 'Policy TC2 – Nature of town centre growth' for more detail.
District centre.	• Abbey Green. • Attleborough. • Bulkington. • Camp Hill – Copper Beech Road.	Provide for the day-to-day shopping and service needs of local people.	• Hairdressers. • Newsagents. • Small supermarkets. • Post offices.

Type of centre	Name of centre	Function	Appropriate uses
	• Horeston Grange. • Queens Road.		• Banks. • Building societies. • Laundrettes. • Libraries. • Restaurants/eating establishments.
Local centre.	• Arbury Road. • Bulkington Road. • Chapel End. • Church Road North. • Church Road South. • Coventry Road/School Lane. • Crow Hill. • Kingswood Road. • Lutterworth Road. • Newtown Road. • Nuneaton Road. • Pine Tree Road. • Smorrall Lane. • St Nicolas Park Drive. • Tomkinson Road/Croft Road. • Weddington Road (corner of Brook Lane). • Weddington Road (between Shanklin Drive and Kingsbridge Road). • Weddington Terrace.	Provide for the day-to-day top-up shopping needs of local people on a smaller scale than a district centre.	• Hairdressers. • Newsagents. • Small convenience store. • Sub-post offices.

Table 23: Hierarchy of centres.

10.18 The NPPF recognises centres as the heart of communities and seeks to support their viability and vitality[80]. The Framework states that there should be a defined network and hierarchy of centres that can respond to rapid

[80] Department for Levelling Up, Housing and Communities (2021). *NPPF.*

changes in the retail and leisure industries by allowing a suitable mix of uses (including housing) [81].

10.19 The Retail, Leisure and Office Study Update (2022) assists in identifying Nuneaton as the primary shopping centre in the Borough. However, Bedworth is also a very important part of the retail hierarchy in the area. The study does identify differences in the number of facilities and units within each centre. Consequently, the hierarchy differentiates the two centres based on the evidence.

10.20 The Borough comprises of 6 district centres and 18 local centres as well as numerous neighbourhood centres and stand-alone shops. The provision of easily accessible shops and services such as convenience stores, pharmacies and post offices, play an important role in meeting the day-to-day shopping needs of residents. The district and local centres are monitored bi-annually to understand how they change year-on-year and to ensure evidence indicates that they are still fit for purpose and meet the day-to-day shopping and service needs of local communities.

10.21 Applications for town centre uses are required to follow a sequential approach whereas sites outside of the town centre boundary, where the floorspace proposed exceeds 1,000sq.m. (the Council's locally set threshold) must undertake an Impact Assessment[82]. This policy identifies the hierarchy, and in so doing, assists in carrying out any Sequential and Impact Assessments by identifying the locations of centres and appropriate uses within them.

10.22 The National Design Guide defines walkable local facilities as "local facilities [that] are within walking distance, generally considered to be no more than a 10-minute walk (800m radius)"[83]. The NPPF (paragraph 134) states that "development that is not well designed should be refused, especially where it fails to reflect local design policies and Government guidance on design"[84]. This threshold has been applied to the policy in respect of accessing local centres. In relation to district centres, it is considered acceptable to drive to these, and an 8-minute drive time has been applied[85].

10.23 The boundaries of the district and local centres are set out in Appendix G and Appendix H.

Borough Plan objectives

10.24 This policy delivers the following Borough Plan objectives:

- Strategic objective 2.
- Strategic objective 3.

[81] Department for Levelling Up, Housing and Communities (2021). *NPPF.*
[82] Department for Levelling Up, Housing and Communities (2021). *NPPF.*
[83] Ministry of Housing, Communities and Local Government (2021). *National Design Guide.*
[84] Department for Levelling Up, Housing and Communities (2021). *NPPF.*
[85] Department for Transport (2011). *Accessibility Statistics 2011.*

Evidence base

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

- Cushman and Wakefield (2022). *Retail, Leisure and Office Study Update.*
- Peter Brett Associated (2013). *Nuneaton and Bedworth District Centre Accessibility Assessments.*
- Warwickshire County Council (2011). *Warwickshire Local Transport Plan 2011 – 2026 (or as per any subsequent updates).*

Delivery mechanisms

10.26 The delivery mechanism for this policy is as follows:

- Adopted SPD 'Planning for a healthier area – hot food takeaways (2020)'[86].

Monitoring

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

Monitoring ref	Indicator	Target
TC3a	Health of district and local centres. Bi-annual review of the local centres study to cover: • Health check of centres (this includes district and local centres). • Site assessment of any new district or local centres.	District and local centres remain healthy in terms of their function, viability and vitality.
TC3b	Delivery of new district and local centres.	New district or local centres as set out in the strategic site policies.

Table 24: Indicators and targets to be monitored for Policy TC3.

[86] Nuneaton and Bedworth Borough Council (2020). *Planning for a healthier area – hot food takeaways.*

11.0 Healthy, safe and inclusive communities

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

Policy HS1 – Ensuring the delivery of infrastructure

Development will be required to provide infrastructure appropriate to the scale and context of the site in order to mitigate any impacts of the development, and address the needs associated with the development. It may be related to social, economic and/or environmental provision. Where this provision is considered unviable, the applicant should provide clear evidence to demonstrate this. Supplementary Planning Guidance and documents will be used to guide provision where relevant.

New infrastructure must be resilient to the long-term implications of climate change such as additional flooding, water supply issues and overheating. New infrastructure must promote public safety and the wider security and defence requirements.

Infrastructure delivery should be suitably phased within the associated development, and where appropriate, arrangements should be made for subsequent maintenance. Applications which provide new facilities will be supported, subject to agreement with appropriate service delivery partners.

Key infrastructure requirements are outlined in the Infrastructure Delivery Plan (IDP). Infrastructure requirements for each proposal will be taken on a site-by-site basis and other site-specific measures will be considered at the time of the planning application. These will be secured through the use of planning obligations/agreements (e.g. Section 106, Section 278 and any future adopted mechanisms) and/or conditions. It will be necessary to ensure the ongoing maintenance, where appropriate, of any infrastructure provision by the developer.

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

11.2 Developers should get in contact with utilities, including Severn Trent Water, as early as possible in the planning process, to ensure infrastructure can be provided in a timely manner.

11.3 Ensuring infrastructure provision keeps pace with new development is a key component of delivering the Borough Plan Review. It is important that growth meets the needs of existing and future communities. Where possible, the proposed growth seeks to take advantage of existing infrastructure provision. This is important because it will assist in ensuring that proposed developments are viable and as sustainable as they can be.

11.4 New development will create pressures on existing infrastructure which will therefore need to be upgraded. The provision of new infrastructure will also be needed to bring development sites forward.

11.5 Infrastructure provision also helps to mitigate any negative impacts the development may have on the Borough's ability to provide services and facilities and include but are not restricted to:

- Sustainability and ability to drive carbon neutrality.
- Educational attainment.
- Accessibility to services and jobs.
- Health, social and cultural wellbeing of its communities.
- Community safety and emergency services.
- Heritage and the natural environment.
- Biodiversity.
- Flood risk mitigation.
- Telecommunication and broadband provision.
- Refuse and recycling facilities.

11.6 This policy identifies generic infrastructure considerations. A number of other policies in the plan refer to specific infrastructure requirements and the delivery mechanisms used to deliver them, such as via planning obligations. The infrastructure requirements for each of the strategic sites are outlined in the site-specific policies, although discussions with the infrastructure providers are ongoing. In the event that additional on-site infrastructure is required, or planning obligations are required to go towards off-site infrastructure, these will be included in the updated IDP/Schedule.

Borough Plan objectives

11.7 This policy delivers the following Borough Plan objectives:

- Strategic objective 5.
- Strategic objective 6.
- Strategic objective 8.

Evidence base

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

- Nuneaton and Bedworth Borough Council (2021). *Infrastructure Delivery Plan.*
- JBA (2024) *Coventry and Warwickshire Sub-regional Water Cycle Study (WCS) - Stage 1 Final Report.*

Delivery mechanisms

11.9 The delivery mechanisms for this policy are as follows:

- Annual update of the IDP.
- Use of planning obligations/agreements to bring in funds for infrastructure.
- Continued co-ordination of the IDP Group.
- Continued engagement with infrastructure service delivery partners and other partnership working, e.g. membership of the A5 group.
- Identification of infrastructure requirements for all sites set out within the IDP.
- Maintenance of infrastructure provided on-site or built/improved as part of the development will be achieved through adoption by a public body, with appropriate maintenance payments or other secure arrangements.

Monitoring

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

Monitoring ref	Indicator	Target
HS1a	Delivery of infrastructure set out within the IDP.	Where infrastructure on sites is not being delivered in line with the IDP, this will trigger a review with appropriate service delivery partners.
HS1b	Applications granted in line with advice of infrastructure service delivery partners.	Where applications are granted contrary to advice of infrastructure service delivery partners, it is expected that suitable planning justification is provided by the Council. Where advice from partners leads to mitigation, this is considered positive.
HS1c	Monitoring of planning obligations/agreements that are: • Agreed • Implemented • Amended	Qualitative monitoring of this indicator will take place in the Authority Monitoring Report. The purpose is to enable an understanding of how well the Council is performing in terms of the obligations/agreements.

Table 25: Indicators and targets to be monitored for Policy HS1.

Policy HS2 – Strategic accessibility and sustainable transport

Transport proposals in line with those identified in the Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan, Warwickshire County Council Local Transport Plan 2011 - 2026 (or subsequent updates), Warwickshire County Council Cycle Network Development Plan/Local Cycling and Walking Infrastructure Plan (LCWIP) and Bus Service Improvement Plan (BSIP) will be supported.

The Strategic Transport Assessment (2023) modelling work assessed the provision of new dwellings or sq.m. of employment land as a maximum, whilst the policies refer to a minimum. Therefore, submissions for higher quantums will need to be assessed as part of any Transport Assessment submitted, to support a planning application, and additional infrastructure may be identified as necessary. Furthermore, new development should be integrated effectively with existing businesses and community facilities.

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

1. How the development ensures adequate accessibility in relation to all principal modes of transport to drive carbon neutrality and resilience to climate change.
2. Whether the development identifies suitable demand management measures.
3. How the proposal considers the Council's adopted Transport Demand Management Matters (2022) and Air Quality (2020) SPDs. Development must consider the cumulative impact on air quality and measures proposed to ensure impact is not exacerbated, sustaining and contributing towards compliance with relevant limit values or natural objectives for pollutants, taking into account the presence of AQMAs and Clean Air Zones. The Council will require measures for new development to provide infrastructure to deal with the issues of air quality, which at its minimum, development will need to provide electric vehicle charging points and dust management plans.
4. The connectivity of the development to strategic facilities.
5. How the development maximises sustainable transport options such as safe walking and cycling links to the wider transport network. Where relevant, development should, where possible, include the provision of secure cycle parking, easier access to rental bikes, e-bike hubs, lockers and showers in new workplace developments and appropriate shelter or cooling along the walking and cycling links.
6. Whether the proposal will meet acceptable levels of impact on existing highways networks and the mitigation measures required to meet this acceptable level.

7. Transport elements need to reflect the National Design Guide, the National Model Design Code and Warwickshire Design Guide[87].
8. Development will need to be designed to provide safe and suitable access for all users.

Proposals for dedicated lorry parking facilities will be supported where they form extensions to, or are adjoining, existing employment land comprising of predominantly B8 uses or as part of a new predominantly B8 use development, subject to proposals satisfactorily according with the relevant policies in this Borough Plan Review.

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

The Council supports the provision and integration of emerging and future intelligent mobility infrastructure that will help to deal with the issue of air quality.

The Council will work proactively with Warwickshire County Council and Midlands Connect in order to support a new sustainable train station and parkway within the Nuneaton area.

11.11 New employment premises should consider how sustainable transport can be maximised by employees. This includes methods such as the provision of additional bus stops; promoting car sharing; safe walking and cycling routes; secure cycle parking; access to rental bikes or employee schemes for purchasing bicycles; e-bike hubs; lockers and showers.

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

11.13 Proposals outlined in the Warwickshire Local Transport Plan 2011 - 2026 and the Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan have been incorporated into the IDP.

11.14 The West Midlands Metropolitan Transport Emissions Framework and its associated policies, set out transport's role in tackling air quality issues for the wider region, which in combination with the policies in the Borough Plan, will further help air quality.

11.15 The Council is part of the A5 Transport Partnership Group regarding strategic objectives for the A5 corridor. This group comprises of officers representing Councils along the route of the A5 between Gailey, Staffordshire and Weedon, Northamptonshire.

[87] Department for Levelling Up, Housing and Communities (2021). *National Design Guide.* Department for Levelling Up, Housing and Communities (2021). *National Model Design Code.*

11.16 The Council also works with the Getting West Nuneaton Moving: Bermuda Connection scheme, which is focused on tackling congestion in and around west Nuneaton by creating a direct link between west Nuneaton and the Griff roundabout[88].

11.17 Warwickshire County Council is responsible for planning improvements to the strategic cycle network across Warwickshire. The Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy 2024 identifies further potential green links that should be pursued through the Borough Plan. This is considered in more detail in 'Policy NE1 - Green infrastructure'.

11.18 The Strategic Transport Assessment (2023) highlighted the transport implications of bringing forward the strategic allocations. The 2023 Strategic Transport Assessment identified that the strategic site allocations should adopt a 15% modal shift target[89]. Without the 15% modal shift the transport network was considered unlikely to operate to a satisfactory level[90].

11.19 The 2023 updated Strategic Transport Assessment supports the Borough Plan Review and identifies potential impacts of allocations and proposals on the highway network, having regard to the latest available transport modelling. The assessment will also recommend the infrastructure required to make the developments acceptable in planning terms.

11.20 An updated Air Quality Assessment for the Borough Plan Review has been prepared to assess the impacts of the proposed allocations on air quality. The assessment found that overall, the air quality effects of the emerging Borough Plan will not be significant.

11.21 A proposal for a new train station between Nuneaton and Hinckley came about from a study into direct Coventry to Leicester services that might not call at Nuneaton station (the business case for Coventry to Leicester direct services currently include options which either serve or bypass the town's station). Not only would the new station enable access to the new service, but it would also provide a more accessible station for those living on the eastern side of Nuneaton and potentially support major housing development plans in the surrounding area. Depending on the site, it could also provide a 'Parkway' function with good access to the A5. This would reduce the number of cars currently accessing Nuneaton and Hinckley stations on local roads and intercept longer-distance journeys on the strategic road network.

Warwickshire County Council (2022). *Warwickshire Design Guide*.

[88] Warwickshire County Council (2022). *Bermuda Connection.*

[89] Warwickshire County Council (2023). *Nuneaton and Bedworth Borough Council Strategic Transport Assessment: Borough.*

[90] Warwickshire County Council (2023). *Nuneaton and Bedworth Borough Council Strategic Transport Assessment.*

Planning applications

11.22 Paragraphs 112 and 113[91] of the NPPF set out requirements, at the planning application stage, for all proposals that will generate significant amounts of movement. This includes the requirement for a Transport Statement/Transport Assessment, as well as a travel plan document.

11.23 Planning applications will also be required to demonstrate how the proposals address the issues outlined in the policy. In relation to issue 1, the proposal should make best use of existing transport networks; for issue 2, demand management measures should include adequate car parking; and in relation to issue 4, some examples of key strategic facilities should be included, for example, local shopping, education and health facilities.

11.24 The NPPF refers to local areas setting car parking standards. Designs should adhere to the Council's Transport Demand Management Matters SPD (2022) and Warwickshire Design Guide.

11.25 The NPPF supports the provision of lorry parking facilities taking into account any local shortages and the need to reduce the risk of parking in locations that lack proper facilities or results in adverse impacts on amenity. New or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

Borough Plan objectives

11.26 This policy delivers the following Borough Plan objectives:

- Strategic objective 5.
- Strategic objective 8.

Evidence base

11.27 The existing evidence base related to this policy is as follows:

- A5 Transport Liaison Group (2012). *A Strategy for the A5: A449 Gailey (Staffordshire) to A45 Weedon (Northamptonshire).*
- Air Pollution Services (2023). *Air Quality Assessment: Nuneaton and Bedworth Borough Plan Review.*
- Coventry and Warwickshire Local Enterprise Partnership (2016). *Updated Strategic Economic Plan.*
- Warwickshire County Council (2011). *Warwickshire Local Transport Plan 2011 – 2026 (or as per any subsequent updates).*
- Warwickshire County Council (2023). *Nuneaton and Bedworth Borough Council Strategic Transport Assessment.*

[91] Department for Levelling Up, Housing and Communities (2021). *NPPF.*

Delivery mechanisms

11.28 The delivery mechanisms for this policy are as follows:

- The Transport Demand Management Matters SPD (2022) covers:
  - Standards for car parking.
  - Sustainable transport standards and considerations, e.g. cycle parking requirements, safety and accessibility.
- The Air Quality SPD (2020) covers:
  - Requirements for air quality mitigation.
- Nuneaton Town Centre transport study, to be led by Warwickshire County Council.
- Nuneaton and Bedworth Borough Plan Sustainable Transport Strategy to be led by Warwickshire County Council.
- Actively work with Warwickshire County Council, National Highways, Network Rail and transport operators in the development of any new projects that will result in better connectivity, as well as being involved in any bids for funding.
- Actively work with the Borough's cycling forum to inform and influence delivery and prioritisation.
- Continue membership of groups such as the A5 Transport Partnership.
- Air quality action plans.

Monitoring

11.29 The indicators and targets that will be monitored for this policy are outlined in Table 26.

Monitoring ref	Indicator	Target
HS2a	Applications in conformity/non-conformity with Warwickshire County Council and/or National Highways advice: monitor the number of applications granted which are not mitigated against, following objection on transport grounds by either Warwickshire County Council and/or National Highways.	It is expected that applications will not be granted contrary to Warwickshire County Council and/or National Highways advice.

Monitoring ref	Indicator	Target
HS2b	Monitor the number of applications granted which result in a negative outcome when assessed against the criteria set out in the policy.	Qualitative assessment of this indicator will take place in the Authority Monitoring Report. It is expected that the policy will be conformed with, however analysis of individual circumstances on each application will be required to understand whether criteria were conformed with.
HS2c	Conformity with the Council's Transport Demand Management Matters SPD (2022).	Qualitative assessment of this indicator will take place in the Authority Monitoring Report. It is expected that the SPD will be conformed with, however analysis of individual circumstances on each application will be required to understand whether the SPD was adhered to.

Table 26: Indicators and targets to be monitored for Policy HS2.

Policy HS3 – Telecommunications and broadband connectivity

Broadband

All new major development, both residential and non-residential, will be required to facilitate and contribute to the provision of superfast broadband infrastructure in order to enable the delivery of broadband services across the Borough, giving particular attention to the inclusion of Fibre to the Premises (FTTP). Connections within developments must be easily accessible for repairs and upgrades. If a developer is of the view that this would be impractical or unviable, an independent Viability Assessment should be submitted with the application.

Telecommunications proposals

When considering telecommunications proposals, the Council will have regard to the operational requirements of the telecommunications networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus.

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

1. The siting and appearance of the proposed apparatus and associated structures must seek to minimise impact on the visual amenity, character or appearance of the surrounding area.
2. The colour, shade and finish of the paint/coating, to be applied to the mast and cabinet, should be chosen carefully, with consideration to the surrounding landscape.
3. Methods to disguise telecommunications proposals and enhance their design, should be sufficiently explored.
4. Where possible the proposed apparatus and associated structures should be sited on a building and designed in order to minimise impact to the external appearance of the host building. Where siting is not possible on a building, the supporting evidence should indicate why this is unviable or unfeasible.
5. If proposing a new mast, evidence must be provided that demonstrates that mast or site sharing is not feasible, and the possibility of erecting apparatus on existing buildings or other appropriate structures has been explored.
6. If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.
7. Full details of all new landscaping, screening and the retention of any trees or vegetation on the site should be provided.
8. Proposals must include details of a satisfactory scheme to return the site to its former or improved condition once operations have ceased and any apparatus is no longer required. A bond may be requested, by the Council, under a planning obligation, to cover the cost of decommissioning and/or restoration of the site.
9. Proposals should adhere to Government advice on the health effects of radio waves and consider the effects of the proposal on the amenity of local residents.

11.30 Telecommunications is defined as the infrastructure needed to provide fixed and mobile telephone, broadband and digital services. For information, the Code of Practice for Wireless Network Development in England[92] should be used to assist Mobile Network Operators and wireless infrastructure providers in creating policy compliant telecommunications proposals. The document provides information on general siting and design principles, planning considerations and natural environment and heritage assets for example.

11.31 Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The Council is keen to facilitate appropriate expansion whilst at the same time minimising any environmental impacts. It is

[92] Department for Digital, Culture, Media and Sport (2022). *Code of Practice for Wireless Network Development in England.*

our policy to reduce the proliferation of new masts by encouraging mast sharing, as well as siting equipment on existing tall structures and buildings.

11.32 Paragraphs 115, 116 and 117[93] of the NPPF contain detailed planning application requirements associated with communications infrastructure. It is expected that all planning applications will consider the requirements of the NPPF, as well as those within this policy.

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

Broadband connectivity

11.34 The Coventry, Solihull and Warwickshire (CSW) broadband project, of which the Council is a member, is funded by Central Government and local authority money, and aims to achieve 98% coverage at superfast broadband speeds across the area, in line with Government and European connectivity targets[94].

11.35 The CSW broadband project is advocating for new development to install FTTP technology to future proof the delivery of broadband. FTTP technology can be more costly and disruptive to retrofit, particularly in new developments where newly laid roads would have to be taken up upon completion of the whole site. The fitting of FTTP technology is therefore most effective when implemented on new developments during the initial construction phase, alongside wider utilities provision or highways construction.

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

Borough Plan objectives

11.37 This policy delivers the following Borough Plan objective:

- Strategic objective 5.

[93] Department for Levelling Up, Housing and Communities (2021). *NPPF.*

[94] Coventry City Council, Solihull Metropolitan Borough Council and Warwickshire County Council (2017). *Coventry, Solihull, Warwickshire Superfast Broadband.*

Evidence base

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

- Coventry City Council, Solihull Metropolitan Borough Council and Warwickshire County Council (2017). *CSW Superfast Broadband.*

Delivery mechanisms

11.39 The delivery mechanisms for this policy are as follows:

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

Monitoring

11.40 The indicator and target that will be monitored for this policy is outlined in Table 27.

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

Table 27: Indicator and target to be monitored for Policy HS3.

Policy HS4 – Retaining and expanding community facilities

Proposals for development which would lead to the loss of community facilities (as defined within paragraph 11.40 of the supporting text) will only be permitted where:

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

For reference to sports centres; indoor sports and recreational buildings and land; open space, green spaces/parks; and sports and playing fields refer to Policy HS6 'Sport and exercise'.

New development serving a local community or business need (especially in rural areas or where not served by public transport) will be encouraged unless material considerations indicate otherwise.

11.41 This policy seeks to ensure existing facilities are not detrimentally impacted upon as part of any development proposal. The provision of new facilities will primarily be delivered through the IDP and 'Policy HS1 – Ensuring delivery of infrastructure provision'.

11.42 Community facilities have an important role within the local community, contributing towards community cohesion, health and wellbeing, as well as the sustainability of the local area. The loss of existing community facilities will be resisted to ensure that suitable provision remains spread across the Borough. Examples of community facilities are listed below (however, it should be noted that this list is not exhaustive):

- Multi-use halls.
- Allotments.
- Public houses.
- Health facilities.
- Places of worship.
- Cultural facilities.
- Schools.
- Play areas.
- Community centres.
- Local shops.

11.43 There is already some protection afforded to community facilities if they are designated as an asset of community value[95]. Further information on assets of community value can be found on the Council's website[96].

[95] The Assets of Community Value (England) Regulations 2012.
[96] Nuneaton and Bedworth Borough Council (2023). *Assets of Community Value.*

Borough Plan objectives

11.44 This policy delivers the following Borough Plan objectives:

- Strategic objective 5.
- Strategic objective 8.

Evidence base

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

- Nuneaton and Bedworth Borough Council (2013). *Local Hierarchy Study.*
- Nuneaton and Bedworth Borough Council (2011). *Accessibility and Settlement Hierarchy Study 2011.*

Delivery mechanisms

11.46 The delivery mechanisms for this policy are as follows:

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

Monitoring

11.47 The indicator and target that will be monitored for this policy is outlined in Table 28.

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

Table 28: Indicator and target to be monitored for Policy HS4.

Policy HS5 – Health

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

- Health Impact Assessment Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing; or
- Health Impact Assessment where significant impacts on health and wellbeing would arise from that proposal.

All Health Impact Assessments shall be undertaken in accordance with the Council's adopted Health Impact Assessment SPD (2021).

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

11.48 Health and wellbeing are key issues at the national and local level. Alcohol abuse, obesity[97], mental health, dementia and cardiovascular disease[98] are all health concerns for the Borough. Nuneaton and Bedworth ranked the lowest of the districts and Boroughs in Warwickshire for overall vulnerability to the rising cost of living. The Borough was lower on the poverty-based vulnerability rank than the work-based vulnerability rank, meaning that there is a higher relative risk of those who are already struggling being pushed into destitution relating to fuel poverty, food insecurity and child poverty[99]. Health is not simply about access to medical facilities; it is also about lifestyle and the ability to make healthier choices that are not restricted by cost. Physical activity can also play an important part of health and wellbeing. This element is dealt with through 'Policy HS6 – Sport and exercise'. This policy focuses on elements of health that are not picked up elsewhere in the plan.

11.49 Applications requiring an Environmental Impact Assessment are likely to impact health. Planning applications not requiring an Environmental Impact Assessment are still likely to create impacts on health. However, identifying an appropriate scale of application is challenging. Ultimately the impact is likely to vary even for applications of similar use classes. Consequently, the policy recommends a screening process be undertaken by the applicant to assist in determining the need for a Health Impact Assessment.

[97] Ben Cave Associates (2014). *Health Impact Assessment – Nuneaton and Bedworth Borough Plan.*
[98] Warwickshire County Council (n.d.). *Joint Strategic Needs Assessment*.
[99] Warwickshire County Council (2022). *Health and the high cost of living in Warwickshire.*

11.50 The Council's SPD assists in determining how a Health Impact Assessment should be undertaken, as well as the criteria that should be included as part of any assessment. Warwickshire Public Health recommends the use of either the London Healthy Urban Development Unit (HUDU) Health Impact Assessment tool[100], or the Wales Health Impact Assessment Support Unit (WHIASU) tool[101]. The submitted Health Impact Assessment will be assessed by Warwickshire Public Health during the determination period. Warwickshire Public Health's preferred approach is to use the tools outlined within this document (HUDU and WHIASU). In light of the recommendations from Warwickshire Public Health, the Council has adapted an assessment matrix from the HUDU. Applicants should use this Development Health Assessment (Appendix B of the Health Impact Assessment SPD (2021)) as a Health Impact Assessment Screening Report and it should be submitted with planning applications for major development.

11.51 The Development Health Assessment is designed to be used early in the planning process to aid decision-making in relation to impacts on health. It provides an overview of some of the broad determinants of health and wellbeing and it provides a means of recording the consideration given to impacts on health. The intention is that it complements the other policies in the Borough Plan that can impact on the wider determinants of health.

Borough Plan objectives

11.52 This policy delivers the following Borough Plan objective:

- Strategic objective 8.

Evidence base

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

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

Delivery mechanisms

11.54 The delivery mechanisms for this policy are as follows:

- Agreement with Warwickshire Public Health to be developed regarding assessment of Health Impact Assessment.
- Adopted SPD entitled 'Planning for a healthier area – hot food takeaways (2020)'.
- Continue partnership arrangements with healthcare providers and Warwickshire Police.

[100] NHS London Healthy Urban Development Unit (2019). *HUDU Planning for Health – Rapid Health Impact Assessment Tool.*
[101] Wales Health Impact Assessment Support Unit (2021). *Health Impact Assessment (HIA) and Local Development Plans (LDPs): A Toolkit for Practice.*

Monitoring

11.55 The indicators and targets that will be monitored for this policy are outlined in Table 29.

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

Table 29: Indicators and targets to be monitored for Policy HS5.

Policy HS6 – Sport and exercise

Proposals which assist in creating a healthier environment across the Borough, using sports, leisure and recreational facilities and/or opportunities to exercise, will be supported.

Existing open space, sports and recreational buildings and land, including playing fields, should be retained unless justification can be provided as to why they are no longer required or that proves alternative suitable provisions can be provided.

New developments including strategic housing sites, will be required to plan from the outset for the integrated planning of a healthy environment for its communities. This includes the provision and maintenance for sport and physical activity, as well as green infrastructure, open space and walking and cycling routes in line with policies NE1 – Green infrastructure and NE2 – Open space and playing fields. New facilities, links and spaces should relate well to other areas, and be safe, convenient, accessible and functional. Spaces should be resilient to and mitigate for climate change and include natural planting to provide shaded outdoor spaces and to help with air filtration.

Where justified on-site, housing sites will need to provide the land for the facility at no cost, in a suitable location within the site. Where provision is justified, but not on-site, then an off-site contribution will be required to fund the facility and the land required for the facility. Where requirements stated in the Playing Pitch and Outdoor Sports Strategy cannot be met off-site, provisions may be required on-site.

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

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

11.56 Developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site.

11.57 The sport, physical activity and healthy communities' policies directly relate to the NPPF paragraphs 92, 93 and 98; noting that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

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

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

11.59 Paragraph 99 of the NPPF contains detailed planning application requirements associated with open space and sports, recreational buildings and land, including playing field losses. These are identified below:

- Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
  - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
  - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

11.60 The policy does not repeat these requirements; however, it is expected that applications take account of this policy and the wider NPPF requirements. In any case, approval and sign off from Sports England will be required.

Maintenance

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

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

Borough Plan objectives

11.63 This policy delivers the following Borough Plan objectives:

- Strategic objective 5.
- Strategic objective 6.
- Strategic objective 7.
- Strategic objective 8.

Evidence base

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

- Strategic Leisure Ltd (2023). *Nuneaton and Bedworth Borough Council – Playing Pitch and Outdoor Sports Strategy (or as per any subsequent updates).*
- Warwickshire County Council (2024.) *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy.*
- Nuneaton and Bedworth Borough Council (2020). *Indoor Leisure Facilities Needs Assessment Strategy.*
- Warwickshire Museum and Natural Environment (2013). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy.*
- Nuneaton and Bedworth Borough Council (2020*). Indoor Sports Facility Needs Assessment and Strategy 2019-2034.*
- Nuneaton and Bedworth Borough Council (2021*). Open Space and Green Infrastructure SPD (or any subsequent updates).*
- Nuneaton and Bedworth Borough Council (2020). *Sports Facility Needs Assessment and Strategy 2019-2034.*

Delivery mechanisms

11.65 The delivery mechanisms for this policy are as follows:

- Continue to work with the Sports Development and Parks and Open Space teams, seeking their advice on planning applications and the updating of policies and strategies.
- Identification through all stages of the planning application process on all strategic and non-strategic housing sites of the on-site and off-site requirements for sport, recreation, playing fields, physical activity, green infrastructure, open space and walking and cycling.
- Delivery of relevant strategies including Indoor Sports Facility Needs Assessment and Strategy 2019-2034; Open Space and Green Infrastructure SPD (2021) and Sports Facility Needs Assessment and Strategy 2019-2034.
- Ongoing input into, and updating of, the IDP.

Monitoring

11.66 The indicators and targets that will be monitored for this policy are outlined in Table 30.

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

Table 30: Indicators and targets to be monitored for Policy HS6.

Policy HS7 – Creating a healthier food environment

Hot food takeaways (use class sui generis), should be directed to town centres as set out in 'Policy TC3 – Hierarchy of centres (including district and local centres)'.

Outside of Nuneaton and Bedworth town centres, hot food takeaway proposals will be permitted in district or local centres providing the proposal does not increase the number of units of hot food takeaways to over 20% of the centre's total usage.

Outside of the defined town, district and local centres, hot food takeaways will only be supported where:

- It is demonstrated that the proposal will not have a significant adverse impact on residential amenity through odour, noise and litter.
- Deliveries or customer visits by car would not have an unacceptable impact on existing or proposed public transport provision, traffic movements, road or pedestrian safety.
- The proposal is not within a 400m radius, of any access points of an existing primary or secondary school (including any special school, sixth form college or academy). This will not apply when the buffer zone overlaps with a town or local centre.
- The proposal does not jeopardise the provision of an essential local service.
- A Sequential Assessment is provided, which demonstrates that there are no other sequentially preferable sites.

Proposals should be in accordance with the Council's adopted Planning for a healthier area – hot food takeaways SPD (2020).

11.67 A Health Impact Assessment was undertaken to inform the adopted Borough Plan and recommended the inclusion of a restrictive policy regarding fast-food outlets. There is evidence to suggest obesity levels may be higher in areas of high numbers of fast-food outlets. The Council aims to contribute to creating healthy environments where possible and has therefore introduced criteria which must be adhered to for any future fast-food proposals both within and outside of town centres.

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

Borough Plan Objectives

11.69 This policy delivers the following Borough Plan objective:

- Strategic objective 8.

Evidence base

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

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

Delivery mechanisms

11.71 The delivery mechanisms for this policy are as follows:

- Adopted SPD entitled 'Planning for a healthier area – hot food takeaways (2020)'.
- Planning applications for hot food takeaway uses will be determined based on the above criteria.

Monitoring

11.72 The indicators and targets that will be monitored for this policy are outlined in Table 31.

Monitoring ref	Indicator	Target
HS7a	Monitor the number of applications for hot food takeaways within 400m of the boundary of existing primary and secondary schools (including any special school, sixth form, college or academy), excluding applications falling in town, district or local centres.	Zero.
HS7b	Monitor the number of units for hot food takeaway use as a percentage of each local and district centre's units.	20% maximum.

Table 31: Indicators and targets to be monitored for Policy HS7.

12.0 Natural environment

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

Policy NE1 – Green and blue infrastructure

The Borough's green and blue infrastructure assets will be protected, managed and, where possible, enhanced or created to provide nature recovery networks; whilst at the same time protecting and, where possible, enhancing public rights of way.

Green and blue infrastructure must play a part in this by including installation of retro-fit SuDS such as rain gardens, bio-retention and tree pits, where this can be achieved.

Development should consider the Council's adopted Open Space and Green Infrastructure SPD (2021).

Where development proposals have a watercourse classified as a main river within their boundary, as a minimum, developers should set back development 8m from the top of the bank or landward toe of any flood defence. The same easement will also be required on smaller watercourses to maintain water elements, ecology and wildlife corridors. Greater widths are required where forming green infrastructure, open space or ecological corridors unless reduced widths are justified. This includes 50m buffers for ancient woodland, 30m buffers around all semi-natural woodland and broad-leaved plantation woodland and 5m buffers either side of intact hedgerows.

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

- Green links – right of ways, long distance paths, national cycle routes and river and canal networks.
- Amenity green space – village greens, playing fields and sports pitches.
- Parks and gardens – open space hierarchy of local, community and destination parks, cemeteries and churchyards, and allotments.
- Natural and semi-natural green spaces – Local and designated Wildlife Sites, local nature reserves, woodlands, quarries, disused railway lines, floodplains and productive farmland.
- Cultural heritage – historic parks and gardens, scheduled monuments and historic landscapes.

12.3 There are multiple benefits of green infrastructure to residents, wildlife and the economy, for example in terms of health and wellbeing, connecting wildlife habitats, flood protection, carbon storage and presenting an attractive location are recognised at both national and local levels.

12.4 The NPPF points to a strategic need to plan positively to create, protect, enhance and manage networks of biodiversity and green infrastructure.

12.5 The Sub-Regional Green Infrastructure Strategy collates evidence about green infrastructure for Warwickshire, Coventry and Solihull[102]. It focuses on landscape, biodiversity and accessibility to natural green space. The strategy's main messages are to identify for the sub-region:

- The main strategic areas of opportunity for strengthening landscape character.
- Biodiversity assets and strategic areas for reconnecting habitats.
- Accessibility assets and deficiencies using Natural England's Accessible Natural Greenspace Standard and the Woodland Access Standards.

12.6 The Green Infrastructure Plan looks at the benefits and interlinkages of the multi-functions of green infrastructure for the Borough. It analyses the functions, accessible green space, biodiversity, landscape character and distinctiveness, water quality, flooding, climate change, food, fuel, cultural heritage, health and wellbeing, and sustainable active travel. From this analysis, the Green Infrastructure Plan identifies key messages and landscape zones as a framework for projects for the long-term planning of the Borough's green infrastructure especially in relation to climate change and nature recovery. The following landscape zones are identified:

- Forest of Arden landscape enhancement.
- Post-industrial and geological heritage.
- Urban waterways and wetlands.
- Urban greening.
- Strategic and local greenways and corridors.

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

12.8 The historic environment should be valued as an important asset in contributing to the multi-functionality of green-blue infrastructure via cultural heritage, recreation and tourism, utilising assets such as historic parks, gardens and canals.

Blue infrastructure

12.9 The water component of green infrastructure is often referred to as blue infrastructure, and the two can often be interlinked to provide additional

[102] Warwickshire County Council (2024). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy.*

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

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

12.11 Blue infrastructure also includes SuDS. 'Policy NE4 – Managing flood risk and water quality' states that SuDS must be incorporated within all development in order to reduce surface water run-off, as well as provide biodiversity and water quality benefits.

Borough Plan objectives

12.12 This policy delivers the following Borough Plan objectives:

- Strategic objective 1.
- Strategic objective 5.
- Strategic objective 6.
- Strategic objective 7.
- Strategic objective 8.

Evidence base

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

- Warwickshire County Council (2024). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy*.
- Nuneaton and Bedworth Borough Council (2011). *Open Space Strategy: 2011 – 2021*.
- Nuneaton and Bedworth Borough Council (2013). *Allotment Strategy: 2012 – 2022 (or as per any subsequent updates).*

Delivery mechanisms

12.14 The delivery mechanisms for this policy are as follows:

- Green infrastructure requirements and mitigation for strategic housing sites.
- Implementation of the following policies: HS2 – Sustainable transport, HS5 – Health, NE3 – Ecology, Biodiversity, Geodiversity and Local Nature Recovery, NE4 – Managing flood risk and water quality, NE5 – Landscape character, as well as site specific policies.

- Delivery of Open Space Strategy.
- Delivery of Green Infrastructure Plan.
- Delivery of Allotment Strategy.
- Delivery of the proposed strategic cycle network plans.

Monitoring

12.15 The indicators and targets that will be monitored for this policy are outlined in Table 32.

Monitoring ref	Indicator	Target
NE1a	Green and Blue infrastructure.	Provision of green and blue infrastructure to support development in line with the green in-frastructure framework.
NE1b	Distance of strategic network cycle routes.	Delivery towards strategic cycle network plans.

Table 32: Indicators and targets to be monitored for Policy NE1.

Policy NE2 – Open space and playing fields

New development must demonstrate how it will improve the green network of publicly accessible and linked open spaces to support growth by:

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

9. Providing areas of tree planting of a mix of predominantly native trees, street trees of appropriate species and where appropriate community orchards.

New development, including open spaces, must play a part in delivering long term mitigation and adaptation to climate change and must have regard to this when considering tree planting, the provision of shade and the use of flood mitigation and SuDS within the development site.

New open space can be used multi-functionally as flood storage except for formal children's play areas or sports pitches.

12.16 The NPPF recognises that access to high quality open spaces for sport and recreation can make an important contribution to the health and wellbeing of communities. Landscaping within open spaces can also make a valuable contribution to help reduce greenhouse gases in the atmosphere and to build resilience and adaptation for climate change.

12.17 The NPPF also sets out criteria for the loss of existing open space, sports and recreational buildings and land, including playing fields. 'Policy HS4 – Retaining community facilities', sets out the local approach to the loss of such facilities. Where losses are proposed, the Council will consider the criteria in the NPPF as well as relevant standards and assessments set out in the Open Space Strategy[103] and Playing Pitch and Outdoor Sports Strategy[104] (or as per any subsequent updates) in terms of using 'Policy HS4 – Retaining community facilities'.

12.18 The Open Space Strategy defines a typology and hierarchy of sites and standards for the quantity, quality and accessibility of open space. The strategy identifies the areas where there is a surplus or deficit of open space in terms of quantity, quality and accessibility, as well as those open spaces to be given priority for improvement and investment in order to meet access and quality standards. The overall aim is to create a publicly accessible green network of open spaces.

12.19 A key element of the Open Space Strategy is to ensure that all properties in the Borough have access to a community park. This means that all residents will be within 600m or 10-12 minutes walking distance of a community park. To achieve this aim, current deficiencies will be addressed by:

- Improving open spaces to create community parks at Change Brook Close, Buttermere Recreation Ground, St Giles, Blackberry Lane and Anderton Road.
- Providing new community parks in Whitestone, The Long Shoot and Bulkington.
- Providing new community parks and/or improving existing community parks in order to meet the needs of residents of the strategic housing sites.

[103] Nuneaton and Bedworth Borough Council (2011). *Open Space Strategy: 2011 – 2021.*
[104] Strategic Leisure Ltd (2023). *Nuneaton and Bedworth Borough Council - Playing Pitch and Outdoor Sports Strategy.*

12.20 Proposed community parks will be removed from Green Belt as part of the related development proposals.

12.21 In terms of access to nature, when considering development proposals, the Council will take account of the standards proposed by Natural England, the Accessible Natural Greenspace Standard and the Woodland Trust's Woodland Access Standard.

12.22 The Open Space Strategy recognises the need for children and young people to have access to play provision and teenage facilities to meet their needs.

12.23 The Allotment Strategy identifies areas where there are deficiencies of allotments and quantity, quality and accessibility standards[105]. New allotments will be provided in line with the standards in the Allotment Strategy.

12.24 Guidance is provided in the Council's Open Space Strategy and Open Space SPD, Playing Pitch and Outdoor Sports Strategy, Warwickshire County Council's LCWIP in terms of the strategic provision of active travel, Warwickshire County Council's Flood Risk Management Strategy in terms of climate change impacts, Environment Agency guidance, relevant individual policies and Concept Plans, in regard to the content of this policy.

Borough Plan objectives

12.25 This policy delivers the following Borough Plan objectives:

- Strategic objective 5.
- Strategic objective 6.
- Strategic objective 7.
- Strategic objective 8.

Evidence base

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

- Strategic Leisure Ltd (2023). *Nuneaton and Bedworth Borough Council – Playing Pitch and Outdoor Sports Strategy (or as per any subsequent updates).*
- Warwickshire County Council (2024). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy*.
- Nuneaton and Bedworth Borough Plan (2011). *Open Space Strategy: 2011 – 2021.*
- Nuneaton and Bedworth Borough Plan (2013). *Allotment Strategy: 2012 – 2022*.

[105] Nuneaton and Bedworth Borough Council (2013). *Allotment Strategy: 2012 – 2022.*

Delivery mechanisms

12.27 The delivery mechanisms for this policy are as follows:

- Open space requirements for strategic housing sites.
- Delivery of Open Space Strategy.
- Delivery of Green Infrastructure Plan.
- Delivery of Allotment Strategy.

Monitoring

12.28 The indicator and target that will be monitored for this policy is outlined in Table 33.

Monitoring ref	Indicator	Target
NE2a	Change to open space.	No net loss of open spaces, made up of destination parks, community parks, neighbourhood parks or allotments, to development.

Table 33: Indicator and target to be monitored for Policy NE2.

Policy NE3 – Ecology, Biodiversity, Geodiversity and Local Nature Recovery

Development proposals need to ensure ecological networks, services and biodiversity and geological features are either conserved, enhanced, restored or created to assist in nature recovery. The use of mechanisms to improve biodiversity such as green roofs or green walls are encouraged.

Species

Protected, UK Priority, rare and endangered species surveys will be required where there is a reasonable likelihood of their presence. Where their presence is found or suspected their populations will be protected and enhanced during and after development. Developments that provide species provision into the development will be encouraged[106].

Ecological network

Sites of international, national and local importance (including Local Wildlife Sites) will be protected from development to safeguard the criteria for which they were designated and thereby maintain their significant contribution to supporting a functional Green Infrastructure throughout the borough, county, sub-region and nationally.

106 Red and amber listed mammals and birds, as per Natural England's standing advice, surveys and mitigation measures provided (Section 41 (Natural Environment and Rural Communities Act 2006), Schedule 1 (Wildlife and Countryside Act 1981), red listed and amber listed birds (Birds of Conservation Concern).

The level of protection sought for these sites will be at an appropriate scale to the site's designation status, and the contribution it makes to the ecological network. Any Potential Local Wildlife Sites (pLWS) will be surveyed for their ecological importance against the Guidance for the Selection of Local Wildlife Sites[107]. Where protection, retention and/or enhancement of these sites is not possible, this must be clearly demonstrated (including survey work) to show that the benefits from the development significantly and demonstrably outweigh the impacts on the site, when assessed against legislation, and National and Borough Plan Review policies.

Fragmentation of habitats

Development proposals will ensure species are able to positively respond and adapt to the impacts of climate change by preventing the fragmentation of existing habitats. Links and habitats should be created where there are gaps to the ecological network of wildlife sites, wildbelts, stepping stones, wildlife and canal corridors, and green spaces, regardless of whether they are of international, national or local importance. Watercourses should be joined up to provide natural linkages for ecological networks and to improve water quality.

Biodiversity Net Gain offsetting

All applicable development, that is not exempt[108], must demonstrate a minimum 10% Biodiversity Net Gain with off-site offsetting being required as a last resort once all available options in the avoidance mitigation hierarchy have been demonstrably explored. Developers must use the Statutory Metric to quantify the impact, and to calculate an appropriate level of compensation to replace the lost habitat. If there is any habitat loss that cannot be replaced on site, then replacement habitat should be provided in the following sequential spatial hierarchy in accordance with the Warwickshire, Coventry and Solihull Green Infrastructure Strategy:

1. Within the Borough
2. Within a neighbouring authority
3. Within Warwickshire, Coventry or Solihull

Within each of these areas, the location of the replacement habitat should be considered in the following order:

- In a strategic area for habitat creation or enhancement
- In a semi-strategic area for habitat creation or enhancement
- The creation or enhancement of an offset site greater than 20 hectares in area

If these locations are not suitable then:

4. Elsewhere in England:
    - In other local authority areas
    - The purchase of national credits

[107] THE GREEN BOOK Guidance for the Selection of Local Wildlife Sites in Warwickshire, Coventry and Solihull Local Wildlife Sites Project Habitat Biodiversity Audit (HBA) Warwickshire Wildlife Trust Ecological Services available at: Guidance Note on Application of Site Selection Criteria (warwickshire.gov.uk). Page 138 provides guidance notes for any planning application/development that is likely to impact on a pLWS.

