Nuneaton and Bedworth Borough Council

Concept Plans for Strategic Allocations: HSG3, Gipsy Lane

Supplementary Planning Document (2020)



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1 Introduction

1.1 Introduction

- 1.1.1 The Nuneaton and Bedworth Borough Plan will see the delivery of circa 14,060 new homes and 107.8 Ha of new employment land within the Borough for the plan period ending in 2031. A key component of accommodating this growth within the Borough will be the development of a number of strategic land allocations for housing and employment uses (see Figure 1). This framework relates to the strategic allocation known as HSG3 Gipsy Lane. Policy HSG3 of the Borough Plan requires the delivery of at least 575 dwellings within the HSG3 allocation area.
- 1.1.2 The Strategic Land Allocation covers an area of 27.24 hectares in the centre of the Nuneaton and Bedworth Borough area.

1.2 Role of concept plan

- 1.2.1 The preparation of a concept plan is a key step in guiding all future stages of development on each strategic land allocation. It establishes a strategic context for planning applications and sets a 'baseline' position in terms of assessing future schemes which will contain more detailed proposals. A key objective of the concept plan is to ensure that the Strategic Land Allocation is brought forward in a strategic and comprehensive manner.
- 1.2.2 In meeting this objective, the concept plan establishes the following matters for each site:
 - Land uses;
 - Development principles; and
 - Infrastructure delivery.
- 1.2.3 The concept plan provides guidance on the delivery of the development principles set out in the adopted Borough Plan for each Strategic Site Allocation. The Concept Plans are intended to provide a visual representation of policy requirements, as well as other key elements, and so are conceptual in nature. They are not intended to be exhaustive and show all required elements. The Concept Plans should inform the more detailed masterplans that are submitted at the planning application stage. Alternative solutions and land use arrangements may come forward as part of the planning application process, but the Concept Plans should be viewed as fundamental principles for the site, and any significant differences in approach would need to be justified at the planning application stage.

Strategic housing and employment sites

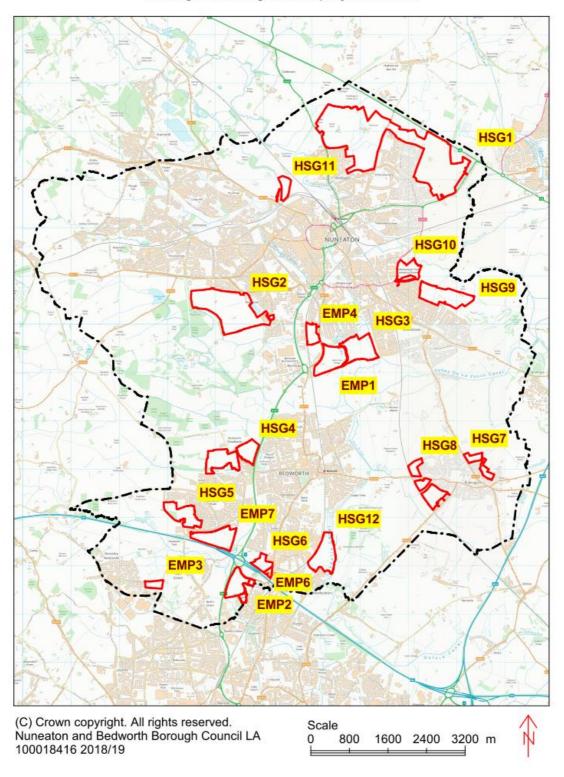


Figure 1: Strategic housing and employment sites

1.3 Stakeholder and community engagement

1.3.1 The concept plan has been prepared by WYG on behalf of Nuneaton and Bedworth Borough Council in consultation with other stakeholders, developers and the main landowner interests.

1.4 Status of concept plan

1.4.1 It is intended that the Concept Plan will acquire status as a Supplementary Planning Document (SPD), providing additional explanation to the Borough Plan policies. This concept plan accords with Borough Plan policy, the National Planning Policy Framework and national planning policy guidance. Once adopted, the Concept Plan SPDs will be a material consideration when deciding planning applications.

