

# BOROUGH PLAN BACKGROUND PAPER - Sport and active recreation

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Nuneaton and Bedworth Borough Council

2015



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# 1 INTRODUCTION

- 1.1 This paper sets out the Council's approach to dealing with sport and active recreation. The purpose of this paper is to draw together the key datasets and information that have been used in developing the policy. The technical paper provides the detail behind the development of the policy and is used to justify the elements included within the policy. The paper explains the background research that has been undertaken and how it is proposed to adapt this in practice to achieve a policy that is both reasonable and deliverable.
- 1.2 The Council is currently commissioning a Sports and Community Facilities Study and a Playing Pitch Strategy. These will consider existing levels of provision and the quality of this provision and whether more may be required to meet existing and future demand. The outcomes of these studies will be expected to feed into the next iteration of the draft Borough Plan.

# 2 NATIONAL PLANNING POLICY FRAMEWORK

- 2.1 The National Planning Policy Framework addresses the importance of the health and wellbeing of a community. Local authorities are advised to set local standards for the provision of open space, sports, and recreational facilities based on a quantitative and qualitative assessment of existing provision.
- 2.2 Health is an element that runs through many sections within the NPPF. Section 8 of the NPPF, 'Promoting healthy communities', emphasises the ability of planning in meeting the requirements of strong, vibrant and healthy communities. The theme of health is evident within the Borough Plan, in that health covers a number of cross cutting areas and is addressed through different ways. A key component of health is physical activity and it is this aspect which this policy seeks to deliver.
- 2.3 This policy has a number of links with both health and community facilities, but only the key elements of Section 8 of the NPPF, that specifically relate to this policy have been included in Table 1: NPPF Conformity and it is considered that the policy meets the NPPF requirements.

| <b>NPPF Requirement</b>                          | <b>NPPF requirement</b> | <b>sub-</b> | <b>Relationship with policy</b>  |
|--|-------------------------|-------------|--|
| Core planning principle:<br>"take account of and |                         |             | The Borough Plan as a whole contains elements that takes account of strategies which will enable |

| NPPF Requirement  | NPPF sub-requirement   | Relationship with policy   |
|---|--|--|
| <p>support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”</p>             |  | <p>improvements to the lives of the Borough’s residents, as all of these factors contribute to overall wellbeing and quality of life. The Council recognises that health and physical activity are intrinsically linked and where possible, the Borough Plan provides direction to improve both these elements. The policy takes account of local issues for the Borough and the Council has worked closely with Warwickshire Public Health. The development of Supplementary Planning Document ‘Planning for a healthier area – Nuneaton and Bedworth’ will assist in delivering health improvements for the Borough. This policy is specifically focussed on improving the opportunities for sport and active recreation within the Borough as well as ensuring existing and future residents have sufficient access to community facilities. Elements will also be achieved through the Infrastructure Delivery Plan.</p> |
| <p>Paragraph 28:<br/>“Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To</p> | <p>promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.”</p> | <p>The policy (and Borough Plan) does not include specific proposals for the rural areas. Consultation with the Warwickshire County Council rural economy team indicated that DEFRA does not recognise any of Nuneaton and Bedworth Borough to fall within the rural area.</p>   |

| NPPF Requirement  | NPPF sub-requirement   | Relationship with policy   |
|---|--|--|
| promote a strong rural economy, local and neighbourhood plans should:   |  | However, as part of the evidence to support the policy local provision will be considered and assessed to see how it can meet local needs.           |
| Paragraph 69:<br><br>“The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning. Planning policies and decisions, in turn, should aim to achieve places which promote: | opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity | This is delivered through other policies within the Borough Plan such as Policy Green Infrastructure and Policy Sustainable Design and Construction. |
|   | safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and  | This is delivered through Policy Sustainable Design and Construction.  |
|   | safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.”  | This is delivered through other policies within the Borough Plan such as Policy Green Infrastructure and Policy Sustainable Design and Construction. |
| Paragraph 70:   | plan positively for the  | The policy makes reference   |

| NPPF Requirement  | NPPF sub-requirement   | Relationship with policy  |
|---|--|---|
| <p>“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> | <p>provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</p> | <p>to supporting the facilities needed by local communities where there is evidence to support additional provision. This will also be delivered through Policy – Retaining Community facilities. Other parts of these requirements will be delivered through the Infrastructure Delivery Plan.</p>                           |
|   | <p>guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;</p>  | <p>This is delivered through the Infrastructure Delivery Plan, Policy Hierarchy of Centres and Policy Retaining Community Facilities.</p>   |
|   | <p>ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and</p>   | <p>The policy makes reference to supporting the facilities needed by local communities where there is evidence to support additional provision. This will also be delivered through Policy – Retaining Community facilities. Other parts of these requirements will be delivered through the Infrastructure Delivery Plan</p> |
|   | <p>ensure an integrated approach to considering the location of housing, economic uses and community facilities and</p>  | <p>This is delivered through the Infrastructure Delivery Plan, Policy Scale of Growth and Policy Retaining Community</p>  |