[108] Biodiversity net gain: exempt developments - GOV.UK

Geological diversity

Development proposals will avoid adversely impacting sites of geological interest and, where appropriate, conserve and enhance such features for the enjoyment of residents, and for reasons of advancing local geological education.

Warwickshire Local Nature Recovery Strategy

Development proposals need to have regard to the Warwickshire Local Nature Recovery Strategy and its priority habitats and species and any Areas of Particular Importance for biodiversity (APIBs) or opportunity areas.

12.29 The NPPF provides opportunities to help redress biodiversity losses from new development, as it promotes the concept of biodiversity net gains. The Environment Act 2021 takes this further and sets a legal requirement for planning permission to exceed the pre-development biodiversity value of the onsite habitat by at least 10%. The Council may wish to adopt a higher percentage after consultations within the preparation of the Warwickshire Local Nature Recovery Strategy. If this is the case, then due process, prior to the adoption will be carried out.

12.30 The NPPF states that Councils should plan positively to create, protect, enhance and manage recovery networks for biodiversity. It also states that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is appropriate with their status and gives appropriate weight to their importance and the contribution that they make to the wider ecological networks.

12.31 Sites which are awarded protection include:

- International sites (such as Special Areas of Conservation).
- National sites (such as SSSI).
- The Warwickshire, Coventry and Solihull Biodiversity Action Plan Priority Habitats and Species.
- Local nature reserves.
- Local and potential wildlife sites and local geological sites.
- Sites with a high distinctiveness score.

12.32 The 2016 maps produced by the Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull[109] show habitat provision, connectivity and access to nature are particularly poor on the east side of the Borough, whilst to the west, provision is relatively good, but connectivity and access is also poor. Additionally, the Borough only has a small number of statutory protected wildlife and geological sites (one Special Area of Conservation, two SSSIs and three local nature reserves).

[109] Warwickshire County Council (2015). *Grassland connectivity 2015, Hedgerow connectivity 2015, Local Wildlife Sites 2023, Phase 1 currency 2015, Phase 1 distinctiveness 2015, Phase 1 habitats 2015, Woodlands connectivity 2015.*

12.33 The Borough's ecological network consists of statutory designated sites, including Special Areas of Conservation, SSSIs and local nature reserves. One site, Ensor's Pool, is currently designated as all three. The majority of the network is made up of non-statutory Local Wildlife Sites and potential Local Wildlife Sites, as well as priority habitats and species, woodland and ancient woodland, rivers and canals, and green corridors and stepping stones. In line with this, connected habitat corridors and networks, linking sites of higher ecological value, are now recognised as essential. Additionally, nonstatutory sites contribute to the greater good of conserving biodiversity and geodiversity and are viewed as an integral component of the ecological network. Due to their local ecological network importance, LWS, pLWS and key ecological corridors (like water courses, disused and active railways and distinctive hedgerow networks) receive additional protection within this Borough Plan Review.

12.34 To distinguish between habitats with greater ecological importance, both the Ecology and Geodiversity Assessment[110] and Sub-Regional Green Infrastructure Strategy[111] score habitats on their distinctiveness. High distinctiveness scores equate to areas of highest biodiversity, including all unimproved and semi-improved habitats. High distinctiveness will also incorporate statutory sites, Local Wildlife Sites and the Biodiversity Action Plan habitats. The high distinctiveness category for linear habitats includes species-rich hedgerows.

12.35 The protection, enhancement and creation of ecological habitats has the opportunity to help ameliorate the effects of climate change through carbon capture. As such, habitats can serve dual purposes and opportunities should be taken to enhance not only biodiversity but the ability to capture carbon (but the latter not at the expense of the biodiversity of the land). Areas of increased biodiversity interest can also ameliorate the effects of overheating, from rising temperatures, through tree planting and by providing shade. Fruit trees should form part of this planting.

12.36 The Natural Environment and Rural Communities Act 2006 (as amended), protected species, the Government's 25 Year Plan and Environment Act 2021 (footnote 105) are all key national legislation that must be adhered to.

Ecological and geological assessment

12.37 All major developments, and minor developments affecting ecological and/or important geological features, will be accompanied by an Ecological Assessment and/or, where relevant, a Geological Assessment.

[110] Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull (2022). *Nuneaton and Bedworth Borough Council Ecology and Geodiversity Assessment (EGA) Borough Plan Publication Version.*

[111] Warwickshire County Council (2024). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy.*

12.38 Where the assessment indicates an adverse impact, the assessment must set out a mitigation strategy to halt and reverse the loss of biodiversity, indicate how it will create biodiversity net gains and where relevant, how it will reduce its geological impact.

12.39 The Mitigation Hierarchy will be adhered to by development. Any proposal that directly or indirectly impacts on a highly distinctive ecological site or habitat must show that less distinctive ecological sites or habitat have been considered first and explain why those alternative locations were not suitable. The assessment must demonstrate that the benefits of the development proposal will outweigh the immediate loss of biodiversity and/or geodiversity before development is permitted. The assessment must also demonstrate that the combination of proposed habitat retention, enhancement and any biodiversity offsetting, results in a minimum of a 10% net gain in biodiversity, and where appropriate enhance 'at risk habitats' identified in the Biodiversity Action Plan, Green Infrastructure Strategy and any emerging Warwickshire Local Nature Recovery Plan. The assessment should include retention, enhancement and creation of ecological habitats and nature recovery. Developments that create new habitat should seek to accommodate a mix of predominantly native trees, including fruit trees, as well as suitable species of street trees.

12.40 Where there is evidence of deliberate neglect, clearance or damage to biodiversity prior to the submission of an application, the Council will assess the acceptability and biodiversity calculations on what was considered to be the original condition.

Biodiversity Net Gain

12.41 The mitigation hierarchy should be applied where relevant, which follows the order of avoid, minimise, restore and offset. Evidence as to why impacts on important biodiversity features cannot be avoided will need to be submitted as part of any application before further levels within the mitigation hierarchy are considered.

12.42 A completed Statutory Biodiversity Metric with no errors will be required (except for householder applications and other exempted developments) at the time of any planning application submission. An indicative or fully completed Biodiversity Net Gain Plan that secures gain for at least 30 years will be required prior to determination, unless exceptional circumstances prevail. Biodiversity offsetting metrics have been provided by the Department for Environment, Food and Rural Affairs and Natural England in order to calculate the value of biodiversity. Applying the metrics ensures that the

losses resulting from development and the gains achieved, are measured in the same way.

Survey and development expectations

12.43 The ODPM Circular 2006/5: Biodiversity and geological conservation makes it clear that protected species are a material consideration, and surveys will be required where there is a reasonable likelihood of their presence. It will be expected that species information is acquired from the Warwickshire Biological Record Centre to inform relevant applications and is used to inform any species surveys. The Council will expect species surveys with the submission of an application for validation. Conditions for surveys will only be used in exceptional circumstances.

12.44 The Council encourages proposals that support the integration of species in the development. These features include hedgehog passageways, swift and house sparrow cavities and boxes as well as the use of non-invasive, high wildlife value shrubs.

Borough Plan objectives

12.45 This policy delivers the following Borough Plan objective:

- Strategic objective 6.

Evidence base

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

- Warwickshire County Council (2015). *Grassland connectivity 2015, Hedgerow connectivity 2015, Local Wildlife Sites 2023, Phase 1 currency 2015, Phase 1 distinctiveness 2015, Phase 1 habitats 2015, Woodlands connectivity 2015.*
- Habitat Biodiversity Audit Partnership for Warwickshire, Coventry and Solihull; (2022). *Nuneaton and Bedworth Borough Council Ecology and Geodiversity Assessment (EGA) Borough Plan Publication Version.*
- Warwickshire County Council (2024). *Warwickshire, Coventry and Solihull Sub-Regional Green Infrastructure Strategy.*

Delivery mechanisms

12.47 The delivery mechanisms for this policy are as follows:

- Work closely with the Habitat Biodiversity Audit Partnership, Natural England, Warwickshire Geological Conservation Group and Warwickshire Wildlife Trust, amongst others, to ensure that the Borough's ecological, geological and landscape assets are conserved, restored and, where necessary, created.
- Delivery of the Green Infrastructure Plan and the Sub-Regional Green Infrastructure Strategy.

Monitoring

12.48 The indicators and targets that will be monitored for this policy are outlined in Table 34.

Monitoring ref	Indicator	Target
NE3a	Deterioration in SSSI, Special Area of Conservation and Local Wildlife Sites.	No deterioration; maintain at favourable status.
NE3b	Development resulting in less than 10% gains for biodiversity.	Zero.
NE3c	Development causing a loss of Local Biodiversity Action Plan habitats and species.	Zero.
NE3d	Planning permission granted on designated statutory sites and sites with high biodiversity distinctiveness.	Zero.
NE3e	Local Wildlife Sites in positive management.	All Local Wildlife Sites.
NE3f	Increase or decrease in connectivity of ecological network. This could be monitored through planning applications and the Habitat Biodiversity Audit.	Year on year increase.

Table 34: Indicators and targets to be monitored for Policy NE3.

Policy NE4 – Managing flood risk and water quality

Managing flood risk

New development should be prioritised to areas of lowest flood risk and must not increase flood risk elsewhere. This should consider the risk from all sources including fluvial, surface water, groundwater and sewer flood risk, making use of the SFRAs (both Level 1 and Level 2) (August 2023), available public mapping such as the Flood Map for Planning and the Flood Risk from Surface Water map and historic flood information (which is available from the Lead Local Flood Authority (LLFA) and other partners).

Flood risk should be considered proportionately for all development. A site-specific Flood Risk Assessment will be required to support planning applications for major developments or those in areas at risk of flooding, in order to demonstrate that the risk both within the site and to surrounding/downstream sites is not increased. Submitted Flood Risk Assessments should refer to the recommendations of the latest SFRA: Level 2 (August 2023), the Humber and Severn Flood Risk Management Plans and Warwickshire County Council's Local Flood Risk Management Strategy. Notwithstanding the requirement for a Flood Risk Assessment for major developments to be submitted, all developments will require a drainage strategy which demonstrates how surface water will be managed in accordance with the drainage hierarchy and flood risk will not be increased downstream.

New development proposals must account for climate change in their plans to ensure that the site will be safe over its lifetime. This should consider the potential for exceedance events, for example due to extreme events beyond design standards or through failure of assets, and how such overland flows are directed safely through a development without exposing new or existing property to greater flood risk.

A sequential approach to the layout of the development should be taken so that buildings and access routes are located in areas of lowest flood risk. Modification of ground levels/compensation works may be undertaken in order to reconfigure land located within flood zone 3a. However, modifications to increase land available for development is not permitted. With any changes in ground levels, detailed consideration should be given to exceedance/overland flow routes.

For development located in areas at risk of flooding, mitigation measures should be provided up to the 1% annual probability plus climate change flood event. Safe access and egress must also be demonstrated. Finished floor levels in areas at risk of flooding should be set no lower than 600mm above the 1% annual probability plus climate change flood level.

All new developments should contribute to creating space for water through use of blue and green infrastructure, and where relevant, restoring functional floodplains (flood zone 3b). New developments should also seek opportunities for river restoration and enhancement, e.g. de-culverting, removing structures and reinstating a natural, sinuous river channel. As a minimum all developments are required to provide an 8m wide undeveloped buffer strip from the watercourse (from the top of the bank or the centreline of the culvert) to allow access for routine maintenance and emergency clearance.

In terms of the risks to traditional buildings from flooding, care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building.

Flood risk management schemes (flood defences)

Proposals for new developments should not detrimentally impact upon existing and planned flood risk management schemes. New developments that will benefit from existing flood risk management schemes will be required to contribute towards their ongoing maintenance, in line with the requirements of the IDP.

Land that is required for current and future flood management will be safeguarded from development.

SuDS

New development will be required to implement appropriate, above-ground, SuDS techniques, where feasible, in order to manage surface water run-off. For all sites, surface water discharge rates should be no greater than QBar (or QMed) site-specific greenfield run-off rates, unless otherwise agreed by the LLFA. Warwickshire County Council's Flood Risk Guidance for Development[112] should be referenced for drainage design and guidance on discharge rates.

Surface water run-off should be managed as close to its source as possible and discharged in line with the surface water drainage hierarchy. Opportunities to utilise rainwater harvesting or reuse should be explored, to have benefits for both flood risk and water scarcity. Discharge via any sewer network is considered the last resort and where discharging into 3rd party assets (e.g. sewer network), written confirmation from the asset owner of the acceptance of such connection will be required. All redevelopment of brownfield sites should seek to remove existing connections to the public sewer for surface water drainage.

All development proposals and public realm improvements should consider the use of urban wetlands and street rain gardens as part of sustainable drainage schemes, particularly where there are known surface water flooding problems, or where wildlife habitat connectivity could be enhanced or restored.

Above ground SuDS features must, where feasible, be included within all development in order to bring wider sustainability benefits including improved water quality, enhanced biodiversity and amenity/leisure value. SuDS should be dispersed across a development (e.g. not concentrated in a single attenuation feature) with consideration given to design for and retaining the first 5mm of rainfall.

SuDS should be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS features.

Details of the SuDS proposed to be used, including operation and maintenance, must be agreed at the earliest possible stage with the LLFA.

Water quality

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology, in and adjacent to the Borough.

[112] Warwickshire County Council (2023). *Flood Risk Guidance for Development*.

All attempts must be made to separate surface water and foul water, ensuring that surface water connections are not made to the foul/combined sewer network.

The management and improvement of water quality should be considered hand-in-hand with the provision of SuDS across a development. Proposals should be accompanied by a proportionate assessment (e.g. simple index approach) outlining the risks of a development proposal and how the proposed surface water drainage system will manage and mitigate those risks.

Proposals will benefit the river network by restoring the functional floodplain and reinstating a natural meandering river channel where it has previously been lost. In doing so, development proposals should refer to the principles of the EU Water Framework Directive and the associated actions and objectives of the Humber and Severn River Basin Management Plans (RBMPs).

Management schemes supported by the RBMPs will be encouraged within development proposals, such as the use of tree planting to reduce soil run-off into watercourses, standing water bodies and groundwater.

Groundwater quality

Where development has the potential to directly or indirectly pollute groundwater, a Groundwater Risk Assessment, demonstrating that the development proposal and subsequent works required will not lead to deterioration in groundwater quality and quantity, is needed to support the planning application. Development should, wherever possible, improve water quality.

If a deterioration in groundwater quality cannot be avoided, there will be a presumption against the development proposal.

All new housing and employment allocations with piled foundations or basements, within 1km of Ensor's Pool Special Area of Conservation, should undertake a hydrogeological study to confirm that it will not affect groundwater flows or quality at the Special Area of Conservation.

12.49 The NPPF promotes a sequential approach to identifying new land for development. This ensures that flood risk to people and property is avoided by selecting land at least risk of flooding considering the risk of flooding from all sources. Site layout and design are recognised as ways to influence the risk and impact of flooding, and to provide resilience for climate change.

12.50 Climate change is a key threat in terms of flooding. It is expected that peak rainfall intensity and peak river flow will increase during the plan period. This will increase both the size of the flood zones associated with rivers and the amount of flood experienced from other sources. The SFRA: Level 2 (August 2023) for Nuneaton and Bedworth updated previous flood zone maps to consider climate change[113]. The maps show that climate change will increase flood risk over time. The SFRA has been updated to inform the review process in order to consider new legislation, further climate change predictions and better modelling.

[113] JBA Consulting (2023). *Nuneaton and Bedworth Borough Council SFRA – Level 2: Final Report August 2023.*

12.51 Monitoring of the chemical and ecological status of the water bodies in the Humber and Severn River basin districts indicates that improvements in water quality are needed to reach the environmental objectives that have been set across each of the districts[114].

12.52 This policy, and the legal obligations imposed by the Flood and Water Management Act 2010 and the EU Water Framework Directive will help to address flood issues, adapt to climate change and reverse the decline in the chemical and ecological status of water bodies.

Flood risk

12.53 Nuneaton and Bedworth Borough Council lies in the River Trent Catchment Flood Management Plan (CFMP), Upper Soar and Upper Anker sub-region where policy option 4 has been allocated[115]. Policy 4 requires further action to sustain the current level of flood risk into the future (responding to the potential increases in risk from urban development, land use change and climate change). 'Policy NE4 – Managing flood risk and water quality' aims to support this aim of the River Trent CFMP by effective management of future development.

12.54 The River Trent CFMP and the Humber and Severn Flood Risk Management Plans[116] indicate the following measures are required to reduce the risk of flooding:

- Directing development away from the floodplain.
- Slowing rates of run-off in the upstream catchment in order to reduce surface water flooding (particularly in Bedworth).
- Better understanding of the interaction between river and surface water flooding in order to help identify solutions in urban areas.
- Assessing long-term opportunities to move development away from the floodplain and create green river corridors.
- Considering future climate change and urban growth.
- Returning watercourses to a more natural state, increasing biodiversity and opening up green river corridors.
- Protecting and increasing the amount of Biodiversity Action Plan habitat in the catchment.
- Making more space for rivers through urban areas via blue corridors, e.g. restoring access for floodwater onto key strips of floodplain.

12.55 The Environment Agency also published the revised Flood Risk Management Plans in December 2022 which span the period of 2021 – 2027.

[114] Environment Agency (2022). *Humber and Severn River Basin District, RMBPs.*
[115] Environment Agency (2010). *River Trent CFMP.*
[116] Environment Agency (2023). *Humber River Basin District Flood Risk Management Plan 2021 to 2027.*

12.56 Nuneaton and Bedworth Borough Council's Level 1[117] and Level 2[118] SFRAs are a Borough-level assessment of potential flood risk from all sources. All proposals should have regard to the findings of these assessments.

12.57 Warwickshire County Council, in their role as LLFA, have published a Local Flood Risk Management Strategy. The strategy ranks Nuneaton as number 10 in the top 40 combined (historic and predictive) flood risk sites across Warwickshire through ordinary watercourses, surface water and sewer capacity. Bedworth is ranked as number 7, with the nature of flood risk listed as the main river area of Delamere Road (addressed by an Environment Agency scheme) and surface water. Nuneaton Centre is ranked as number 24 with the main river, ordinary watercourse, surface water and sewer flooding all listed as the sources[119].

12.58 Section 10 of the Council's IDP outlines the infrastructure requirements across the Borough regarding flooding and drainage, and states that "where development does occur in areas of flood risk, financial contributions obtained from planning applications may be used to mitigate the risk associated with the development".

Flood risk management schemes (flood defences)

12.59 The SFRA: Level 2 also assessed the Borough's flood defences. Details of the flood defences, their standard of protection and condition were provided by the Environment Agency and should be taken into consideration where development may compromise the condition and function of the flood defence.

SuDS

12.60 In accordance with the NPPF and the Flood and Water Management Act 2010, SuDS are required to be implemented at all scales of development.

12.61 As of 15th April 2015, Warwickshire County Council are statutory consultees on major planning applications for surface water. As announced in January 2023, it is the Government's intention to enact Schedule 3 of the Flood and Water Management Act (2010) which will see Warwickshire County Council take on the role of SuDS Approving Body (SAB).

12.62 Surface water run-off should be managed at source at a discharge rate no greater than the QBar greenfield rate, for all events up to the 1% annual probability plus climate change flood event.

12.63 Surface water drainage systems should discharge in line with the drainage hierarchy, first considering the potential for rainwater harvesting and reuse

[117] JBA Consulting (2022 and 2023). *Nuneaton and Bedworth Borough Council Level 1 SFRA Assessment Final Report.*
[118] JBA Consulting (2023). *Nuneaton and Bedworth Borough Council Level 2 SFRA Final Report August 2023.*
[119] Warwickshire County Council (2016). *Local Flood Risk Management Strategy.*

then, in descending order of priority, considering infiltration, discharge to surface water bodies such as watercourses and finally discharge to the public sewer network. Consideration should be given to the capacity of the receiving body, including an appreciation of any downstream assets e.g. culverts which may provide an additional constriction of flows.

12.64 Where connecting into a 3rd party asset, such as a public sewer, written acceptance of the connection from the asset owner will be required. This should confirm location and discharge rates are acceptable. Whilst higher capacities may be allowed by an asset owner, discharge rates should be in line with the policy set out above.

12.65 The Environment Act (2021)[120] also sets out changes to the water environment. Each sewerage undertaker now has a statutory requirement to prepare a Drainage and Wastewater Management Plan (DWMP) setting out the capacity of a sewer system, future demands, resilience and other measures. The Severn Trent DWMP[121] has now been published (2023).

12.66 An increasing focus is also being put upon reducing Storm Overflows from sewer networks. The Environment Act sets out how the Secretary of State must prepare a plan for the purpose of reducing discharge from storm overflows. The Severn Trent Storm Overflows Discharge Reduction Plan (SODRP) (2023)[122] has now been published. The DWMP outlines how the plan aligns with the SODRP.

12.67 The policy measures set out how, by reducing discharge amounts to the QBar greenfield runoff rate and discharging to water bodies other than sewer infrastructure, this has benefits as it meets the potential of the Environment Act objectives.

12.68 Above-ground SuDS are required with all development. Well-designed SuDS, integrated within a development's landscaping and green infrastructure can provide multiple benefits thereby meeting many national and local policy objectives:

- Flood risk: the controlled discharge of surface water runoff will aid the downstream management of flows within a watercourse and thereby mitigate and potentially improve the risk of flooding.
- Water quality: many SuDS features provide water quality improvements by slowing flows thereby allowing the deposition of pollutant-carrying sediment and the filtration of water through vegetation such as reedbeds.
- Amenity: there can be many facets of amenity through which SuDS provide benefits including improved air quality, reducing urban temperatures, sequestering carbon, providing educational and recreational spaces where everyone can interact with water, reducing noise through sound-absorption by vegetation and finally improving health and wellbeing.

[120] HM Government (2021). *Environment Act.*
[121] Severn Trent (2023). *DWMP.*
[122] Severn Trent (2023). *DWMPs– Appendix 6 – Alignment to the SODRP.*

- Biodiversity: SuDS provide excellent habitats for aquatic and non-aquatic flora and fauna, thereby helping to meet biodiversity net gain targets under the Environment Act (2021).

12.69 Where this is not possible, developers should contact the LLFA at the earliest convenience, and ideally during the master planning process, for advice on suitable surface water drainage techniques. The Warwickshire County Council LLFA Flood Risk Guidance for Development should be taken into consideration when designing SuDS.

Water quality

12.70 A key requirement of the EU Water Framework Directive is the management and prevention of deterioration of the environment. This sits alongside the Government's 25 Year Environment Plan[123] to improve the environment within a generation. All development has a role to play in meeting these objectives and paragraph 174 of the NPPF supports this statement and policy.

12.71 RBMPs are prepared by the Environment Agency under the direction of the EU Water Framework Directive. The RBMPs indicate that the chemical and ecological status, in relation to the quality of surface water bodies and groundwater quality, are below current accepted standards. The RBMPs indicate that a number of measures are required to improve water quality, including:

- Reducing the impact of diffuse pollution from rural and urban sources, including the use of SuDS.
- Remediating contaminated land.
- Improving and protecting habitats.

12.72 As outlined earlier, the Environment Act (2021) places additional statutory duties on sewerage undertakers to understand and manage sewer capacity and for Government to plan for reducing storm overflows. This highlights the importance for development proposals to use sewer networks as a last resort for surface water drainage.

12.73 The Council will work in conjunction with Severn Trent with regards to water quality modelling in order to determine the potential for deterioration as a result of the growth and increased sewage discharges across the Borough. Severn Trent will also consider the impact on concentrations in the rivers related to percentage deterioration, impact on current EU Water Framework Directive classifications, and potential for future EU Water Framework Directive failures.

12.74 Development proposals must therefore consider the impacts they may have on the water quality environment and how the proposals mitigate those impacts. For most development, an assessment utilising the Simple Index Approach, as

[123] HM Government (2018). *A Green Future: Our 25 Year Plan to Improve the Environment.*

outlined in The SuDS Manual[124], could be considered appropriate. However, for complex development or potentially contaminated sites, more detailed assessments, through escalating Land Contamination Risk Assessments, may be more appropriate.

Groundwater quality

12.75 Groundwater accounts for around a third of public water supply in England and Wales[125]. Unfortunately, it is also under threat from unsustainable levels of abstraction for drinking water, exceeding the rate at which rainfall can recharge aquifers. This in turn causes further problems, as lower groundwater levels can affect river flows, wetlands and is seen as one of the causes for not achieving good ecological status in some rivers, lakes and estuaries. The higher Building Regulations requirements for water efficiency, as set out in Policy BE3 – Sustainable design and construction, will contribute towards ensuring sustainable water supply and abstraction.

Advice from the Environment Agency

12.76 The Environment Agency advises the following:

Development Vulnerability	Allowance (lifetime)
Essential Infrastructure	Higher Central - 2080's
Highly Vulnerable and More Vulnerable (residential), and some Less Vulnerable (commercial, and non-residential development where a period of at least 75 years is likely to form a starting point for assessment (see NPPG)	Central - 2080's
Water Compatible and temporary (shorter lifetime)	Central - 2050's

12.77 In reference to safe access requirements the following criteria should be noted:

12.78 For 'more vulnerable' development, where overnight accommodation is proposed, the FRA should demonstrate that the development has safe, pedestrian access above the 1% river flood level plus climate change. Pedestrian

[124] CIRIA (2015). *The SuDS Manual (C753).*
[125] JBA (2024) *Coventry and Warwickshire Sub-regional Water Cycle Study (WCS) – Stage 1 Final Report.*

access should preferably remain flood free in a 1% river flood event plus climate change. However, in cases where this may not be achievable, the FRA may demonstrate that pedestrian access is acceptable based on an appropriate assessment of 'hazard risk' including water depth, velocity and distance to higher ground (above the 1% river flood level plus climate change). Refer to DEFRA Hazard risk (FD2320) – 'Danger to People for Combinations of Depth & Velocity' (see Table 13.1 – DEFRA/EA Flood Risk Assessment Guidance for New Development FD2320, page 118).

12.79 Opportunities for flood risk reduction should be considered wherever possible, including the provision of additional flood storage capacity.

12.80 Applicants are encouraged to contact the Environment Agency where a Flood Risk Assessment (FRA) is required and consider the Agency's West Midlands area Flood Risk Assessment guidance and Approach to Ground water Protection (2018) – Position Statement G13 - Sustainable drainage systems:

12.81 The Environment Agency advise that, the Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework (the Framework) and National Planning Practice Guidance (NPPG)
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

12.82 Where infiltration SuDS are proposed for anything other than clean roof drainage in a Source Protection Zone 1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply. The design of infiltration SuDS schemes and of their treatment stages needs to be appropriate to the sensitivity of the location and subject to a relevant risk assessment, considering the types of pollutants likely to be discharged, design volumes and the dilution and attenuation properties of the aquifer. Unless the supporting risk assessments show that SuDS schemes in SPZ1 will not pose an unacceptable risk to the drinking water abstraction, the Environment Agency will object to the use of infiltration SuDS.

12.83 In line with the Level 2 SFRA, all Flood Risk Assessment should consider ordinary/unmodelled watercourses, which have the potential to cause fluvial

flood risk. Modelling of these watercourses will be essential to inform the risk to any development proposals within the vicinity of unmodelled watercourses.

12.84 The Environment Agency advises that contributions for flood defences may be sought by them to enable new flood defence infrastructure, in line with the IDP and the Environment Agency's Programme of pipeline works where considered appropriate.

12.85 Severn Trent Water advise:

Developers are encouraged to contact Severn Trent regarding sewer capacity at an early stage of planning to ensure adequate time is available to assess the risk and develop any network improvements should they be required.

Borough Plan objectives

12.86 This policy delivers the following Borough Plan objectives:

- Strategic objective 6.
- Strategic objective 7.

Evidence base

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

- JBA Consulting (2022 and 2023). *Nuneaton and Bedworth Borough Level 1 SFRA Final Report.*
- JBA Consulting (2023). *Nuneaton and Bedworth Borough Council Level 2 SFRA Final Report.*
- Warwickshire County Council (2016). *Local Flood Risk Management Strategy (to be reviewed).*

Delivery mechanisms

12.88 The delivery mechanisms for this policy are as follows:

- Using the Council's SFRA: Level 2 (August 2023) and Warwickshire County Council's Local Flood Risk Management Strategy to identify sites for development, at least risk of flooding, in the Borough Plan and other DPDs.
- Developing new flood defences and SuDS to allow development to take place.
- Delivery of projects set out in the Green Infrastructure Plan relating to flood alleviation.
- Review the SFRA on a five-yearly basis.

Monitoring

12.89 The indicators and targets that will be monitored for this policy are outlined in Table 35.

Monitoring ref	Indicator	Target
NE4a	The number of planning permissions granted contrary to the advice of the Environment Agency and LLFA on grounds of flood risk.	Zero.
NE4b	The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to water quality.	Zero.
NE4c	The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to groundwater quality.	Zero.
NE4d	Number of developments including SuDS.	100%.

Table 35: Indicators and targets to be monitored for Policy NE4.

Policy NE5 – Landscape character

Major development proposals must demonstrate how they will conserve, enhance, restore or create a sense of place, as well as respond positively to the landscape setting in which the development proposal is located. Developers must take account of the Land Use Designations Study and landscape guidelines when preparing their landscape strategy.

Key characteristics and distinctiveness

Major development proposals must demonstrate that they are in balance with the setting of the local landscape and historic environment, respect the key characteristics and distinctiveness of that landscape, and in particular show how the proposal will:

1. Conserve or enhance important landmark views.
2. Conserve, enhance or create boundary features and field patterns including ridge and furrow topography.
3. Conserve and where necessary enhance the strength of character and landscape condition.

Landscape hierarchy

Major development proposals must take account of the landscape strategy set out in the Landscape Character Assessment (2023). Outside of the strategic sites and

urban area, defined by the settlement boundaries, developers must show they have sequentially considered development opportunities in areas of least landscape value first, prior to any development proposals being permitted in higher value landscape character areas. The areas of search will follow the landscape hierarchy in the order set out below:

4. Restore and create.
5. Enhance and restore.
6. Enhance.
7. Conserve and enhance.
8. Conserve.

12.90 The NPPF says that valued landscapes should be protected and enhanced. Landscape planning policies should be informed by Landscape Character Assessments in order to help determine the likely impacts new development proposals will have on the landscape, against which development proposals will be judged.

12.91 This policy will ensure that any suitable development will take account of landscape character and that the Land Use Designations Study will be used to determine decisions in this respect.

12.92 In 2016, TEP carried out site-specific Landscape Character Assessments. These were updated by FPCR in 2023[126] in order to assess the landscape character and mitigation required for the identified strategic and some non-strategic sites.

12.93 The landscape of Nuneaton and Bedworth is covered by 13 landscape character areas, none of which have national designation status. Only one of the landscape character areas, Arbury Parklands, is considered to have a high landscape quality. The concept of landscape character areas will help to identify and understand local landscapes in terms of their diversity, character, distinctiveness and sensitivity to change, as well as where landscapes need to be conserved, enhanced, restored or created.

Key characteristics

12.94 In the FPCR 2023 update the 13 identified local landscape character areas each have their own set of key characteristics and key features. Some character areas have retained much of their characteristics and features, and have developed higher levels of strength of character, resulting in better landscape conditions. Other character areas have lost much of their key characteristics and features to development, intensive agricultural practices and other human activities. New development proposals therefore will need to take full account of the development guidelines set out in the Character Assessment[127] and updated site-specific landscape sensitivity studies[128].

[126] FPCR (2023). *Nuneaton and Bedworth Landscape Character Assessment*

[127] FPCR (2023). *Nuneaton and Bedworth Landscape Character Assessment.*

[128] FPCR (2023). *Nuneaton and Bedworth Landscape Sensitivity Study.*

Landscape hierarchy

12.95 It is recognised that some areas in landscape terms are less able to adapt to accommodating development than others. This is reflected in the landscape strategies. Landscape Character Assessments assume that all landscapes have the potential to accommodate development, provided it is in keeping with their key characteristics. However, changes which do not respect the landscape's key characteristics and features are likely to be detrimental to the local landscape character. Mitigation therefore is likely to be least achievable/sympathetic in high quality landscapes, and more achievable where the landscape character is of a lesser quality. For this reason, the Council will take a more restrictive approach to development in the highest quality landscapes, and direct development to landscapes of lesser value.

12.96 The overall aim of a Landscape Character Assessment, and ultimately the planning, design and management of landscapes, is to achieve sustainable landscapes that are visually diverse, culturally rich and provide potential biodiversity opportunities, as well as being able to meet social, economic and environmental needs. By conserving and creating landscape characteristics and features, Landscape Character Assessments become less about restricting development and more about how development can fit into the landscape by creating a distinct sense of place.

Borough Plan objectives

12.97 This policy delivers the following Borough Plan objective:

- Strategic objective 6.

Evidence base

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

- FPCR (2023). *Nuneaton and Bedworth Landscape Character Assessment.*
- FPCR (2023). *Nuneaton and Bedworth Landscape Sensitivity Study.*

Delivery mechanisms

12.99 The delivery mechanisms for this policy are as follows:

- Work with developers, Historic England and Warwickshire County Council's Archaeological Information and Advice Team, as well as others, to ensure that landscape character is considered when planning and designing new development.
- Use the Land Use Designations Study as evidence to ensure that this policy is implemented.
- Maintaining a five-year housing land supply will ensure the Borough's valued landscapes will be protected.

Monitoring

12.100 The indicators and targets that will be monitored for this policy are outlined in Table 36.

Monitoring ref	Indicator	Target
NE5a	Development given planning permission in highly valued landscape areas.	Zero.

Table 36: Indicators and targets to be monitored for Policy NE5.

13.0 Built environment

13.1 These policies outline requirements relating to the built environment.

Policy BE1 – Contamination and land instability

Development proposals located on or adjacent to land which may have been subject to contamination, land instability or likely to risk creating land instability that could adversely affect nearby land or infrastructure will need to demonstrate the following:

1. That the site is suitable for its proposed use and that measures can be taken to mitigate effectively the impacts arising from land contamination and instability on public health, environmental quality, the built environment and general amenity.
2. That the development site is or will be made suitable for the proposed final use and will need to provide, as a minimum, the following documents with the planning application (often referred to as a Preliminary Risk Assessment or desk study):
   a. Detailed site history identifying contaminative uses and land instability.
   b. The nature and agent of the contamination, land instability and the hazards and risks posed.
   c. Evidence that any risks of creating land instability likely to adversely affect nearby land or infrastructure have been adequately mitigated.

Development proposals should also demonstrate consideration of pollution prevention measures during construction.

13.2 The NPPF provides guidance on how to deal with land contamination and instability. It states that the planning system is the process by which areas of land contamination and instability will be effectively remediated in relation to its location and use. However, the responsibility for securing a safe development rest with the developer and/or landowner.

13.3 Nuneaton and Bedworth's long history of coal mining, quarrying and heavy engineering has left behind a legacy of land contamination and land instability, hazardous to human health and safety. This is reflected in the identification of over 3,100 potentially contaminated sites across the Borough, and a Coal Authority development high risk area that stretches across the Borough from Hawkesbury/Bedworth/Bermuda/Stockingford/Whittleford/Nuneaton Common through to North Warwickshire[129]. Despite this there are no sites, within the Borough, identified on the Contaminated Land Register, nor have any 'special sites' (highly toxic sites transferred to the Environment Agency for remediation) been identified in the Borough.

[129] Nuneaton and Bedworth Borough Council (2010). *Contaminated Land Strategy: Phase 2.*

13.4 The following points outline some scenarios in which land instability could be an issue for development:

- Cut and fill scenarios to level sites – excess or unstable filled ground created. The new buildings should not be affected because Building Regulations should identify the problem but there could be a risk of land slide or subsidence that could affect roads and land around the buildings.
- Use of retaining walls to retain land – these should be assessed and designed to the relevant British/EU Standard.
- Creation of balancing ponds in combination with the above – i.e. soil used to retain large volumes of water, especially on sloping sites.
- Underground structures – e.g. rainwater retention tanks, especially under roads and lorry parking areas.
- Removal of established trees in shrinkable soils – may cause heave and damage to neighbouring properties. Usually factored into the Building Regulations design of new buildings, extensions etc but usually when work starts.
- Open cast sites that are then back filled - there have been cases where the back fill assumptions have caused damage to new buildings constructed on the once open cast site.

13.5 Reference should be made to the UK Government's Approach to Stabilisation; A guide for policy makers and practitioners (stabilisation unit) and Planning Practice Guidance and that any site investigation/land slope instability risk assessment should be prepared by a person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

Applying the precautionary principle

13.6 The possibility of contamination should be assumed by developers when considering planning applications in relation to all land subject to or adjacent to previous industrial use. The precautionary principle should especially be applied where land uses are particularly sensitive to contamination, for example, housing, schools, hospitals and children's play areas.

Risk Assessment

13.7 Part IIA of the Environmental Protection Act 1990 states that the standard of remediation to be achieved through the granting of planning permission for new development (including permission for land remediation activities) is the removal of unacceptable risk and existing contaminant linkages, as well as to ensure the site is suitable for its new use. All receptors relevant to the site should be protected to an appropriate standard. It is essential therefore to ensure that the development of these sites leaves them safe and suitable for the new uses.

13.8 The need for the type and complexity of reports to accompany planning applications will depend on the specific site, and the level of contamination/land instability. This is particularly relevant where a planning condition is imposed prior to the granting of planning permission that requires a detailed remediation scheme.

13.9 The Council supports the consideration of issues of land instability in development proposals.

Advice from the Environment Agency

13.10 When promoting land affected or potentially affected by contamination, developers and site promoters are actively encouraged to engage with the Environment Agency as early as possible in the planning process to follow the risk management framework provided in Land Contamination Risk Management (LCRM) 2020, available on gov.uk.

13.11 Furthermore, the Environment Agency recommend developers of land affected by contamination should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- Refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed

13.12 Refer to the contaminated land pages on gov.uk for more information

Borough Plan objectives

13.13 This policy delivers the following Borough Plan objective:

- Strategic objective 6.

Evidence base

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

- Nuneaton and Bedworth Borough Council (2010). *Contaminated Land Strategy: Phase 2.*

Delivery mechanisms

13.15 The delivery mechanism for this policy is as follows:

- Work with Development Management, Environmental Health, the Environment Agency and the Coal Authority to identify contaminated sites and bring about remediation.

Monitoring

13.16 The indicator and target that will be monitored for this policy is outlined in Table 37.

Monitoring ref	Indicator	Target
BE1a	Development of a potentially contaminated or unstable site.	Remediation is suitable for new use and is no longer considered contaminated.

Table 37: Indicator and target to be monitored for Policy BE1.

Policy BE2 – Renewable and low carbon energy

To address the climate change emergency, schemes providing renewable and low carbon technologies will be supported unless material considerations indicate otherwise. These include but are not exclusive to schemes that promote biomass energy, ground and air source heat pumps, hydro power, solar thermal and solar photovoltaic.

Development must have regard to the Climate Change Act 2008, zero carbon emissions by 2050 and the Environment Act 2021 and, where possible, look to reduce carbon emissions and provide resilience to climate change. Therefore, new development must, where possible, make use of sustainable transport, sustainable materials, minimise waste materials, make use of low carbon technologies, renewable energy and energy efficiency measures.

Proposals for retrofitting microgeneration technologies in existing developments will be approved, subject to a suitable assessment of the potential impacts to the local area. Community led initiatives for renewable and low carbon energy schemes will be approved if in accordance with other policies in the Plan.

Wind Energy

Proposals for small scale wind energy will be supported where appropriate in conjunction with the below criteria:

1. No significant harm to the amenity of and safety of residential areas, particularly in relation to:
   a. Noise pollution, proximity and/or highway safety.
   b. Electromagnetic interference.
   c. Unacceptable shadow flicker.
   d. Impacts on aviation.
2. Certified accreditation or similar evidence of the wind turbine meeting the RenewableUK Small Wind Turbine Performance and Safety Standard should be provided, with the planning application, prior to the granting of planning permission.
3. A decommissioning scheme is in place. The applicant should expect that the Council will request that a bond be provided under a planning obligation to cover the cost of decommissioning and/or restoration of the site.

When considering proposals for wind turbines, the Council will balance conflicting objectives, such as the need to increase renewable energy uptake, against the need to protect attractive landscapes, heritage, nature conservation and local amenity. Whilst some of these issues may be reduced through mitigation, the overall impact might still be unacceptable. Consequently, any benefits arising from wind turbine proposals will be weighed against their potential harm.

13.17 The NPPF states that the use and supply of renewable and low carbon energy should be increased through policies, in order to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts. The deployment of renewables will help tackle climate change by reducing emissions of carbon dioxide and help the country move towards a low carbon sustainable economy.

13.18 The EU Renewable Energy Directive (2009) committed the UK to source 15% of its total energy from renewable sources by 2020, increasing its renewable energy uptake by 12% from 2010. Furthermore, on 27th June 2019 the UK Government amended the Climate Change Act 2008 so that the UK will be required to bring all greenhouse gas emissions to net zero by 2050. Both of these legal requirements are a direct result of climate change and a fear that a five degree increase in global temperature will cause devastating impacts on global water supplies, food production, the economy, loss of life and a complete and unprecedented overturn in the way people live their lives.

Residential and non-residential

13.19 This policy supports the use of a range of renewable, low and zero carbon energy sources and technologies which is essential to reduce energy waste, reduce fuel poverty, adapt for climate change and contribute to the Government's commitment for the UK to become carbon neutral.

13.20 Renewable and low carbon energy solutions include:

- Biomass energy.
- Ground and air source heat pumps.
- Solar water heating.
- Solar photovoltaics.
- Combined heat and power/Combined cooling heat and power.
- District heating network.

13.21 The Feed-in Tariff and Renewable Heat Incentive are current Government schemes to encourage the use of renewable energy technologies. These incentives make the use of renewable and low carbon energy more viable.

13.22 A study conducted by Camco[130] indicates that renewable energy and low carbon energy has the potential to deliver between 9.5% and 12% of Nuneaton and Bedworth's energy demand, summarised in Table 38.

[130] Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study.*

Energy type	GWh (%)	Potential percentage of Borough's energy demand met (%)
Wind	20.8 - 36	1.3 - 2.3
Biomass	40.8	2.56
New build (mix of sources)	28.4 - 31.5	1.8 - 2.0
Existing built stock (mix of sources)	61.4 - 79.8	3.85 - 5.0

Table 38: Potential renewable and low carbon energy generation by 2026 (Camco, 2010).

Small-scale wind turbine energy

13.23 Large-scale wind energy development is significantly constrained in the Borough. This is because land areas are restricted due to the potential proximity of wind turbines to housing and other buildings (based on a 600m buffer distance)[131].

13.24 In comparison to large-scale wind energy, small-scale wind energy development is far less imposing, being less visually intrusive and requiring less distance between wind turbines and buildings. Small-scale wind turbines have capacity of less than 100kW, typically comprise of singe turbines and are usually ground-based developments with few installed on the roofs of buildings[132]. This makes small-scale wind energy development a sustainable and appealing source of renewable energy in both the Borough's urban and rural context.

13.25 Onshore wind potential is low in the West Midlands, and within Nuneaton and Bedworth Borough specifically, due to limited wind speeds and built-up or protected areas[133]. However, there is still potential for small-scale wind energy developments, with higher wind speeds reported adjacent to the northern and north-western boundaries of the Borough within North Warwickshire[134]. Therefore, the uptake of small-scale wind turbines will be promoted and encouraged, to contribute to the overall renewable energy mix, as there is still potential for this form of development.

13.26 The RenewableUK Small Wind Turbine Standard provides an assured level of safety, power performance and acoustic noise measurements. The standard aims to provide consumers with a measure of confidence in small wind turbine products.

[131] Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study.*

[132] SQW (2011). *Renewable energy capacity study for the West Midlands and Wrekin Council.*

[133] Western Power Distribution (2022). *Distribution Future Energy Scenarios: Regional Review Midlands license area.*
Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study.*

[134] Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study.*

13.27 The decommissioning of wind turbines is often an afterthought, but it is critical that turbines are taken down responsibly. Conditions will be applied to planning consents for wind turbines requiring that the land be restored to its previous use when the operation of the wind turbines has expired (for example, after 25 years). Full restoration may require the removal of turbines, ancillary structures and restoration of appropriate vegetation, depending on the nature of the site.

Borough Plan objectives

13.28 This policy delivers the following Borough Plan objectives:

- Strategic objective 6.
- Strategic objective 7.

Evidence base

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

- Camco (2010). *Renewable and Low Carbon Energy Resource Assessment and Feasibility Study.*
- SQW (2011). *Renewable energy capacity study for the West Midlands: A final report to Telford and Wrekin Council.*
- Western Power Distribution (2022). *Distribution Future Energy Scenarios: Regional Review – West Midlands license area.*

Delivery mechanisms

13.30 The delivery mechanism for this policy is as follows:

- Work with developers on strategic sites to deliver renewable and low carbon energy.

Monitoring

13.31 The indicator and target that will be monitored for this policy is outlined in Table 39.

Monitoring ref	Indicator	Target
BE2a	Proposals for small wind turbines in conformity with criteria.	100%.

Table 39: Indicator and target to be monitored for Policy BE2.

Policy BE3 – Sustainable design and construction

All Development proposals should be:

1. Designed to meet the requirements specified in any relevant extant Concept Plan SPD and the Sustainable Design and Construction SPD (2020).
2. Able to evidence efficient use and protection of natural resources.
3. Able to evidence that new developments are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 100 litres/person/day (until such time this is superseded by a lower figure under Building Regulations).
4. Able to evidence that new development will maximise energy efficiency and meet the optional higher standard for Building Regulations in regard to energy use. Development should adhere to the Future Homes and Buildings Standard, prior to its introduction in 2025, by promoting a fabric first approach, including the use of passive design principles where possible.
5. Minimise the potential for pollution of air, soil, noise and light, and in particular not contribute to unacceptable levels of air pollution.
6. Adaptable, resilient and minimise climate change impacts to achieve the nation's carbon net zero emissions target by 2050.
7. Able to reduce crime by demonstrating where the principles of Secured by Design have been incorporated into the design including consideration of wider security and defence.
8. Able to promote sustainable transport.
9. Able to promote placemaking strategies for an inclusive, safe, accessible and healthy living environment for all.