1.5 Planning policy background

National Planning Policy Framework

- 1.5.1 The National Planning Policy Framework (NPPF) (2019) includes a presumption in favour of sustainable development. The NPPF states that sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:
 - an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

1.5.2 The NPPF further states that "Plans should be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable". The concept plan seeks to provide development parameters to guide the future deliverability of the proposed scheme on the strategic site allocation.

Borough Plan

- 1.5.3 The vision for the Borough Plan is: "By 2031, Nuneaton and Bedworth Borough will be a place where there are opportunities for sustainable economic growth with diverse job prospects, healthy living and an integrated infrastructure network. Business will want to invest in the Borough as a result of the outcomes of policies in the Plan, which will include creating an attractive environment".
- 1.5.4 In order to meet this vision the Borough Plan has set out a number of strategic objectives and planning policies. The following sites are identified:
 - HSG 1 North of Nuneaton,
 - HSG 2 Arbury,
 - HSG 3 Gipsy Lane,
 - HSG 4 Woodlands.
 - HSG 5 Hospital Lane,
 - HSG 6 School Lane,
 - HSG 7 East of Bulkington,
 - HSG 8 West of Bulkington,
 - HSG 9 Golf Drive,
 - HSG 10 Attleborough Fields,
 - HSG 11 Tuttle Hill,
 - HSG 12 Former Hawkesbury Golf Course,
 - EMP 1 Faultlands,
 - EMP 2 Pickards Way/Wilsons Lane,
 - EMP 3 Prologis Extension,
 - EMP 4 Coventry Road,
 - EMP 6 Longford Road, and
 - EMP 7 Bowling Green Lane.
- 1.5.5 There are a number of other Borough Plan policies, which will have implications for the development of the Strategic Land Allocation.

Supplementary planning documents

- 1.5.6 There are Supplementary Planning Documents produced by Nuneaton and Bedworth Borough Council which should be read in conjunction with this framework. At the time of publishing, these include:
 - Affordable Housing (2007);
 - Car Parking Standards (2003); and
 - Residential Design Guide (2004).
- 1.5.7 The following Supplementary Planning Documents are also due to be produced. Once adopted, the new documents will replace the older documents where necessary.
 - Affordable Housing
 - Air Quality
 - Transport Demand Management Matters
 - Heritage, Conservation Area Appraisals and Management Plans
 - Health Impact Assessment
 - Planning for a Healthier Area Hot Food Takeaways
 - Green Infrastructure
 - Sustainable Design and Construction

Other planning guidance

- 1.5.8 The following publications have also informed the preparation of this Framework:
 - National Planning Practice Guidance.

2 Site and context

2.1 HSG3 strategic site

Context

- 2.1.1 Strategic allocation HSG3 covers 27.24 ha of land located to the north of Gipsy Lane, located on the southern edge of Nuneaton, with the southern edge of the site approximately 1.1 km to the north of Bedworth. The site consists of a large arable field, with hedgerow boundaries and some existing tree planting on site. The topography of the site shows that it sits at approximately 85-90 AOD, sloping west to east towards the Wem Brook.
- 2.1.2 The built area of Nuneaton lies to the north and east of the site, with the land to the south comprising undeveloped arable land. Strategic Employment site EMP1 is located to the west of the site, which comprises arable fields.
- 2.1.3 The northern boundary of the site is formed by Griff Brook and playing fields in the north eastern corner, with The George Eliot School beyond. The eastern boundary is formed by the Wem Brook. Beyond the eastern and northern boundary lies modern housing comprising two storey detached and semi-detached dwellings at Red Deeps and along Marston Lane. The western boundary of the site is formed by the Coventry Canal, with Gipsy Lane forming the southern boundary of the site.