Urban character

All development proposals must contribute to local distinctiveness and character by reflecting the positive attributes of the neighbouring area and respecting the sensitivity to change of the generic character types within each urban character area. Development must take a comprehensive and co-ordinated approach, respecting existing constraints, including utilities, situated within each site. Key characteristics to consider include:

10. Current use of buildings.
11. Ownership/tenure.
12. Street layout.
13. Patterns of development.
14. Residential amenity.
15. Plot size and arrangement.
16. Built form.

Residential

Residential development should meet the principles set out within the relevant SPDs (including the Future Homes and Buildings Standard where technically and financially feasible). Where assessment methods are changed or superseded, the appropriate replacement standards will be used.

All residential developments must be designed with sufficient private outdoor amenity space to promote health and wellbeing.

Major development proposals must also provide a statement, with their application, showing how their proposal will:

17. Meet all of the 12 considerations in Building for a Healthy Life[135]. Where it is not possible to positively meet all considerations, a statement of justification must be provided to explain why it is not possible, and what mitigation measures will take place to offset this.
18. Install rainwater harvesting and greywater recycling systems in the curtilage of all new buildings.
19. Integrate the principles of passive solar design.
20. Be able to accommodate the flexible needs of occupants.

Development proposals for estate regeneration will be supported where they deliver high quality, well designed housing and improved public space.

Commercial

Major non-domestic (commercial) development proposals must meet the Building Research Establishment's Environmental Assessment Method (BREEAM) very good standard for new construction projects, using the most up-to-date new construction version of BREEAM, or equivalent LEED standard, where technically and financially feasible.

21. Applicants must submit a pre-assessment, as part of an application, demonstrating the proposed design will meet the BREEAM very good standard.
22. Applicants are also required to submit certificates once the development has been completed at post construction.

Where assessment methods are changed or superseded, the appropriate replacement standards will be used.

Sustainable construction

Development must minimise or re-use waste generated during the construction phase. This should be done by using materials and construction techniques that generate the least waste and minimise emissions. Waste should be treated as a resource to be re-used, recycled or recovered, and should only be disposed of when all other options have been explored.

On-site management of waste will be preferred, unless the activities would result in unacceptable harm through impacts on the environment, transport, neighbouring uses or that management elsewhere would have wider sustainability benefits.

[135] Homes England (2020) *Building for a Healthy Life.*

If the policy requirements cannot be met:

Where a developer considers meeting any of the above requirements is unviable or can demonstrate that they are not suited to local circumstances, supporting evidence must be provided, with any planning application, to clearly demonstrate this. An independent Viability Assessment is likely to be the most appropriate assessment to demonstrate that it is unviable.

13.32 The NPPF states that good design is a key aspect of sustainable design by creating better places for communities. This includes individual buildings, public and private spaces, and wider area development schemes. Paragraph 110 specifically refers to the requirement for development proposals to reflect current national guidance which includes the ten characteristics of the National Design Guide and National Model Design Codes. Therefore, this has been included within Policy BE3.

13.33 There are a number of key issues in Nuneaton and Bedworth that would benefit from the sustainable design and construction of new development. These issues include:

- Existing AQMAs.
- Low levels of car ownership.
- Poor health and lower life expectancy.
- High crime and perception of crime.
- High levels of fuel poverty.

13.34 This policy will help to address these issues by ensuring development is of a high quality; minimises the release of air pollutants into the atmosphere; is not unreasonably noisy or otherwise obtrusive; is accessible to local shops, services and public transportation; meets the existing or future circumstances of residents, workers and visitors; is safe; is energy and water efficient; and is equipped to adapt to climate change and aid zero carbon emission developments.

13.35 Regarding fire safety, in the unlikely event that buildings are proposed which contain two or more dwellings, or educational accommodation, and meet the height condition of 18m or more, or 7 or more storeys, the Planning Gateway One[136] must be adhered to and details submitted with the application.

Water efficiency

13.36 The NPPF states that local authorities should take water supply and demand into full account in their strategies and local plans. The West Midlands Climate Change Risk Assessment and Adaptation Plan (2021-2026)[137] identifies that

[136] Department for Levelling Up, Housing and Communities (2021). *Fire safety and high-rise residential buildings.*

[137] Sustainability West Midlands (2021). *Climate Change Risk Assessment and Adaptation Plan 2021-2026.*

the Severn Trent Water region is already seriously water stressed and supply is likely to become more constrained with drier summers and an increasing population. The Coventry and Warwickshire Sub-regional Water Cycle Study (WCS) - Stage 1 Final Report, also identifies a number of wastewater treatment works, across the sub-region, which are currently operating at capacity, or will be at some point across the plan period[138]. As a result, the Council aims to help the sub-region achieve a water neutral position.

13.37 In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed. This new approach includes the impact of climate change, pressure on the environment and how to meet the challenges they create. The updated water stress method takes a long-term view of the availability and the demand for public water supply, rather than a snapshot of shorter or peak periods. It accounts for future population growth, climate change, environmental needs and increased resilience. The results of this revision in classification, categorises the Severn Trent region as 'seriously water stressed'. This reference to the area being water stressed is also included in the "The Environment Agency publication - Water Stressed Areas final classification 2021[139].

13.38 The Humber RBMP[140] covers the Severn Trent region. Section 3.2 identifies measures to prevent deterioration and protect the water environment and the benefits it provides. The section titled 'Changes to natural flow and levels of water' identifies a role that regulators, operators, influencers and project undertakers have, to make sure water is used efficiently.

Passive solar design and energy use

13.39 Passive solar design is a technique that exploits local climate and site conditions in order to minimise the need to use energy. It uses free renewable sources of energy such as sun and wind to provide heating, cooling, ventilation and natural lighting, reducing the need to use conventional space heating and cooling. Because passive solar design lessens the need to use traditional heating systems, annual energy bills can be cut by a third and carbon emissions reduced, with cost savings paid back in two years.

13.40 Including passive solar concepts into the design is not difficult to apply; it simply requires consideration at the preliminary stages of design. When used correctly, passive solar buildings are comfortable, economically efficient, durable, aesthetically appealing and environmentally responsible.

13.41 With the introduction of the Environment Act, emerging legislation, carbon neutrality by 2050 and climate change predictions, it is considered that the higher Building Regulations for energy efficiency, Future Homes and Building Standards should be included in the Borough Plan Review policy, from its adoption, rather than waiting for the new Building Regulations to come into

[138] JBA (2024). *Coventry and Warwickshire Sub-regional Water Cycle Study (WCS) – Stage 1 Final Report.*

[139] *(https://www.gov.uk/guidance/housing-optional-technical-standards) and the Environment Agency publication - Water Stressed Areas final classification 2021 'https://www.gov.uk/government/publications/water-stressed-areas-2021-classification.*

[140] Department for Environment, Food and Rural Affairs (2015). *Part 1: Humber River basin district – RBMP.*

force. This is to promote a fabric first approach and passive design principles and therefore, will invoke the spirit of the Environment Act 2021 as early as possible.

13.42 Integrating passive solar design, passive house concepts and energy efficiency into new developments will have significant economic benefits for people buying or renting new properties in the Borough. This will also result in better social conditions and improve the environment and carbon emissions.

Crime and fear of crime

13.43 A survey of Nuneaton and Bedworth residents in 2020[140] found that 92% of respondents had not been either a victim or witness of a crime in the last 12 months of the survey. However, a high proportion of respondents were worried about having their home broken into and something stolen (75%) or having their car stolen (69%). 92% of respondents felt that anti-social behaviour was a problem in their area. Therefore, crime and fear of crime still remain a significant factor in undermining residents' quality of life. Nuneaton and Bedworth also has the highest level of offences per thousand households across Warwickshire[141].

13.44 Despite some improvements in peoples' perception of crime and burglary rates, there still remains a significant threat to property and the safety and welfare of residents and visitors. Consequently, new development proposals must consider the robustness of buildings, so that they can withstand unwanted intrusions, as well as consider the safety of residents and visitors in terms of accessibility and visibility within the surrounding area.

BREEAM

13.45 BREEAM is a credit-based assessment system that aims to reduce the environmental impacts throughout construction and operation of a building. BREEAM considers all areas of sustainability, such as ecology, energy use, water consumption, waste management, lighting and location, resulting in a best practice approach to developing sustainable buildings which are adaptable to climate change.

13.46 As well as these environmental benefits, meeting at least a very good BREEAM standard can reduce energy and running costs, demonstrate environmental credentials to potential customers and create an improved image for the company.

13.47 As an alternative to BREEAM, development can use the alternative scheme LEED certification.

[140] Business Intelligence (2020). *Your Say on Community Safety Survey Results Nuneaton and Bedworth Borough Residents.*
[141] Warwickshire Observatory (2014). *Warwickshire Domestic Burglary Analysis*.

Sustainable construction

13.48 To ensure that the construction of new buildings does not have a negative impact on the environment, proposals are required to consider minimising waste and emissions that are generated as a result of construction.

13.49 Developers should use the waste hierarchy when dealing with waste resulting from construction, in the order of re-use, recycle or recover and disposal should be a last resort measure when the other options are not suitable. Wherever possible, on-site management of waste should be pursued.

Heritage Assets

13.50 Heritage assets can be a valuable aid to achieving sustainable development, in both climate change mitigation and adaption. For example, retaining, repairing, refurbishing, retrofitting and reusing heritage assets, and especially historic buildings, can contribute to reducing carbon emissions. The historic environment is also important in respect of the embodied carbon value of buildings. In particular, the contribution that the retention and reuse of old buildings makes, together with the sustainability of traditional building materials and design.

Building for a Healthy Life

13.51 The Building for a Healthy Life document uses the 'red, amber, green' scoring system. Applicants should aim to achieve a green score against all 12 questions. However, there may be circumstances where local context means it is not possible to achieve the maximum number of scores, for example. In these cases, developers should endeavour to achieve the highest possible outcome.

Borough Plan objectives

13.52 This policy delivers the following Borough Plan objectives:

- Strategic objective 6.
- Strategic objective 7.
- Strategic objective 8.

Evidence base

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

- JBA (2024) *Coventry and Warwickshire Sub-regional Water Cycle Study (WCS) – Stage 1 Final Report.*
- Sustainability West Midlands (2021). *Climate Change Risk Assessment and Adaptation Plan 2021-2026.*
- Department for Levelling Up, Housing and Communities (2021). *National Model Design Code.*
- Department for Levelling Up, Housing and Communities (2021). *National Design Guide.*

Delivery mechanisms

13.54 The delivery mechanisms for this policy are as follows:

- Consider preparing a Design Code SPD as per National design coding and guidance.
- Reference to the Council's Sustainable Design and Construction SPD (2020) in order to provide greater detail for developers and decision makers.

Monitoring

13.55 The indicator and target that will be monitored for this policy is outlined in Table 40.

Monitoring ref	Indicator	Target
BE3a	Developers should submit a completed Sustainable Design and Construction Checklist for all new developments to demonstrate what will be delivered and secured as part of the development proposal.	100% of all new developments.

Table 40: Indicator and target to be monitored for Policy BE3

Policy BE4 – Valuing and conserving our historic environment

Development proposals should sustain and, where possible, enhance the Borough's heritage assets including listed buildings, conservation areas (Appendix D), scheduled monuments (Appendix I), registered parks and gardens, archaeology, historic landscapes and settings of townscapes including canals.

Development affecting a designated or non-designated heritage asset and its setting will be expected to make a positive contribution to its character, appearance and significance.

To conserve and enhance the Borough's heritage assets, development proposals must:

1. Understand the asset and its setting

Applications affecting the significance of a heritage asset will be required to provide sufficient information and assessment (such as desk-based appraisals, field evaluations and historic building reports) of the impacts of the proposal on the

significance of heritage assets and their setting, in order to demonstrate how that proposal would contribute to the asset's conservation. This assessment must determine the significance of the archaeological remains and assess the implications of the development on those remains. The level of detail should be proportionate to the importance of the asset and should comply with any relevant supporting local plan documents.

Applicants should take account of the heritage asset's communal, aesthetic, evidential and historical values.

2. Conserve the asset and its setting

Great weight will be given to the conservation of the Borough's heritage assets and their settings, with greater weight being given to assets of higher importance. Any harm to the significance of a designated or non-designated heritage asset must be justified.

Proposals causing harm to designated heritage assets will be weighed against the public benefits of the proposal in the following ways:

- Whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses or mitigate the extent of the harm to the significance of the asset.
- Whether the works proposed are the minimum required to secure the long-term use of the asset.

Development that would adversely affect non-designated heritage assets will only be acceptable where:

- The degree of harm has been minimised and the remaining harm is clearly and convincingly justified.
- The benefits of the development are demonstrated to outweigh the remaining harm.
- Satisfactory provision is made for evaluation, excavation, recording and interpretation of the remains before and during the commencement of the development.

Scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in-situ. Development proposals that would result in the removal or destruction of scheduled monuments or remains of archaeological interest that are considered to be of equivalent significance to a scheduled monument will not normally be permitted, as substantial harm or loss should be wholly exceptional.

Development that would adversely affect non-designated archaeological sites will only be acceptable where:

- the benefits of development outweigh the harm to the remains and the value of retaining them in situ.
- the degree of disturbance/loss has been minimised.
- satisfactory provision is made for the evaluation, excavation, recording and interpretation of the remains before commencement of the development.

Where there are likely to be valuable archaeological remains, archaeological evaluation, which may include a geophysical survey and/or trial trenching, is likely to be required prior to the determination of any planning application.

Where harm to any heritage assets can be fully justified, and development would result in the partial or total loss of the asset and/or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, archaeological excavation where relevant, and ensure the publication of that record to an appropriate standard. The recording should be proportionate to the importance of the asset.

Where applicable, further investigation into archaeological remains may need to be undertaken prior to determination of planning applications and mitigation measures proposed need to be included within the submitted documents. Planning conditions will be utilised to ensure the continued protection of important archaeological features in situ, where development can take place.

13.56 National planning policy on the historic environment provides guidance on the identification, significance and protection of heritage assets. These assets include listed buildings, conservation areas, registered parks and gardens, and archaeological remains. National policy expects that the contribution of such heritage assets to local character and sense of place is recognised and valued.

13.57 The Warwickshire Historic Environment Record, the Borough's Conservation Area Character Appraisals and Management Plans, the local list of non-designated heritage assets and Historic Landscape Characterisation Project are examples of sources of information that will be used to inform the consideration of future development, including potential conservation and enhancement measures.

13.58 The Heritage Assessment has informed the policies within the Borough Plan Review. A Heritage SPD is due to be produced to provide more localised guidance on the different typologies of heritage assets.

13.59 The Borough's heritage consists of approximately 90 listed buildings and approximately 90 non-statutory listed buildings, 5 conservation areas, 2 registered parks and gardens, and 2 scheduled monuments. Two buildings located in the Borough are currently on Historic England's Heritage at Risk Register. The Council is working with Historic England to find solutions on how to save these buildings.

13.60 It is strongly recommended that pre application discussions are sought with Warwickshire County Council Archaeological Information and Advice where an application is likely to result in a loss or partial loss of an asset.

Registered parks and gardens and scheduled monuments

13.61 The majority of registered sites are the grounds of private houses. However, public parks and cemeteries form important categories. This is consistent with the Arbury Hall and Bedworth Cemetery registered sites. Arbury Hall registered park and garden is grade II* listed. It is believed to be the only stately home in Britain to have a private system of canals (built in the 18th century) running through the gardens.

13.62 Bedworth Cemetery registered park and garden is grade II listed. It is a municipal cemetery and was consecrated in 1874. The site is around 3ha and consists of a number of entrances, several groups of specimen trees, a promenade and a war memorial.

13.63 Legal protection for nationally important sites and monuments is achieved through the scheduling of sites under the Ancient Monuments and Archaeological Areas Act 1979. Exhall Hall scheduled monument consists of upstanding earthworks and buried building remains of a variety of features.

13.64 The Benedictine Priory and Precinct of St Mary scheduled monument was built in the 13th century and was one of only four Benedictine nunneries in England identified as belonging to the important Abbey of Fontevrault. The priory closed in 1539 as a result of the Dissolution. The priory is also one of the few surviving nunneries with a church and outer precinct complex preserved in a fully urban context.

13.65 Both the registered parks and gardens and scheduled monuments, as well as their setting, are unique and are of significant historical and cultural importance to the Borough and will be given due protection.

Non-designated heritage assets

13.66 In comparison with neighbouring local authorities, the Borough has only a small amount of designated historic heritage, reflecting the fact that much of the built environment dates from the late Victorian period and the 20th century. This is an important point, as after 1840, selection criteria for listed buildings became progressively more difficult. It is important, therefore, to protect these designated assets and recognise the Borough's wider heritage assets.

13.67 The Council's list of non-designated heritage assets is currently being reviewed. These locally listed heritage assets include buildings, monuments and places that contribute to the distinctive local character of the Borough. The review will undertake a comprehensive review of buildings of local architectural and historical interest. This will involve the local community in the identification and selection of additional assets.

13.68 Locally listed heritage assets are not afforded the same degree of legislative protection (particularly from demolitions and alterations not requiring planning permission) as statutory listed buildings. In line with national guidance, this policy recognises that local heritage deserves a level of protection appropriate to its value.

Archaeology

13.69 Archaeological sites of national and local importance are identified in the Warwickshire Historic Environment Record[140]. Any further archaeological finds will be added to the record through the Development Management

[140] Warwickshire County Council (n.d). *Historic Environment Record (HER).*

process, with the expectation that desk-based assessment and field evaluation will be carried out for development proposals affecting sites of possible archaeological interest.

Conservation areas

13.70 Conservation areas are designated under the provisions of Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 for their "special architectural and historic interest, the character and appearance of which it is desirable to preserve or enhance". The Borough has five conservation areas:

- Abbey Conservation Area.
- Bedworth Town Centre Conservation Area.
- Bulkington Conservation Area.
- Hawkesbury Junction Conservation Area.
- Nuneaton Town Centre Conservation Area.

13.71 Conservation Area Appraisals and Management Plans describe the key characteristics of each of the Borough's conservation areas and will be used to identify and assess local character and promote enhancements. The designation of additional conservation areas along the Coventry Canal and the Ashby Canal, within the Borough, will be progressed.

13.72 This policy will ensure that heritage assets are safeguarded or, where possible, enhanced. It will inspire suitable development to take place which respects both urban and landscape heritage that brings wider benefits to communities. The benefits of implementing the policy will include improvement in the quality of the built and natural historic environment, improvements in architectural design, as well as the creation of stronger local identity and sense of place.

Borough Plan objectives

13.73 This policy delivers the following Borough Plan objective:

- Strategic objective 7.

Evidence base

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

- ECUS (2016). *Nuneaton and Bedworth Borough Council Borough Plan – Heritage Assessment.*
- Nuneaton and Bedworth Borough Council (2022). *Abbey Conservation Area Appraisal and Management Plan.*
- Nuneaton and Bedworth Borough Council (2022). *Bedworth Conservation Area Appraisal and Management Plan.*
- Nuneaton and Bedworth Borough Council (2022). *Bulkington Conservation Area. Area Appraisal and Management Plan*.

- Nuneaton and Bedworth Borough Council (2022). *Hawkesbury Junction Conservation Area Appraisal and Management Plan.*
- Nuneaton and Bedworth Borough Council (2022). *Nuneaton Town Centre Conservation Area. Area Appraisal and Management Plan.*
- Oxford Archaeology (2014). *A Historic Environment Assessment of Potential Development Areas within Nuneaton and Bedworth Borough.*
- Warwickshire County Council (2010). *Warwickshire Historic Landscape Characterisation Project.*
- Warwickshire County Council (2011). *Warwickshire Historic Farmstead Characterisation Project.*
- FPCR (2023). *Nuneaton and Bedworth Landscape Character Assessment.*
- FPCR (2023). *Nuneaton and Bedworth Landscape Sensitivity Study.*

Delivery mechanisms

13.75 The delivery mechanisms for this policy are as follows:

- Emerging SPD on the design, preservation and enhancement of the Borough's heritage assets and their setting.
- Updated Conservation Area Appraisals and Management Plans.
- To complete work on urban character areas, using resources such as Warwickshire County Council's Historic Towns Project.
- To engage local communities in the identification of locally important heritage assets, using models like Warwickshire County Council's Imaging our Past social media Flickr project.

Monitoring

13.76 The indicators and targets that will be monitored for this policy are outlined in Table 41.

Monitoring ref	Indicator	Target
BE4a	No loss of designated historic assets.	No loss.
BE4b	Harm to registered parks and gardens and scheduled monuments.	No harm.

Table 41: Indicators and targets to be monitored for Policy BE4.

Appendix A - Schedule of policies from the Borough Plan superseded by the Borough Plan Review

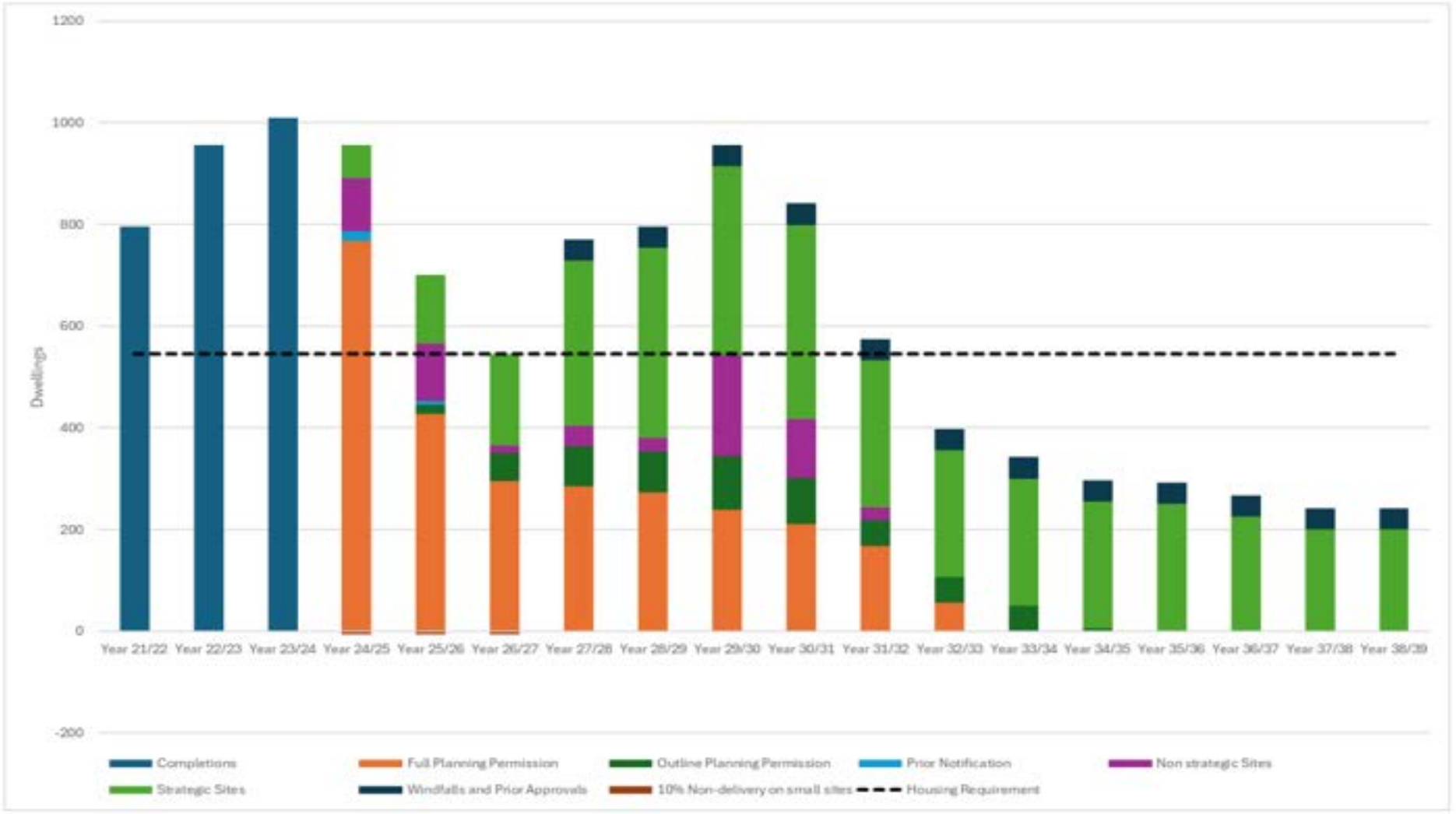
The table below lists all the adopted policies from the Borough Plan (2011-2031) and outlines whether they are proposed to be either updated or deleted by the policies in the Borough Plan Review, upon its adoption.

Borough Plan Policy Reference	Name of Policy	Status
Policy DS1	Presumption in favour of sustainable development	Updated (Strategic)
Policy DS2	Settlement hierarchy and roles	Updated (Strategic)
Policy DS3	Development principles	Deleted
Policy DS4	Overall development needs	Updated (Strategic Policy DS3 – Overall Development Needs)
Policy DS5	Residential allocations	Updated (Strategic Policy DS4 – Residential Allocations)
Policy DS6	Employment allocations	Updated (Strategic Policy DS5 – Employment Allocations)
Policy DS7	Green Belt	Updated (Policy DS6 – Green Belt)
Policy DS8	Monitoring of housing delivery	Updated (Policy DS7 – Monitoring of housing delivery)
Policy DS9	Review	Updated (Policy DS8 – Review)
Policy SA1	Development principles on strategic sites	Updated (Strategic)
Policy HSG1	North of Nuneaton	Updated (Strategic Policy SHA1 – Land at Top Farm, North of Nuneaton)
Policy HSG2	Arbury	Updated (Strategic Policy SHA2 – Arbury)
Policy HSG3	Gipsy Lane	Deleted
Policy HSG4	Woodlands	Deleted
Policy HSG5	Hospital Lane	Updated (Strategic Policy SHA4 – Hospital Lane)
Policy HSG6 and EMP6	School Lane/Longford	Deleted (the remainder of the site has been designated as a non-strategic allocation in Strategic Policy DS4 – Residential Allocations)

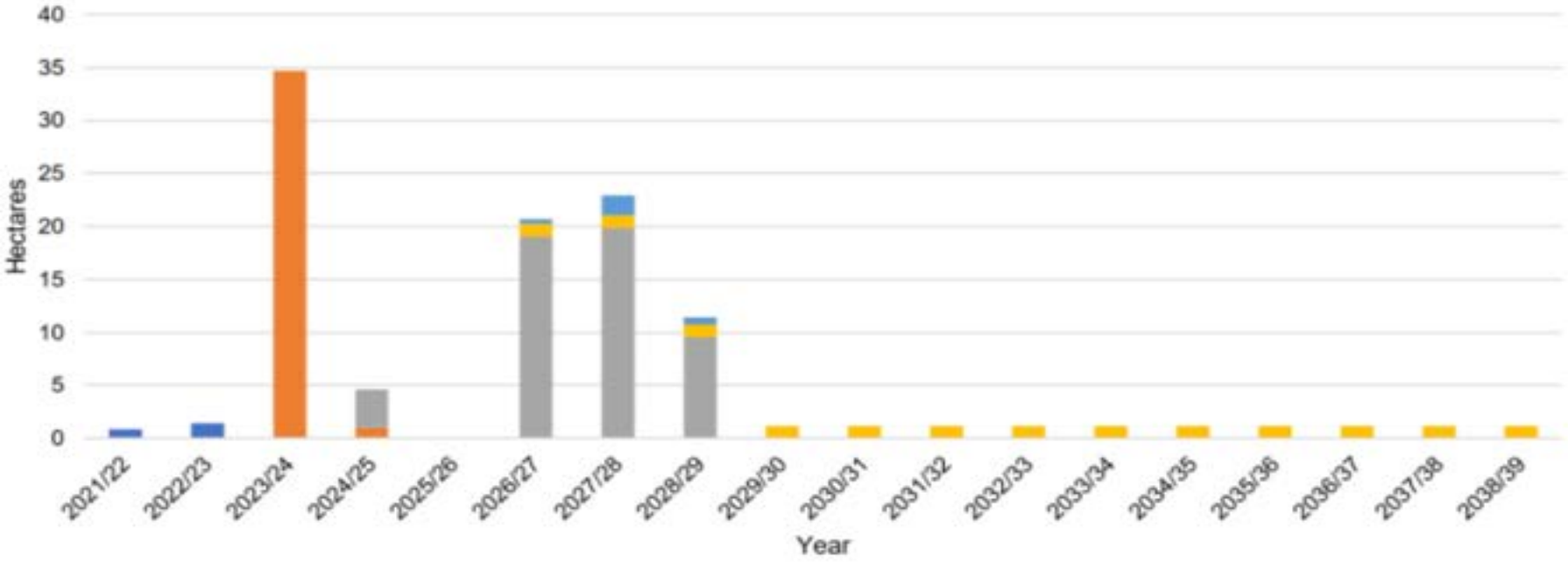
Policy HSG7	East of Bulkington	Updated (Strategic Policy SHA7 – East of Bulkington)
Policy HSG8	West of Bulkington	Updated (Strategic Policy SHA5 – West of Bulkington)
Policy HSG9	Golf Drive	Deleted
Policy HSG10	Attleborough Fields	Deleted
Policy HSG11	Tuttle Hill	Updated (Strategic Policy SHA3 – Land at Tuttle Hill (Judkins Quarry)
Policy HSG12	Former Hawkesbury Golf Course	Updated (Strategic Policy SHA6 - Land at former Hawkesbury Golf Course)
Policy EMP1	Faultlands	Deleted
Policy EMP2	Wilsons Lane	Updated (Strategic Policy SEA2 – Wilsons Lane)
Policy EMP3	Prologis extension	Updated (Strategic Policy SEA3 – Prologis Extension)
Policy EMP4	Coventry Road	Updated (Strategic Policy SEA4 – Coventry Road)
Policy EMP7	Bowling Green Lane	Updated (Strategic Policy SEA6 – Bowling Green Lane)
Policy H1	Range and mix of housing	Updated
Policy H2	Affordable housing	Updated
Policy H3	Gypsies and Travellers	Updated
Policy E1	Nature of employment growth	Updated
Policy E2	Existing employment estates	Updated
Policy TC1	Town centre requirements	Updated
Policy TC2	Nature of town centre growth	Updated
Policy TC3	Hierarchy of centres	Updated
Policy HS1	Ensuring the delivery of infrastructure	Updated
Policy HS2	Strategic accessibility and sustainable transport	Updated
Policy HS3	Telecommunications and broadband connectivity	Updated
Policy HS4	Retaining community facilities	Updated
Policy HS5	Health	Updated
Policy HS6	Sport and exercise	Updated
Policy HS7	Creating a healthier food environment	Updated
Policy NE1	Green infrastructure	Updated
Policy NE2	Open Space	Updated (Open Space and playing fields)
Policy NE3	Biodiversity and geodiversity	Updated (Ecology, Biodiversity, Geodiversity and Local Nature Recovery)

Policy NE4	Maintaining flood risk and water quality	Updated
Policy NE5	Landscape character	Updated
Policy BE1	Contamination and land instability	Updated
Policy BE2	Renewable and low carbon energy	Updated
Policy BE3	Sustainable design and construction	Updated
Policy BE4	Valuing and conserving our historic environment	Updated

Appendix B - Housing Trajectory

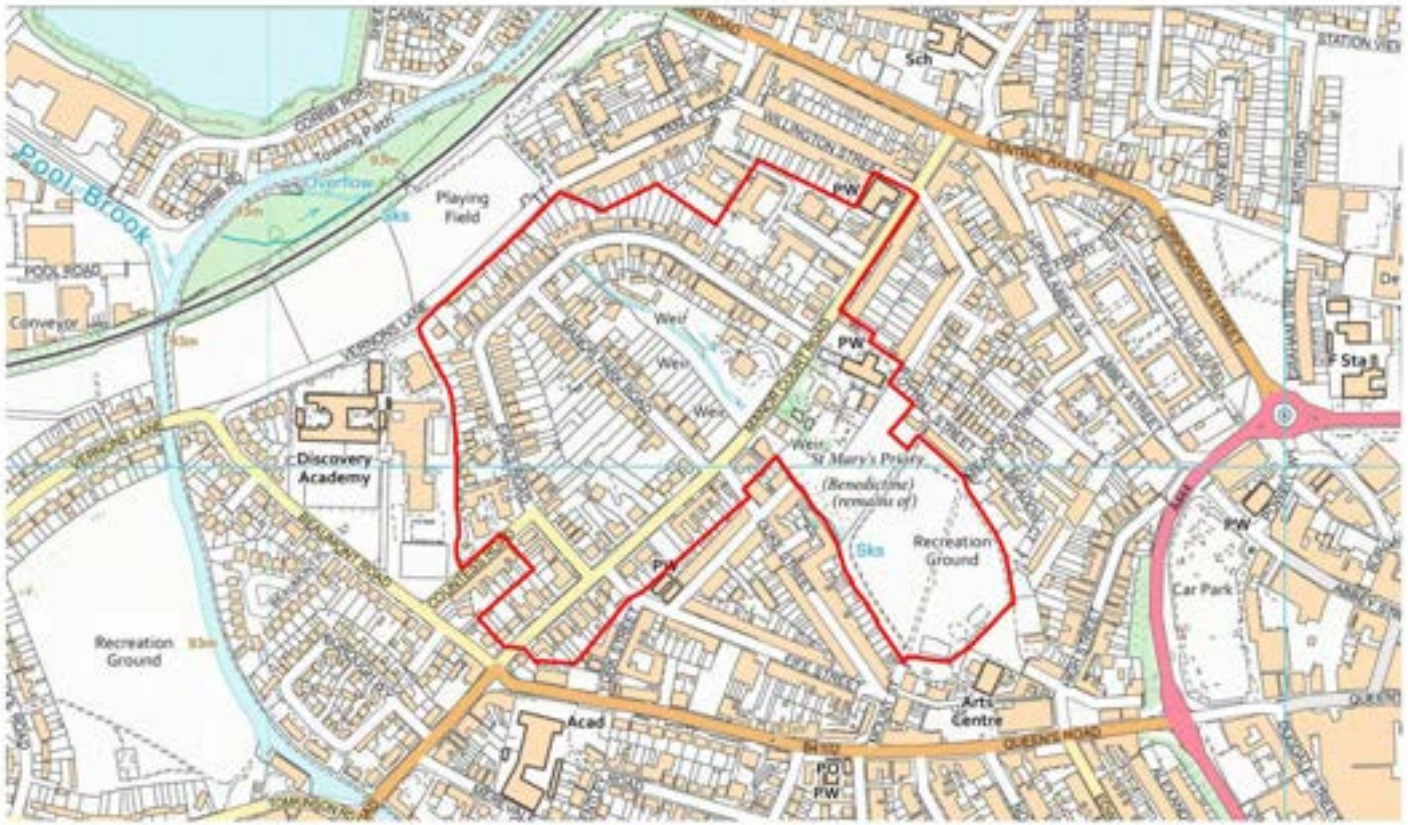


Appendix C - Employment Trajectory

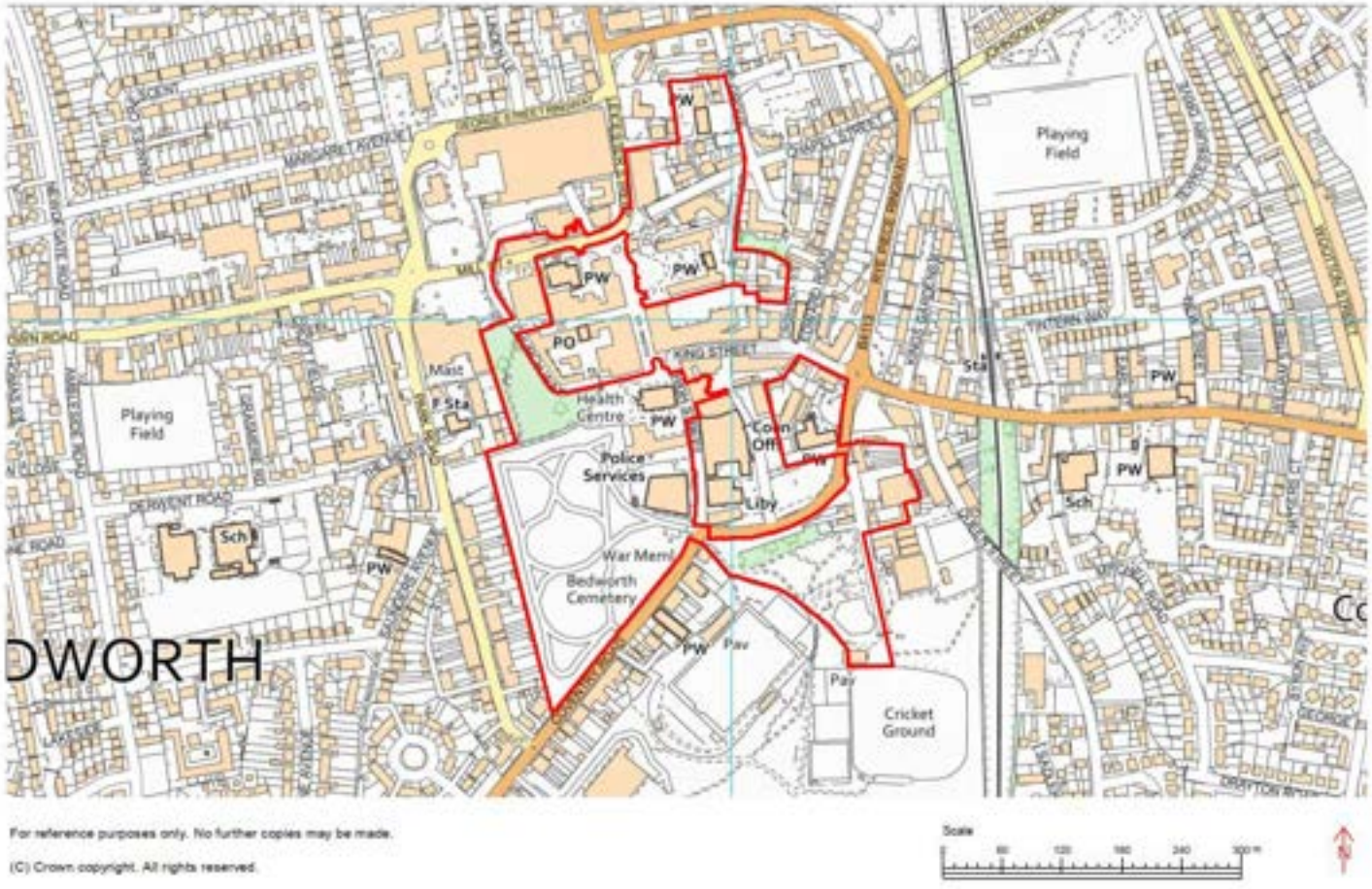


Appendix D – Conservation areas

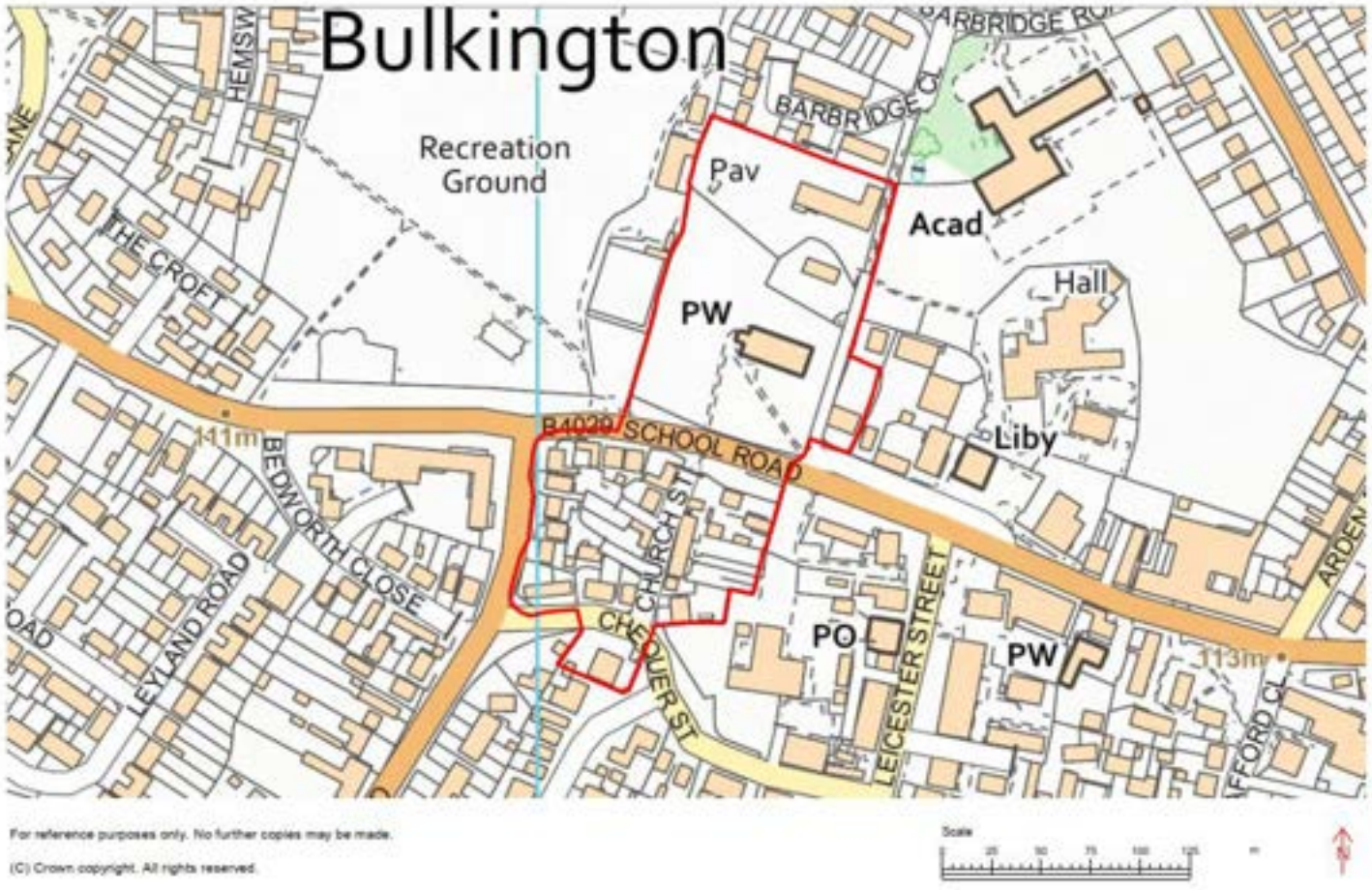
Abbey Conservation Area



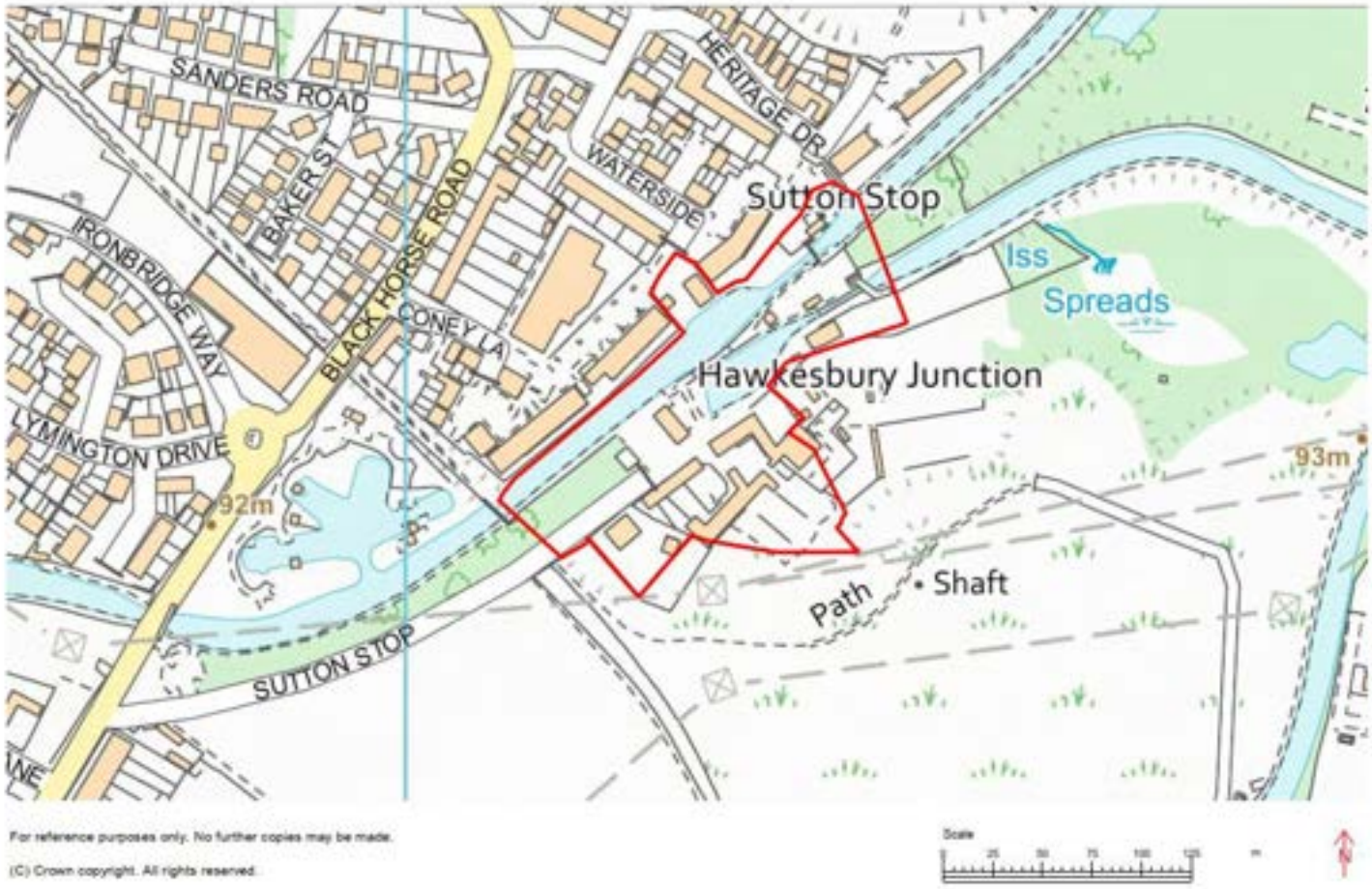
Bedworth Town Centre Conservation Area



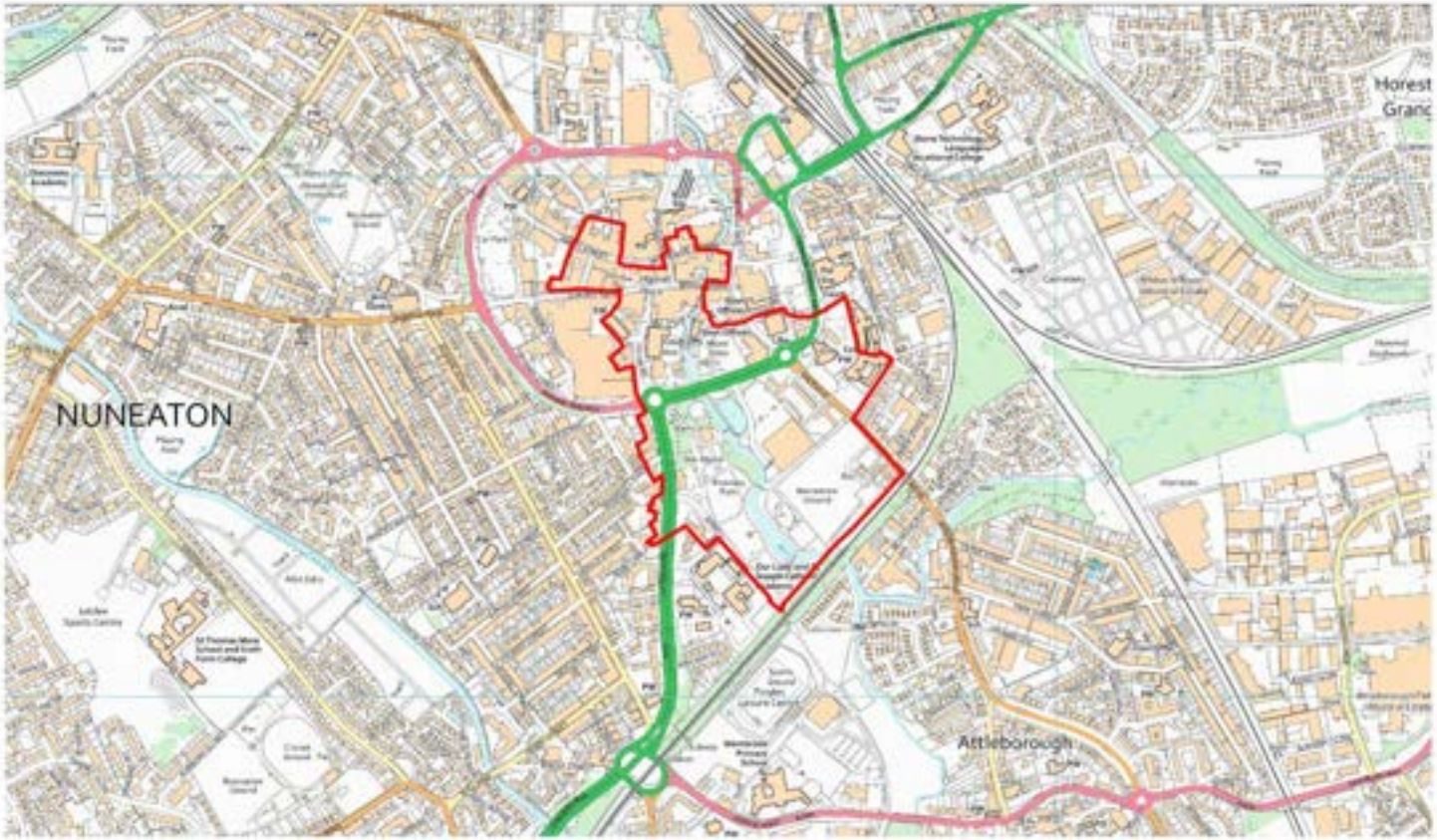
Bulkington Conservation Area



Hawkesbury Junction Conservation Area



Nuneaton Town Centre Conservation Area



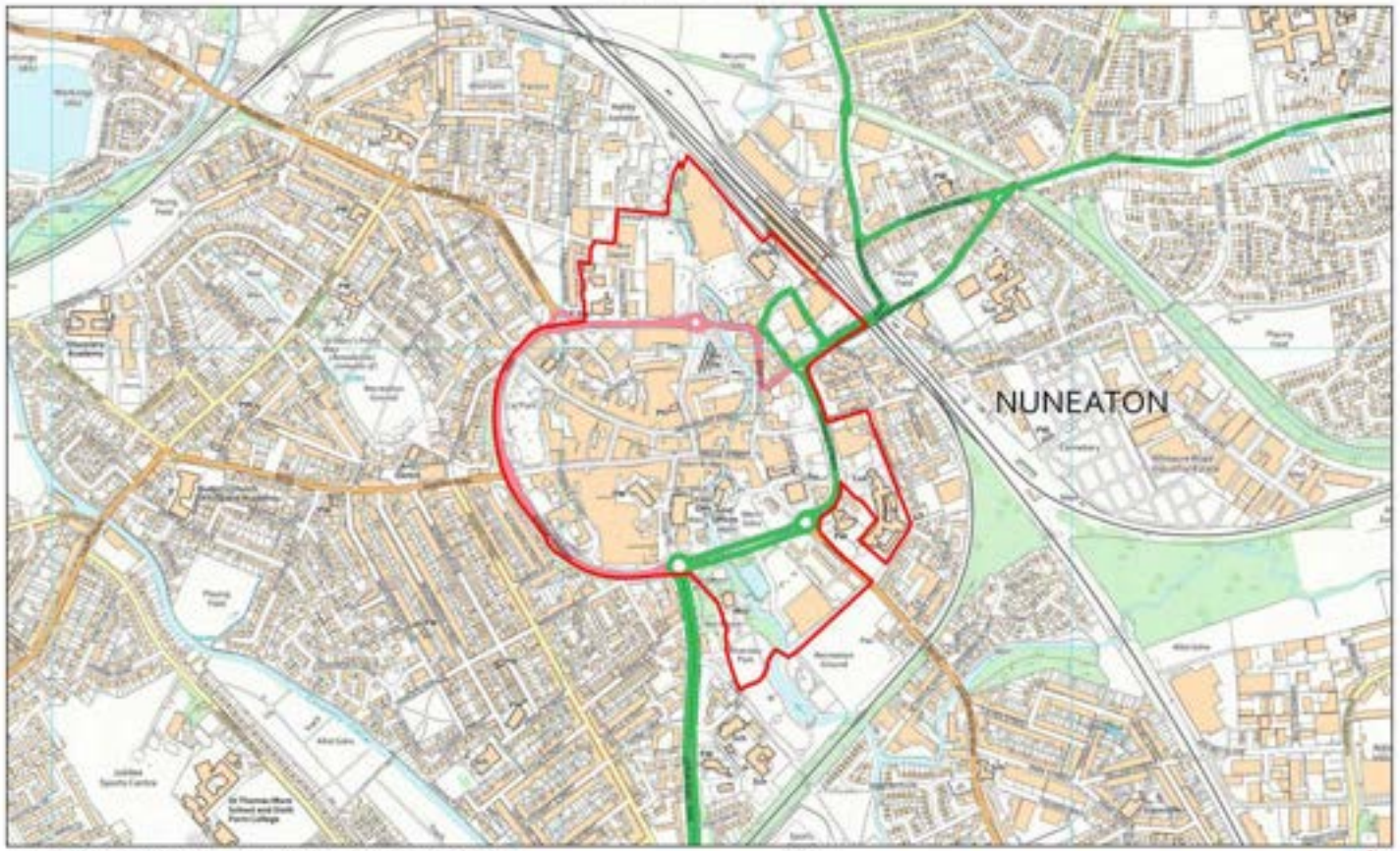
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Scale

Appendix E – Town centres

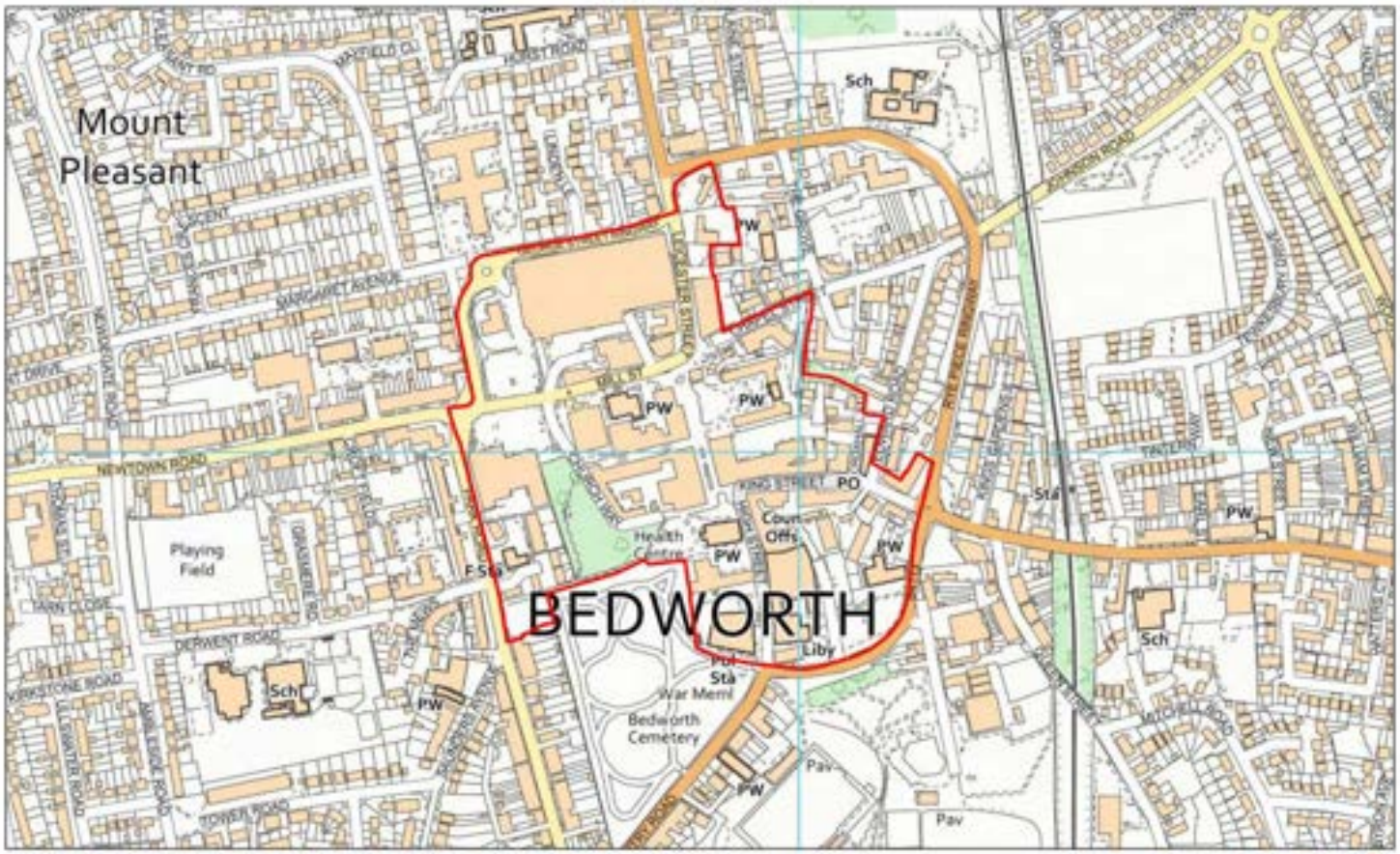
Nuneaton Town Centre



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100018416

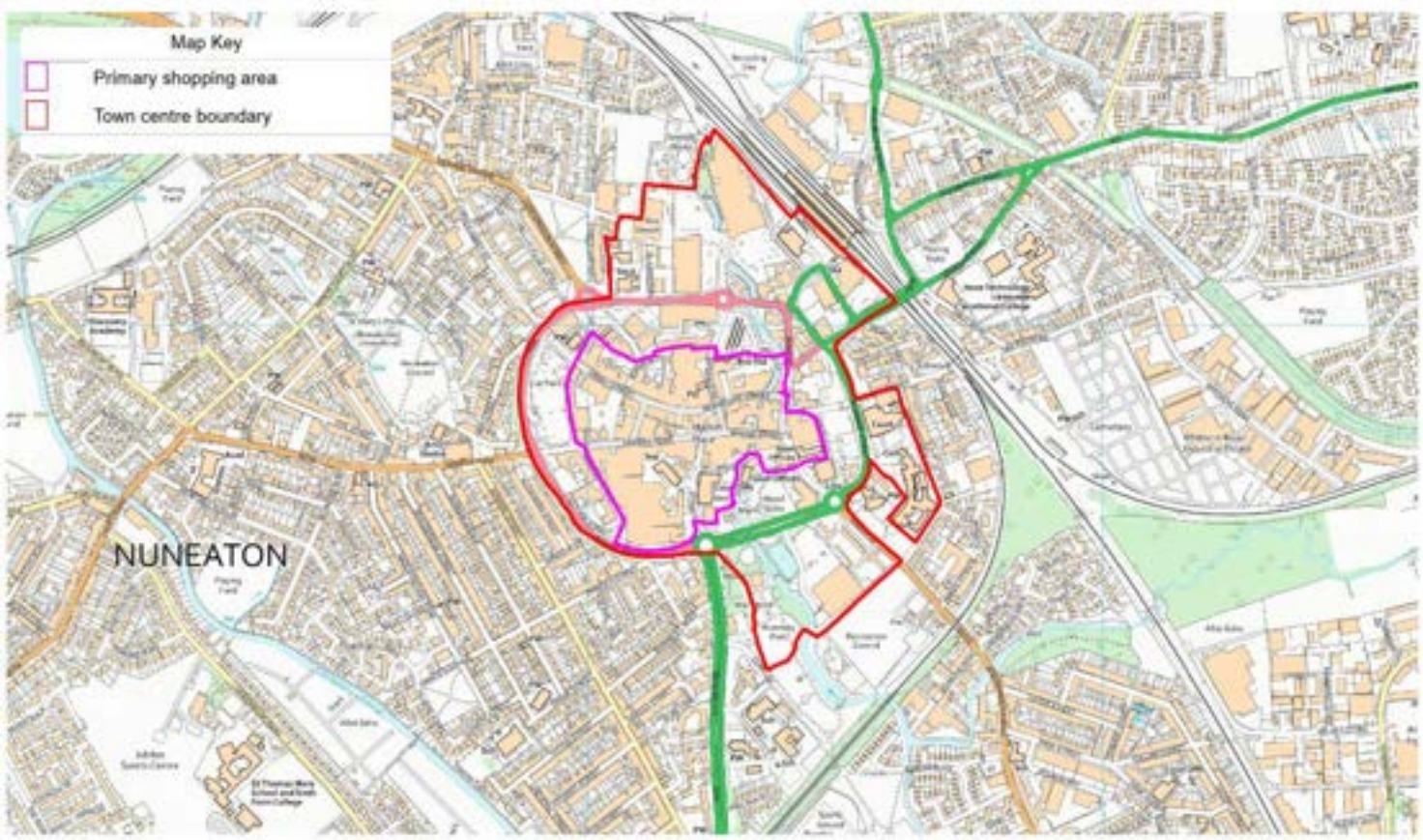
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Bedworth Town Centre

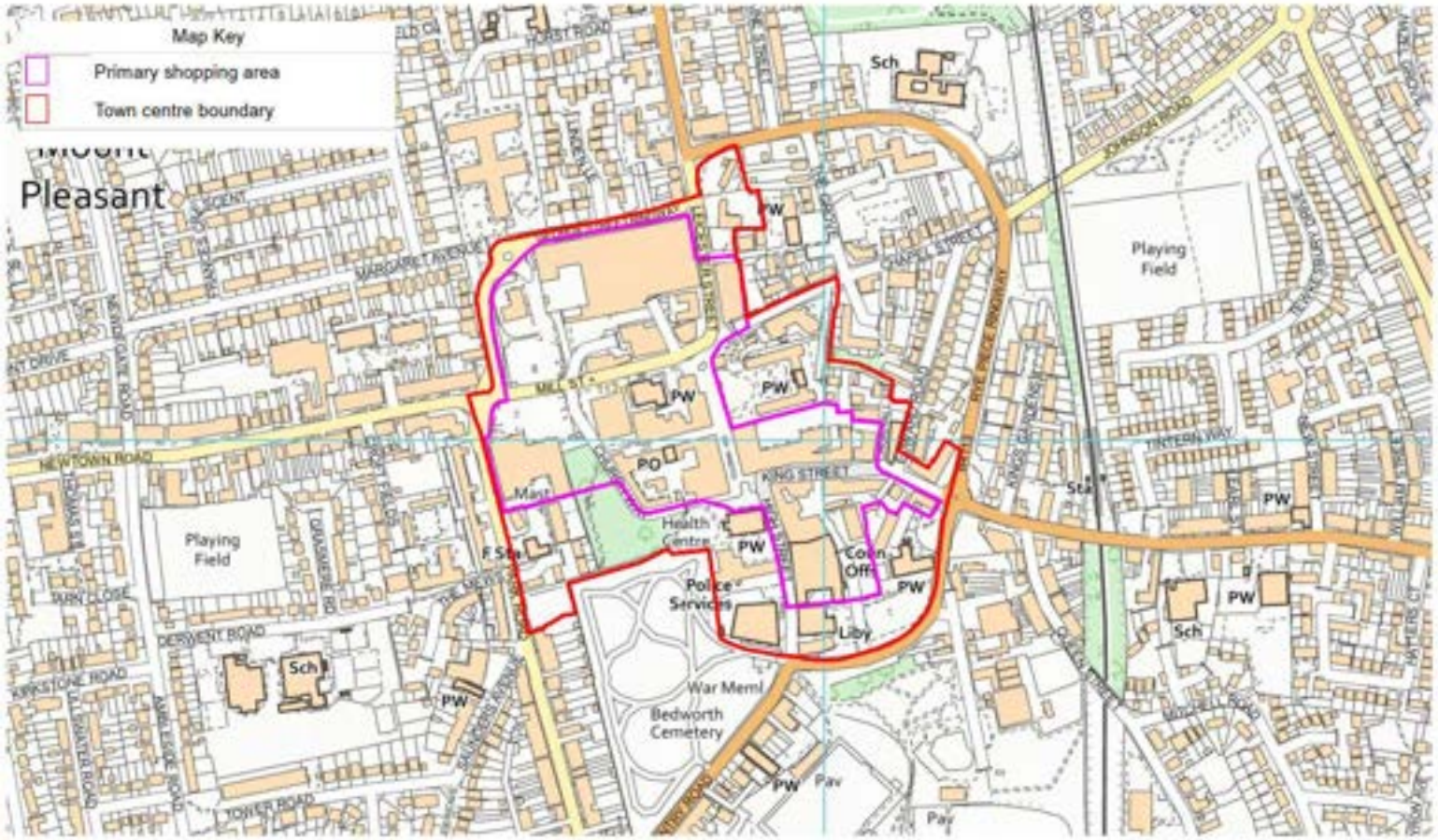


Appendix F – Town centre primary shopping areas

Nuneaton primary shopping area

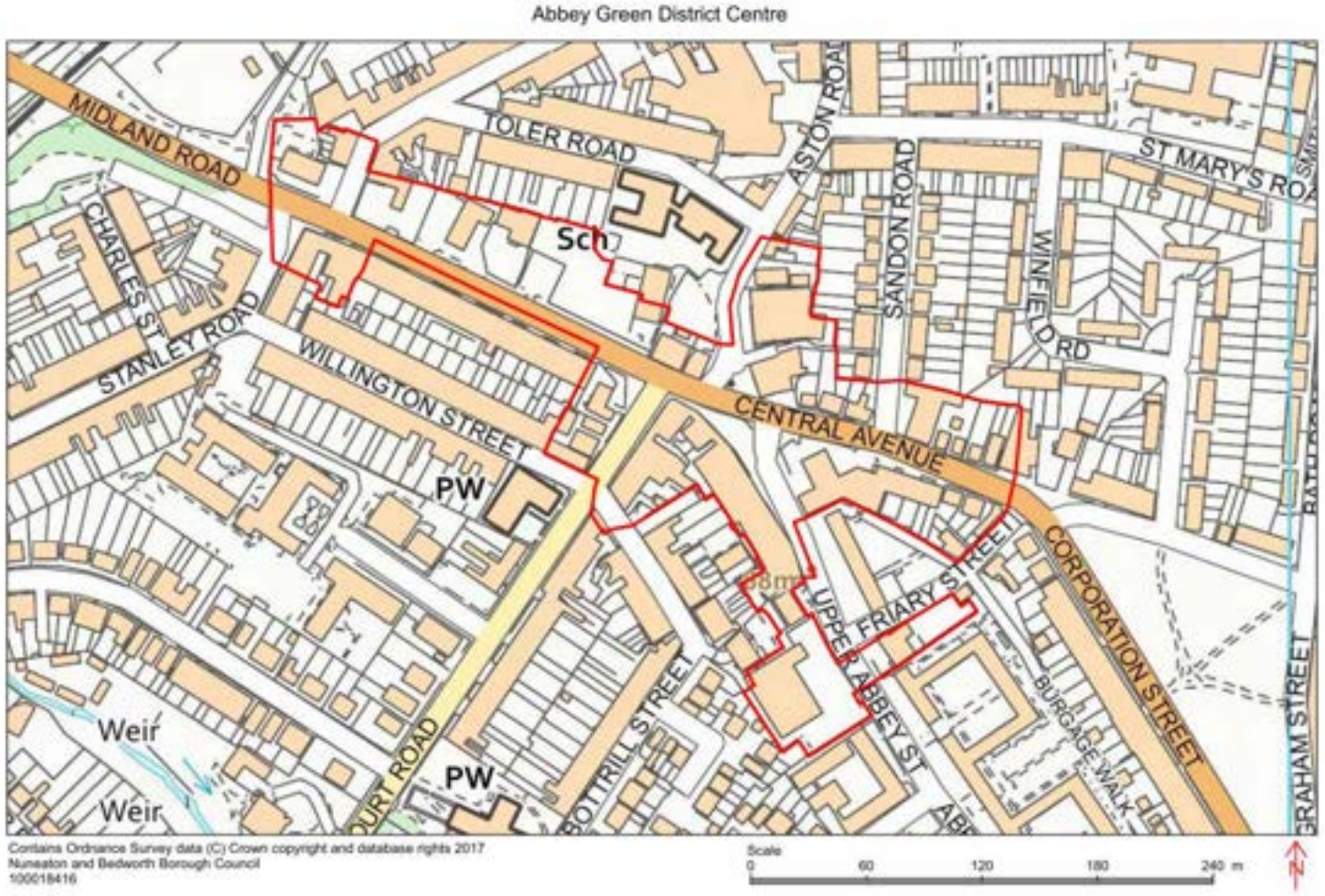


Bedworth primary shopping area



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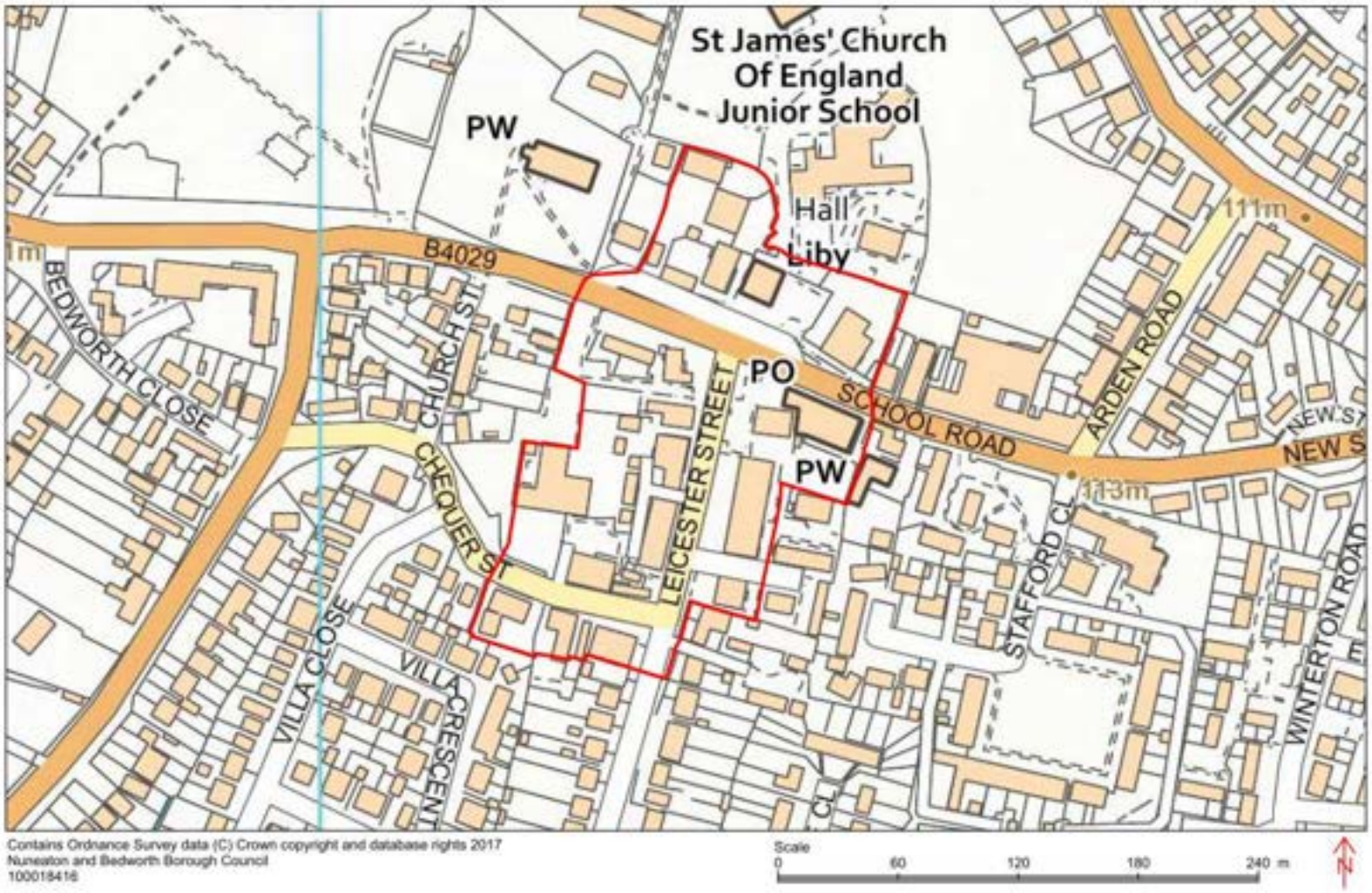
Appendix G – District centres