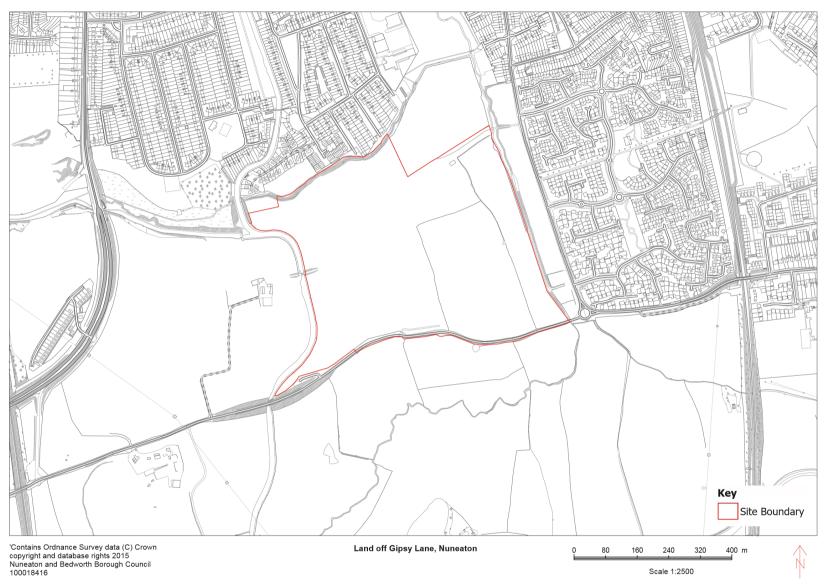


Figure 2: HSG3 Site location

2.2 Edge conditions

- 2.2.1 Edge conditions are important as they form the interface with the existing context. Depending on the nature of the edge conditions, they can inform a certain development or response to the surrounding environment.
- 2.2.2 The strategic site benefits from existing areas of established landscaping located on the periphery of the site. The southern boundary, fronting Gipsy Lane, is defined by a hedgerow with mature tree planning, as well as further hedgerows with isolated tree planting, which define the western boundary fronting the Coventry Canal.
- 2.2.3 The northern and eastern edge of the site are defined by the Griff Brook and Wem Brook respectively, which sit within areas of linear open space acting as a buffer to the residential development located beyond.

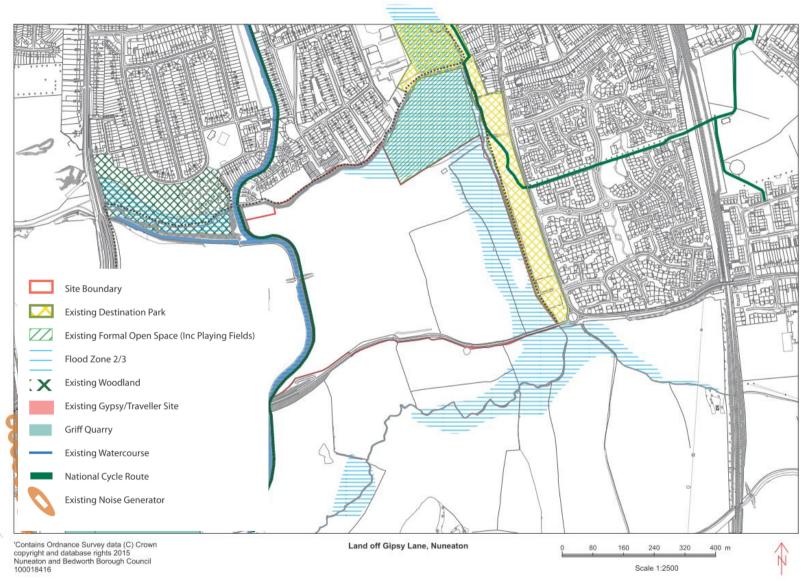


Figure 3: HSG3 Site context

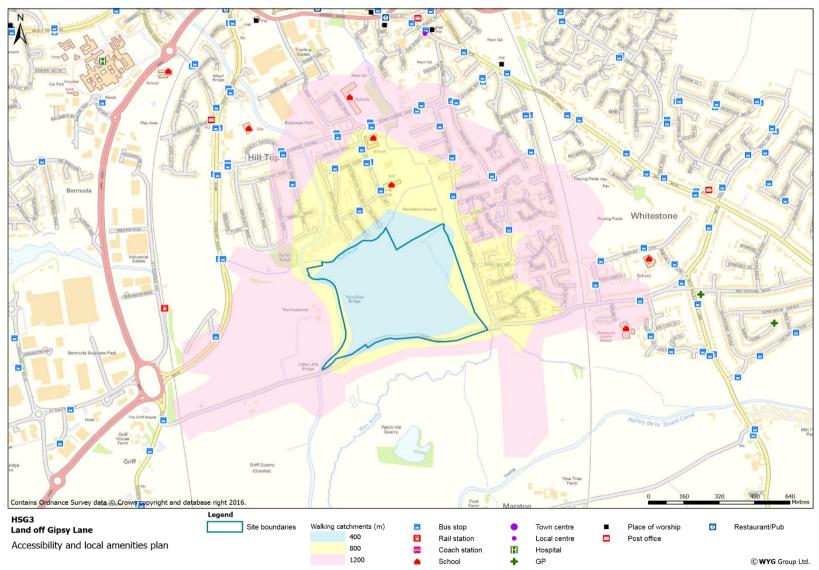


Figure 4: HSG3 Accessibility and local amenities

2.3 Views

- 2.3.1 The site is low lying land with some prominence from the open spaces which buffer the housing to the north and east. Public views are present from the immediate surroundings which comprise areas of public open space, including recreational routes and playing fields.
- 2.3.2 Existing vegetation along Wem Brook limits visual connectivity to the eastern edge. Views across Griff Brook of the existing housing at Red Deeps are present here due to more limited vegetation.

2.4 Flood risk and drainage

2.4.1 The northern and eastern part of the site are located within Flood Zones 2 and 3.

2.5 Landscape character

- 2.5.1 Nuneaton and Bedworth Borough Council commissioned a Landscape Character Assessment in 2012 prepared by TEP which was updated in 2016.
- 2.5.2 Strategic site HSG3 is situated in the northern part of Landscape Character Area 6 Nuneaton and Bedworth Urban Fringe. The land use varies from typical urban landscapes including golf courses and recreational areas, to more rural surroundings of pasture and arable farm land and horse paddocks. The landscape character area also includes parcels of restored land and active quarries, reflecting the industrial heritage of the landscape.
- 2.5.3 A strip of heavily vegetated land with standing water is situated along the eastern boundary, providing a screen to the edge of the built-up area in this location. The northern boundary adjoins housing at Red Deeps and this edge is quite prominent in views from the south and the towpath.

2.6 Habitat and vegetation

2.6.1 Development Parcel HSG3 is a single arable field at the southern edge of the Hill Top area of Nuneaton. The field is separated from suburban Hill Top by the Griff Brook, which has a footpath running alongside it, in addition to Griff Hollow LWS which lies parallel on the opposite side of the Coventry Canal. Likewise, in the north, a sports field belonging to the George Eliot School is bordered by palisade fencing. The Coventry Canal runs alongside the western border, adjacent to grassland contained within employment development parcel EMP1 - The

- Faultlands. The fields are connected by Turn Over Bridge, which crosses the Coventry Canal at the mid-point of the boundary between the two fields.
- 2.6.2 Gipsy Lane forms the southern boundary with arable fields dissected by the Wem Brook, forming part of an evolving rural landscape. Subsequently, the Wem Brook marks the eastern boundary alongside Red Deeps and Wem Meadows Wildspace, an area of open space comprising a mosaic of scattered scrub and grassland, which form a green wedge between the rural development parcel and the housing developments off Marston Lane.

2.7 Access and movement

Public transport

- 2.7.1 Stagecoach Service No. 1 and 2 operate from the bus station in Nuneaton Town Centre to Red Deeps to the north of the Site, via George Eliot Hospital and Attleborough.
- 2.7.2 Bermuda Park Station is located approximately 680 m from the western edge of the Site. Train services from the station operate to Coventry and Nuneaton.

Highway network

- 2.7.3 Gipsy Lane connects to Coventry Road to the west. This provides access to the A444 dual carriageway / B4113 roundabout. The A444 is a primary route at this location, linking through Nuneaton and Bedworth to the A5 in the north, and Junction 3 of the M6 to the south.
- 2.7.4 To the east Gipsy Lane connects to Marston Lane and Lutterworth Road, which provide access to Attleborough to the north and Bulkington to the south.

Pedestrian and cycle routes

- 2.7.5 There are no public rights of way across the site.
- 2.7.6 The canal towpath forms part of the National Cycle Network Route 52, which runs alongside the eastern edge of the canal in a north-south direction. Route 52 connects to Nuneaton Town.