Attleborough District Centre



Bulkington District Centre



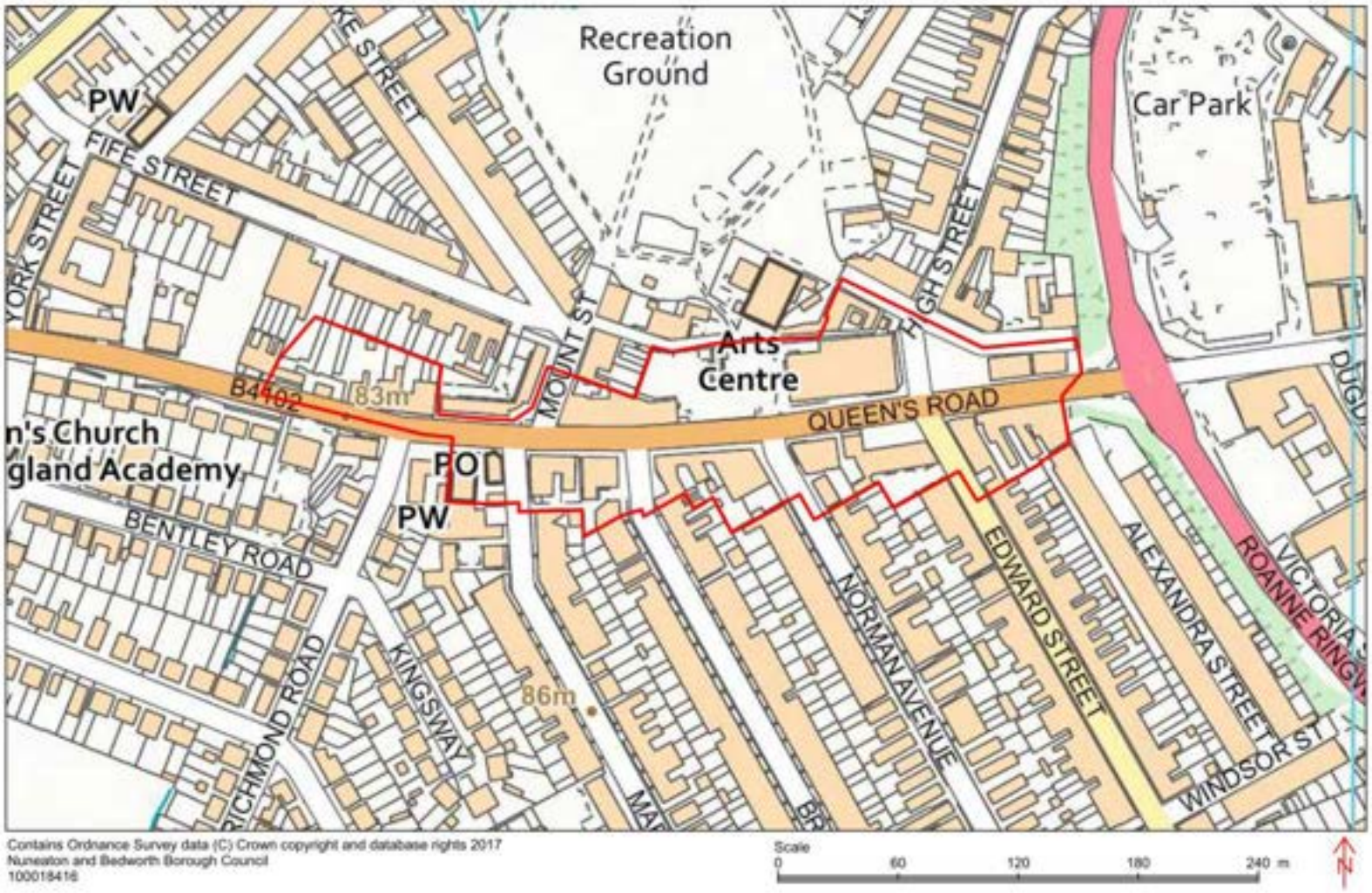
Copper Beech Road District Centre



Horeston Grange District Centre

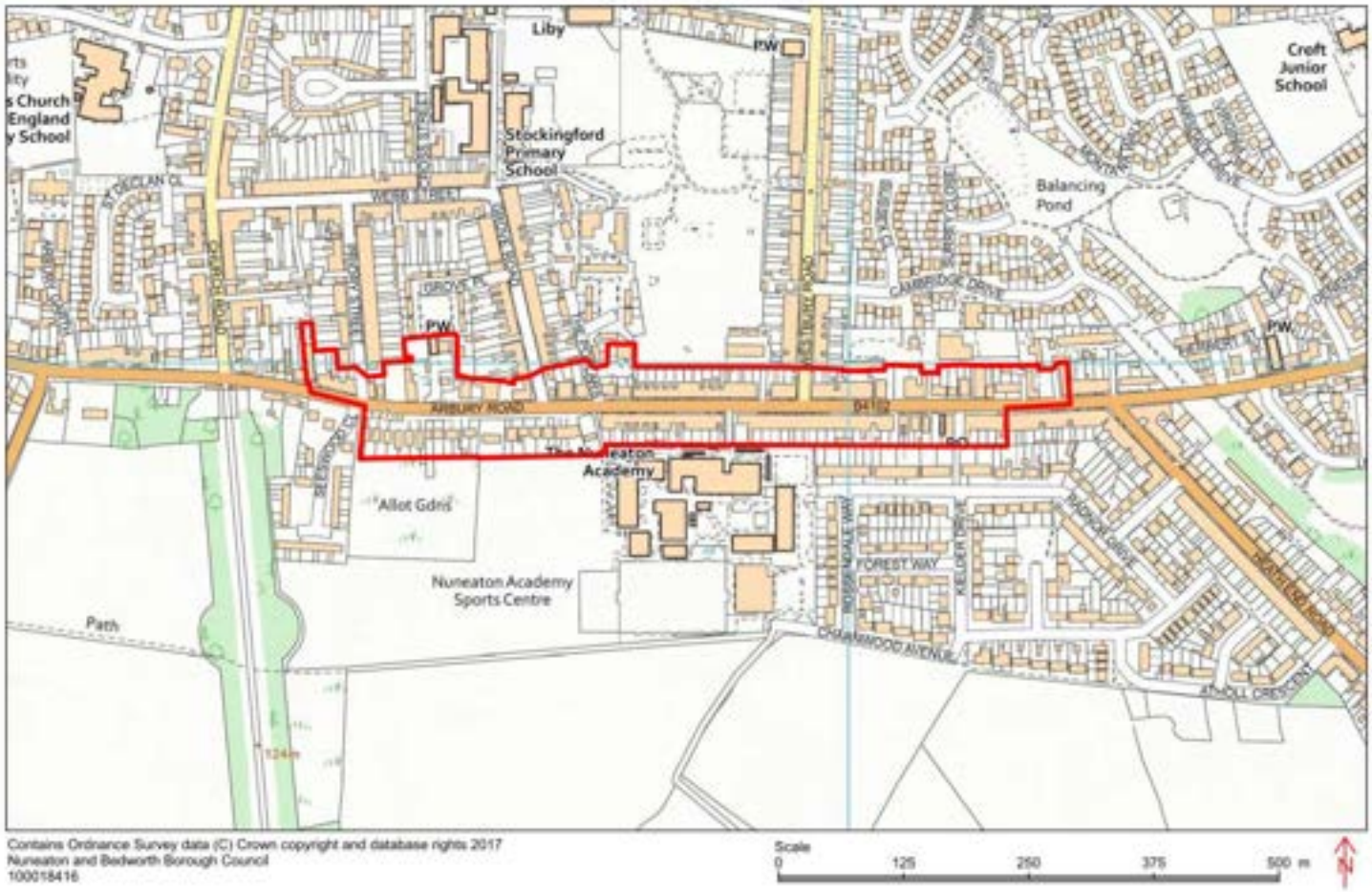


Queens Road District Centre

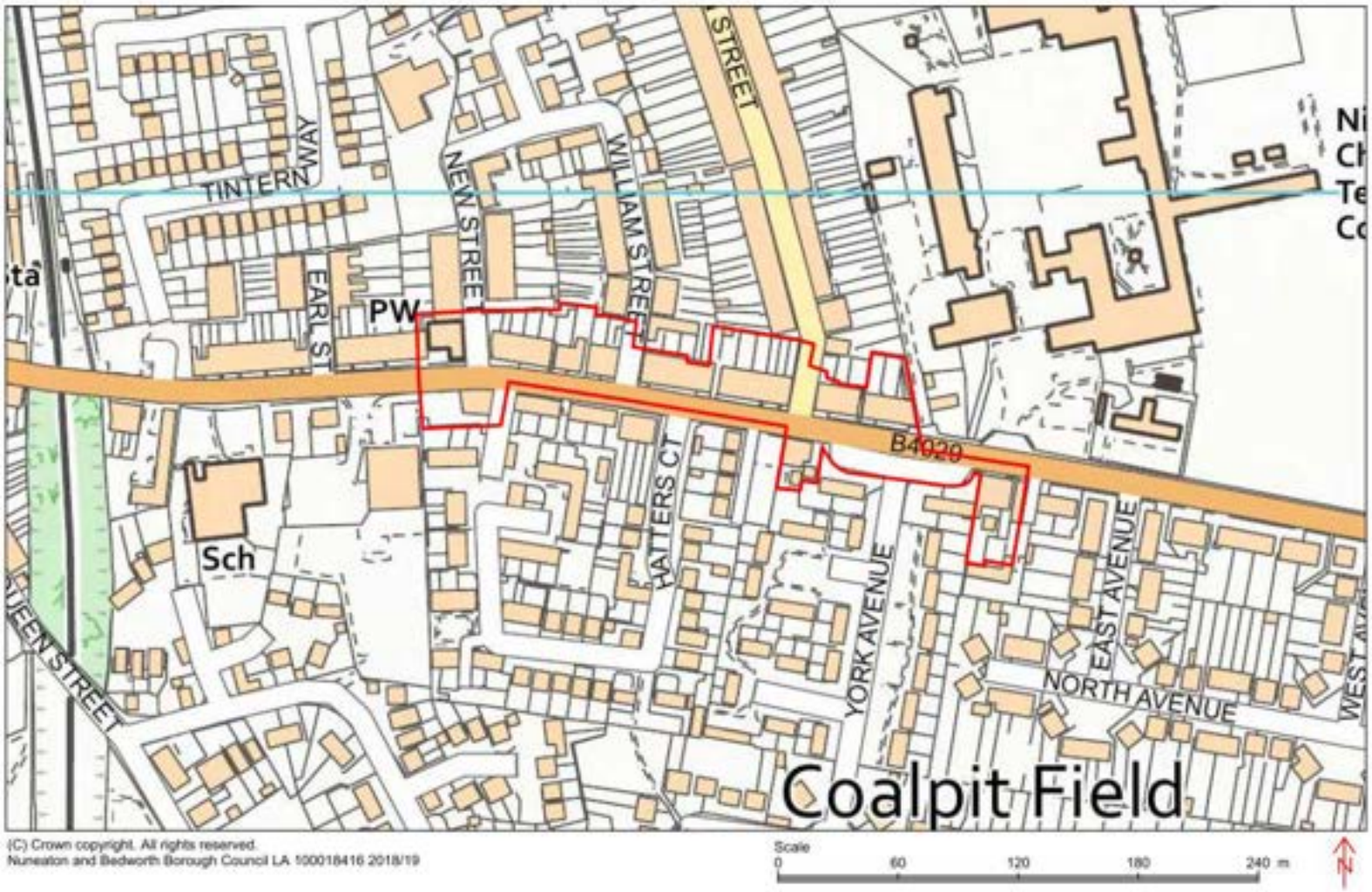


Appendix H – Local centres

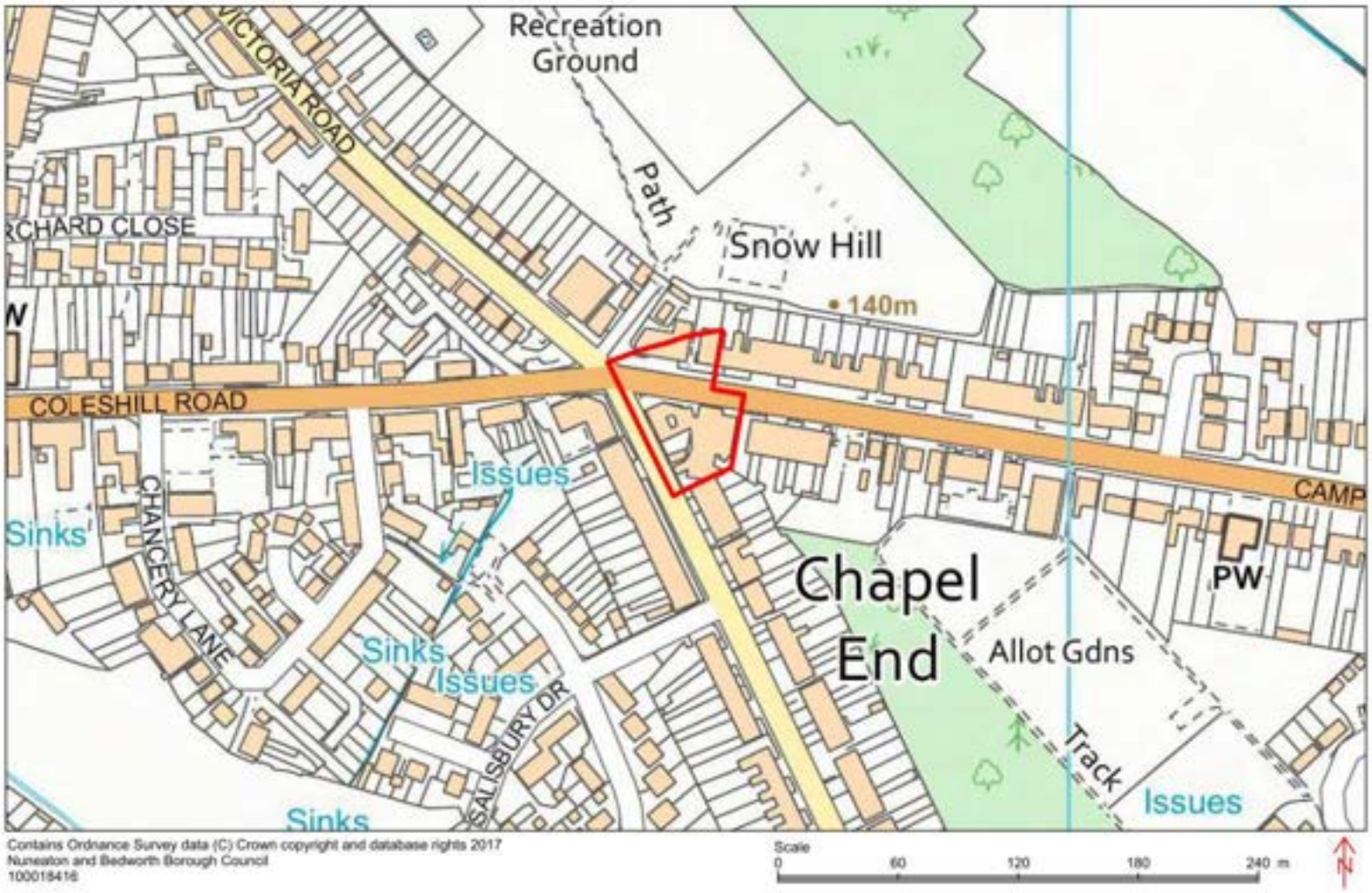
Arbury Road Local Centre



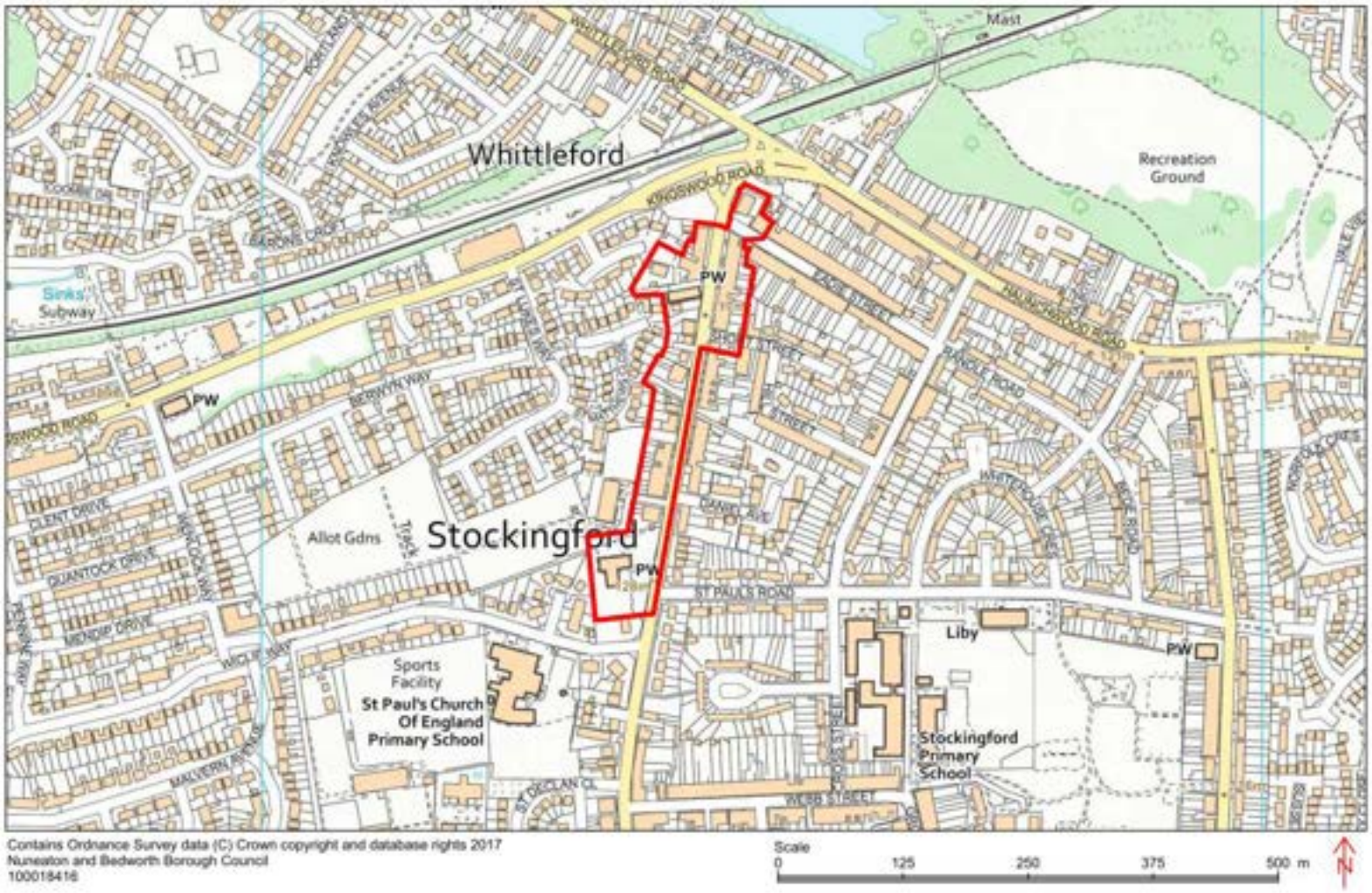
Bulkington Road Local Centre



Chapel End Local Centre

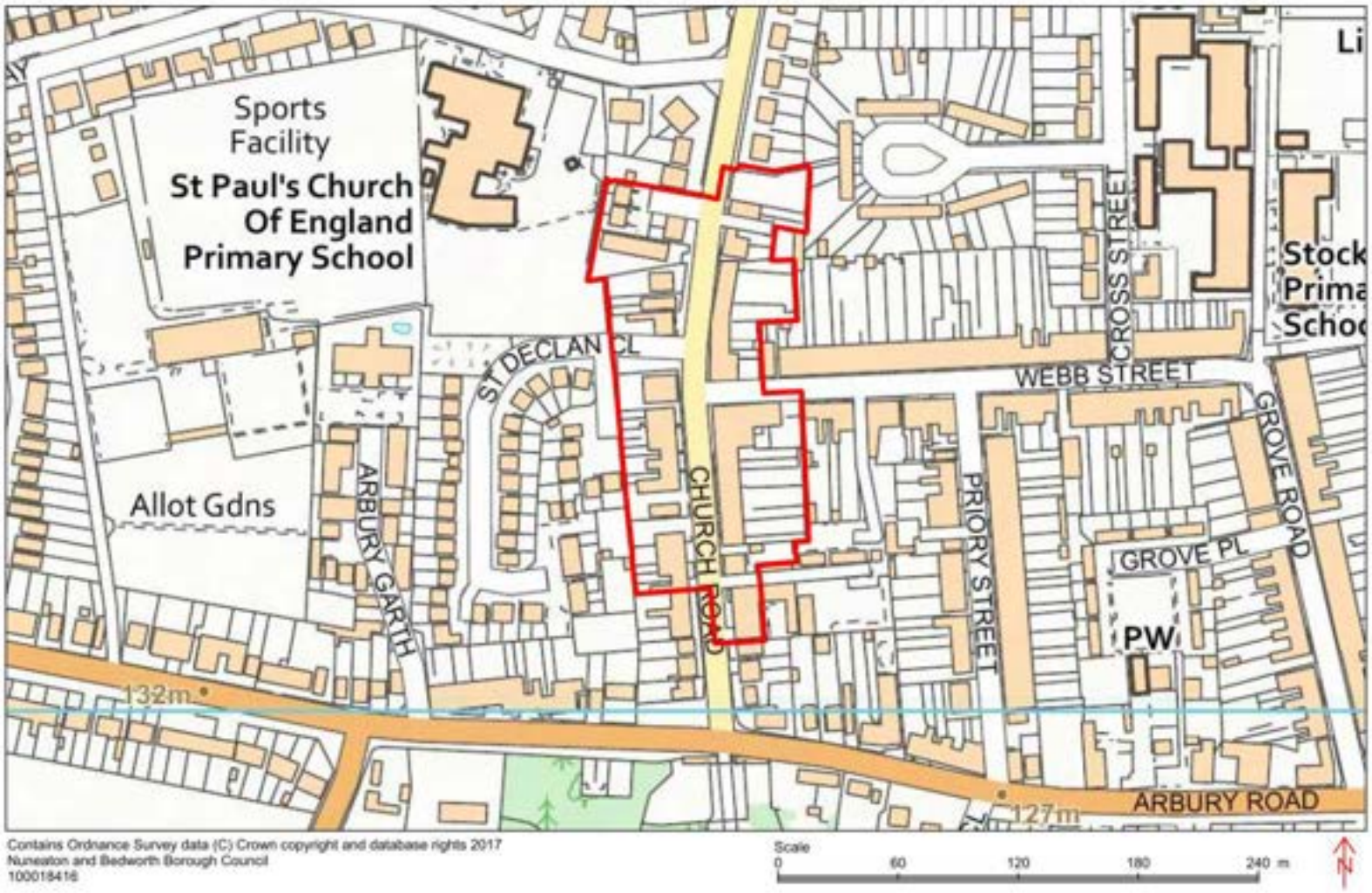


Church Road North Local Centre

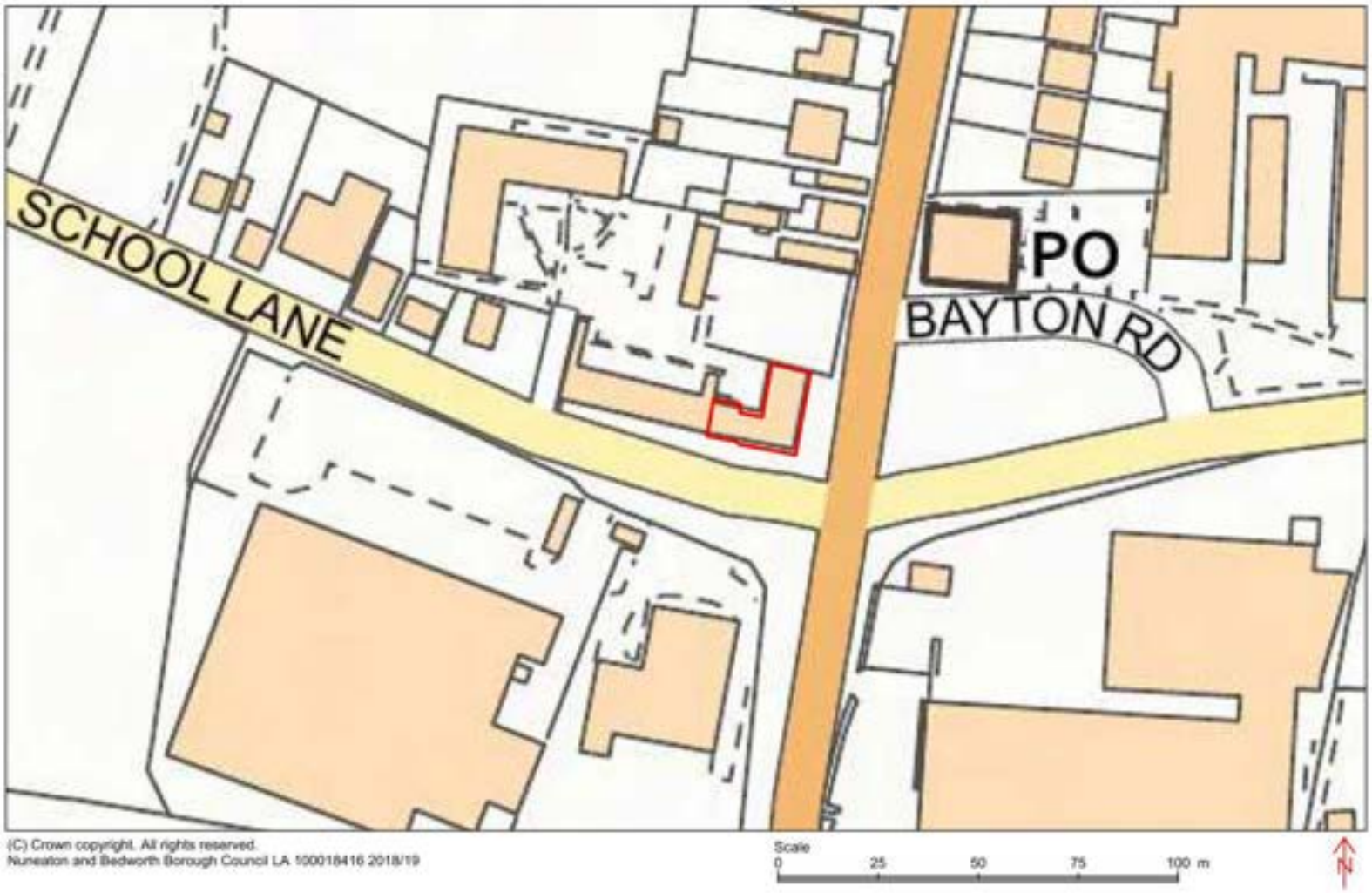


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100018416

Church Road South Local Centre



Coventry Road / School Lane Local Centre



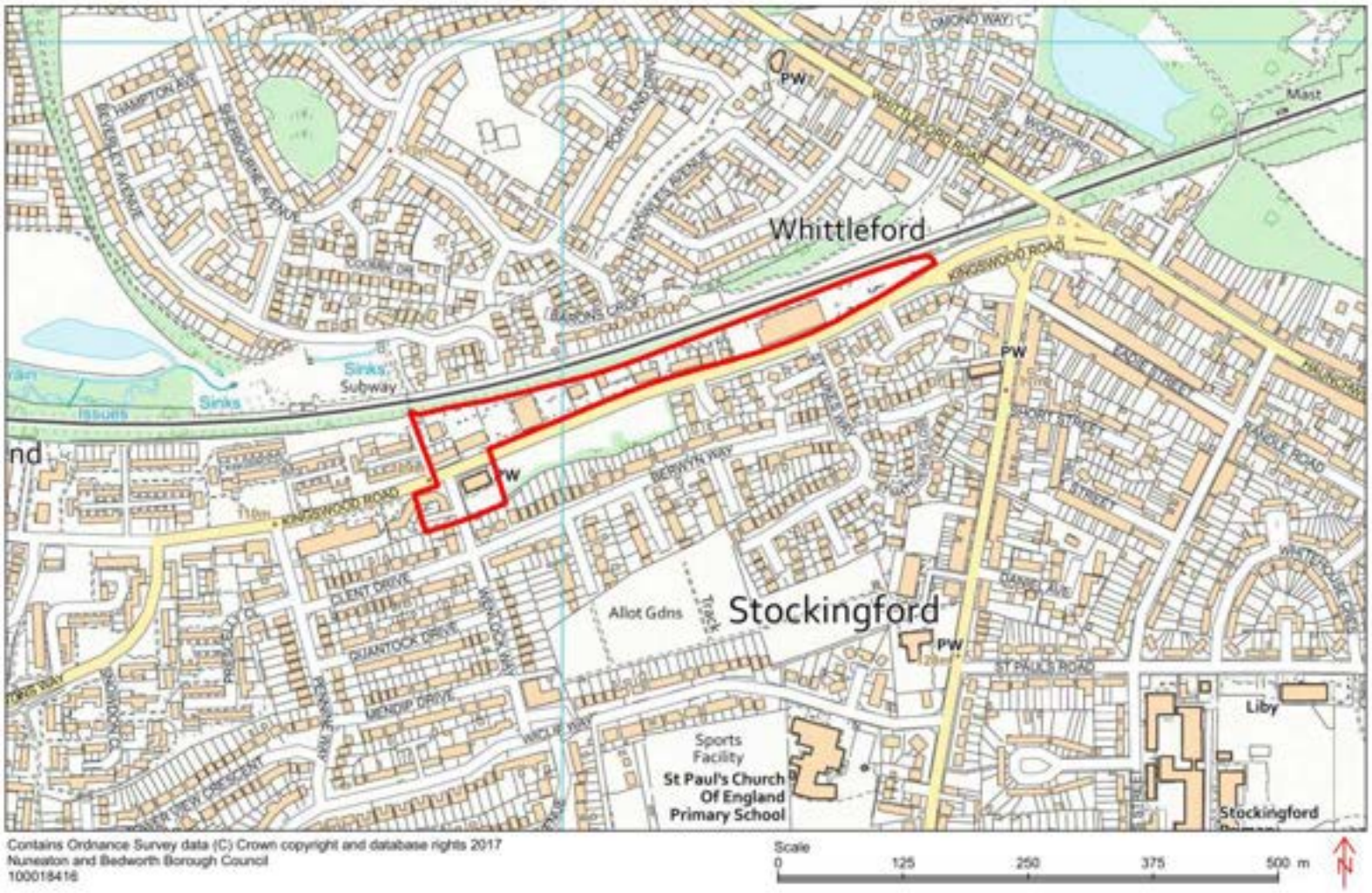
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Nuneaton and Bedworth Borough Council LA 100018416 2018/19

Scale
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Crow Hill Local Centre



Kingswood Road Local Centre



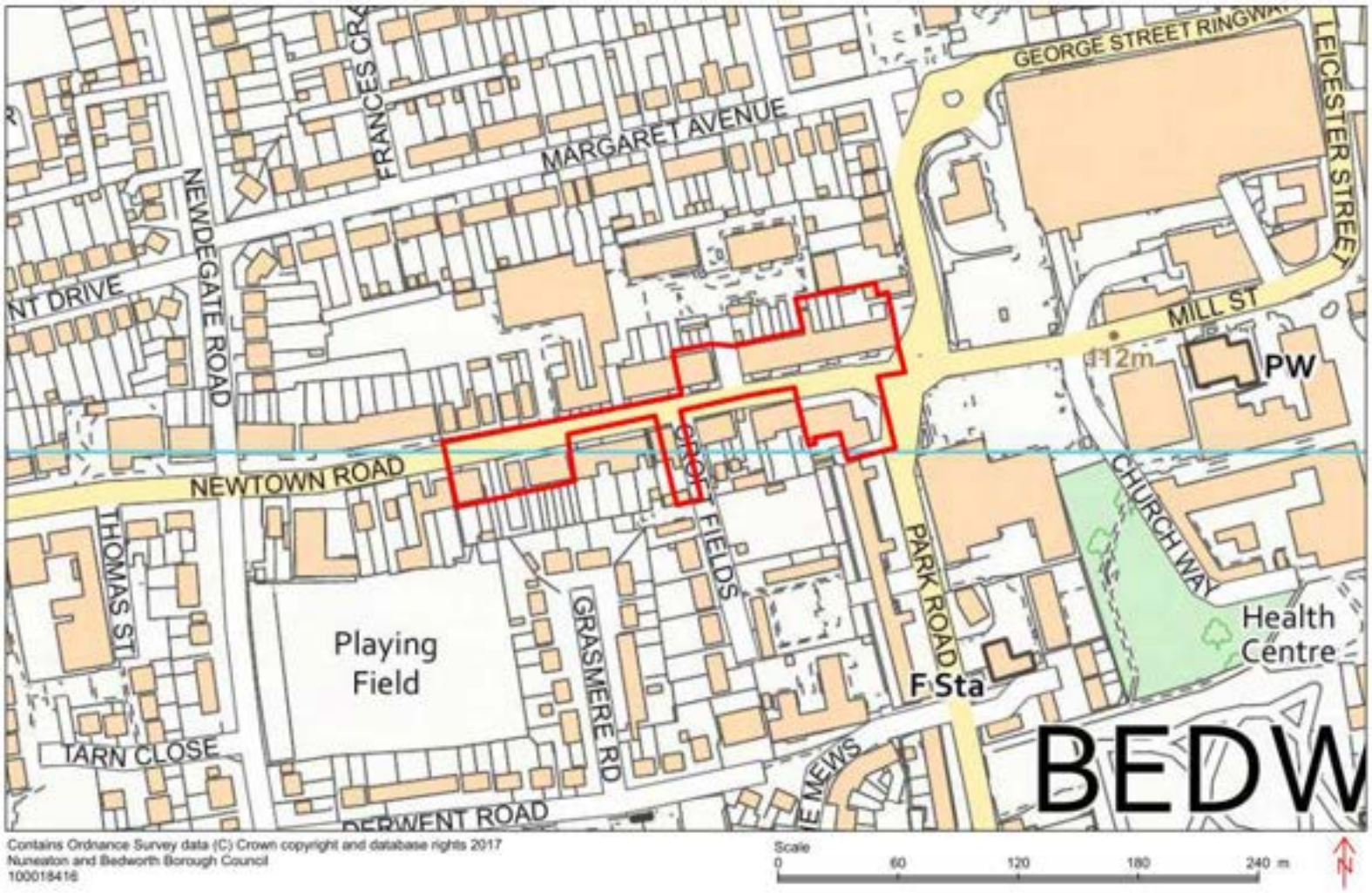
Lutterworth Road Local Centre



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Scale
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Newtown Road Local Centre



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100018416

Scale 0 60 120 180 240 m

Nuneaton Road Local Centre



Pine Tree Road Local Centre



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100018416

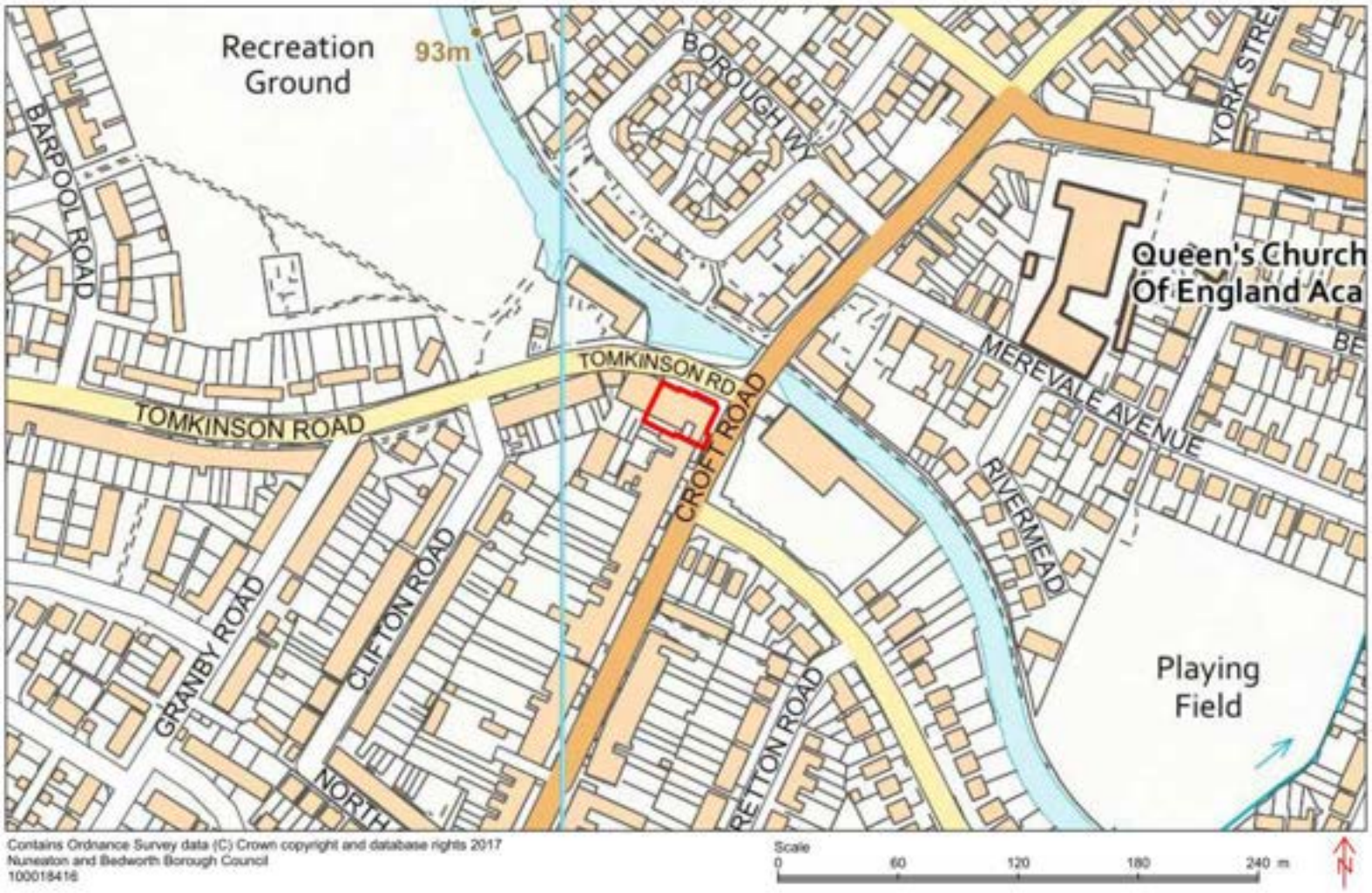
Smorrall Lane Local Centre



St Nicolas Park Drive Local Centre



Tomkinson Road / Croft Road Local Centre



Weddington Road (corner of Brook Lane) Local Centre

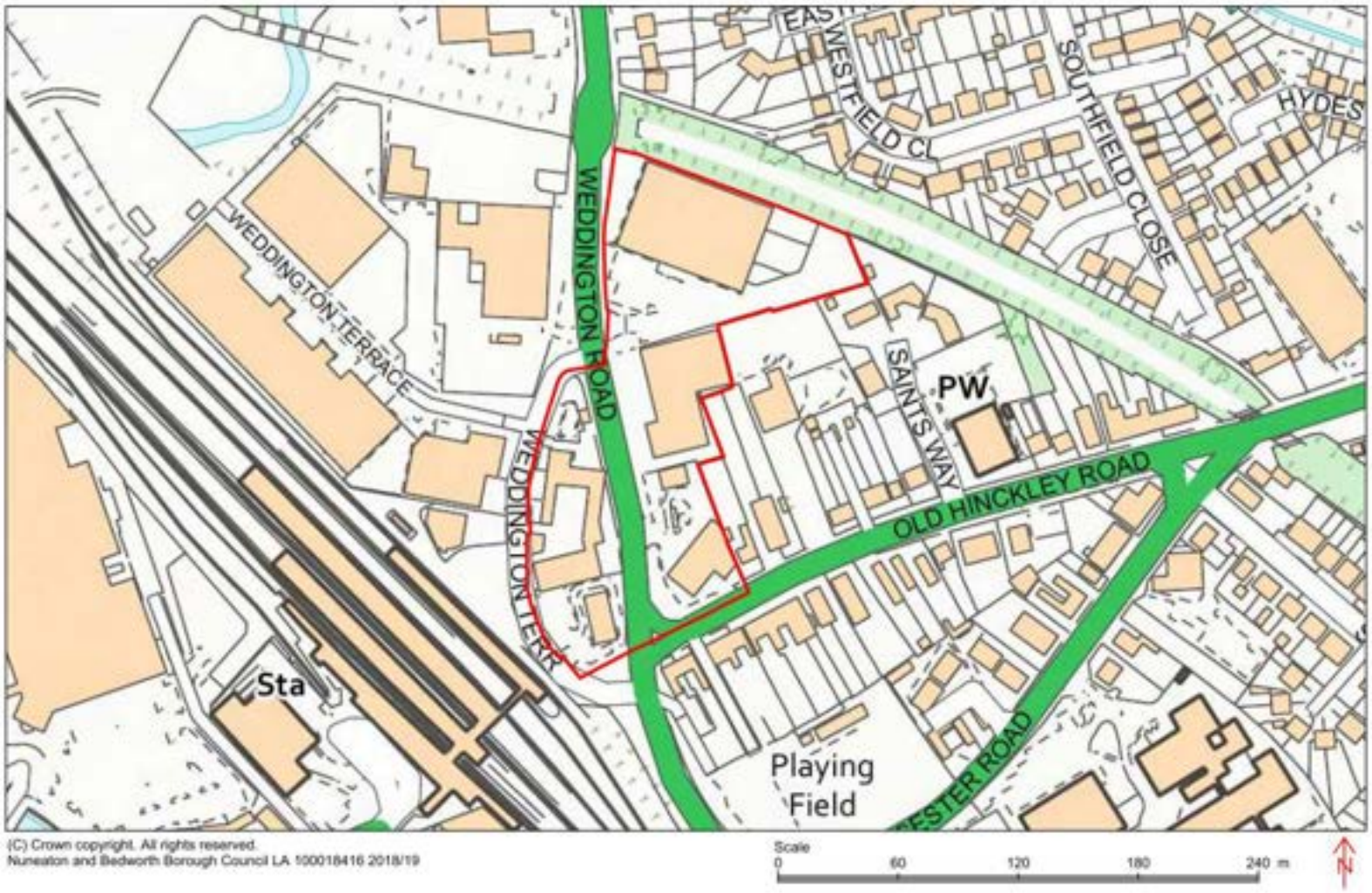


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Weddington Road (between Kingsbridge Road and Shanklin Drive) Local Centre

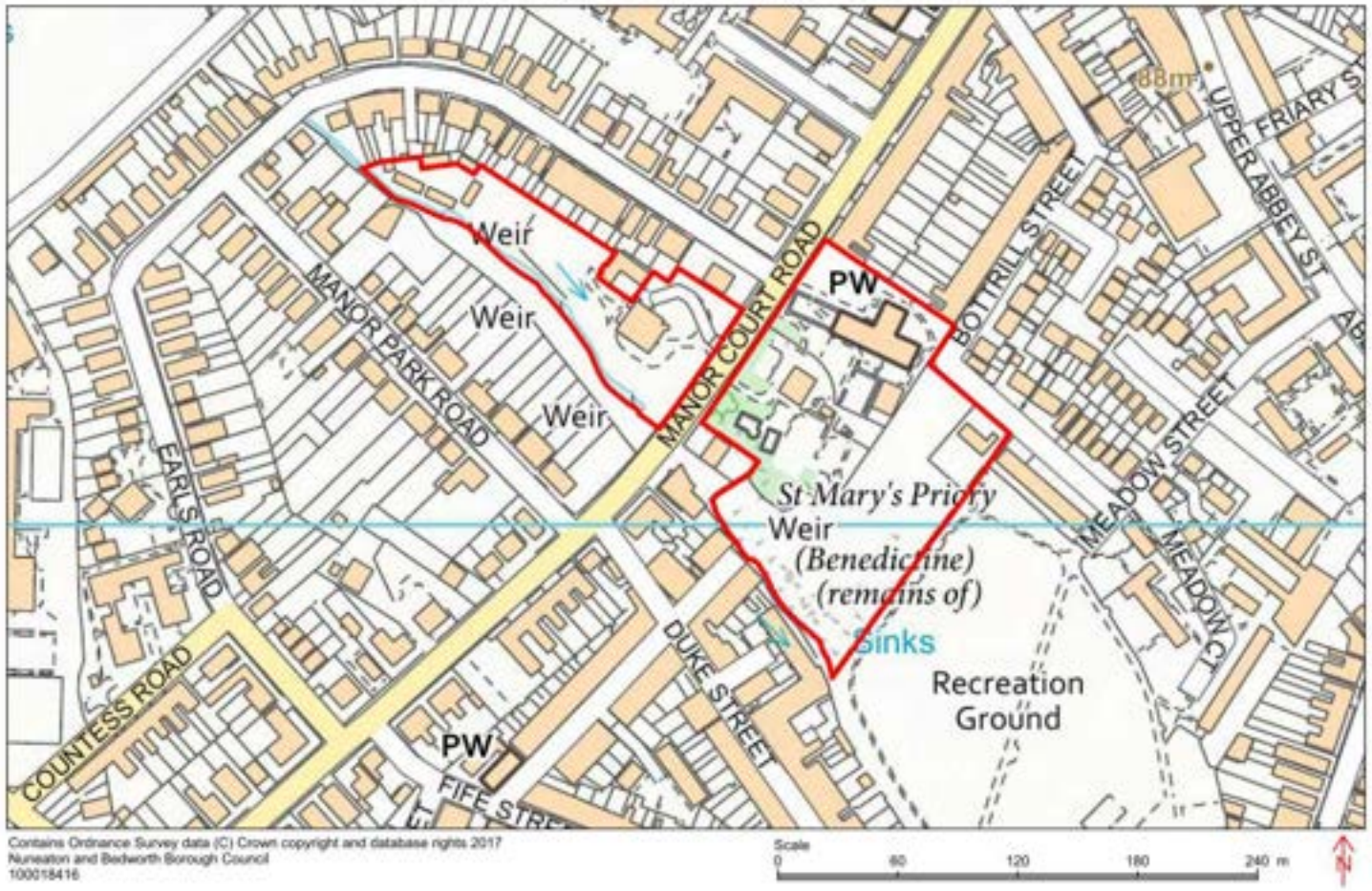


Weddington Terrace Local Centre



Appendix I – Scheduled monuments

The Benedictine Priory and Precinct of St Mary Scheduled Monument



Moated Site at Exhall Hall Scheduled Monument



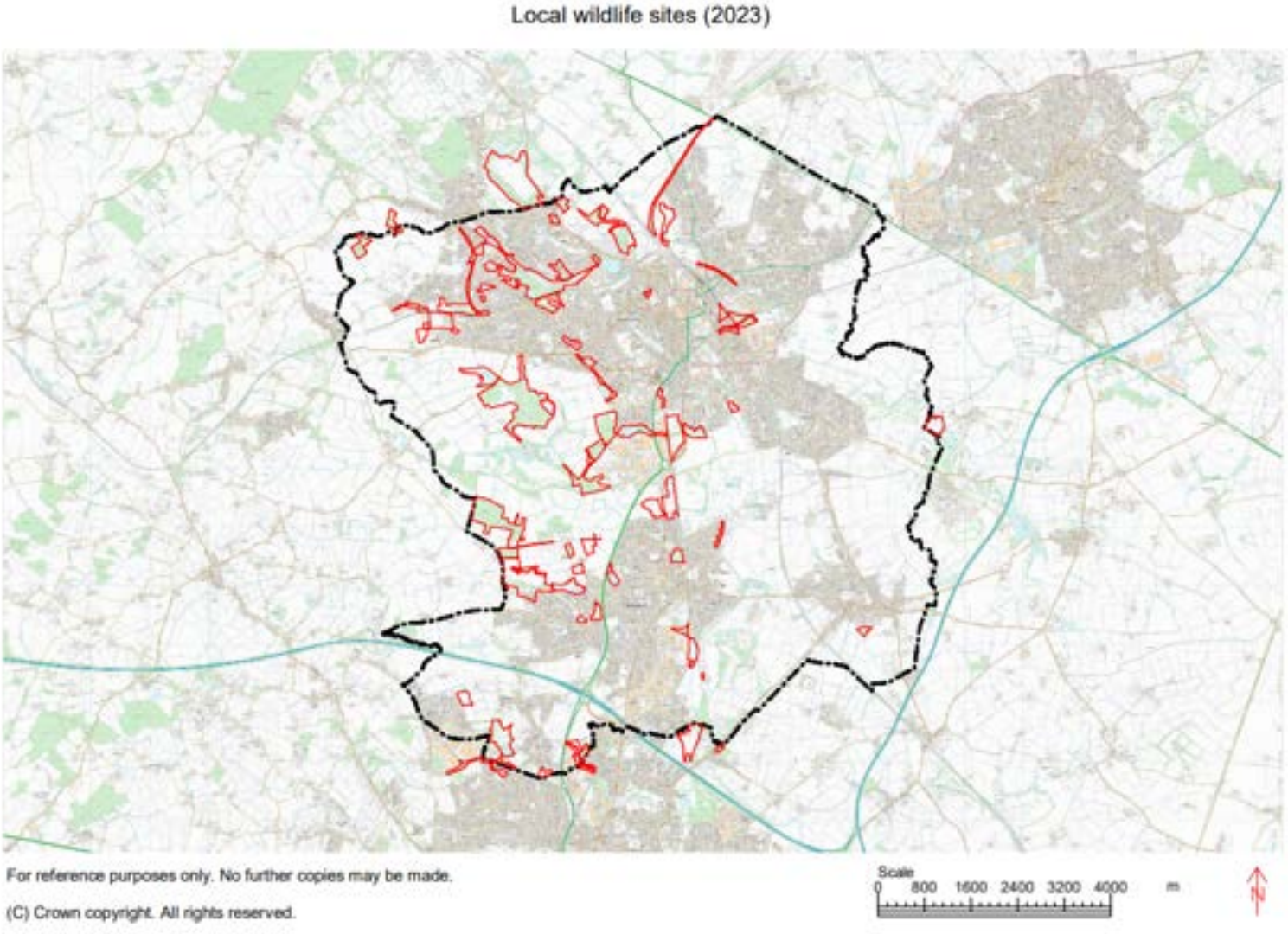
Appendix J – Ensor's Pool



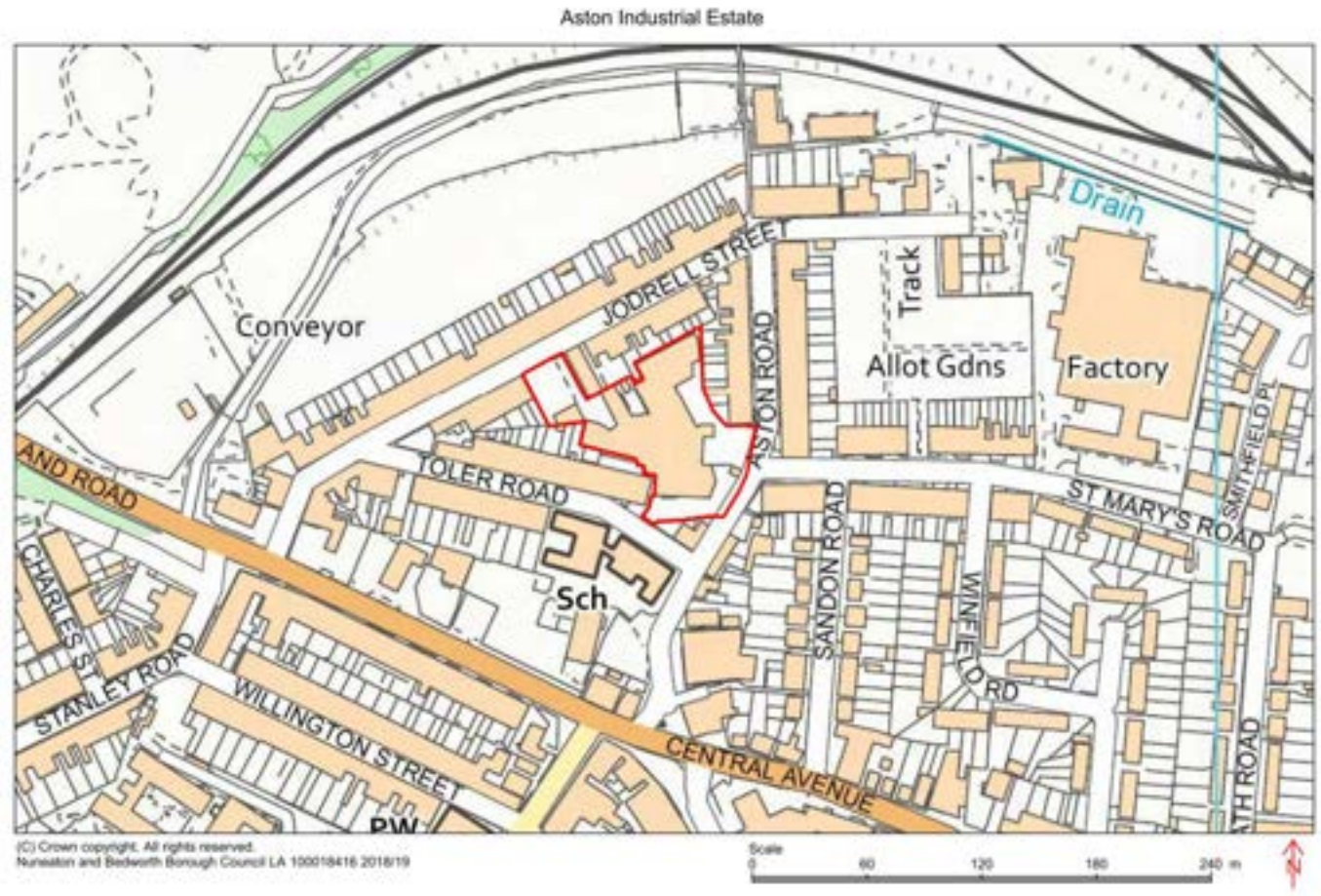
Ensor's Pool Site of Special Scientific Interest

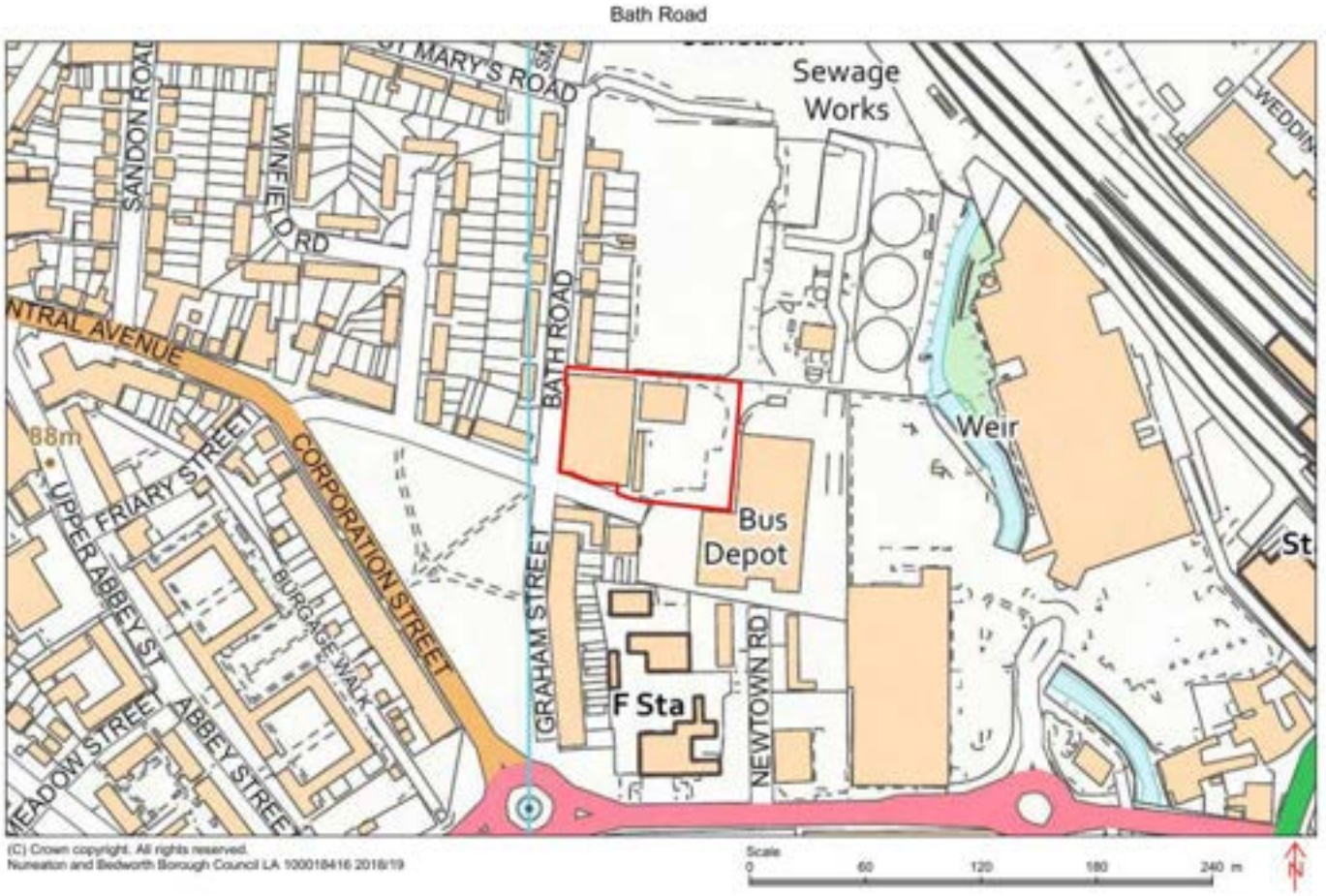


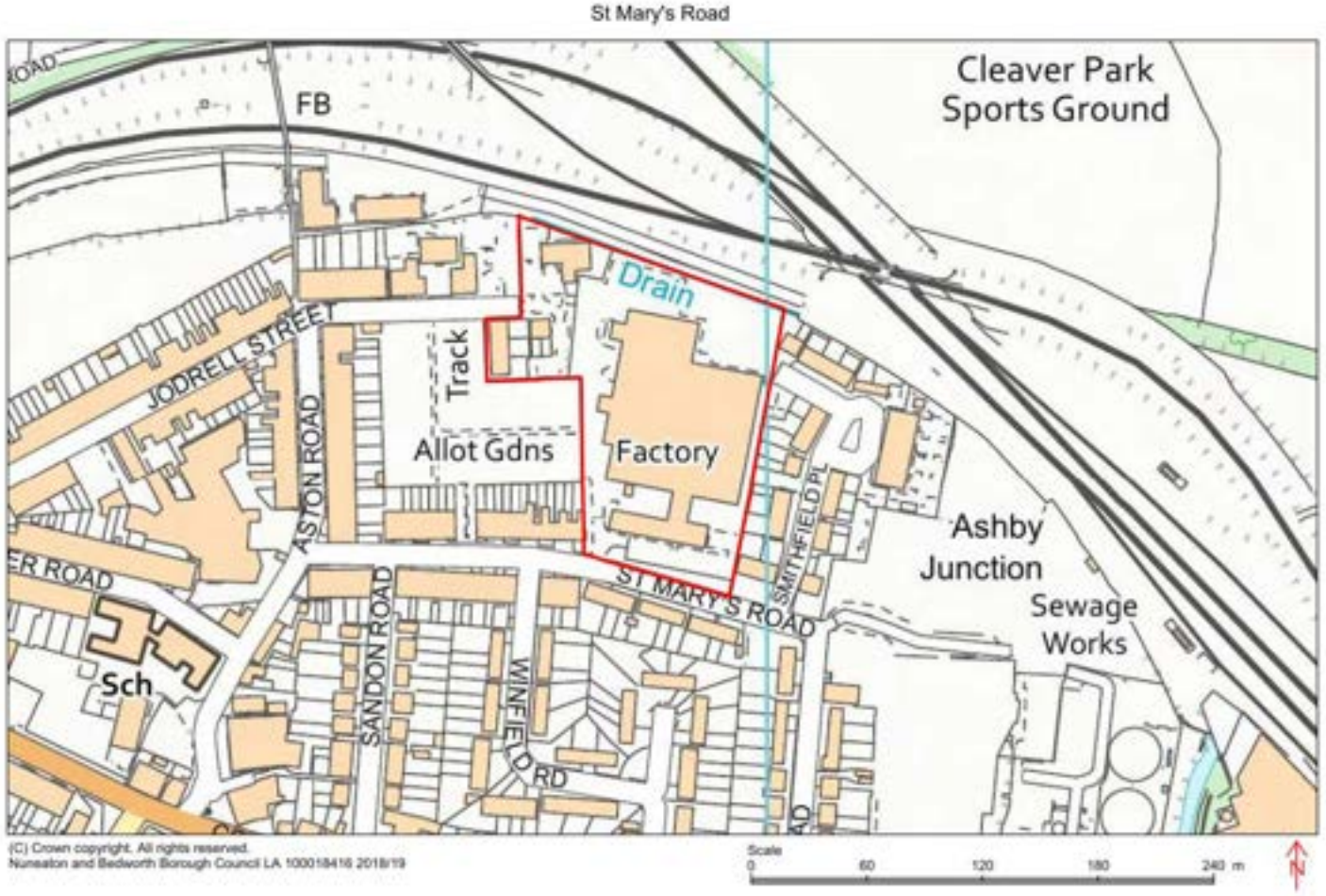
Appendix K – Local Wildlife Sites

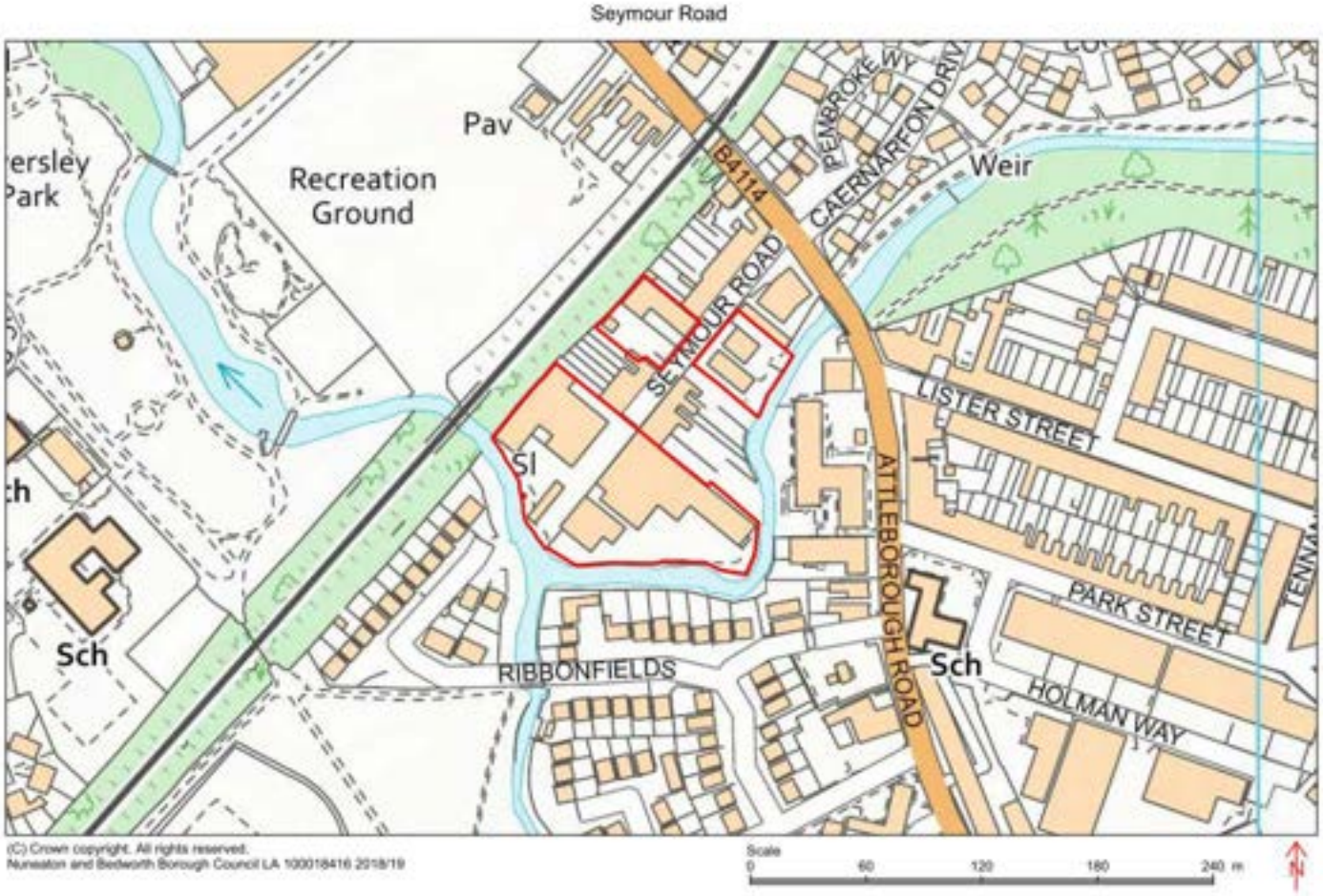


Appendix L – Employment estates suitable for alternative uses

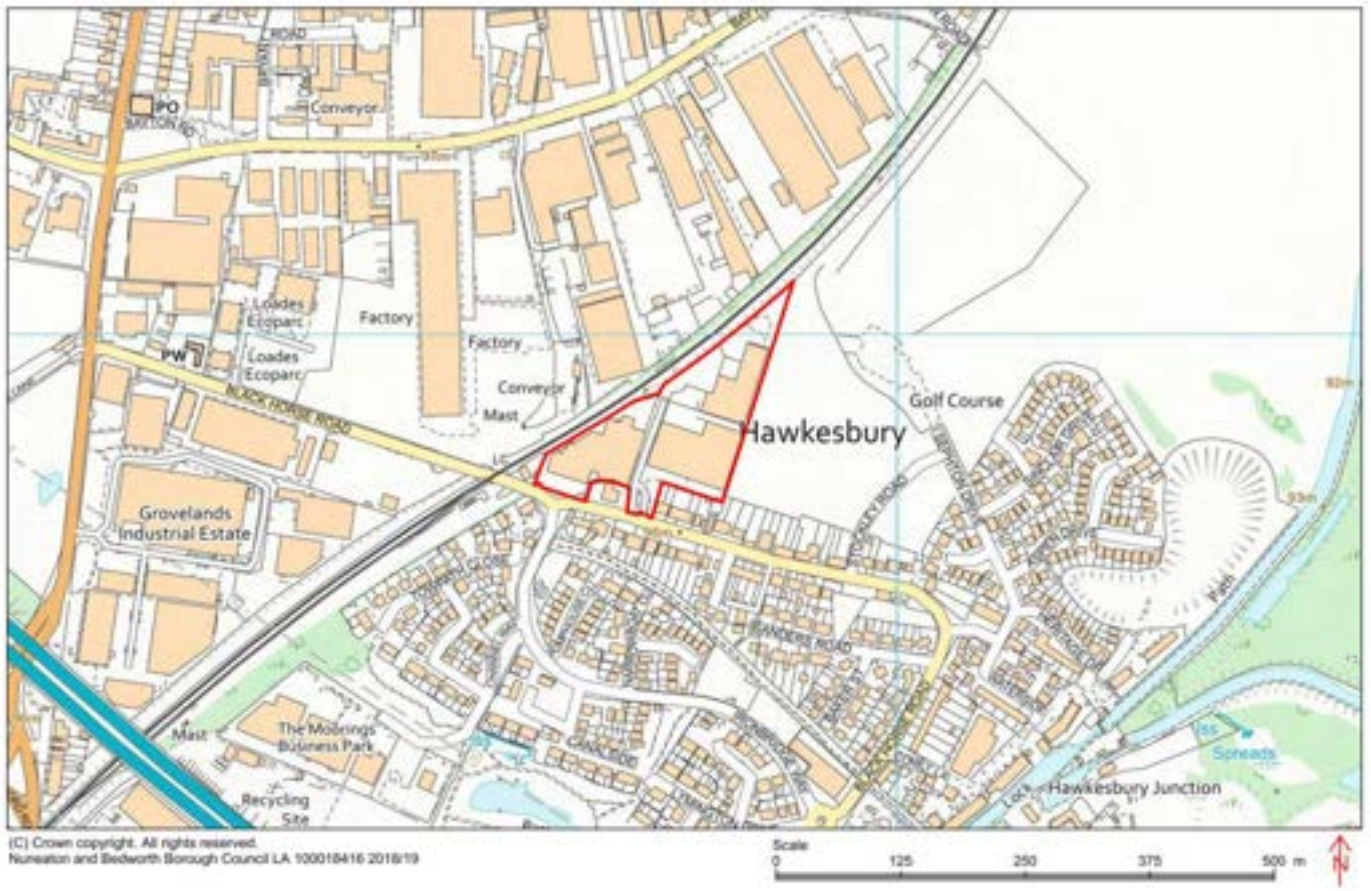



Bath Road
MARY'S ROAD
SANDON ROAD
WINFIELD RD
Sewage
Works
NTRAL AVENUE
BATH ROAD
88m
FRIARY STREET
CORPORATION STREET
Weir
Bus
Depot
UPPER ABBEY ST
BURGAGE WALK
GRAHAM STREET
F Sta
NEWTOWN RD
ABBEY STREET
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Nuneaton and Bedworth Borough Council LA 100018416 2018/19
Scale
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60
120
180
240 m