2.8 Facilities

- 2.8.1 Attleborough District Centre is located 810 m to the north of the northern edge of the site, situated on The Square, Attleborough, which provides day-to-day shopping and services to meet the needs of local people. Nuneaton Town Centre is located 1.7 km to the north of the northern edge of the Site.
- 2.8.2 The nearest existing primary and secondary school provisions for the Site are:
 - The George Elliot Secondary School within 800 m of the edge of the Site;
 - Oak Wood Primary School within 800 m of the edge of the Site;
 - All Saints Church of England Primary School within 800 m of the edge of the Site; and
 - Oak Wood Secondary School within 800 m of the edge of the Site.
- 2.8.3 Existing health services located within 1 mile of the site:
 - The Chaucer Surgery, School Walk 1.2 km from the edge of the site;
 - Attleborough Dental Surgery 900 m from the edge of the site;
 - Red Roofs Surgery, 31 Coton Road, Nuneaton 1.7 km from the edge of the site;
 - Whitestone Surgery, 82 Bulkington Lane, Nuneaton 970 m from the edge of the site; and
 - Riversley Road Surgery, Riversley Road, Nuneaton 1.7 km from the edge of the site.

2.9 Heritage and archaeology

- 2.9.1 Nuneaton and Bedworth Borough Council commissioned a Heritage Assessment which was prepared by ECUS Environmental Consultants, forming part of the evidence base for the Borough Plan.
- 2.9.2 The Heritage Assessment confirms there are no designated heritage assets (Scheduled Monuments, listed buildings, conservation areas, Registered Parks & Gardens or Registered Battlefields) on or close to strategic housing site HSG3.
- 2.9.3 The following designated heritage assets are found to be located within 1 km of HSG3:
 - The Griff House Hotel (Grade II Listed Building);

- Griff Cottage and the disused cottage (Grade II Listed Building);
- Bridge Number 1 of Ashby De La Zouch Canal (Grade II Listed); and
- Bridge Number 2 of Ashby De La Zouch Canal (Grade II Listed).
- 2.9.4 Archaeological investigations previously undertaken have identified prehistoric and Romano-British finds within the strategic site study area.

2.10 Environment

2.10.1 The agricultural land is classified as part Grade 2, part Grade 3a and part Grade 3b.

2.11 Utilities

- 2.11.1 National Grid online mapping indicates that a medium pressure gas main runs under the southern part of the site.
- 2.11.2 There are overhead electricity lines that cross the site, but these are not considered to be a major constraint as they are situated in the south western corner, and situated outside the proposed 'development area' for the strategic allocation.
- 2.11.3 The site drains to foul and surface water sewers to the north and east of the site.

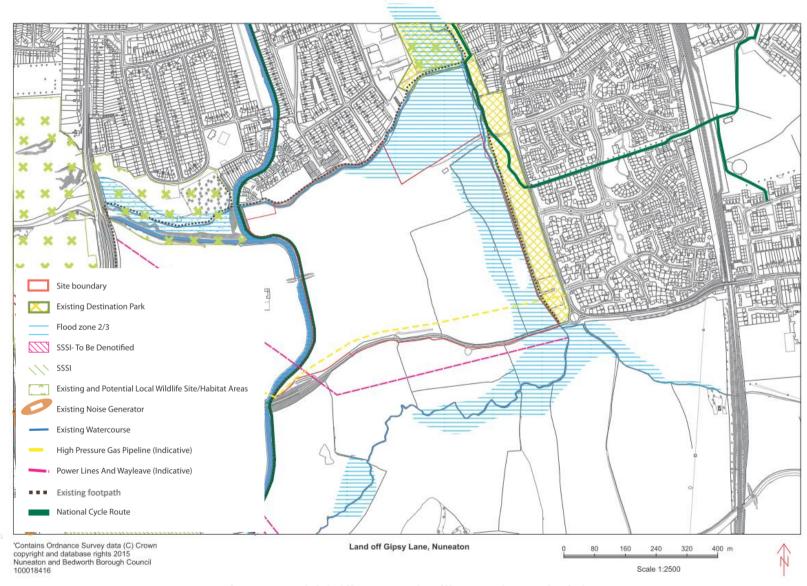


Figure 5: HSG3 Site opportunities and constraints

3 Framework and delivery

3.1 Core concept

- 3.1.1 The concept plan is not a masterplan but rather highlights key principles that will help inform and guide subsequent planning applications which are brought forward on the strategic employment site. This framework and accompanying indicative plan seeks to ensure comprehensive delivery of the site to fulfil the strategic aims of the Borough Plan. The concept plan uses a base map that is to scale, however the elements overlaid onto the plan are indicative and for illustrative purposes only. The elements shown on the plan (and as set out in the key) are therefore not to scale and so the plan should not be used for measuring purposes. Key elements of the concept plan have been derived from stakeholder engagement and policy requirements within the Borough Plan, and are split into the following sections:
 - Landscape, open space and biodiversity;
 - Movement;
 - Land Uses;
 - Character and design; and
 - Sustainability.

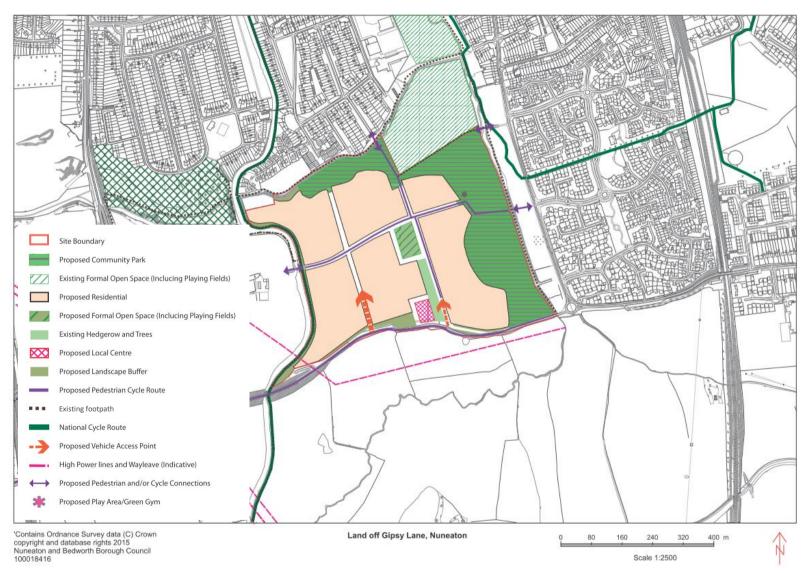


Figure 6: HSG3 Site concept

3.1.2 These sections inform the overall indicative plan.

3.2 Landscape, open space and biodiversity

- 3.2.1 The development of strategic site HSG3 should support the provisions of Borough Plan Policy NE1 which seeks to create, protect, manage and enhance the Borough's Green Infrastructure assets. To achieve this any development proposal should seek to:
 - Enhance and maintain open space corridors through the new landscape buffers along Griff Brook, Wem Brook and Coventry Canal, creating an attractive setting for new housing.
 - Create new east-west green links through the development, connecting through new landscape corridors along the perimeter of the site.
- 3.2.2 Applicants are encouraged to engage with the Council's Parks and Countryside team at the earliest opportunity to ensure that ecology, biodiversity and open space are considered at the outset and adequately factored into site masterplanning.

Edge treatments

- 3.2.3 Edge treatments and landscape buffers should align with the policy requirements and recommendations of the 2017 Landscape Capacity Study¹ for the site. Along the northern, western and eastern edges of the site, a landscaped area of open space should be provided, serving as a recreational resource and creating an appropriate interface with existing residential development located to the north and east of the site, and proposed strategic employment allocation EMP1 situated to the west of the site. Also to the west of the site, any new development should address the canal by fronting houses onto it, with a suggested storey height of 2 storeys, preferably with front gardens to provide an additional buffer between the canal and any new housing.
- 3.2.4 A landscape buffer should be provided along the southern edge of the site to include informal and structure planting to screen the proposed development from Gipsy Lane and protect local views from the surrounding area.