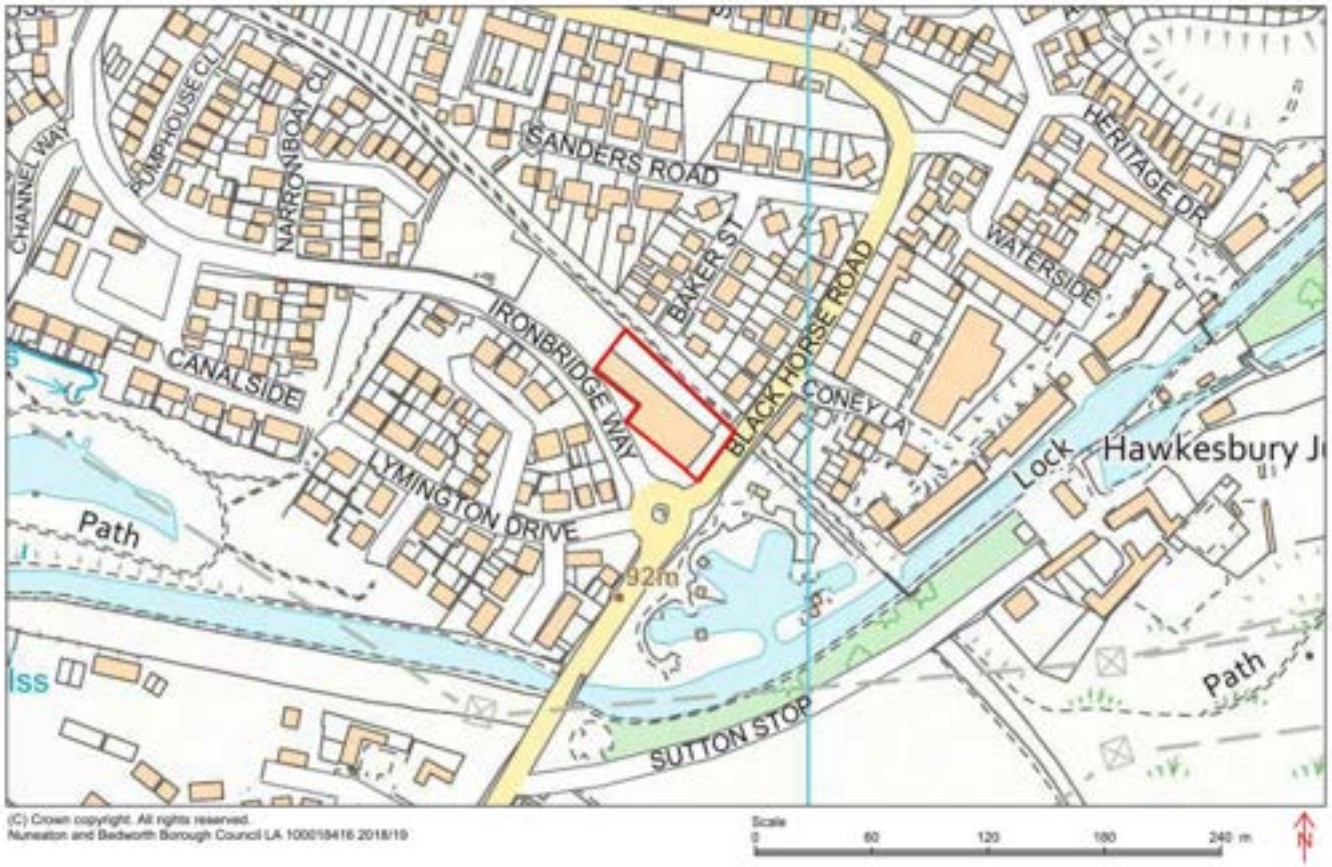

St Mary's Road
FB
Cleaver Park
Sports Ground
Drain
JODRELL STREET
ASTON ROAD
Track
Allot Gdns
Factory
SMITHFIELD PL
Ashby
Junction
Sewage
Works
ER ROAD
Sch
SANDON ROAD
WINFIELD RD
ST MARY'S ROAD
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Nuneaton and Bedworth Borough Council LA 100018416 2018/19
Scale
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240 m
N


Seymour Road
Recreation Ground
Pav
B4114
SEYMOUR ROAD
PEMBROKE WY
CAERNARFON DRIV
Weir
LISTER STREET
ATTLEBOROUGH ROAD
PARK STREET
HOLMAN WAY
RIBBONFIELDS
Sch
Sch
SI
(C) Crown copyright. All rights reserved.
Nuneaton and Bedworth Borough Council LA 100018416 2018/19
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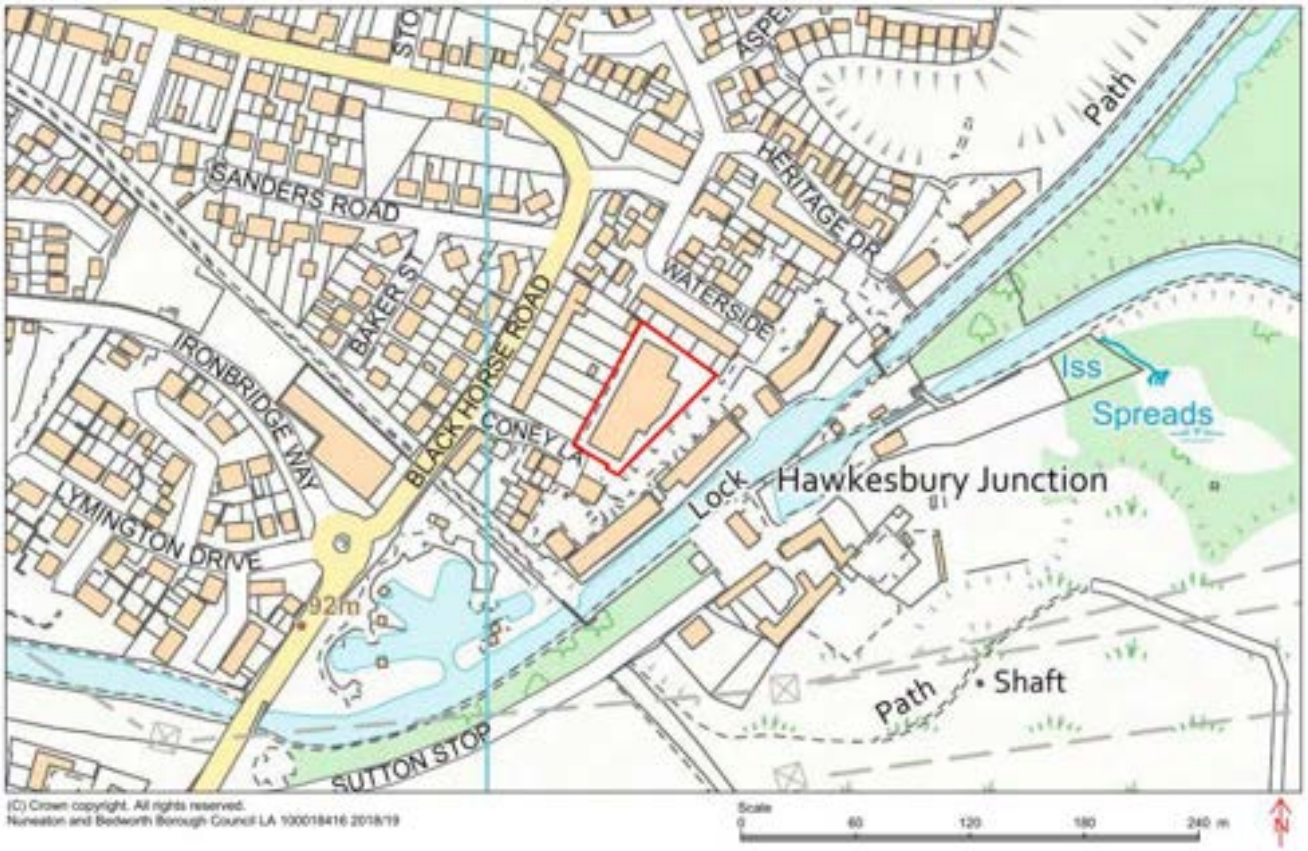
Black Horse Road (E23)

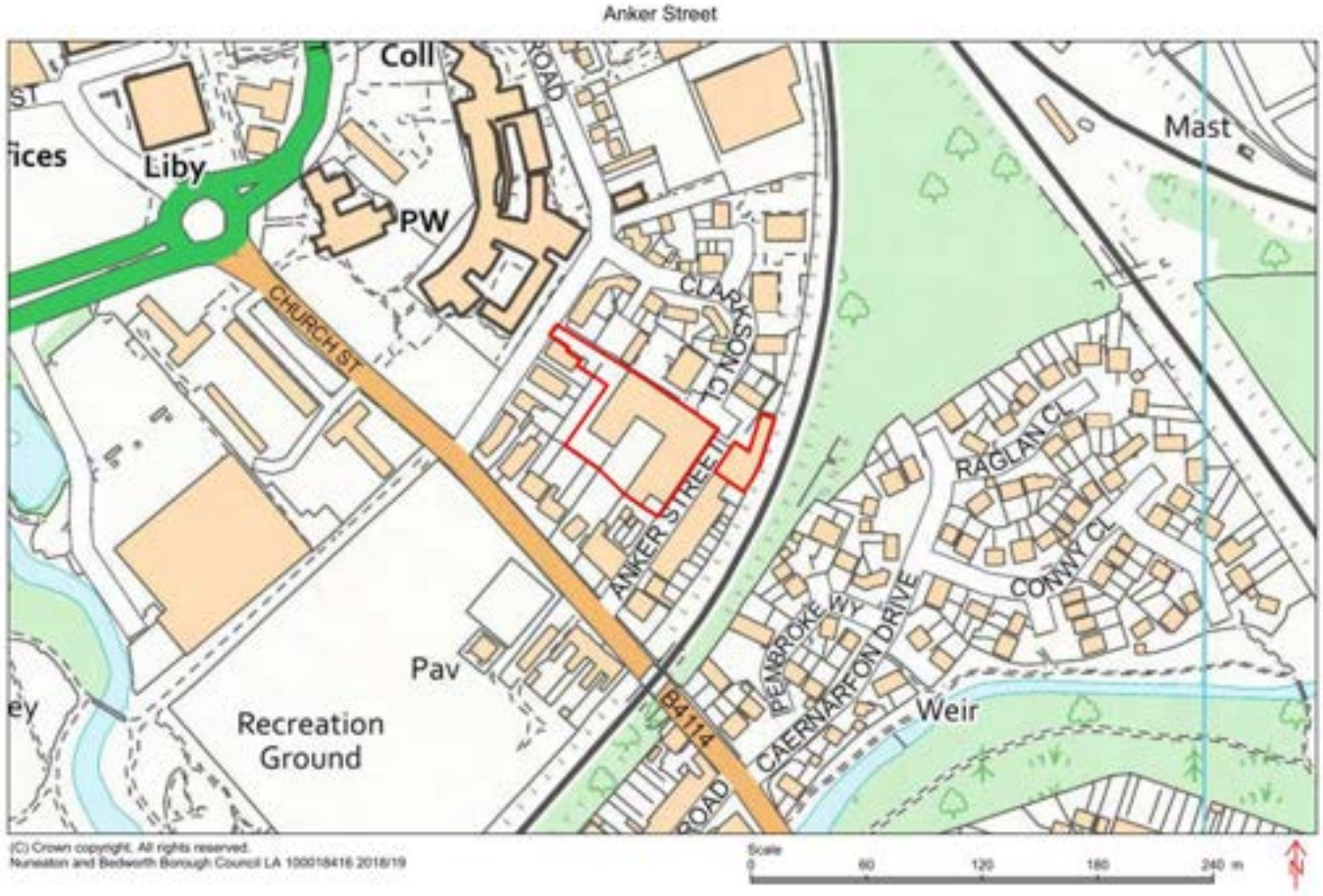


Black Horse Road (E26)

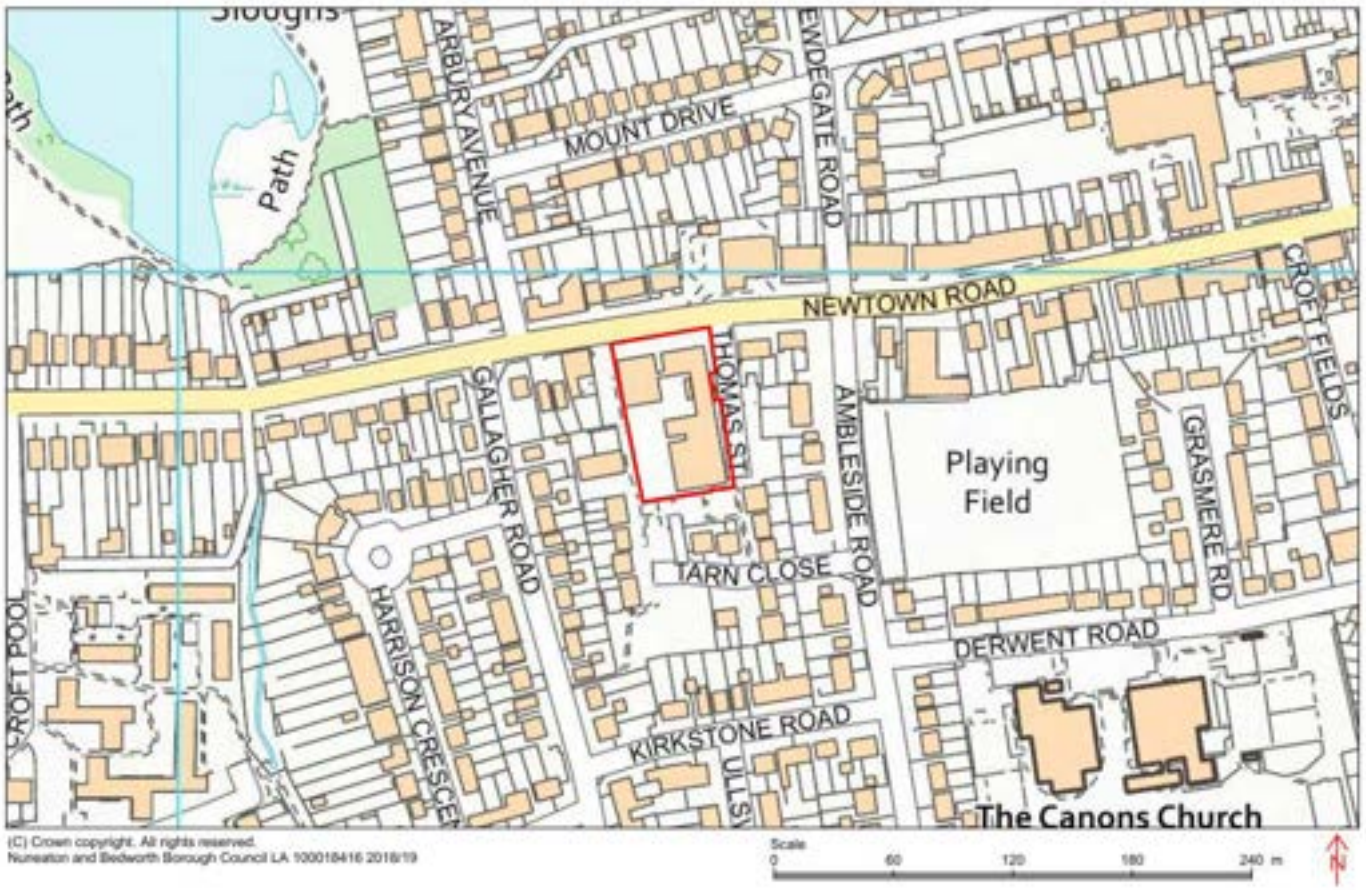


Hawkesbury Lock




Anker Street
Coll
Liby
PW
CHURCH ST
CLARKSON CL
ANKER STREET
Mast
RAGLAN CL
CONWY CL
PEMBROKE WY
CAERNARFON DRIVE
Weir
Pav
Recreation Ground
B4114
ROAD
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Scale
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60
120
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240 m
N

Newtown Road, Bedworth



Appendix M – Use Classes

The following list gives an indication of the types of use which may fall within each use class. Please note that this is a guide only and it is for the Council to determine, in the first instance, depending on the individual circumstances of each case, which use class a particular use falls into[141].

Class B

B2 General industrial - Use for an industrial process other than one falling within class E(g) (excluding incineration purposes, chemical treatment, landfill or hazardous waste).

B8 Storage or distribution - This class includes open air storage.

Class C

C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).

C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

C2A Secure residential institutions - Use for a provision of secure residential accommodation, including use as a prison, young offenders' institution, detention centre, secure training centre, custody centre, short-term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.

C3 Dwelling houses - This class is formed of three parts:

> **C3(a)** covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
>
> **C3(b)** covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
>
> **C3(c)** allows for groups of people (up to six) to live together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for. For example, a small religious community may fall into this section as could a homeowner who is living with a lodger.

[141] Planning Portal (2022). *Change of use: Use Classes.*

C4 Houses in multiple occupation - Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

Class E – Commercial, Business and Service

E(a) Display or retail sale of goods, other than hot food.

E(b) Sale of food and drink for consumption (mostly) on the premises.

E(c) Provision of:

- E(c)(i) Financial services.
- E(c)(ii) Professional services (other than health or medical services).
- E(c)(iii) Other appropriate services in a commercial, business or service locality.

E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink).

E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner).

E(f) Creche, day nursery or day centre (not including a residential use).

E(g) Uses which can be carried out in a residential area without detriment to its amenity:

- E(g)(i) Offices to carry out any operational or administrative functions.
- E(g)(ii) Research and development of products or processes.
- E(g)(iii) Industrial processes.

Class F – Local Community and Learning

F1 Learning and non-residential institutions – Use (not including residential use) defined in 7 parts:

- F1(a) Provision of education.
- F1(b) Display of works of art (otherwise than for sale or hire).
- F1(c) Museums.
- F1(d) Public libraries or public reading rooms.
- F1(e) Public halls or exhibition halls.
- F1(f) Public worship or religious instruction (or in connection with such use).
- F1(g) Law courts.

F2 Local community – Use as defined in 4 parts:

- F2(a) Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280sq.m. and there is no other such facility within 1000m.
- F2(b) Halls or meeting places for the principal use of the local community.

- F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms).
- F2(d) Indoor or outdoor swimming pools or skating rinks.

Sui Generis

'Sui generis' is a Latin term that, in this context, means ‘in a class of its own’. Certain uses are specifically defined and excluded from classification by legislation, and therefore become ‘sui generis’. These are theatres, amusement arcades/centres or funfairs, launderettes, fuel stations, hiring, selling and/or displaying motor vehicles, taxi businesses, scrap yards, or a yard for the storage/distribution of minerals and/or the breaking of motor vehicles, ‘Alkali work’ (any work registerable under the Alkali, etc. Works Regulation Act 1906 (as amended)), hostels (providing no significant element of care), waste disposal installations for the incineration, chemical treatment or landfill of hazardous waste, retail warehouse clubs, nightclubs, casinos, betting offices/shops, pay day loan shops, public houses, wine bars, or drinking establishments, drinking establishments with expanded food provision, hot food takeaways (for the sale of hot food where consumption of that food is mostly undertaken off the premises), venues for live music performance, cinemas, concert halls, bingo halls and dance halls.

Glossary

Air source heat pumps: A system harnessing heat from the air outside. Can include air to water systems. The heat pump increases the temperature and the heat is used to provide heating or hot water. The pump needs electricity to run but uses less energy than the heat it produces. It performs the same role as a boiler, but it uses ambient heat rather than burning fuel to generate heat.

Air Quality Management Area (AQMA): A designated area where there is a likelihood that the air quality objectives, set out in the Air Quality Regulations 2000, will not be met.

Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.

Ancient woodland: Land that has been continuously wooded since 1600. They are full of cultural heritage and are our richest sites for wildlife.

Authority Monitoring Report (AMR): A report published annually to assess the progress of policies and proposals in the Borough Plan.

Area Action Plan (AAP): A development plan document focussing on a specific location or an area subject to change.

Area of restraint: A designation of the Local Plan 2006 to protect land for its open character and the contribution it makes to the character and structure of the urban areas.

Biodiversity offsetting: A way of delivering biodiversity net gains in a measurable way, where the potential to avoid any damage/mitigate any damage has been fully considered and is unavoidable.

Blue infrastructure: Features such as streams, ponds, canals and other water bodies.

Brownfield land/previously developed land: Land that is or was occupied by a permanent (non-agricultural) structure and associated fixed surface infrastructure, including the curtilage of the development, in urban and rural areas. It excludes land and buildings that have been used for agricultural purposes, forest and woodland, and land in built-up areas, which has not been developed previously (known as greenfield land).

Building at risk: A listed building or structural scheduled ancient monument known to Historic England to be at risk because of neglect and decay or vulnerable to becoming so.

Building for a Healthy Life: A tool for assessing the design quality of homes and neighbourhoods.

Building Research Establishment's Environmental Assessment Method (BREEAM): The world's leading and most widely used environmental assessment method for non-domestic buildings.

Community facilities: Facilities or services for the community, including open space, sport and recreational facilities, community buildings, doctor's surgeries, libraries, pubs, churches and children's play areas.

Combined heat and power/combined cooling, heat and power: Efficient and simultaneous generation of usable heat and power in a single process, thereby reducing wasted heat and putting it to use by distributing it to buildings via district heating pipes.

Community Infrastructure Levy (CIL): A duty allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Community Park: A park normally between 1 and 10ha.

Comparison retailing: A type of retail selling items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods where a comparison of alternatives is made.

Conservation area: An area designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest, the character and interest of which it is desirable to preserve and enhance.

Contaminated land: Land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.

Convenience retailing: A type of retail selling everyday essential items, including food, drinks, newspapers/magazines and confectionery.

Corporate Plan: Part of the Council's Strategic Planning Framework showing the Council's vision, aims and priorities.

Decentralised energy: The local generation of electricity or heat from renewable and/or low carbon sources at, or near to, its point of use.

Derelict land: Land so damaged by previous industrial or other development that it is incapable of beneficial use without treatment. Treatment can include demolition, clearing of fixed structures or foundations and levelling. The definition also includes abandoned and unoccupied buildings in an advanced state of disrepair i.e. with unsound roof(s).

Destination Parks: The Borough's largest parks. Normally covering an area of between 10 and 65ha and containing a range of quality facilities and experiences for all members of the public.

Development Plan Document (DPD): A statutory component part of the local development framework including the Borough Plan, Area Action Plans and site-specific allocations.

District centre: Provides for the day-to-day shopping and service needs of local people.

District heating network: A local network of insulated pipes used to deliver heat, in the form of hot water or steam, from a centralised boiler or from combined heat and power generation for residential and commercial users.

Economic Development Strategy: A document stating the Council's vision, objectives and priorities for the Borough's economy.

Employment Land Review: A review of the quantity and quality of existing and proposed employment land within the Borough.

Evidence base: Economic, social and environmental information and data gathered by the Council in order to provide robust and credible evidence to justify the soundness of the policies in the Borough Plan.

Feed-in tariff: A policy mechanism designed to accelerate investment in small scale (less than 5 MW (Mega Watts)) renewable energy technologies. Under the feed-in tariff, eligible renewable electricity generators (which can include homeowners, business owners, farmers, as well as private investors) are paid a cost-based price for the renewable electricity they produce. The scheme stopped accepting new applications after 31st March 2019.

First Homes: On 24th May 2021 the Government announced its First Homes Initiative to help meet the housing needs of first-time buyers. This came into effect on 28th June 2021. Under this scheme the first 25% of all affordable housing units must be delivered via this option and that is 'topped up' to ensure that 10% of the total number of houses on a site are provided in this method (exceptions apply). First Homes are a specific kind of discounted market sale housing. First Homes are discounted market sale units which:

a. Must be discounted by a minimum of 30% against the market value.
b. Are sold to a person or persons meeting the First Homes eligibility criteria.
c. On their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer.
d. After the discount has been applied, the first sale must be at a price no higher than £250,000.

Five-year housing supply: A supply of housing sites that can be delivered within five years. To be 'deliverable', sites should be available now, offer a suitable location now and be achievable on the site within 5 years.

Future Homes and Buildings Standard: Is a set of standards that will complement the Building Regulations to ensure new homes, built from 2025, will produce 75-80% less carbon emissions than homes delivered under current regulations.

Green Belt: A designation which aims to keep land permanently open or largely undeveloped. The purpose of the Green Belt is to:

- Check the unrestricted sprawl of large built-up areas.
- Prevent neighbouring towns from merging.
- Safeguard the countryside from encroachment.
- Preserve the setting and special character of historic towns.
- Assist urban regeneration by encouraging the recycling of derelict and other urban land.

Green corridor: A green linear space that can be used for walking and cycling and may also provide a habitat for plants and animals.

Greenfield: Land where no development has previously taken place such as agricultural or forestry land.

Green infrastructure: A network of multi-functional green spaces, both urban and rural, which are capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure includes parks, gardens, nature reserves, river valleys, footpaths and cycle paths, allotments and grass verges and are multi-functional, e.g. they provide wildlife, recreational, cultural and ecological benefits.

Green network: Open spaces of all kinds, including canal-ways and river corridors, that are accessibly linked together.

Ground source heat pumps: A system harnessing heat from underground by pumping water through it. The heat pump increases the temperature and the heat is used to provide home heating or hot water. The pump needs electricity to run, but the idea is that it uses less electrical energy than the heat it produces. The heat pump performs the same role as a boiler does in a central heating system, but it uses ambient heat from the ground rather than burning fuel to generate heat.

Housing and Economic Development Needs Assessment (HEDNA): Assesses future housing needs, the scale of future economic growth and the quantity of land and floorspace required for economic development uses for a set period (e.g. to 2039).

Housing and Employment Land Availability Assessment (HELAA): The HELAA is a key tool in the development of local housing and employment policy and proposals. It assesses whether a site is deliverable, developable or not currently developable. The definitions of these attributes are outlined below.

- Deliverable – the site is available now, offers a suitable location for housing and there is a reasonable prospect that housing will be delivered within five years.
- Developable – the site is in a suitable location for housing and there is a reasonable prospect that it will be available and delivered for housing at a specific point in time – for example, by the end of the plan period.
- Not currently developable – it is unknown when the site could be developed.

Health Impact Assessment (HIA): A means of assessing the health impacts of policies, plans and projects using quantitative, qualitative and participatory techniques.

Health Impact Assessment Screening Report: A preliminary evaluation including an overview of how some of the broad determinants of health and wellbeing have been considered as part of a planning application to determine if a full Health Impact Assessment is needed.

Historic Parks and Gardens: A park or garden that is deemed to be of sufficient historic interest to merit inclusion on Historic England's Register of Historic Parks and Gardens.

Infrastructure Delivery Plan (IDP): Provides information about the infrastructure which needs to be delivered in order to support the policies and growth targets set out in the Borough Plan. It outlines the sources of funding for those projects and identifies who is responsible for the delivery of infrastructure. Due to the nature of the document this is updated on a regular basis. The IDP is accompanied by an Infrastructure Delivery Strategy.

Infrastructure Delivery Schedule: This accompanies the IDP and sets out on-going and planned schemes for different infrastructure categories.

Intermediate housing: Homes for sale, and rent, provided at a cost above social, but below market levels. These include shared equity (shared ownership and equity loans) and other low-cost homes for sale and intermediate rent, but not affordable rented housing.

Landscape character: What makes an area unique, defined as distinct, recognisable and consistent pattern of elements (be it natural (soil, landform) and/or human (for example settlement and development)) in the landscape that makes one landscape different from another, rather than better or worse.

Landscape Character Assessment: A tool to identify and understand our local landscapes in terms of their diversity, character, distinctiveness and sensitivity to change.

Leadership in Energy and Environmental Design (LEED): An alternative certification to BREEAM. Whilst LEED was developed in the US, the principles are increasingly being used in the UK.

Listed building: A building or structure of special architectural, historical or cultural interest designated by Historic England on behalf of the Government. Buildings are listed Grade I, Grade II* or Grade II. Changes to such buildings may require listed building consent.

Local Biodiversity Action Plan (LBAP): These are aimed to look at conserving fauna, flora and habitats. These identify local priorities for biodiversity conservation and work to deliver agreed actions and targets for priority habitats and species and locally important wildlife sites.

They also seek to reflect the values of local people and provide a focus for local initiatives. LBAPs are delivered through wide, local partnerships that involve wild-life organisations, local authorities, businesses and other interested parties.

Local centre: Provides for the day-to-day top-up shopping needs of local people on a smaller scale than a district centre.

Local geological site: Sites identified by local geo-conservation groups as being of geological importance. Nuneaton and Bedworth has eight sites of geological interest.

Local Parks: Smaller parks normally between 0.4ha and 10ha.

Local Plan 2006: Old-style development plan adopted by the Council in 2006.

Local nature reserve: Statutory designation for areas of importance for wildlife, geology, education or public enjoyment. Nuneaton and Bedworth have three local nature reserves at Bedworth Sloughs, Ensor's Pool and Galley Common.

Local Transport Plan: The Local Transport Plan is a document which sets out the long-term vision, objectives and outcomes for transport.

Local Wildlife Site (LWS): Sites identified locally for their substantive nature conservation importance, either for wildlife (LWS) or geology (Local Geological Sites, LGS).

Low carbon energy: Energy generated from low-carbon sources such as wind, solar, hydro and nuclear power. These release less carbon into the atmosphere. The term "low carbon" simply refers to the reduction of carbon dioxide (CO2) emissions.

Major development: Where the number of dwelling houses to be provided is 10 or more, or the development is to be carried out on a site having an area of 0.5ha or more. For all other types of development, development carried out on a site having an area of 1ha or more.

National Model Design Code (2021): Ministry of Housing, Communities and Local Government. Government policy to promote successful design to provide high quality places.

National Design Guide (2021): Ministry of Housing, Communities and Local Government. Government guidance to promote well designed places in the form of ten characteristics.

National Planning Policy Framework (NPPF): Department for Levelling up, Housing and Communities (2021). Government policy on planning matters which seeks to create sustainable communities and foster sustainable development. The policies in the NPPF provide the national framework within which local policy should be prepared.

NUCKLE: NUCKLE is the upgrade of the existing rail line between Leamington and Nuneaton to improve accessibility and encourage increased use of the train for journeys that might otherwise be undertaken by car.

Potential Local Wildlife Sites (pLWS): Sites that have not yet been assessed against the Local Wildlife and Geological Sites selection but may potentially support species of note and areas of important semi-natural habitat or valuable geological features.

Refer to glossary for LWS and THE GREEN BOOK, Guidance for the Selection of Local Wildlife Sites in Warwickshire, Coventry and Solihull Local Wildlife Sites Project Habitat Biodiversity Audit (HBA) Warwickshire Wildlife Trust Ecological Services (Warwickshire County Council) Available at: Guidance Note on Application of Site Selection Criteria (warwickshire.gov.uk).

Primary shopping area: Where retail development is concentrated, comprising of the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage.

Priority species and habitats: Species and habitats that have been identified as being the most threatened and requiring action under the UK Biodiversity Action Plan, 1994. Nuneaton and Bedworth have several species and habitats that are of a priority status.

Proposals map: Visual representation on an ordnance survey map of policies and land allocations in the Borough Plan, as well as other development plan documents in the local development framework.

Renewable heat incentive: Payment system for the generation of heat from renewable energy sources introduced through the Energy Act 2008.

Scheduled monument: Process through which nationally important sites and monuments are given legal protection by being placed on a list (schedule). Historic England takes the lead in identifying sites in England, which are placed on the schedule by the Secretary of State for Digital, Culture, Media and Sport.

Section 106: A legally enforceable obligation entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Section 278: An agreement of works to existing highways. Section 278 of the Highways Act 1980 allows a developer to carry out works to the public highway. This is generally necessary where planning permission has been granted for a development that requires improvements to, or changes to, public highways.

Semi-strategic areas: Areas where habitat enhancement or creation will expand existing habitat within a Biodiversity Rich Area (an area of greater than 20ha of a broad habitat type within a 1km square).

Sequential approach: A planning principle that seeks to identify, allocate, or develop certain types or locations of land before others. For example, previously developed land before greenfield sites, or town centre retail sites before out-of-centre sites.

Site of Special Scientific Interest (SSSI): An area of special interest by reason of its flora, fauna, geological or physiographical features designated under the Wildlife and Countryside Act 1981.

Small scale wind energy: Is defined as having less than 100 kW (kilowatts) and typically comprise single turbines. They are considered to be viable at lower wind speeds (4.5m/s at 10m above ground level).

Social rented housing: Housing that is let at below market rents and on a secure basis to people in housing need, usually by local authorities or a registered social landlord.

Special area of conservation: European designation to protect habitats and species considered to be of European interest by the EC Habitats Directive.

Strategic areas: Where creation or enhancement of relevant habitat can be shown through the regional GI mapping to have the greatest beneficial impact particularly by increasing habitat connectivity between fragmented existing habitat and also buffering adjacent areas of highest habitat concentration and value.

Strategic Environmental Assessment (SEA): Procedure, set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Strategic Flood Risk Assessment (SFRA): An assessment, at a strategic level, of all forms of flood risk, considering the impacts of climate change.

Strategic Housing Market Assessment (SHMA): An assessment of the demand and need for market and affordable housing, as well as types of housing tenures in Nuneaton and Bedworth, in addition to associated Housing Market Areas within the C2 Housing Market Area.

Strategic sites: Large scale sites that are key to the successful delivery of the Borough Plan Review.

Sub-regional strategy: A wide reaching approach for managing growth within the sub-region. Relevant to Nuneaton and Bedworth are Coventry, Solihull and Warwickshire (including all Boroughs/districts).

Super Output Area (SOA): A small area used for the collection and publication of small area statistics. They can be used for statistical comparison because they are of consistent size and are not subject to frequent boundary change.

Supplementary planning document (SPD): Provides further detail on policies and proposals contained within a development plan document and are a material consideration when determining planning applications.

Sustainability appraisal (SA): A tool for appraising policies to ensure they reflect sustainable development objectives (e.g. social, environmental and economic factors) and is required to be undertaken on the Borough Plan.

Sustainable Community Plan: Required under the Local Government Act 2000, a Sustainable Community Plan (also referred to as a Sustainable Community Strategy) sets out the strategic vision for a place which aims to improve the social, economic and environmental wellbeing of an area. It is produced by the Local Strategic Partnership. The Borough Plan Review can be viewed as a delivery tool for the Sustainable Community Plan, and, therefore, needs to be aligned with it.

Sustainable design: Design principles to reduce negative environmental impacts through skillful, sensitive design and to connect people with open spaces. Sustainable design should be responsive to local context, adaptable, resource efficient and deliver value over its whole life.

Sustainable drainage systems (SuDS): A management practice which enables surface water to be drained in a way which mimics, as closely as possible, the run-off prior to site development.

Windfall development or site: A site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most 'windfalls' are referred to in a housing context.

Zero carbon: No carbon emissions are being produced from a product or service (for example, a wind farm generating electricity or a battery deploying electricity).

Acronyms

AQMA: Air Quality Management Area.

BREEAM: Building Research Establishment's Environmental Assessment Method.

CFMP: Catchment Flood Management Plan.

CSW: Coventry, Solihull and Warwickshire.

DWMP: Drainage and Wastewater Management Plan.

FTTP: Fibre to the Premises.

GVA: Gross Value Added.

HEDNA: Housing and Economic Development Needs Assessment.

ICB: Integrated Care Board.

IDP: Infrastructure Delivery Plan.

LEED: Leadership in Energy and Environmental Design.

LLFA: Lead Local Flood Authority.

NDSS: Nationally Described Space Standards.

NPPF: National Planning Policy Framework.

NUCKLE: Nuneaton, Coventry, Kenilworth and Leamington.

PPG: Planning Practice Guidance.

RBMP: River Basin Management Plan.

SFRA: Strategic Flood Risk Assessment.

SHLAA: Strategic Housing Land Availability Assessment.

SHMA: Strategic Housing Market Assessment.

SODRP: Storm Overflows Discharge Reduction Plan.

SPD: Supplementary Planning Document.

SSSI: Site of Special Scientific Interest.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: QB-2019-000616

BETWEEN :

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

Claimants

– and –

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

Defendants

Exhibit 'SM2'

Gypsy and Traveller Site Allocations DPD

2021 - 2037

Nuneaton & Bedworth
United to Achieve

Nuneaton and Bedworth Borough Council

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Adopted January 2024

1.0 Introduction

1.1 Nuneaton and Bedworth Borough Council adopted a Borough Plan on 11th June 2019 which planned for new development in the borough until 2031. The Borough Plan plans, principally, for new commercial, employment, and residential uses. In terms of residential uses the Borough Plan must plan for all parts of the community and thus deals with provision for Gypsies and other Travellers.

1.2 Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the need for new pitches by 2031/2032 to be at least 39 residential and 5 transit pitches. Policy H3 does not set out where the new pitches would be provided but sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It is through this DPD that land is identified and allocated for future traveller sites. Policy H3 of the current adopted Borough Plan (2011-2031) is superseded entirely by the DPD and in the emerging Borough Plan Policy H3 will purely refer to the DPD for Policies relating to Gypsy, Travellers and Showperson pitches and plots.

1.3 The current Local Development Scheme (2020) sets out the timetable for the production of Gypsy and Traveller Site Allocations DPD which is as follows:

- May 2021 – consultation on an Issues and Options document;
- January 2022 – consultation on a publication document;
- July 2022 – submission of the document to the Secretary of State;
- January 2023 – receipt of Inspector's report on the examination of the document; and
- February 2023 – adoption of the document.

1.4 This adopted DPD was preceded by the Publication version of the Gypsy and Traveller Site Allocations DPD; which was the formal document required by Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. This was consulted on between 28th January 2022 and 25th March 2022. A consultation on the previous version of the Gypsy and Traveller Site Allocations DPD, the Issues and Options consultation draft, took place between 11th June 2021 and 6th August 2021. This document was that required by Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. A consultation statement has been produced which sets out the responses received and how they were considered in producing the DPD.

1.5 The document is set out in four subsequent chapters addressing the vision and objectives of the DPD, followed by the need for new pitches, the locations of these new pitches and a monitoring schedule for the DPD.

1.6 To support this document the Council has commissioned a consultant to produce a new Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA) and this can be viewed alongside this document. The most recent study prior to this new GTAA dates from 2016 and it concluded that the evidence base is refreshed on a five-yearly basis to ensure that the level of pitch and pitch provision remains appropriate. The DPD is also supported by a 'Site Assessments and the Green Belt' document, a Sustainability Appraisal Report, and an Appropriate Assessment, the contents of which have been considered in the production of this DPD. All supporting documents can be seen on the Borough Council's website alongside this DPD as part of the formal consultation.

2.0 Vision & Objectives

Vision

2.1 The vision was contained within the Issues and Options consultation draft of the DPD. Since that document the vision has been amended so that reference to the environment is made thereby linking the vision more to objective 3.

2.2 The vision for this DPD is for the needs of the travelling community in and visiting the borough to be provided with sufficient pitches so that they can live, work, and rest in the borough. Pitches will be well located and integrated into the environment and the local community thereby providing good access to essential services.

Objectives

2.3 The following objectives will help achieve the vision for the DPD. Three objectives were consulted upon and although no issues were raised by consultation responses on the content of the objectives, objective 3 has been amended. The intent of the objective remains the same, but the terminology has been changed so that it aligns better with the language used in the adopted Borough Plan.

Objective 1 - to provide sufficient pitches for the needs of the travelling community.

Objective 2 - to provide provision in sustainable locations with good access to local services.

Objective 3 - to provide provision in such a way that the local environment is protected and, where appropriate, enhanced.

These objectives are interrelated and in combination they will contribute to realising the vision for the DPD.

3.0 Need

Introduction

3.1 The evidence base that supported the formation of the need for new pitches in the Borough Plan was the 2016 Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA). Since the 2016 GTAA was produced the 2016 Housing and Planning Act introduced the need to conduct a wider assessment of all caravan and houseboat accommodation needs, not just those from Gypsy and Traveller ethnicities. A new assessment of accommodation needs has been produced, dated from 2021. This assessment updates the need for new pitches to those published in the Borough Plan and addresses the implications of the 2016 Housing and Planning Act.

3.2 The Issues and Options consultation proposed four options for the number of pitches to provide ranging from that in the 2021 GTAA through to figures above those in the GTAA from 2016 (and published in the Borough Plan). After careful consideration it is considered that the figures from the 2021 GTAA should be used as the basis for the need. Even though representations on the DPD were low, the newer figures were clearly preferred over those that were now nearly six years old by respondents. Not only are these figures more recent, but the interview rate was also much higher giving greater confidence that the assessment of need is more robust and closer to that actually required. These four options were assessed in the accompanying sustainability appraisal to the issues and options document and these four options all came out the same, partly because all reasonable options considered would achieve the number of pitches set in the 2021 GTAA as a minimum (which is the most recent data source) but also because there were many unknowns of the likely impacts that would result from these different sets of figures for new pitch numbers.

3.3 Using the requirement for new pitches from the 2021 GTAA as a minimum rather than the higher figures in the extant Borough Plan means that this document will need to supersede the requirements for new pitches set out in Policies DS4 and H3 of the Borough Plan.

Gypsies and Travellers

3.4 The first part of the 2021 GTAA was to assess the current occupancy of pitches within the borough, then to assess how much capacity remains above this, so, how many pitches are unoccupied but are available, followed by calculating how many more pitches are needed to fulfil the need for new pitches within the borough. The new GTAA advises that with the current

occupied and vacant pitches within the borough there is a need for 16 additional residential and no transit pitches to meet the needs of those who meet the definition of travellers as set out in the Planning Policy for Traveller Sites, August 2015; this increases by four to a total of 20 additional residential pitches to meet a cultural need (that is, people who do not meet the definition of a traveller but nevertheless live on pitches). For travellers, this is change of 23 residential pitches and 5 transit pitches from those figures published in the Borough Plan (both decreasing). Table 1 below repeats the figures from Table 6.3 of the 2021 GTAA in which the need for new pitches is set out.

Table 1 - Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37.

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

PPTS = Planning Policy for Traveller Sites (2015) within which the definition of Gypsies and Ttravellers is provided.

3.5 The 2021 GTAA assumes that some of this provision for additional pitches can be found through turnover on the site at The Griff and by a combination of intensification and expansion of three existing sites to provide 11 pitches. Table 2 below repeats the figures from Table 6.4 of the 2021 GTAA which sets out these assumptions. Thus, the table shows that through the provision of 11 new additional pitches the need up to 2036/37 is met is and, therefore, this meets the need evidenced in the 2021 GTAA.

Table 2 - Addressing Gypsy and Traveller pitch need.