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¹ https://www.nuneatonandbedworth.gov.uk/downloads/21027/landscape

Areas of wildlife interest

- 3.2.5 Borough Plan Policy NE3 requires developments to conserve, enhance and restore ecological networks, biodiversity features and geological features, as well as where appropriate, create new ecological networks.
- 3.2.6 Development proposals brought forward shall be accompanied by an Ecological Assessment and deliver net biodiversity gains in line with Borough Plan Policy NE3.
- 3.2.7 Wildflower meadows should be created within open spaces, as well as wetland creation areas, in order to improve habitat conditions for local species.

Open space

- 3.2.8 The design for any new development on strategic site HSG3 will need to comply with the provisions of Policy NE2 in creating an improved green network, and accessible and linked open spaces.
- 3.2.9 Formal public open space and children's play provision should be concentrated within the central part of the site, with access from the new east-west pedestrian link connecting the existing destination park to the east of site with the existing canal towpath on the western boundary.
- 3.2.10 Further areas of informal open space around the perimeter of the site as shown on the indicative layout should seek to provide routes for pedestrians and cyclists.

3.3 Movement

- 3.3.1 The submission of a Transport Assessment will be required as part of any planning application to determine whether any impact from the development on transport is acceptable. The Transport Assessment should identify the measures that would be applied to mitigate any transport impacts of the development and to improve accessibility and safety for all modes of travel, particularly promoting travel by sustainable modes such as public transport, walking and cycling as an alternative to the use of the car.
- 3.3.2 A transport modelling report commissioned by Warwickshire County Council set out a number of strategic road improvements in close proximity to HSG3. The development of HSG3 is expected to contribute financially towards the A444 corridor road improvement schemes.

3.3.3 Any transport improvements/upgrades required will be secured by planning condition attached to the grant of any planning permission and subsequent Planning Obligation.

Highway access

3.3.3 Primary access for vehicles will be provided from Gipsy Lane.

Footpaths and cycleways

- 3.3.4 Reinforce connectivity to the existing footpath and cycle routes surrounding the site with the provision of cyclepaths running north to south and east to west across the development, as well as parallel to Gipsy Lane. The layout and position of internal cyclepaths in relation to the site boundaries should make them capable of ensuring effective connections to the cycle network provision within EMP1 and on to Bermuda Park.
- 3.3.9 The Concept Plan shows the main walking and cycling routes which are principal utility routes through the site. Other walking and cycling routes may also be required. Any necessary pedestrian and cycle routes will need to be of suitable design and construction. Consultation should be undertaken with active travel officers at the Borough and County Councils at the earliest opportunity to ensure that the design and construction of such routes are factored into site masterplanning.

3.4 Land uses

Housing

- 3.4.1 The strategic housing allocation HSG3 will accommodate at least 575 dwellings over the Plan period. The site should be developed at a net density of around 35 to 40 dwellings per hectare for the centre of the site, with lower densities around any new urban edges.
- 3.4.2 Affordable housing will be provided in line with Policy H2. Any development proposal not complying with the provisions of Policy H2 will need to be supported by a viability statement.

Education requirements

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

3.4.4 There should be a financial contribution to Warwickshire County Council towards the provision by Warwickshire County Council of a 1 form entry primary school either on-site or the equivalent additional school places off-site. The developers of HSG3 are encouraged to engage in early dialogue with the Local Education Authority to determine what level of financial contributions are required towards school expansions to address the demand for school places.

Community facilities

- 3.4.5 Policy TC3 of the Borough Plan requires new residential development to be within 1200m walking distance of a district or local centre, or an 8 minute drive to a district centre.
- 3.4.6 The nearest district centre to the site is located 1.7 km from the site and therefore, a local centre is required under the provisions of Policy TC3.
- 3.4.7 The following uses will be acceptable within a new local centre: Use Class A1, Use Class A2 and Use Class D1. Proposals for A3-A5 Uses will need to comply with the policy test set out in Policy TC2.
- 3.4.8 The Concept Plan does not show locations for play provision, but this is a policy requirement. The location, design and type of provision should be determined in consultation with the Council's Parks and Countryside team.