Time period	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6

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

3.6 Although turnover has been considered and has the potential to meet need based on past trends, this cannot be wholly relied upon as the future level of turnover at The Griff is not guaranteed. Instead, turnover is one element of supply but there remains a need to take positive steps to increase the number of pitches available to households across the borough to meet the needs identified and to plan positively for the area. This is particularly important for the Council to achieve a 5-year land supply of new pitches. So, turnover can be relied upon to meet some of the forecast need but not to the exclusion of allocating new pitches. The GTAA of 2021 identified 11 pitches that could be found in the Borough and this should be used to form

the basis of the minimum new pitches to provide, the remainder will be met by turnover.

Travelling Showpeople

3.7 The GTAA from 2021 states that there is 1 occupied and 3 vacant pitches in the Borough for use by Travelling Showpeople. The 2016 GTAA set out that there were 4 private owned pitches, and plots on site/yards of which 4 were occupied and 0 were vacant. Therefore, plot numbers have remained the same but vacant plot numbers have increased. No additional provision is recommended by the current GTAA.

Bargee Travellers

3.8 In the 2016 GTAA bargee Travellers were accounted for by one family present in the borough. No change to bargee Traveller numbers are contained within the updated GTAA.

Future Need

3.9 In the 2021 GTAA it is recommended that the "…*evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth.*" This is an important element of confirming that the need in this DPD remains as required. It is therefore the Council's intention that the number of new pitches will be assessed each year at the Authority Monitoring Report (AMR) stage and landowners contacted to encourage the sites to come forwards. The DPD will be reviewed five years after adoption and subsequently five years thereafter on an ongoing basis, to ensure the document meets the current needs. The update of the GTAA is referenced in Table 3 of Chapter 5.0 on Monitoring of this document. Should need be found to have changed beyond that set out in this DPD (or indeed for another reason such as undeliverability of a site or sites) then this should trigger a review of this DPD.

Strategic Policy GT1 – Overall Need

The following levels of development will be planned for and provided within Nuneaton and Bedworth Borough between 2021 and 2037:

- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025 and
- At least a further 5 permanent residential pitches beyond those required by 2025 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2037.

This Policy supersedes the third bullet point of DS4 of the adopted Borough Plan (2011-31).

4.0 Location of Pitches

Green Belt

4.1 Two of the sites to receive new pitches are within the Green Belt, namely Sunrise Cottage and The Old Nursery. Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt and Green Belt forms a large part of the borough. The Green Belt is mostly located to the south of Nuneaton, but also surrounds the main areas of Bedworth, Bulkington, and Ash Green. Nationally, the government attaches great importance to the Green Belt. The five key purposes of Green Belts are:

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

4.2 Alterations to the Green Belt boundary are only approved in exceptional circumstances and must be done during the local plan making process. In reviewing land to be released from the Green Belt for development, the exceptional circumstances should be weighed up against any potential adverse effects on the overall integrity of the Green Belt, according to an assessment of the whole of the Green Belt based around the five purposes set out above. Traveller sites are inappropriate development in the Green Belt. Furthermore, subject to the best interests of the child, personal circumstances, and unmet need Traveller sites in the Green Belt are unlikely to clearly outweigh harm to the Green Belt.

4.3 Sunrise Cottage and The Old Nursery are not currently being considered for the removal of their Green Belt status. The removal of the two sites from the Green Belt would not be consistent with Policy DS7 of the current Borough Plan (and would be noncompliant with Regulation 8(4) of the 2012 Regulations) which is the Part 1 plan. Notwithstanding this, the Borough Plan is currently being reviewed and the Green Belt status of these two sites may be revisited, if necessary, when the Borough Plan is updated as part of a wider review of the Green Belt. However, the Site Assessments and the Green Belt document explains how the Green Belt sites may be considered suitable for development subject to meeting national policy for the Green Belt.

4.4 If future planning applications on these sites are considered to be inappropriate development in the Green Belt, then it would be necessary to demonstrate 'very special circumstances' in accordance with the

Framework. In this regard, the allocation of these sites for new Gypsy and Traveller pitches in this DPD will be an important consideration in any such assessment.

Sustainability

4.5 Beyond the issue of the Green Belt, which is a significant matter, there are other factors that may need consideration for the locating of new Gypsy and Traveller pitches. Sites should have reasonable access to services, such as shops, schools, GP surgeries, and pharmacies, and this access should be capable of being done by modes of transport other than private car. Walking is the easiest and cheapest way to access services and thus is the focus for accessibility. However, many of the current sites are limited by their options for modes of travel.

4.6 Sites should also avoid locations that would impact upon land that has been designated for its interest, so, sites of ecological, heritage, or geological value. Similarly, contaminated land, land prone to flooding, and land in a sensitive landscape should also be avoided. These and other criteria for selecting new Gypsy and Traveller sites are set out in Policy GT2 – Strategy.

Locational Strategy

4.7 The fundamental purpose of the Gypsy and Traveller Site Allocations DPD is to allocate land to provide for the number of pitches identified for the required need to 2037. The Issues and Options consultation draft proposed four strategies for allocating new pitches. These were all assessed within the accompanying sustainability appraisal and two of the options were found to be the most sustainable, namely the following:

A. Seek to allocate new pitches firstly within the permitted area of existing sites and/or adjacent to these sites, then based on walking distances to services, and then by existing Policy H3.

D. Seek to allocate new pitches firstly within the permitted site area of existing sites, then adjacent to these existing pitches, then based on the criteria set out in the latter part of the policy.

4.8 Respondents to the issues and options selected only options A and D – with an even split of numbers to these two options from respondents. Options A and D – the first difference is that option A uses extant Policy H3 to assess sites at the outset whilst option D only uses extant Policy H3 once insufficient sites have been found via other means. The second difference is that option D separates out the permitted areas of existing sites from land adjacent to existing sites whereas option A does not and treats them together. It is considered that option D should form the basis of the

allocation of new pitches as it allows for the consideration of the permitted site area of existing sites first (and in isolation) and this has the potential for the least impact. However, in hindsight, the use of the word 'adjacent' could give rise to some ambiguity and the word 'adjoining' will be used instead to emphasise that there should be a physical relationship between the new and the existing. It should be noted that should planning applications be made for new pitches on unallocated sites then the strategic policy in this DPD would be used as the starting point to assess their suitability.

4.9 Policy GT2 identifies that new Gypsy and Traveller pitches will generally be supported within the sites allocated within GT3 or within the permitted area of existing lawful, authorised Gypsy and Traveller sites. In addition, to ensure that consideration is given to sustainability, any new sites that come forwards within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan). In addition, land adjoining the permitted area of existing lawful, authorised Gypsy and Traveller sites will be considered as long as these are in proportion appropriate to the scale of the existing site. The intention is to supersede entirely Policy H3 in the current adopted Plan (2011 – 2031). Within the emerging Borough Plan (2024 – 2039) emerging Policy H3 will simply signpost to the adopted DPD for guidance on any new pitches or plots.

Strategic Policy GT2 – Strategy

Planning permission will be granted for new Gypsy and Traveller pitches subject to compliance with other policies of the development plan and with national policy, including in relation to Green Belt, on the following land:

a) Sites allocated in Policy GT3 or within the permitted area of existing lawful, authorised Gypsy and Traveller sites;
b) Sites within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan);
c) Extensions adjoining the permitted area of existing lawful, authorised Gypsy and Traveller sites that are proportionate in scale to the existing site.

Any proposed sites considered must comply with all of the following:

a) The site should have reasonable access to essential services including health and education facilities and access to local shops;
b) The number of pitches or plots is in proportion to the size and scale of the site;
c) The number of pitches or plots is in proportion to the size and density of the nearest settled community;
d) The site is not located in areas of high flood risk;

e) The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets;
f) The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected;
g) The site has suitable access to the highway network;
h) The site is located where air or noise pollution will not significantly affect the health and well-being of site residents; and
i) The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made.

This Policy supersedes Policy H3 of the adopted Borough Plan (2011-31).

4.10 Where alternative methods for foul water treatment such as septic tanks or cesspits are required; consent will be required from the Environment Agency for an Environmental Permit (Regulations 2016). This is to enable the discharge of polluting substances (including sewage effluent) into surface waters or the ground. It is the Applicants responsibility to make the appropriate enquiries regarding any Environmental Permit requirements. (Environmental Permitting Guidance can be found at: https://www.gov.uk/environmental-permit-check-if-you-need-one

Allocation of Sites

4.11 Using the strategy above as the basis for allocating new pitches, the starting point is within existing sites. The 2021 GTAA identified two privately owned sites within the Borough which had the potential to accommodate new additional pitches within their existing approved extent. These are Winter Oak, Watling Street, Nuneaton and Sunrise Cottage, Mile Tree Lane, Bulkington. The GTAA indicated that these could accommodate up to 11 additional pitches. These have been independently assessed and it was concluded that they could accommodate 9 additional pitches without detriment to the existing occupiers. The sites have also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in these locations (this can be viewed in the 'Site Assessments and the Green Belt' document).

4.12 The 2021 GTAA also identified another site that had the potential to accommodate new pitches through the physical expansion of the site. This was the privately owned site at Fella's Acre, Mile Tree Lane, Bulkington which it was considered could accommodate an additional two pitches. This was also independently assessed and following this the site was deemed to be unsuitable for expansion – mainly relating to deliverability. However, the

landowner expressed an interest in developing another site for new pitches, namely The Old Nursery, Parrotts Grove, Coventry. This has been independently assessed and it was concluded that the site could be developed to provide five to six new pitches. The site has also been assessed by the Council, with input from key technical stakeholders, and there are no outright technical reasons why this form of development would be unacceptable in this location.

4.13 The number of pitches provided by the three sites found acceptable for allocation would provide 14-15 pitches which would, firstly, meet the minimum 11 pitches required and, secondly, build in some resilience should the anticipated levels of turnover at The Griff not take place.

4.14 To support the production of this document the Council ran a call for sites between 17th September 2021 and 22nd October 2021 which included Gypsy and Traveller sites. No sites were put forward for this type of use as a result of this call for sites. Therefore, the three assessed independently for the Council remain the only sites for consideration.

4.15 Further to the independent assessment and the Council's 'Site Assessments and the Green Belt' document the sites (and the policies) were assessed in the Sustainability Appraisal Report and the Habitats Regulations Assessment. This latter document is a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The Habitats Regulations Assessment concludes that due to the location of the allocated sites and the general absence of realistic linking impact pathways that there would be no likely significant effects on either Ensor's Pool Special Area of Conservation (SAC) or the River Mease SAC either alone or in combination.

4.16 The need for new Gypsy and Traveller pitches set out in Strategic Policy GT1 – Overall Need is for at least 11 permanent residential pitches to accommodate Gypsies and Travellers. The sites that have been found acceptable to allocate would provide up to 15 pitches at three locations and these are set out in Policy GT3 – Site Allocations. Below the policy an accompanying plan is provided showing the area to which the allocation relates.

4.17 As a result of the assessments of the sites a number of matters are considered important for any subsequent planning application to address, and these have been set out as key development requirements in the relevant policy. The basis of these principles are the responses received

during the informal consultation with key technical stakeholders on the three sites (the details of which can be viewed in the supporting 'Site Assessments and the Green Belt' document) and analysis of the site's context.

4.18 It is considered that to make additional use of the accesses at The Old Nursery and Sunrise Cottage sites some key development principles are required to ensure the use of the access is safe. Related to this is a requirement to ensure any new layout encompasses suitable bin storage to ensure these do not end up being stored outside the site. The sites have been assessed against the Wildlife Assessment Check tool as advised by the Open Spaces and Green Infrastructure SPD and in all cases a Preliminary Ecological Assessment is required to ascertain if further ecological survey work is required. The sites of Winter Oak and The Old Nursery both have boundary hedgerows and these help in reducing the site's impact on the local landscape and, thus, any development of the site should not result in these being affected.

4.19 The 'Designing Gypsy and Traveller sites: good practice guide' of 2008, although withdrawn on 1st September 2015 and replaced by the 'Planning policy for Traveller sites' document remains a useful guide setting out broad principles to consider in Traveller and Gypsy sites. With regard to communal recreation areas for children the good practice guide set out that it is considered that such areas should be provided where suitable provision is not available within walking distance on a safe route or using easily accessible public transport.

4.20 The independent assessment of the sites highlighted that the site at Sunrise Cottage already had provision of a small play area within the site. The Winter Oak site does not but on the other side of the A5 land is being developed for residential uses (reference 034076) which includes a play area, and this would be accessible nearby and thus provision within the site is not considered essential. However, the new site at The Old Nursery has no obvious communal play area in proximity to it and, thus, should be provided within the site – the independent assessment set out that there was sufficient space to accommodate it.

4.21 The matter of flooding is not addressed because at this time it is not considered to be relevant as sites are in flood zone 1 and there is no indication that they suffer inundation. However, climate change means that this could change and should this be the case then extant Policy NE4 – Managing flood risk and water quality (Borough Plan) would be used.

Policy GT3 – Site Allocations

Planning permission will be granted for new Gypsy and Traveller pitches at the following sites and as denoted with a solid red line on the accompanying site plans:

GTSA1 – Sunrise Cottage for three additional pitches within the existing site as shown as a solid red line on the accompanying plan.

GTSA2 – The Old Nursery for five to six new pitches within the site as shown as a solid red line on the accompanying plan.

GTSA3 - Winter Oak for six additional pitches within the existing site as shown as a solid red line on the accompanying plan.

Key Development Requirements

Planning applications at the allocated sites shall contain the details as set out below:

GTSA1 – Sunrise Cottage

- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.

GTSA2 – The Old Nursery

- Closure of the northern access within the site.
- Access to be made in and out of the site from the southern access within the site.
- Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site.
- Any gates within the access to be setback sufficient distance to allow any vehicle entering the site to exit the highway completely whilst the gates are opened or closed.
- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Landscaping of the site boundary to soften the appearance of the pitches from external views.

- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.
- Address any contamination on the site.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.

GTSA3 – Winter Oak

- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.
- Ensure air and noise quality to future residents of the site is acceptable.
- Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water quality will need to be considered.

GTSA1 – Sunrise Cottage



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GTSA2 – The Old Nursery



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GTSA3 – Winter Oak



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4.22 For site GTSA3 – Winter Oak, it is suggested that prior to any submission of a planning application, that the Applicant contacts National Highways to discuss the access and the information they may require to be submitted for any formal submission. In addition, for this particular site, an Air Quality Exposure Assessment and Noise Assessment may be required to determine any formal planning application to inform of any mitigation required.

Policy GT4 – Site Safeguarding

The Travelling Showpeople site at Spinney Lane/Whittleford Road, Nuneaton as denoted on plan GTSA4 with a solid red line will be safeguarded for use by Travelling Showpeople.

Alternative uses will only be permitted if it is clearly demonstrated that the site is no longer required for Travelling Showpeople accommodation.

GTSA4 – Spinney Lane/Whittleford Road, Nuneaton



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4.23 As well as the allocation of sites for new Gypsy and Traveller pitches the Council has considered the ongoing need for a Travelling Showperson's yard within the Borough, currently at Spinney Lane/Whittleford Road, Nuneaton. This is the only such type of accommodation in Warwickshire and thus has considerable importance to the County as an asset and also by ensuring continuity and availability of these plots within the Borough it contributes towards provision. The issues and options consultation document proposed the safeguarding of the site for its current use given its special status in the County. Comments were sparse on this matter, but no responses were received stating that safeguarding of this site for this purpose was

incompatible with surrounding land uses or unacceptable. The Habitats Regulations Report and the Sustainability Appraisal Report both conclude that there would be no significant adverse impacts from the identified land continuing to be used for its current use.

5.0 Monitoring

5.1 The Council produces annually an Authority Monitoring Report (AMR). Within the AMR the performance of the policies in the Borough Plan are reported as well as those in other DPDs (Development Plan Documents). Therefore, the AMR will need to report on the policies of the performance of this DPD once it has been adopted. Table 3 below sets out the indicators and targets that will be used to monitor the policies of this DPD.

Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).

Policy	Indicator	Target
Strategic Policy GT1 – Overall Need	Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.
Strategic Policy GT2 – Strategy	Sites permitted in accordance with the criteria mentioned in policy GT2.	100%. Timescales as below.
Policy GT3 – Site Allocations	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report. Contact the proposed sites on a yearly basis after the AMR to encourage the sites to come forwards and answer any concerns the owners may have on bringing the sites forwards at that time.	A minimum of six additional residential pitches permitted and available for use by 2025 and a minimum of 11 additional residential pitches permitted and available by 2037.
Policy GT4 – Site Safeguarding	Monitor the use of the safeguarded site.	The identified site at Spinney Lane/Whittleford Road, Nuneaton to remain used for Travelling Showpeople unless it is clearly demonstrated that the site is no longer required for Travelling Showpeople accommodation.

Appendix 1

Relationship between the policies in this DPD and the extant Borough Plan.

Existing Borough Plan policies	Effect of Gypsy and Traveller Site Allocations DPD policies
Policy DS4 – Overall development needs (third bullet point only).	Superseded by Strategic Policy GT1 – Overall Need.
Policy H3 – Gypsies and Travellers.	Superseded by Strategic Policy GT2– Strategy.

For reference Policy DS4 Overall development needs should now read:

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: QB-2019-000616

BETWEEN :

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

Claimants

– and –

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

Defendants

Exhibit 'SM3'

Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2021 Update

Nuneaton and Bedworth Borough Council

Final Report

December 2021

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Executive Summary

Introduction

The Nuneaton and Bedworth Borough Council Gypsy and Traveller Accommodation Assessment (GTAA) provides the latest available evidence to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople across the borough.

The GTAA updates the study of 2016 and has included:

- A review of existing (secondary) data.
- Stakeholder consultation; and
- A household survey. Survey data for 46 out of 52 Gypsy and Traveller households living on pitches (an 88.5% response rate) and a survey response from the Travelling Showperson household living in the borough were obtained.

These data have been analysed to provide a picture of current provision and activity across the district and an assessment of future need. The findings of the study provide an up-to-date, robust and defensible evidence base for policy development.

Population and current accommodation provision

The 2011 Census identified a total of 29 households in Nuneaton and Bedworth where the Household Reference Person had a 'White: Gypsy or Irish Traveller' ethnicity. Of these 13 lived in a caravan and 16 in bricks and mortar housing.

The bi-annual DCLG Traveller caravan count (July 2019 reported a total of 85 caravans (54 social rented and 31 private) and an average of 58 caravans over the last nine counts starting in January 2016. The annual Travelling Showperson caravan count (undertaken each January) has consistently showed zero caravans on Travelling Showperson's yards but there is one occupied Showperson's yard which currently has 1 occupied caravan.

In terms of Gypsy and Traveller site provision there is one county council site (25 pitches), 12 private authorised sites (41 pitches). There is one Travelling Showperson yard (4 plots).

Planning policy requirements for needs assessments

The 2019 National Planning Policy Framework (NPPF) states in Paragraph 61 '*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy (including travellers)*'. A footnote in the NPPF then states '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document*'.

The 2015 Planning Policy for Traveller Site (PPTS) document states that 'local planning *authorities should make their own assessment of need for the purposes of planning'* and '*ensure that their Local Plan includes a fair, realistic and inclusive policies to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply'.*

In the absence of further guidance on preparing GTAAs, the methods adopted by arc[4] reflect the PPTS, build upon those methods established through previous guidance, our practical experience and decisions made at planning inquiries and appeals.

'Cultural' and 'PPTS need'

In order to reconcile the requirements of national policies, the GTAA establishes an overall 'cultural' need for pitches which accords with the overall need for the Travelling community and takes into account the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. A PPTS 'policy filter' is then applied to identify the level of need associated with those households meeting the definitions set out in the PPTS Annex 1. It is our understanding that the needs arising from the PPTS analysis establishes the level of need against which a 5-year land supply is assessed, but the Council should be mindful of a wider obligation to consider overall 'cultural' need.

Analysis of the travelling behaviour of households or emerging households planning to move residential location indicates that 80% meet the nomadic habit of life/travelling behaviour criteria set out in PPG.

Plan periods

Need has been assessed over a short-term 2021/22 to 2025/26 and longer-term 2025/26 to 2036/37.

Gypsy and Traveller pitch requirements

Overall need

For the period (2021/22 to 2036/37) the GTAA has identified the following Gypsy and Traveller pitch needs: a cultural need of 20 pitches of which the PPTS need is 16 pitches. Needs figures are broken down into time periods as show in Table ES1.

The main drivers of need are net-in migration and household formation. This level of need should be recognised in the Local Plan.

Table ES1 Gypsy and Traveller pitch need: Nuneaton and Bedworth 2021/2 – 2036/37		
	Cultural need	**Of which: PPTS NEED**
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	**8**	**6**
Longer-term need		
Over period 2026/7 to 2030/31 (B)	*4*	3
Over period 2031/32 to 2036/37 (C)	*8*	7
Longer-term need TOTAL 2021/22 to 2036/37 (11 years) D=(B+C)	***12***	**10**
NET SHORTFALL 2020/21 to 2036/37 (A+D) (17 years)	**20**	**16**

Meeting the need

The GTAA analysis needs to take account of the potential additional supply of pitches before a final shortfall figure is calculated. This supply can come through turnover of pitches on The Griff County Council site – that is pitches becoming vacant and available for new households to move onto them; through existing sites being extended or intensified (more pitches within the site); and through new site development.

Turnover

Based on household survey evidence, 7 pitches became available on The Griff County Council site in the past 5 years, or 1.4 pitches each year. Over the next five years and estimated 7 pitches will come available based on past trends and over the period 2026/7 to 2036/7, a further 15 pitches are expected to become available to meet identified need.

Expansion/intensification of existing sites

There is potential for an additional 11 to 13 pitches across Nuneaton and Bedworth through site expansion (increasing the size of a site to accommodate new pitches) or site intensification (increasing the number of pitches on an existing site).

Overall impact on need

Table ES2 considers the impact of turnover and site expansion/intensification on overall pitch need to 2036/37.

Table ES2 Addressing Gypsy and Traveller pitch need		
Nuneaton and Bedworth	**Cultural need**	**Of which: PPTS NEED**
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	8	6
Anticipated minimum turnover on council site (B)	7	7
Potential intensification/expansion of existing sites (C)	6	6
Residual need 2021/22 to 2025/26 after turnover and potential intensification/expansion (D) = A-B-C	**-5 Need met**	**-7 Need met**
Longer-term need 2026/27 to 2036/37 (E)	12	10
Anticipated minimum turnover on council site (F)	**15**	**15**
Potential intensification/expansion of existing sites (G)	**5**	**5**
Residual need 2025/26 to 2036/37 after turnover (H) = E-F-G	**-8 Need met**	**-10 Need met**
Residual need 2021/22 to 2036/37 after turnover and potential pitch development considered (I) = D+H	**-13 (Need Met)**	**-17 Need met**
Summary	**Cultural need**	**Of which: PPTS NEED**
Plan period Authorised Pitch Shortfall (2021/22 to 2036/37) (J = A+E)	**20**	**16**
Anticipated minimum turnover on council site (K) = B+F	**22**	**22**
Potential intensification/expansion of existing sites (L)=C+G	**11**	**11**
Residual need 2021/22 to 2036/37 after turnover (M=J-K-L)	**-13 Need met**	**-17 Need met**

Transit site/stop over need

There is currently no provision to address transit need but given unauthorised encampment activity, the Council will need to consider appropriate responses. These include transit pitches, stopover places and negotiated stopping arrangements. The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. The need to identify land for negotiated stopping[1] is a priority.

Travelling Showperson plot requirements

There is currently one Travelling Showperson yard in the borough accommodating 1 household on 4 plots. The GTAA has evidenced no additional need but it does

[1] See https://www.negotiatedstopping.co.uk for further details

recommend that the Council safeguards the current yard for Travelling Showperson use.

Temporary stopping places and transit provision

There are a number of ways to deliver temporary places where Travellers can stop whilst passing through a local authority area. There is currently no provision to address transit need but given unauthorised encampment activity, the Council will need to consider appropriate responses. These include transit pitches, stopover places and negotiated stopping arrangements. The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. The need to identify land for negotiated stopping[2] is a priority.

Regarding Bargee Travellers, the 2016 GTAA identified at least one family and the council needs to explore the potential of establishing at least one affordable permanent mooring within Nuneaton and Bedworth

Policy recommendations

The Local Plan should recognise an overall cultural need for 20 pitches of which 16 is from households who meet the PPTS household definition over the period to 2036/37. However, anticipated turnover on The Griff and the potential expansion and intensification of existing private sites is expected to meet the identified need.

The level of turnover on The Griff should be monitored through site management data. The Council should also carry out technical appraisals of the expansion/intensification of existing sites to confirm that additional pitches can be delivered.

The analysis would indicate there is no overall strategic need for additional sites. It is however recommended that the Local Plan sets out criteria-based policies to inform future planning applications for small private sites.

The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. This includes identifying land for Negotiated Stopping arrangements.

Although there is no additional need for Travelling Showperson plots, it is recommended that the existing yard is safeguarded for Travelling Showperson use.

[2] See https://www.negotiatedstopping.co.uk for further details

1. Introduction

Overview

1.1 In January 2021 , arc[4] was commissioned by Nuneaton and Bedworth Borough Council to update the 2016 Gypsy and Traveller Accommodation Assessment which had also been carried out by arc[4].

1.2 The overall scope of the study is to ensure that the Council has a robust evidence base to determine an appropriate level of residential pitch and transit provision over the period to 2036/37 and to identify the accommodation needs of Gypsies and Travellers to meet both the PPTS-defined need and the Council's obligations under Section 124 of the Housing and Planning Act 2016.

1.3 The Council are also looking to develop a site allocations documents to sit alongside the Borough Plan which is based on up to date evidence. The 2021 GTAA replaces the 2016 GTAA.

1.4 The 2021 GTAA will:

- Inform the development of future pitches across the borough.
- Provide information on Gypsy, Traveller and Travelling Showpeople's accommodation needs – both temporary and permanent (including bricks and mortar accommodation).
- Help gain a better understanding of the pattern of movements and encampments in the Council's administrative area.
- Consider key health, education, employment and social care considerations to feed into a community development strategy.

1.5 The needs of Bargee Travellers/Houseboat dwellers will also be considered in this GTAA and build upon the evidence base established in the 2016 GTAA.

1.6 This GTAA has assessed pitch needs based on the overall requirements of the Gypsy and Traveller community. It then takes into account the definitions in Annex 1 of the PPTS relating to travelling behaviour in line with government guidance. This is discussed in further detail in Chapter 2 of this report.

1.7 This GTAA forms part of the evidence base for the emerging Local Plan.

1.8 This study has been carried out during the 2020 COVID-19 pandemic and lockdown. We are extremely grateful to the help and support provided by the Council in preparing this GTAA.

Who the study covers

1.9 This GTAA adopts the definition of 'Gypsies and Travellers' set out within *Planning policy for traveller sites* (PPTS), which was published by the government in August 2015. This sets out the following definition of 'Gypsies and Travellers':

'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.'[3]

1.10 In addition, PPTS 2015 provides the following 'clarification' for determining whether someone is a Gypsy or Traveller:

'In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

a) whether they previously led a nomadic habit of life

b) the reasons for ceasing their nomadic habit of life

c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.'[4]

1.11 The following definition of 'Travelling Showpeople' is set out in PPTS 2015:

'Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.'[5]

1.12 In addition:

'For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use pitches for "travelling showpeople", which may/will need to incorporate space or to be split to allow for the storage of equipment.'[6]

1.13 For the purposes of this study, therefore, Gypsies and Travellers live on pitches on sites, whilst Travelling Showpeople live on plots on yards.

1.14 This GTAA expresses two levels of need for pitches: a 'cultural' and 'PPTS' need. This is to ensure that the overall needs of the Travelling community are fully reflected in the evidence base which needs to accord with planning and wider policies.

[3] DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 1
[4] DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 2
[5] DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 3
[6] DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 5

Report structure

1.15 The GTAA 2021 report structure is as follows:

- **Chapter 1** **Introduction**: provides an overview of the study.
- **Chapter 2** **Policy and local context**: presents a review of the national policy context which guides the study and the key findings from the 2016 GTAA.
- **Chapter 3** **Methodology**: provides details of the study's research methodology.
- **Chapter 4** **Review of current Gypsy and Traveller population and provision of pitches/plots**: reviews estimates of the Gypsy and Traveller and Travelling Showpeople population across the study area and existing site/yard provision.
- **Chapter 5** **Household survey:** presents relevant data obtained from the household survey research.
- **Chapter 6** **Pitch/plot/transit requirements**: focuses on current and future pitch/plot requirements. This chapter includes a detailed assessment of drivers of demand, supply and current shortfalls across the study area.
- **Chapter 7** **Conclusion and strategic response**: concludes the report, providing brief summary of key findings and recommendations.

1.16 The report is supplemented by the following appendices:

- **Appendix A** Household questionnaires;
- **Appendix B** Glossary of terms.

2. Policy and local context

2.1 This study is grounded in an understanding of the national legislative and planning policy context that underpins the assessment and provision of accommodation for Gypsies and Travellers and Travelling Showpeople.

2.2 This chapter sets out the policy context within which this GTAA has been prepared, including a consideration of the previous GTAA for the borough.

Government policy and guidance

2.3 The 2019 National Planning Policy Framework states in Paragraph 61 '*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*' It then lists a number of groups including Travellers. A footnote to the paragraph states '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document*'.

2.4 The 2015 Planning Policy for Traveller Site (PPTS) document states that 'local planning *authorities should make their own assessment of need for the purposes of planning'* and '*ensure that their Local Plan includes a fair, realistic and inclusive policies to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply'.*

2.5 Policy A of the 2015 PPTS relates to evidence needed to plan positively and manage development. This states *'in assembling the evidence base necessary to support their planning approach, local planning authorities should:*

- *pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups);*
- *co-operate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and*
- *use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.*

2.6 In the absence of further guidance on preparing GTAAs, the methods adopted by arc[4] reflect Policy A of the PPTS; build upon those methods established through previous guidance; our practical experience and findings from planning inquiries and appeals.

2.7 The calculation of pitch/plot requirements is based on established DCLG modelling methodology, as advocated in *Gypsy and Traveller Accommodation Needs Assessment Guidance* (DCLG, 2007). Although this guidance was

formally withdrawn in December 2016, in the absence of any updated guidance on the subject, it continues to provide a good practice approach for needs modelling.

2.8 Policy B of the 2015 PPTS relates to planning for traveller sites and requires Local Plans:

- to be prepared with the objective of contributing to the achievement of sustainable development and consistent with the policies of the NPPF; and
- to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

2.9 Policy B (paragraph 10) sets out that local authorities should, in producing their Local Plan:

a. identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;

b. identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;

c. consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);

d. relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and

e. protect local amenity and environment.

2.10 Policy B (paragraph 13) sets out that local authorities should ensure that traveller sites are sustainable economically, socially and environmentally and therefore ensure that their policies:

a. promote peaceful and integrated co-existence between the site and the local community;

b. promote, in collaboration with commissioners of health services, access to appropriate health services;

c. ensure that children can attend school on a regular basis;

d. provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;

e. provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers who may locate there or on others as a result of new development;

f. avoid placing undue pressure on local infrastructure and services;

g. do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and

h. reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Intentional unauthorised development

2.11 The planning policy statement issued with PPTS 2015[7] (and confirmed by Ministerial Statement[8]) makes clear that if a site is intentionally occupied without planning permission this would be a material consideration in any retrospective planning application for that site. Whilst this does not mean that retrospective applications will be automatically refused, it does mean that failure to seek permission in advance of occupation will count against the application.

2.12 In addition, PPTS 2015 (Paragraph 12) makes clear that in exceptional cases where a local authority is burdened by a large-scale unauthorised site that has significantly increased their need, and their area is subject to strict and special planning constraints, then there is no assumption that the local authority will be required to meet their Gypsy and Traveller site needs in full. This is intended to protect local planning authorities with significant land constraints from being required to provide for additional needs arising directly from large sites such as Dale Farm (a large unauthorised site in Essex).

PPTS Definitions

2.13 The PPTS 2015 Annex 1 sets out definitions of Gypsies and Travellers and Travelling Showpeople for the purposes of planning policy:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such."[9]

2.14 In addition, PPTS 2015 adds the following 'clarification' for determining whether someone is a Gypsy or Traveller:

"In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

a) whether they previously led a nomadic habit of life

b) the reasons for ceasing their nomadic habit of life

[7] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457632/Final_Chief_Planning_Officer_letter_and_written_statement.pdf
[8] http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-12-17/HCWS423/
[9] DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 1

c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances."[10]

2.15 The following definition of 'Travelling Showpeople' is used, also taken from PPTS 2015:

"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above." [11]

2.16 In addition:

"For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use pitches for "travelling showpeople", which may/will need to incorporate space or to be split to allow for the storage of equipment."

Considering 'Cultural' and 'PPTS' need

2.17 Paragraph 61 of the 2019 NPPF recognises the need to assess a range of community needs including those of Travellers. The February 2019 Planning Practice Guidance (PPG) which accompanies the NPPF states, 'the household projections that form the baseline of the standard method are inclusive of all households including Gypsies and Travellers as defined with Planning Policy for Travelling Sites'[12] .The NPPF states that the PPTS sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document. The planning policy therefore differentiates between 'travelling' and 'non travelling' Gypsies and Travellers.

2.18 For non-travelling Travellers, their needs should also be met by the requirements of the NPPF as non-travelling households are a component of overall housing need. The needs of non-travelling Gypsies and Travellers are therefore effectively contained within the general housing requirement that Local Plans will set out. Additionally, the Human Rights Act 1998 and the Equalities Act 2010 protects the cultural choice of Gypsies and Travellers to live in mobile accommodation and therefore there is a need to plan for this type of accommodation. The Housing and Planning Act 2016 section 124 also makes specific reference to the needs of households living in caravans.

2.19 Therefore, our GTAAs establish an overall 'cultural' need for pitches which accords with the overall need for the Travelling community and takes into account the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. A PPTS 'policy filter' is then applied to identify the level of need associated with those households meeting the definitions set out in the PPTS Annex 1. It is our understanding that the needs

[10] DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 2
[11] DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 3
[12] 2019 PPG Paragraph: 017 Reference ID: 2a-017-20190220

arising from the PPTS analysis establishes the level of need against which a 5-year land supply is assessed but the Council should be mindful of a wider obligation to consider overall 'cultural' need.

2.20 Our assessment methodology is set out in Chapter 3 and the outworking of this approach for Nuneaton and Bedworth is set out in Chapter 7.

Previous GTAA

2.21 A Gypsy and Traveller and Travelling Showperson Accommodation Assessment was prepared in 2016. This evidenced an overall need for 19 pitches over the period 2016/17 to 2031/32. However, this took into account potential supply of 20 pitches at Parrotts Grove which had been verified by Warwickshire County Council as potential pitches for occupancy. The need also assumed that 2 pitches would come available each year on The Griff, the County Council run site. A need for 5 transit pitches was also identified. There was no additional need for Travelling Showperson plots identified.

Responding to challenges

2.22 GTAAs are subject to intense scrutiny, particularly at planning inquiries and hearings. The methodological approaches taken by arc[4] aim to maximise the robustness of evidence and measures include:

- An up-to-date assessment of the number of pitches on sites and the number of households living on pitches and any vacancies.
- Maximising response rates from households.
- Carefully considering the relationship between households and the pitches they occupy.
- Sensitive analysis of the flows of existing households from and to districts.
- Consideration of overcrowding and concealed households.
- Careful consideration of turnover on council/housing association pitches, with clear assumptions over future potential capacity from households moving away from pitches.
- Longer-term modelling of need using detailed demographic information contained from household survey work.
- Reasonable assumptions around the number of households in bricks and mortar accommodation who may want to move to a pitch.

3. Methodology

Introduction

3.1 The GTAA research method is grounded in an understanding of the requirement of the NPPF and based on an established methodology which regularly withstands scrutiny at planning inquiries and hearings.

3.2 The methodology has comprised:

- a desktop analysis of existing documents, including data on pitches/sites, plots/yards and unauthorised encampments;
- the collection of primary data, including a household interviews with Gypsies and Travellers and Travelling Showpeople; and
- an assessment of accommodation needs taking into account all available data and information.

3.3 The information gathering has been carried out in three phases, as outlined below:

- Phase 1: Literature/desktop review.
- Phase 2: Survey of Gypsies and Travellers and Travelling Showpeople across the districts.
- Phase 3: Survey of stakeholders.
- Phase 4: Needs assessment and production of the GTAA 2021 report.

Phase 1: Literature/desktop review and steering group discussions

3.4 We have reviewed relevant literature, including legislative background and best practice information; and analysis of available secondary data relating to Gypsies and Travellers and Travelling Showpeople in the borough.

Phase 2: Fieldwork survey and interviews with Gypsies and Travellers and Travelling Showpeople

3.5 Our aim is to obtain interviews from all households living on sites using a standard questionnaire (Appendix A). This questionnaire has been carefully designed in consultation with councils, feedback from community representatives and planning agents. Letters were sent to residents advising them that the study was taking place and inviting people to contact arc^4 directly if they wanted the interview done over the phone. Site visits took place during early March 2021 and some interviews were conducted with appropriate social distancing taking place. Most interviews took place during late April following

the easing of lockdown restrictions, but social distancing measures were maintained.

3.6 Regarding the PPTS definition, the questionnaire asks if households have been travelling in the preceding year or within the past 5 years and/or intend to travel in the next year or in any year in the next five years. Note that households who cannot travel due to age or health limitations are excluded from analysis. If eligible households answer 'yes' to either question the household meets the travelling criteria set out in PPTS. By contrast, all households identifying as part of the Gypsy and Traveller or Travelling Showpeople community are contained within a broader 'cultural' definition.

3.7 Analysis of the travelling behaviour of households or emerging households planning to move residential location indicates that 76.2% meet the nomadic habit of life/travelling behaviour criteria set out in PPG, These households meet the criteria by either travelling in the preceding year or within the past 5 years and/or intend to travel in the next year or in any year in the next five years. This is discussed further in the analysis in Chapter 7.

Phase 3: Stakeholder survey

3.8 The survey of stakeholders was conducted during January to March 2021, each stakeholder was contacted and provided with a questionnaire and invited to answer questions they felt were relevant to their knowledge and experience.

3.9 Stakeholders included representatives from all of the neighbouring local authorities, who were requested to provide information regarding their local situation and provision, including issues such as unauthorised encampment activity. This approach assists the Council in meeting their requirements under the Duty to Cooperate.

3.10 A total of three responses to the stakeholder survey were obtained and the findings of the online stakeholder survey are set out in Chapter 6 of this report.

Phase 4: Needs assessment and production of report

3.11 A detailed explanation of the analysis of pitch requirements is contained in Chapter 6 but briefly comprises analysis of the following:

- current pitch supply, households living in bricks and mortar accommodation; households planning to move in the next five years, and emerging households to give total need for pitches; and
- supply based on the number of authorised pitches and turnover on sites on public pitches.

3.12 The overall need for pitches is then compared with the overall supply.

3.13 The need for transit pitches was calculated using unauthorised encampment data which set out how many encampments had taken place and the number of caravans on them. The survey also asked households if they felt there was a need for transit pitches.

Pitches and households

3.14 One of the key challenges faced when assessing Gypsy and Traveller pitch requirements is the actual nature of pitches and how this relates to the number of households they can support.

3.15 PPTS 2015 refers to the need for local planning authorities to '*identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets'* and *'relate the number of pitches/plots to the circumstances of the specific size and location of the site and the surrounding population's size and density'* (PPTS 2015, paragraph 10).

3.16 Planning decision notices usually refer to the number of pitches on a site or the specifics of what can be on a pitch e.g. statics, tourers; or specific individuals and/or households.

3.17 As part of the GTAA, it is essential that the characteristics of sites, the number of pitches and how many households these can support is carefully considered. There are a range of issues which need to be considered when reviewing site and pitch characteristics and their potential implications for future pitch and site requirements which are now summarised.

Site and pitch size

3.18 There are no definitive parameters for site or pitch sizes. Previous Design Guidance (DCLG, 2008) states in paragraph 4.4 that '*Gypsy and Traveller sites are designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking. Sites of various sizes, layouts and pitch numbers operate successfully today and work best when they take into account the size of the site and the needs and demographics of the families resident on them'.*

3.19 Paragraph 4.47 states that *'to ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 metres from any other trailer, caravan or park home that is occupied separately'.*

3.20 Paragraph 7.12 states that '*as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area'*.

3.21 Paragraph 4.13 states that *'smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle'.*

3.22 As a general guide, it is suggested by arc[4] that the minimum pitch size is 25m by 25m (625 square meters or 0.0625 hectares). This would support a twin-unit chalet/mobile home (15m x 6.5m), a tourer, an amenity shed/building (5m x 4m), two vehicle spaces (minimum 2.4m x 4.8m for each space) and turning circle for vehicles, amenity space and a small garden area/play space. Residential units need to be 3m from the pitch boundary and at least 6m apart. A slightly larger pitch of 25m by 30m (750 square meters or 0.075 hectares)

would be appropriate for larger household units requiring several residential units.

3.23 There is no guidance on the maximum size of a site but it is generally accepted amongst the Travelling community that sites of 6-10 pitches are appropriate.

Occupancy

3.24 A pitch may accommodate more than one family unit, for instance it could include a family, older children who have formed their own household and other family members. This could lead to potential overcrowding and this is considered as part of the GTAA household survey.

3.25 Private sites may restrict occupancy to close family/friends. This limits opportunity for others to move onto the site but this restrictive occupancy may provide for emerging needs within a household, for example as grown-up children (previously living within a parent(s) or grandparent(s) home) form independent households of their own.

3.26 Quality, size of pitch and proximity of caravans on pitches vary dramatically.

Response

3.27 For each site, a pragmatic and reasonable judgement should be made as part of the GTAA regarding the number of pitches or sub-divisions on sites. This may relate to the number of families living on sites, and could include a consideration of the potential intensification of sites (for instance through further sub-division, extension or use of vacant areas within the site). Capacity and layout of sites should be identified through site observation (directly or indirectly through Google maps or similar), planning history and local knowledge of planning, enforcement and liaison officers.

3.28 Pitches can become intensified or sub-divided once planning applications have been approved. These sub-divisions tend to be tolerated by councils. Often pitches become subdivided to provide space for newly-forming households, particularly from family members. The potential for pitch intensification/sub-division was considered on site visits and respondents were asked whether intensification/sub-division was possible on the site they lived on.

4. Review of the Gypsy, Traveller and Travelling Showpeople population and existing provision of pitches and plots

4.1 This chapter looks at the current picture in terms of the current population and demography of Gypsies and Travellers across the study area before going on to explore the extent and nature of provision across the area.

2011 Census population and household estimates

4.2 The 2011 Census (Tables 4.1 and 4.2) identified a total of 75 people and 29 households in Nuneaton and Bedworth with a Household Reference Person who identified as having a White Gypsy or Irish Traveller ethnicity. 46.7% of households who identified as Gypsy/Traveller lived in bricks and mortar accommodation.

Table 4.1 People from households identifying as White Gypsy or Irish Traveller by accommodation type

Local Authority	Total: Accommodation type	House or bungalow	A flat, maisonette or apartment	A caravan or other mobile or temporary structure
Nuneaton and Bedworth	75	31	4	40

Source: 2011 Census CT127

Table 4.2 Households identifying as Gypsy Traveller by accommodation type

Local Authority	Total: Accommodation type	House or bungalow	A flat, maisonette or apartment	A caravan or other mobile or temporary structure
Nuneaton and Bedworth	29	12	4	13

Source: 2011 Census CT0128

Caravan Count information

4.3 Snapshot counts of the number of Gypsy and Traveller caravans were requested by the government in 1979 and have since been undertaken every January and July by local authorities. An annual count of Travelling Showperson caravans takes place every January. The counts provide a source of information on the number of caravans located on authorised and unauthorised sites but do not record the actual number of pitches on sites/yards.

4.4 The figures for the last nine Traveller caravan counts for Nuneaton and Bedworth are set out in Table 4.3. Data shows that an average of 58 caravans have been recorded on sites across the borough during the nine-count period. Of these, 63.8% have been on the county council site, 35.2% on private sites and 1% on unauthorised sites.

Table 4.3 Bi-annual Traveller caravan count figures January 2016 to January 2020 Nuneaton and Bedworth

Date	Authorised sites with planning permission		Unauthorised sites without planning permission	Total
	Social Rented	Total Private	Total Unauthorised	
Jan 2016	**28**	**20**	**1**	49
Jul 2016	**37**	**17**	**0**	54
Jan 2017	**28**	**20**	**1**	49
Jul 2017	**28**	**3**	**1**	32
Jan 2018	**28**	**20**	**1**	49
Jul 2018	**54**	**31**	**0**	85
Jan 2019	*	*	*	0
July 2019	**54**	**31**	**0**	85
Jan 2020	*	*	*	0
Nine-Count Average (excluding missing counts)	37	20	1	58
Nine-Count % Average	63.8	35.2	1.0	100.0

Source: MHCLG Traveller Caravan Count, Live Table 1 (January 2020)

*No data reported in MHCLG tables

Source: MHCLG Traveller Caravan Count, Live Table 1

4.5 Over the period 2015 to 2020 there were no reported Travelling Showperson caravans across Nuneaton and Bedworth in the MHCLG caravan count

statistics (Table 4.4). However, there is one Showperson's yard at Whittlesford which currently has 1 caravan .

Table 4.4 Annual Travelling Showpeople caravan count figures January 2015 to January 2020

Count	Authorised sites with planning permission		Unauthorised sites without planning permission	Total
	Social Rented	Total Private	Total Unauthorised	
2015	0	0	0	0
2016	0	0	0	0
2017	0	0	0	0
2018	0	0	0	0
2019	0	0	0	0
2020	0	0	0	0
Six-Count Average	0	0	0	0
Six-Count % Average	0	0	0	0

Source: MHCLG Travelling Showpeople Caravan Count, Live Table 3 (January 2019)

Local site and yards

4.6 Broadly speaking, authorised sites are those with planning permission and can be on either public or privately-owned land. Unauthorised sites are made up of either longer term[13] unauthorised encampments[14], that have been in existence for some considerable time and so can be considered to be indicative of a permanent need for accommodation (in some instances local authorities class these as tolerated sites and do not take enforcement action to remove them); and unauthorised developments, where Travellers are residing upon land that they own and that does not have planning permission (see Appendix B for more detailed definitions).

4.7 Table 4.5 sets out the range of sites and Travelling Showpersons yards across Nuneaton and Bedworth. The table also shows the number of household survey responses obtained. In summary there is one county council site (25 pitches), 12 private authorised sites (41 pitches) and one Travelling Showperson yard (4 plots).

[13] Approximately three months or longer
[14] Please note that unauthorised encampments also encompass short-term illegal encampments, which are more indicative of transit need, see para 7.10 for more information on these encampments.

Table 4.5 List of Gypsy & Traveller Pitches on Sites and Showperson Plots on Yards (as at April 2021)

Site Reference	Site Name	Site Location	Type of Site	Ownership	Total Number of Pitches	Total Occupied Pitches	Total Vacant Pitches	Number of households	Household interview achieved*	Household interviews not achieved	Reason why household interview not achieved	
											Residents not present	Unable to contact
Priv1	Tides Reach, Smorrall Lane	Smorrall Lane, Bedworth, CV12 0NL	Permanent	Private	1	**1**	0	**2**	2	0		
Priv2	Bottom Meadow, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	8	**8**	0	**3**	3	0		
Priv3	Fella's Acre, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	5	**5**	0	**3**	3	0		
Priv4	Rosewood, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	1	**1**	0	**1**	1	0		
Priv5	The Haven, Mile Tree Lane	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	3	**3**	0	**3**	3	0		
Priv6	The Poppy's Mobile Caravan Park	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	6	**5**	1	**5**	5	0		
Priv7	Two Trees	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	2	**2**	0	**2**	0	2	0	2
Priv8	Plot 5, Parrotts Grove	Parrotts Grove, Coventry, CV2 1NQ	Permanent	Private	2	**2**	0	**1**	1	0		

CONTINUED ON NEXT PAGE

Priv9	Boundary Paddock, Withybrook Road	Withybrook Road, Bulkington, CV12 9JW	Permanent	Private	2	**2**	0	**3**	3	0		
Priv10	Watling Street (also known as Winter Oak and The Paddock)	Watling Street, Nuneaton, CV11 6BQ	Permanent	Private	6	**6**	0	**4**	4	0		
LA1	The Griff, Coventry Road	Coventry Road, Nuneaton, CV10 7PE	Permanent	Council	25	**20**	5	**20**	19	1	1	0
Priv11	Tara Park	Coventry Road, Bulkington, CV2 1NT	Permanent	Private	2	**2**	0	**1**	1	0		
Priv12	Sunrise Cottage	Mile Tree Lane, Bulkington, CV2 1NT	Permanent	Private	3	**3**	0	**3**	1	2	0	2
Gypsy and Traveller TOTAL					**66**	**60**	**6**	**51**	**46**	**5**	**1**	**4**

Yard Reference	Site Name	Site Location	Type of Site or Yard	Ownership	Total Number of Plots on Yard	Total Occupied Plots	Total Vacant Plots	Number of households	Household interviews achieved	Household interviews not achieved	Reason why household interview not achieved	
											Residents not present	Unable to contact
TSP1	Fairways Showman's Site	Spinney Lane/Whittlesford Road, Whittlesford, Nuneaton, CV10 9HU	Permanent	Private	4	**1**	3	**1**	1	0		

* The total number of completed surveys was 38. For some sites, one survey covered multiple households (Priv1 Tides Reach 1 survey covered 2 households; Priv 2 Bottom Meadow 1 survey covered 3 households; Priv 3 Fellas Acre 1 survey covered 3 households; Priv 5 The Haven 1 survey covered 3 households; Priv 9 Boundary Paddock 1 survey covered 3 households. This results in data from 46 Gypsy and Traveller households being obtained out of 51 households (90.2%)

Table 4.6 Summary of Gypsy, Traveller pitches and Travelling Showperson plots

Summary		Total number of pitches/plots	Total occupied pitches/plots	Total vacant pitches/plots	Number of households on pitches/plots	Household interviews achieved	Household interviews not achieved	Reason for not achieving interview	
								Residents not present	Unable to contact
Gypsy and Traveller	Private	41	40	1	31	27	4	0	4
	Council	25	20	5	20	18	1	1	0
	Total	**66**	**60**	**6**	**51**	**46**	**5**	**1**	**4**
Travelling Showperson	**Private**	**4**	**4**	**0**	**1**	**1**	**0**	**0**	**0**

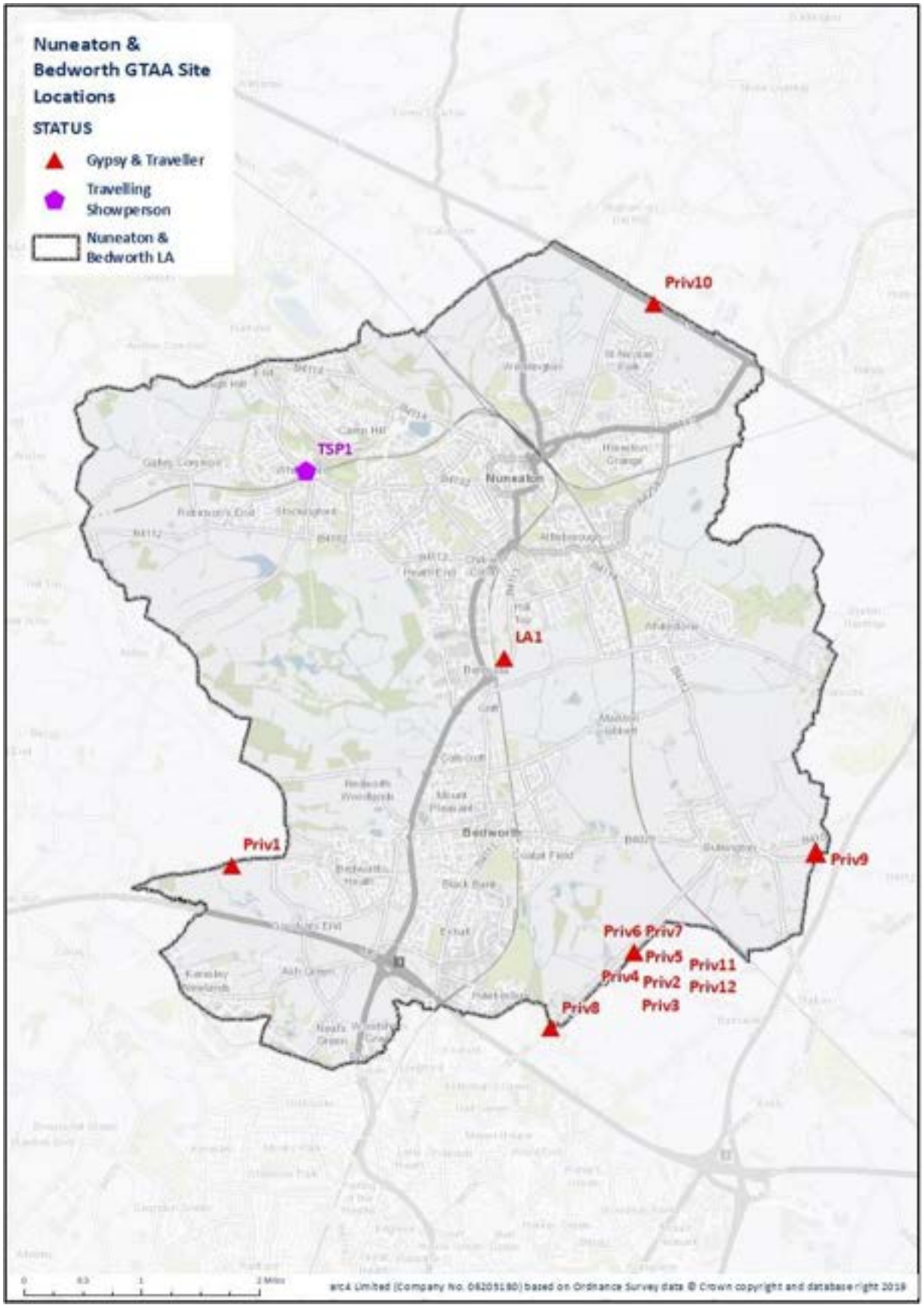
Source: Council data 2021, site survey fieldwork 2021

Note: the following sites are no longer assumed to be part of supply:

Parrots Grove CV2 1NQ: Sunny Acre, Half Acre, Plot 3, Gypsy Site No, 4

Punch Bowl Bridge, Stoney Road, Nuneaton, CV10 0JS

Map 4.1 Location of sites and yards in Nuneaton and Bedworth



5. Household survey and stakeholder findings

5.1 This chapter presents the findings of the household survey, which was carried out to provide primary data to inform this GTAA. The survey aimed to reach as many Gypsy, Traveller and Travelling Showpeople living in the study area as possible. It was conducted using the questionnaire presented in Appendix A. Data from site management information is also included in the analysis where appropriate.

Gypsy and Traveller households living in Nuneaton and Bedworth

5.2 There were a total of 38 responses to the household survey. Of these:

- 19 surveys were completed by households living in the Griff County Council site.
- 19 were surveys completed by Gypsy and Traveller households living on private sites. Some of these surveys included information for multiple households living on family sites. Information for 8 households was collected in this way.
- The total number of Gypsy and Traveller household responses was therefore 46.
- 1 survey was completed by a Travelling Showperson family.

5.3 It would not be appropriate to provide a detailed analysis of the survey information as this has the potential to identify individual responses. Broad summaries of the household survey data findings from all 47 households are presented below in order to maintain respondent confidentiality. Each question includes a 'base' number which is the number of households responding to a particular question.

5.4 Of household representatives interviewed (base=38), 34.2% described themselves as Gypsy (including Romany, Romany Gypsy and English Gypsy), 34.2% as English Traveller, 28.9% as Irish Traveller and 2.8% as Travelling Showperson.

5.5 Data from the household survey provided an insight into household size, type and the age of residents living on pitches/plots.

5.6 In terms of household size (base=38): 18.4% of households were single person; 15.8% were two person; 18.4% were three person; 7.9% were four person, 18.4% were five person, 13.2% were six person and 7.9% were six or more person households.

5.7 Regarding household type (base=38), 18.4% were singles, 15.8% couples, 31.6% couples with children, 18.4% lone parents and 15.8% other household types (for instance extended families).

5.8 Across the sites/plots there were a total of 132 people recorded living in 47 households. Overall, 34.1% of the Travelling population living on pitches/plots were aged 13 or under and 7.6% were aged 14-17. In addition, 22% were aged 18-34, 15.2% aged 35-49, 11.4% aged 50-64 and 9.8% aged 65 and over.

5.9 In terms of length of residence (base=35), 51.4% had lived at their current place of residence for less than 5 years, 11.4% between 5 and less than 10 years, 17.1% between 10 and less than 20 years and 20% for 20 years or more.

5.10 When asked about overcrowding (base=38), 18.4% of respondents said that their home is overcrowded and 23.1% said their pitch was overcrowded.

5.11 The consensus amongst respondents was that more pitches were needed (71.9%, base = 32). 15 respondents stated a number: 11 (73.3%) said less than 10 pitches, 2 (13.3%) between 10 and 20 pitches and 2 (13.3%) between 20 and 25 pitches.

5.12 19 respondents provided information on why they travel and they could state one or more reason for travelling. The most frequently mentioned reasons for travelling were work (52.6% mentioned) or cultural reasons (52.6%). Other reasons included visiting family/friends (15.8%), to attend fairs (5.3%) and limited opportunities to settle down (5.3%).

5.13 17 respondents provided further information on where they travel. Respondents tend to give general answers, with 6 saying ‘all over’ and 5 saying they travel to where fairs and religious conventions are taking place. Some gave specific responses such as Manchester and the North, Nottingham and Wales. But there was no specific pattern of travelling behaviour that could be ascertained from the responses.

Health and support needs

5.14 The household survey asked if the respondent or members of their family had particular health issues (base=38). The most frequently mentioned were: asthma (26.3% of respondents), depression (15.7%) and arthritis (7.9%).

5.15 The survey also asked if households needed their home to be adapted in any way (base=38). The need for insulation was most frequently mentioned (18.4%) followed by better heating (15.7%). There was one response for each of the following needs: adaptations relating to sensory needs, internal grab rails, external grab rails, lever door handles and wheelchair adaptations.

5.16 Regarding support needs, the survey (base=38) found that 15.7% of households included someone with the need for hospital medical treatment and 5.3% counselling. There was one response for each of the following: pregnancy support, post-natal support and occupational therapy.

Education and training support needs

5.17 Regarding educational support (base=38), 28.9% of respondents stated they needed educational support for primary school aged children and 13.2% required support for secondary school aged children.

5.18 Support was also needed for job-related training (base=38). 13.2% of respondents wanted help with English, maths and/or IT skills; 5.3% help with applying for an apprenticeship and 2.6% help with applying for a course at college/university.

5.19 As part of stakeholder consultation, the Gypsy and Traveller Liaison officer at Warwickshire police commented:

"Many of the families that have established in the Borough are registered with health care providers Children are either home educated monitored by the County Traveller education team or attend local primary schools. There are challenges to secondary education that remains an issue to many families and then further education becomes difficult due to the often lack of literacy skills. Often this can lead to youngsters becoming bored and getting involved in less constructive activities leading to a more destructive path within the community. This impact on other parts of the community has been evidenced as detrimental to the cohesion process."

Questions on site locations

5.20 The survey asked, when thinking about new residential sites, what was important to the respondent. The most frequently mentioned things of importance (base=38) were locations within walking distance of primary schools (42.1%), close to doctors (36.8%), walking distance to secondary schools (26.3%) and walking distance to shops (21%).

5.21 Regarding other important factors, 15.7% said visitors parking and room for visitors. 10.5% said child friendly/safe places to play and proximity to main roads. 7.9% said easy access to public transport/bus stops and community spaces/buildings. 5.3% said making sites accessible for people with disabilities and having different sizes of pitches for different types of household.

Stakeholder consultation

5.22 As part of the GTAA a range of stakeholders were contacted. The key points raised in consultation are now summarised.

5.23 Feedback from Rugby Borough Council:

- Nationally there is a shortage of provision for Gypsies and Travellers so there is likely to be a need in Nuneaton and Bedworth Borough.
- The land Gypsy and Travellers can afford to buy is often in the green belt where policy indicates provision should not be made. There is often conflict between the settled community and the Travelling community, so sites need to be close enough to facilities but far enough away from the settled community.
- Council were not aware of any regular movements between the Rugby and Nuneaton and Bedworth council areas.
- Council agreed that this questionnaire contributes to the requirement on the Duty to Cooperate with neighbouring authorities.

5.24 Feedback from Coventry City Council

- Not aware of any regular movement between Coventry and Nuneaton and Bedworth.
- Evidence base needs to comply with the NPPF.
- Council agreed that this questionnaire contributes to the requirement on the Duty to Cooperate with neighbouring authorities.

5.25 Feedback from Warwickshire Police Gypsy and Traveller Liaison Officer

- Over the last few years I have dealt with numerous families in Warwickshire some on unauthorised encampments and some who have a desire to settle in Nuneaton and Bedworth. There has often been no permanent provisions available and even with a waiting list this only provides limited prospects of availability for families to be near to relatives already residing in the area.
- The one County Council site in the borough is full and has a waiting list. Some of these families have had to take up residency in other areas due to the lack of permanent pitch availability. I would estimate that in addition to the pitches currently in the borough the identified 39 further pitches needed would greatly assist in meeting the short fall although that is at the present time. As time goes on this requirement will almost certainly increase as families themselves grow in size and youngsters become adults and need their own units but traditionally keeping close to family which often provide a reliable support mechanism.
- Permanent sites ideally should be located within the urban boundaries of the borough and giving access to services within a proportionate distance in line with that of other housing developments.
- Local Authority owned and managed sites need to be sited with easy access to schools, shops and recreational facilities. Where land is being purchased and developed privately there should not be a distance parameter in place that prevents the freedom of choice to families who may wish to be located in a more rural location where planning legislation is able to be conformed to. It is the freedom of choice that is important and one which is afforded to other communities.
- There are families who would be happy to reside in urban areas with easy access to facilities but as with all communities this is not the ideal for all and the planning criteria should ensure that it caters for the needs of all where possible within the parameters of legality.
- Key barriers to new site provision include the challenge of families obtaining planning permission; political pressure when local authorities try to identify suitable land for permanent and transit provision; a greater

understanding of the Travelling community as a whole may assist with understanding their accommodation needs.

- The officer provided useful background to transit need which is presented in Chapter 6.
- Nuneaton and Bedworth has well-established Gypsy and Traveller communities with families that have resided in the borough for generations. There are a mixture of Romany and Irish Traveller families on The Griff caravan site in Nuneaton. There are numerous private sites which are in the main English families and make up the largest visible Traveller community in the Bulkington area of the borough.
- There is transient movement between settled families and neighbouring districts and boroughs. There are many family links between the community residing in Nuneaton and Bedworth and neighbouring districts and boroughs which means a significant amount of travel across borders.
- With regards to unauthorised encampments in the past we have seen families moving in and out of the borough sometimes only just over the border within the county. This pattern seems to have changed over the last couple of years since numerous families have settled across the border into North Warwickshire or other areas of the country.

5.26 Key strategic messages from the Warwickshire Police Gypsy and Traveller Liaison Officer include:

- A realistic timescale for the delivery of new residential pitches.
- Some Traveller families would be happy to go into bricks and mortar and still lead a nomadic habit of life and this should be considered when new residential building is taking place.
- Delivery of a transit site is likely to take some time. Work should be undertaken to identify land to provide suitable transit site provision in the north and south of the county.
- In the meantime I believe that it is a priority to identify land that can be used for Negotiated Stopping and can be incorporated into the Warwickshire Countywide protocol for managing unauthorised encampments. This will allow for the temporary accommodation for suitable families. This process has many benefits and is something that can be achieved very easily by countywide partners with the relevant expertise.

6. Gypsy and Traveller pitch, Travelling Showperson plot and transit site requirements

Introduction

6.1 This section reviews the overall pitch and plot requirements of Gypsies and Travellers and Travelling Showpeople across Nuneaton and Bedworth. It takes into account current supply and need, as well as future need, based on modelling of data. This chapter also considers transit pitch requirements for Gypsies and Travellers. Finally, it presents planning policy recommendations.

6.2 The calculation of pitch requirements is based on modelling as advocated in *Gypsy and Traveller Accommodation Assessment Guidance* (DCLG, 2007). Although now formally withdrawn, the former DCLG Guidance still provides the best-practice approach towards the assessment of pitch and plot needs (see Chapter 2 for further discussion).

6.3 This approach requires an assessment of the current needs of Gypsies and Travellers and a projection of future needs. It advocates the use of a survey to supplement secondary source information and derive key supply and demand information.

6.4 The GTAA has modelled current and future need and current and future supply separately for Gypsies and Travellers and Travelling Showpeople. For both groups, the modelling shows an overall 'cultural' need and then a 'policy-on' 'PPTS need which takes into account those households who met the PPTS planning definition.

Gypsy and Traveller pitch requirement model overview

6.5 Pitch need is assessed for two time periods. A short-term 5-year model looks at need over the next 5 years (2021/22 to 2025/26). A longer-term model looks at need over the remainder of the plan period (to 2036/37) arising from children likely to need a pitch.

6.6 In terms of **cultural need**, the 5-year model considers:

- the baseline number of households on all types of site (authorised, unauthorised and temporary authorised sites) as at April 2021;
- existing households planning to move in the next five years (currently on sites and also from bricks and mortar) and where they are planning to move to; and
- emerging households currently on sites and planning to emerge in the next five years and stay within the study area on a pitch; to derive a figure for
- total pitch need.

6.7 In terms of **supply**, the model considers:

- total supply of current pitches on authorised sites; and

- vacant pitches on authorised sites.

6.8 The model then reconciles total need and existing authorised supply over the next 5 years by summarising:

- total need for pitches; and
- total supply of authorised pitches.

6.9 The longer-term model then considers the cultural need over the period to 2036/37. This is based on the age profile of children under 13 living in Gypsy and Traveller households on pitches (the longer-term model).

6.10 For each model, the likely pitch need from households meeting the PPTS definition is also calculated.

Nuneaton and Bedworth Gypsy and Traveller pitch need analysis: Description of factors in the 5-year need model

6.11 Table 6.1 provides a summary of the 5-year pitch need calculation. Each component in the model is now discussed to ensure that the process is transparent and any assumptions clearly stated.

Need

6.12 **Current households living on pitches (1a to 1e)**

These figures are derived from planning data and site observation data. There are a total of 20 households on the county council site and 31 households on private pitches. No households were identified as being concealed/doubled up on pitches.

6.13 **Current households in bricks and mortar accommodation (2)**

The 2011 Census suggested there were 16 households living in bricks and mortar accommodation.

6.14 **Existing households planning to move in the next five years (3)**

This was derived from information from the household survey for respondents currently on authorised pitches.

Of existing households currently on sites, 12 plan to move and in the next 5 years.

For households currently in bricks and mortar, based on national arc[4] studies it is estimated that 5.3% of households living in bricks and mortar would prefer to live on a site which would equate to 1 household. A need from 1 household is therefore included within the modelling at 3e.

Regarding in-migration, analysis of household survey data indicates that 16 households have moved into the borough and onto a pitch in the past 5 years and shown at row 3g.

The factors presented in section 3 of the model result in an overall net requirement of +6 pitches from existing households planning to move in the next 5 years which includes an allowance for in-migration.

6.15 **Emerging households (4)**

This is the number of households expected to emerge in the next 5 years based on household survey information. The total number is +9 of whom 2 plan to live outside the district. This results in a net need from 7 emerging households.

If children old enough to form their own household were living with family and have not specified that they want to form a new household, this is assumed to be through choice and the model does not assume they want to form a new household.

6.16 **Total need for pitches (5)**

This is a total of current households on authorised pitches, households on pitches planning to move in the next five years and demand from emerging households currently living on pitches. This indicates a total need for 64 pitches (51 existing households on pitches plus at net need for 6 pitches from existing households planning to move including in-migration and a need for 7 pitches from emerging households).

Supply

6.17 **Current supply of authorised pitches (6)**

This is a summary of the total number of occupied authorised pitches and the number of vacant authorised pitches. This shows a total supply of 51 authorised pitches plus 5 vacant pitches on the county council site resulting in a total supply of 56 authorised pitches. Note that some households on private sites occupy more than one pitch.

Reconciling supply and demand

6.18 There is a total need over the next five years (2021/22 to 2025/26) for 64 additional pitches in Nuneaton and Bedworth (Table 6.1) compared with a supply of 56 authorised pitches (including vacant pitches). The result is an overall cultural shortfall of 8 pitches.

Table 6.1 Summary of demand and supply factors: Gypsies and Travellers – 2021/22 to 2025/26			
CULTURAL NEED			**Nuneaton and Bedworth**
1	**Households living on pitches**	1a. On County Council Site	**20**
		1b. On Private Site - Authorised	**31**
		1c. Unauthorised	**0**
		1d. Total (1a to 1c)	**51**
2	**Estimate of households living in bricks and mortar accommodation**	**2011 Census**	**16**
3	**Existing households planning to move in next 5 years**	**Currently on sites**	
		3a. To another pitch/same site (no net impact)	**0**
		3b. To another site in district (no net impact)	**1**
		3c. From site to Bricks and Mortar (-)	**0**
		3d. To site/bricks and mortar outside borough	**11**
		Currently in Bricks and Mortar	
		3e. Planning to move to a site in LA (+)	1
		3f. Planning to move to another B&M property (no net impact)	0
		In-migrant households	
		3g. Allowance for in-migration (+)	16
		3h. TOTAL Net impact (3g+3e-3c-3d)	**6**
4	**Emerging households (5 years)**	4a. Currently on site and planning to live on current site	5
		4b. Current on site and planning to live on another site in the borough	2
		4c. Currently on site and panning to live outside the borough (no net impact)	2
		4d. Currently in B&M planning to move to a site in LA (+)	0
		4e. Currently in B&M and moving to B&M (no net impact)	0
		4f. Currently on Site and moving to B&M (no net impact)	0
		4g. TOTAL (4a+4b+4d)	**7**
5	**Total Need**	**1d+3h+4g**	**64**
SUPPLY			
6	**Current supply of authorised pitches**	6a Current supply of authorised pitches	51
		6b. Current unoccupied authorised pitches	5
		6c. Total current authorised supply (6a+6b)	56
RECONCILING NEED AND SUPPLY			
7	**Total need for pitches**	**5 years (from 5)**	**64**
8	**Total supply of authorised pitches**	**5 years (from 6c)**	**56**
5 YEAR AUTHORISED PITCH SHORTFALL 2021/22 TO 2025/26			**8**

Longer-term pitch requirement modelling

6.19 Longer-term pitch need modelling has been carried out using known household structure information from the household survey of households living on pitches. On the basis of the age of children in households, it is possible to

determine the extent of 'likely emergence', which assumes that a child is likely to form a new household at the age of 18.

6.20 The year when a child reaches 18 has been calculated and it is possible to assess how many newly forming households may emerge over the period 2026/27 to 2036/37. A reasonable assumption is that half of these children will form new households, bearing in mind culturally women tend to move away on marriage and men tend to stay in close proximity to their families on marriage. The model therefore assumes that 50% of children will form households when they reach 18 and that these households remain in Nuneaton and Bedworth[15]. Analysis would suggest a total cultural need for 12 additional pitches over the period 2026/27-2036/37 (Table 6.2).

Table 6.2 Future pitch requirements in Nuneaton and Bedworth based on the assumption that 50% of children form households on reaching 18

Time period	No. children	Expected household formation
2026/27 to 2030/31	9	4
2031/32 to 2036/37	15	8
Total (2026/27 to 2036/37)	**24**	**12**

Planning Policy for Traveller Site definition

6.21 Analysis of household survey data establishes that from a total of 21 existing or emerging households who are planning to move :

- 1 household is exempt from the PPTS definition test because someone has a health issue which prevents them from travelling.
- 4 households do not meet the PPTS travelling definition because they have not travelled in the past 5 years and do not intend to travel in the next 5 years.
- 16 households meet the PPTS travelling definition.

6.22 Therefore 80% of respondents who are planning to move (either as an existing or emerging household) meet the PPTS travelling definition.

Overall plan period pitch need

6.23 Table 6.3 summarises the overall need for pitches across Nuneaton and Bedworth over the plan period to 2036/37. It presents the overall cultural need based on households identifying as Gypsy and Traveller and a 'policy on' PPTS need which is a subset of the cultural need and is based on those eligible households who meet the PPTS definition of need. Need has been assessed over a short-term 2021/22 to 2025/26 and longer-term 2026/27 to 2036/37

[15] This approach has been tested at inquiry and the assumption has been corroborated by several Travelling interviewees

period. The overall need is 20 pitches of which 16 is PPTS need. The main driver of need in the first five years net in-migration and emerging households.

Table 6.3 Plan period Gypsy and Traveller pitch need 2021/22 to 2036/37

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

Potential capacity for Gypsy and Traveller pitches on existing sites

Turnover on sites

6.24 Turnover relates to the number of pitches that are expected to become available for occupancy. Analysis only includes expected turnover on public sites as this is referenced in (former) CLG guidance and more accurate data on changes in pitch occupancy is likely to be available. Although there is likely to be turnover on private sites, the ability of households to move onto private sites may be more restrictive (for instance the site may be restricted to a particular family) and less likely to be recorded.

6.25 Household survey data indicates that in the past 5 years to April 2021, 7 households moved onto vacant pitches on the Griff or an average of 1.4 each year. Based on 20 occupied pitches, this is a turnover rate of 7% each year.

Potential capacity for additional pitches on existing sites

6.26 There is no additional capacity on the existing county council site. Across three private sites, additional potential capacity has been identified through the household survey:

- Priv 3 Fellas Acre – 2 additional pitches through site expansion.
- Priv 10 Winter Oak – 6 additional pitches through site intensification.
- Priv 12 Sunrise cottage – 3 to 5 additional pitches through site intensification.

There is potential for an additional 11-13 pitches on existing private sites through expansion and intensification. The council should carry out further investigation and a technical assessment of the feasibility of increasing supply from these sites.

Impact of turnover and intensification on pitch need

6.27 Table 6.4 illustrates the impact of a pitch turnover on overall pitch need. This Includes an allowance for anticipated turnover which result in all cultural, and therefore PPTS need, being met.

Table 6.4 Addressing Gypsy and Traveller pitch need

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

Tenure preferences

6.28 Respondents planning to move and form new households were asked to consider their preferred tenure of pitches (social rented or private). Responses tended to relate to their current place of work, with social renters preferring council sites and those on private sites seeking private site options.

Transit requirements

6.29 There are a number of ways to delivery temporary places where Travellers can stop whilst passing through a local authority area. These include transit pitches, stop over places and negotiated stopping arrangements[16].

6.30 Transit sites are permanent sites intended for temporary use by Gypsies and Travellers. The length of stay is usually limited to a maximum of three months. In terms of pitches, 'Designing Gypsy and Traveller Sites: Good Practice Guide' (CLG, 2008) states:

- Size of pitch – sufficient to accommodate two touring caravans, two parking spaces and private amenities;
- Amenities should include electricity supply, toilet, wash basin and shower with hot and cold water supply for each pitch;
- Depending on the level of use, portable facilities may be more appropriate, particularly if the sites are empty for lengthy periods of time and therefore at risk of vandalism.

6.31 A temporary stop over area is land which can be used on a temporary basis if unauthorised encampments occur or likely to occur. They can be fields, areas of hardstanding or a mixture of both. Temporary facilities can be provided when the temporary stop over is in use, for instance portable toilets and rubbish collection.

6.32 Negotiated stopping involves councils making an agreement with Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary but usually include the provision of portaloos, waste disposal, water; the length of the agreement can vary but tends to be around 28 days; and users agree to comply with rules for behaviour and use of the site.

6.33 Data on unauthorised encampment activity helps to establish the extent to which transit provision is needed.

6.34 The Gypsy and Traveller Liaison Office at Warwickshire Police provided a useful overview of unauthorised encampment activity across the borough which is now set out.

[16] See https://www.negotiatedstopping.co.uk for more information

"Nuneaton and Bedworth have experienced a significant number of unauthorised encampments over the last few years, in the main these have been on the highway or on NBBC owned land. A small number have been on private land. Numbers of encampments and their general size has reduced over the last year and this is partly due to several families roadside acquiring land to settle. Last year saw the lowest number of encampments in Nuneaton and Bedworth at 12 compared to 24 in 2019 and 33 in 2018.

One of the main challenges is identifying land where negotiated stopping or transit provision can be offered for short stays and facilities provided. Another challenge is the political element that tries to influence the way that unauthorised encampments are dealt with contrary to the protocol.

Where disruptive groups trespassing on a highway there are currently limited powers available to expedite evictions. However consultation with government is in process and anticipated that further powers to deal with this will be brought into play in the near future. This will most likely provide additional powers under the criminal justice and public order act."

6.35 A majority of household respondents (56.3%, base=32) said there was a need to provide places where people can stop whilst travelling.

- 56.2% (base=32) said transit pitches are needed, with 7 respondents saying up to 10 are needed and 3 more than ten, with council ownership favoured.
- 43.8% (base=32) said stop over places are needed, with 6 respondents saying up to 10 are needed and 1 saying more than ten, with council ownership favoured.

6.36 Regarding transit site provision, the Gypsy and Traveller Liaison Office at Warwickshire police commented:

"Like within the rest of the county, there is a need to provide transit provision for families who desire to travel to or through the borough and have nowhere else to set down for a short period effectively disadvantaging these recognised ethnic minority groups. It is recognised nationally and by government that Gypsies and Travellers have a right to a nomadic lifestyle, yet it becomes impossible for them to travel and set down with minimal provisions provided, meaning that families who wish to visit relatives or attend family or traditional events are forced to trespass. Transit provision would allow families to book on to established transit sites.

Transit provision also enables the ability for the police to instigate police powers under Sec 623A CJPO Act and enables the direction to groups who are occupying unsuitable land and having an evidenced negative impact on the local community to either accommodate the transit facility or vacate the county. This power is more effective than Sec 61 CJPO act that merely gives the police the power to move a group from a particular piece of land should it be proportionate.

Ideally a transit site with up to 15 pitches would suffice and should be located in an area that affords easy access to local facilities. The design and layout of such a site is something that needs to be considered carefully in the planning and consideration needs to be given to how the site will effectively be managed. With the relatively small number of transit sites nationally there are only a few that are effectively managed."

6.37 Regarding stop over provision and negotiated stopping, the Gypsy and Traveller Liaison Office at Warwickshire police commented:

"Temporary stopping places or negotiated stopping are a priority across the county including in Nuneaton and Bedworth, they are something that is relatively cheap and simple to establish. The land should ideally be hard standing although this could include grassed areas during the summer period. Basic provisions would need to be supplied in fresh water, toilets and refuge disposal units.

Negotiated stopping places have been successful across other parts of the country and when choosing the right families and locating appropriately there are many benefits. Nuneaton and Bedworth have had unauthorised encampments with families that would have been suitable for this type of temporary accommodation.

The benefits including removing unauthorised encampment, meeting the needs of the families wishing to reside in the area temporarily and this includes effectively engagement from service providers to the families. It also provides an environment to help build community cohesion."

6.38 Regarding barriers to delivering transit/stop over provision, the Gypsy and Traveller Liaison Office at Warwickshire police commented:

"The barriers to this provision is effectively political and based on negative perceptions of the Travelling community. This is understandable based on the continuous negative press that is afforded to a minority within this minority community.

Applications to transit provision are often objected to and it is difficult identifying suitable land to be put forward for this purpose. Land that is often identified is clearly not suitable.

A lack of understanding on the how to create and effectively manage a transit site is also a barrier but there are excellent examples of transit provision across the county that can be learnt from. I believe that within Warwickshire there is the skill and expertise to make negotiated stopping work."

Nuneaton and Bedworth: Showperson plot requirements

6.39 There is currently one Travelling Showperson's yard occupied by one family. The household living on the Travelling Showperson's yard is actively engaged in Showperson related work and therefore all meet the PPTS definition.

6.40 The yard has 4 plots and only one is currently occupied. There is sufficient capacity on the yard over the plan period to 2036/37 for 3 additional households. Having spoken to the residents on the yard, the only emerging need will be from within the household and they could be accommodated on the yard. There is therefore no additional Showperson need in the borough.

Nuneaton and Bedworth: Bargee Travellers

6.41 The definition of Gypsy and Travellers includes Bargee travellers and therefore Councils have a duty to consider their needs. arc[4] was made aware of at least one Bargee Traveller family living within Nuneaton and Bedworth in 2016. An interview ascertained that the household was licenced by the Canal and Rivers Trust as a 'continuous cruiser' and the following key points were made:

- Affordable permanent moorings are required by households choosing to live on waterways (priced at around £150 each month);
- Having permanent mooring allows the potential for households to have a postal address (which is needed to access the electoral registration system, health service and the potential to improve credit worthiness); and
- Improved service points including water, toilets, dustbins, shower facilities are required.
    - It was suggested that the residential use of canals should be acknowledged in the Local Plan and that there is a need for at least one affordable permanent mooring in the Borough[17]. It is therefore recommended that the Council:
- liaise with the Canals and Rivers Trust and local marina owners to establish the practical steps and policy tools required to meet the needs of Bargee Travellers in the area;
- explore the potential of establishing at least one affordable permanent mooring within Nuneaton and Bedworth;
- relevant agencies and the Council should consider whether further facilities along canals should be encouraged to provide services to households using riverboats/barges as their living accommodation;
- liaise with CRT to better understand the implications and enforcement of their policies, and where the Council and the CRT may be able to work together; and

[17] Existing moorings can be viewed at https://canalrivertrust.org.uk/directory but these are primarily aimed at leisure use rather than for long-term residential use

7. Conclusion and response

7.1 This concluding chapter provides a brief summary of key findings and recommendations.

Current accommodation

7.2 There are well-established Gypsy and Traveller communities living in Nuneaton and Bedworth. Culturally appropriate provision includes one county council site (with 25 pitches) and 12 private authorised sites (with 41 pitches). There is one Travelling Showperson yard (4 plots).

Future residential need

7.3 The Local Plan should recognise an overall cultural need for 20 pitches of which 16 is from households who meet the PPTS household definition over the period to 2036/37. However, anticipated turnover on The Griff and the potential expansion and intensification of existing private sites is expected to meet the identified need.

7.4 The level of turnover on The Griff should be monitored through site management data. The Council should also carry out technical appraisals of the expansion/intensification of existing sites to confirm that additional pitches can be delivered.

7.5 The analysis would indicate there is no overall strategic need for additional sites. It is however recommended that the Local Plan sets out criteria-based policies to inform future planning applications for small private sites.

7.6 Although there is no additional need for Travelling Showperson plots, it is recommended that the existing yard is safeguarded for Travelling Showperson use.

Transit site/stop over need

7.7 There is currently no provision to address transit need but given unauthorised encampment activity, the Council will need to consider appropriate responses. These include transit pitches, stopover places and negotiated stopping arrangements. The Council should work with other Warwickshire local authorities to establish a coordinated response to the delivery of appropriate temporary accommodation options. The need to identify land for negotiated stopping[18] is a priority.

[18] See https://www.negotiatedstopping.co.uk for further details

Future updating

7.8 It is recommended that this evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth.

Appendix A: Gypsy and Traveller Fieldwork Questionnaire

	Date and Time			
	Site Reference			
	Address			
	General Data Protection Regulation (2018) and Data Protection	GDPR came into effect from 25th May 2018. This provides new rights for EU citizens to control personal data held about them by organisations		
		This study is being done for Nuneaton and Bedworth Borough Council to identify if there is a need for more residential pitches and transit provision in the area. A report will be prepared based on the findings of these surveys. The information you provide will not be used for any other purpose.		
		The information you provide will not be used to identify you personally, will be kept strictly confidential		
		Can you please say if you are happy to carry on with the questionaire on this basis?	Yes	No
1	Pitch/Property Type (and tenure if B&M)			
2	No . Statics/mobiles/chalets or bricks and mortar			
3	No. tourers/caravans			
4	Description of pitch occupancy			
5	No. households			
6	No. concealed households			
7	No. doubled up hhs			
8	Anyone else use this pitch as their home? If so, who			
9	**Household characteristics**			
		Gender	**Age**	**Relationship to respondent**
	Respondent			
	Person 2			
	Person 3			
	Person 4			
	Person 5			
	Person 6			
	Person 7			
	Person 8			
10	Ethnicity			
11	How many bedspaces are there on your pitch?			
12	Overcrowding of home	Y / N		
13	Overcrowding of pitch	Y / N		
14	Thinking back to when you were 15, were you living on a site, on the roadside or living in bricks and mortar housing	S, R, B&M		
15	Where were you living? Record district/settlement name			

	Travelling questions				
	In 2015, the Government changed its definition of Gypsies and Travellers for planning purposes. To be recognised as a Gypsy Traveller you or someone in your household has to travel. I'm now going to ask a few questions about whether you or someone in your household travels				
16	In the last year have you or someone in your household travelled	Y / N			
17	Previous to the last year, did you or someone in your household travel?	Y / N			
18	Reason(s) for travelling				
19	Pleae describe when and where do you travel? (if relevant)				
20	Do you or a member of your household plan to travel next year?	Y / N			
21	Do you think you or a member of your household will travel in the next two to five years?	Y / N			
22	What reasons do you or your household have for not travelling now or in the future?				
	Where you plan to live in the future				
23	Are you planning to move to another place to live in the next 5 years?	Y / N			
24	Why are you planning to move ?				
25	Where are you planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where), Bricks and Mortar housing)				
26	What type of dwelling (**c**aravan, **t**railer, **ch** alet, **h**ouse, **f**lat, **b**ungalow)				
	If in B&M housing				
27	If you live in bricks and mortar housing, are you happy to live here or would you prefer to live on a pitch?	Happy Here / Prefer pitch			
28	If you would prefer to live on a pitch is this because you have a 'cultural aversion' to living in bricks and mortar (this means if affects your mental health and makes you unhappy/ depressed)	Y / N			
	Emerging households				
29	Emerging households: Are there any people in your household who want to move to their own pitch in the next 5 yrs?	Y / N			
		HH1	HH2	HH3	HH4
30	Where are you planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where), Bricks and Mortar housing				
31	What type of dwelling (**c**aravan, **t**railer, **ch** alet, **h**ouse, **f**lat, **b**ungalow)				
32	Have they travelled / plan to travel	Y/N	Y/N	Y/N	Y/N
33	If living in bricks and mortar do you have a 'cultural aversion' to living in bricks and mortar? (this means if affects your mental health and makes you unhappy/ depressed)	Y/N	Y/N	Y/N	Y/N
	Additional residential pitches				
34	Scope to expand site (extend the boundary of the site)	Y / N			
35	No. additional pitches				
36	Scope to intensify pitches (put more pitches on the existing site)	Y / N			
37	No. additional pitches				
38	Are their any vacant pitches on the site which could be used by another family? If so how many pitches				
39	In general, is there a need for more authorised pitches (for people to live on all the time?) in this district?	Y / N			
40	If so, now many are needed?				
41	Who should own them them (Council, people from the Traveller Community, non-Travellers)				
42	Do you own any land or know of anywhere within the district which could be considered for development as a site?				

	Transit and temporary stopover need			
43	Is there a need to provide places where people can stop whilst travelling through the district? This can include transit pitches or stopover places	Y / N		
44	Is there a need for transit pitches (for people stopping over temporarily) in the district? A transit pitch is intended for short-term use and usually includes space for two caravans, parking space and access to electricity, a toilet, washing facilities	Y / N		
45	If so, how many are needed?			
46	Who should manage them (Council, Traveller Community)			
47	Where should they be located?			
48	Is there a need for stopover places? A stopover place is land which can be used on a temporary basis and usually include access to portaloos, waste disposal and water	Y / N		
49	If so, how many are needed?			
50	Who should manage them (Council, Traveller Community)			
51	Where should they be located?			
	Residential history			
52	How many years have you lived here?			
Routing	If more than five years	Go to Q58		
	If five years or less	Go to Q53		
53	Where did you move from? **(District)**			
54	Were you living on a Private Site, Council Site, Roadside or Bricks and Mortar housing?			
55	When you moved here, was the pitch vacant, a brand new pitch or had the pitch been created by dividing up an existing pitch?			
56	What were the reasons for moving here?			
57	Did you already have a connection with the area (e.g. family or friends living here; or you used to live here?)			
	Support needs			
58	Is there a need for your home to be adapted in any way?	Go though list of adaptations		
59	Are you or someone in your household in need of any support because of health reasons?	Go thorugh list of support		
60	IF RELEVANT: Do you need any support with the education of your chlid(ren)	Go thorugh list of support		
61	IF RELEVANT: Do you require any support with job-related training	Go thorugh list of support		
	Final questions			
62	Is there anything else you'd like to tell us about your housing or support needs?			
63	Do you know anyone in bricks and mortar housing looking to live on a pitch? If so,can you provide contact details			

Note: A similar questionnaire was prepared for Travelling Showpeople, replacing ‘pitch’ with ‘plot’ and ‘site’ with ‘yard’

Appendix B: Glossary of terms

Caravans: Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.

CJ&POA: Criminal Justice and Public Order Act 1994; includes powers for local authorities and police to act against unauthorised encampments.

CRE: Commission for Racial Equality.

DCLG: Department for Communities and Local Government; created in May 2006. Responsible for the remit on Gypsies and Travellers, which was previously held by the Office of the Deputy Prime Minister (O.D.P.M.).

Gypsies and Travellers: Defined by DCLG *Planning policy for traveller sites* (August 2015) as *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*. The planning policy goes on to state that, *"In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances"*.

Irish Traveller: Member of one of the main groups of Gypsies and Travellers in England. Irish Travellers have a distinct indigenous origin in Ireland and have been in England since the mid nineteenth century. They have been recognised as an ethnic group since August 2000 in England and Wales (O'Leary v Allied Domecq).

Mobile home: Legally a 'caravan' but not usually capable of being moved by towing.

Pitch: Area of land on a Gypsy/Traveller site occupied by one resident family; sometimes referred to as a plot, especially when referring to Travelling Showpeople. DCLG *Planning policy for traveller sites* (August 2015) states that *"For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use plots for "travelling showpeople", which may / will need to incorporate space or to be split to allow for the storage of equipment"*.

Plot: see pitch

PPTS: Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions)

Roadside: Term used here to indicate families on unauthorised encampments, whether literally on the roadside or on other locations such as fields, car parks or other open spaces.

Romany: Member of one of the main groups of Gypsies and Travellers in England. Romany Gypsies trace their ethnic origin back to migrations, probably from India, taking place at intervals since before 1500. Gypsies have been a recognised ethnic group for the purposes of British race relations legislation since 1988 (CRE V Dutton).

Sheds: On most residential Gypsy/Traveller sites 'shed' refers to a small basic building with plumbing amenities (bath/shower, WC, sink), which are provided at the rate of one per pitch/plot. Some contain a cooker and basic kitchen facilities.

Showpeople: Defined by DCLG *Planning policy for traveller sites* (August 2015) as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above".*

Site: An area of land laid out and used for Gypsy/Traveller caravans; often though not always comprising slabs and amenity blocks or 'sheds'. An authorised site will have planning permission. An unauthorised development lacks planning permission.

Slab: An area of concrete or tarmac on sites allocated to a household for the parking of trailers (caravans)

Stopping places/stopover sites: A term used to denote an unauthorised temporary camping area tolerated by local authorities, used by Gypsies and Travellers for short-term encampments, and sometimes with the provision of temporary toilet facilities, water supplies and refuse collection services.

Tolerated site: An unauthorised encampment/site where a local authority has decided not to take enforcement action to seek its removal.

Trailers: Term used for mobile living vehicles used by Gypsies and Travellers; also referred to as caravans.

Transit site: A site intended for short-term use while in transit. The site is usually permanent and authorised, but there is a limit on the length of time residents can stay.

Unauthorised development: Establishment of Gypsy and Traveller sites without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve ground works for roadways and hard standings. People parking caravans on their own land without planning permission are not Unauthorised Encampments in that they cannot trespass on their own land – they are therefore Unauthorised Developments and enforcement is always dealt with by local planning authorities enforcing planning legislation.

Unauthorised encampment: Land where Gypsies or Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks, fields, etc.) and constitute trespass. The 1994 Criminal Justice and Public Order Act made it a criminal offence to camp on land without the owner's consent. Unauthorised encampments fall into two main categories: those on land owned by local authorities and those on privately owned land. It is up to the land owner to take enforcement action in conjunction with the police.

Wagons: This is the preferred term for the vehicles used for accommodation by Showpeople.

Yards: Showpeople travel in connection with their work and therefore live, almost universally, in wagons. During the winter months these are parked up in what was traditionally known as 'winter quarters'. These 'yards' are now often occupied all year around by some family members.