3.5 Character and design

- 3.5.1 The concept plan does not seek to advocate a particular design style. The design for any development on this strategic site should seek to meet the principles of Policy BE3 in delivering high standards; a scheme able to accommodate changing needs of occupants and adapt to and minimise the impact of climate change. However, the architectural appearance of the development should respond positively to the design context and height of the existing residential areas surrounding the site, which includes a mix of single storey bungalows and chiefly two storey detached and semi-detached dwellings built in the post-war era of the twentieth century. This should be achieved through the use of variation in building heights, house types and orientation of dwellings to create an attractive, high quality extension to the urban area. The overall design should, where appropriate, use varied building materials which make reference to the local vernacular. Roof materials should be in recessive colours to help reduce the prominence of urban edges.
- 3.5.3 Policy H1 requires development to provide a mix of housing types, sizes and tenures.

3.5.4	Within the local centre, units should have frontages facing public areas and where possible, servicing located away from key public areas.

3.6 Sustainability

Sustainable construction

3.6.1 Development on the strategic site will meet the objectives of Policy BE3 of the Plan and the Sustainable Design and Construction SPD.

Surface water drainage and flooding

- 3.6.2 The northern and eastern parts of the site are located in Flood Zone 2 and 3.
- 3.6.3 In order to ensure the site remains at low risk of flooding and does not increase the risk of flooding elsewhere, any development shall include a comprehensive Sustainable Drainage System (SuDS) scheme. This is in line with Policy NE4.

Noise and air quality

- 3.6.4 The development of the site will need to take account of the strategic employment allocation (EMP1) to the west, which proposes to bring forward Use Class B1, B2 and B8 uses. Traffic noise along Gipsy Lane will also need to be taken into consideration.
- 3.6.5 If required, suitable noise mitigation shall be incorporated into the proposed landscape buffer along the western and southern boundary of the site. The precise nature of noise mitigation measures should be established through undertaking of a Noise Impact Assessment.
- 3.6.6 Two Air Quality Management Areas (AQMAs) are located in the Borough, both of which are designated in Nuneaton. The development of the Strategic Site is not considered to adversely affect the Air Quality Management Areas (AQMAs).

Safety and security

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

3.7 Delivery

Timescales

3.7.1 The development of the site is anticipated to be delivered within the first 5 years of the Plan period following formal adoption of the Borough Plan.

Infrastructure

- 3.7.2 The strategic housing site shall deliver the following infrastructure and facilities:
 - Financial contribution to local NHS Clinical Commissioning Group.
 - Provision of community hall as part of proposed Local Centre, or financial contribution to off-site provision.
 - Play and open space (including the proposed strategic play area) to be provided, and appropriate management and maintenance arrangements.
 - Financial contribution to WCC towards the provision by WCC of a 1 form entry primary school either on-site or the equivalent additional school places off-site.
 - Any transport improvements/upgrades required along Gipsy Lane as a result of the development and to the Gipsy Lane / Coventry Road junction.
 - Financial contribution towards the upgrading of the existing public footpath from the canal towpath to the Bermuda Park Station.
 - Provision of a footway/cycleway linkage to the existing footway/cycleway alongside the north bank of Griff Brook.
 - Financial contribution towards the provision of footway/cycleway linkages from the eastern site boundary to the Wem Brook Trail (including crossings of Wem Brook).
 - Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services, in order to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.
 - Financial contributions towards borough-wide strategic highway infrastructure works identified within the A444 corridor.
 - Contribution for cycle path links to local schools.
 - Contribution for cycle paths to link into existing Wembrook cycle path, including provision of bridges over Wem Brook.
 - Contribution for cycle path link to Bermuda Industrial Estate.
 - Contribution for cycle path link to Bermuda Train Station.
 - Enhancement to canal towpath and a provision for the crossing of the canal to facilitate cycle usage.

Management and maintenance

- 3.7.4 Consideration should be given at an early stage to the future management arrangements for infrastructure and facilities. Service infrastructure will be the responsibility for the relevant service provider.
- 3.7.5 The Borough/County Councils will manage and maintain the expanded recreation ground space and the new/upgraded footpaths and cycle routes. There is potential for large areas of landscaping and public open space, which should be managed by the Council once it has reached an adoptable standard, however, this should be discussed with the Council at an early stage. The Council will not be responsible for the management and maintenance of SuDS as part of the Strategic Housing Allocation.