| NPPF Requirement  | NPPF requirement sub- | Relationship with policy   |
|---|-----------------------|--|
|   | services.”            | Facilities.  |
| <p>Paragraph 73:</p> <p>“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should 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.”</p> |                       | <p>The Council recognises the importance of the relationship between open space and opportunities for sport and recreation with health. This policy seeks to address any under provision of facilities within the Borough.</p> |
| Paragraph 171:  |                       | The Council recognises the importance of the   |

| NPPF Requirement   | NPPF sub-requirement | Relationship with policy   |
|--|----------------------|--|
| <p>“Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), Including expected future changes, and any information about relevant barriers to improving health and well-being.”</p> |                      | <p>relationship between opportunities for sport and recreation with health. This policy seeks to address any under provision of facilities within the Borough. The Council has worked with Warwickshire Public Health in developing the policy. Policy - health references a HIA requirement for applications which meet the threshold for an EIA. Using the EIA as a trigger for a HIA is considered an appropriate threshold because it is extremely likely that the application will impact health. Planning applications not requiring an EIA are 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 HIA. The submitted HIA will be assessed by Warwickshire Public Health during the determination period.</p> |

**Table 1: NPPF Conformity**

### 3 PLANNING PRACTICE GUIDANCE

- 3.1 The PPG sets out a number of guidance points in relation to health and wellbeing. The following paragraphs are taken directly from the PPG<sup>1</sup> and have all been considered through the development of the policy and the wider Borough Plan and Infrastructure Delivery Plan.

How should open space be taken into account in planning?

- 3.2 Open space should be taken into account in planning for new development and considering proposals that may affect existing open space (see National Planning Policy Framework paragraphs 73-74). Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see National Planning Policy Framework paragraph 114), as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework paragraphs 6-10).
- 3.3 It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to the duty to cooperate where open space serves a wider area. Guidance on Local Green Space designation, which may form part of the overall open space network within an area, can be found here.

How do local planning authorities and developers assess the needs for sports and recreation facilities?

- 3.4 Authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities.

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<sup>1</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/open-space-sports-and-recreation-facilities/>

Who should local planning authorities consult in cases where development would affect existing open space, sports and recreation facilities?

- 3.5 Local planning authorities are required to consult Sport England in certain cases where development affects the use of land as playing fields.
- 3.6 Where there is no requirement to consult, local planning authorities are advised to consult Sport England in cases where development might lead to:
- loss of, or loss of use for sport, of any major sports facility;
  - proposals which lead to the loss of use for sport of a major body of water;
  - creation of a major sports facility;
  - creation of a site for one or more playing pitches;
  - development which creates opportunities for sport (such as the creation of a body of water bigger than two hectares following sand and gravel extraction);
  - artificial lighting of a major outdoor sports facility;
  - a residential development of 300 dwellings or more.
- 3.7 Authorities should also consider whether there are planning policy reasons to engage other consultees.

## **4 SPORTS EVIDENCE BASE**

- 4.1 The key sports based studies that have relevance to the development of this policy is still emerging this is the Playing Pitch Strategy and the Sports and Community Facilities study. In addition, the Council has recently adopted a Sports Facilities Strategy. Below summarises the purpose of both studies and where possible identified key findings. As the Facilities Planning Model is emerging and not adopted the policy is worded loosely at this stage, and simply acknowledges the importance of the studies and need to take account of recommendations. This was considered the most appropriate way forward because given the issues around health identified by health profiling and corroborated within the Issues and Options, sports type work will have a bearing on health change over the Plan period.

### ***Playing Pitch Strategy***

- 4.2 The Council produced its first Playing Pitch Strategy in 2000, with an update to this produced in 2010. The adopted 2010 strategy was developed in line with the recommendations and methodology outlined within Sport England's Playing Pitch Model which was contained within "Towards a Level Playing Field" (2003). There is a need to review and update the 2010 report in order to

identify current provision levels within the Borough and for the strategy to be in line with Sport England's latest guidance "Playing Pitch Strategy Guidance - An approach to developing and delivering a playing pitch strategy" (October 2013). This will enable the Council to analyse the existing usage within the Borough and reveal the likely future levels of demand during the lifetime of the Borough Plan. The update to the PPS will provide revised figures for the current provision and estimated future need for the Borough.

4.3 The key parts of the study will come from the analysis, audit and the recommendations and action plan as outlined below:

- **Analysis**
  - Quantitative and Qualitative Assessments
  - Comparisons to other Local Authorities
  - Current and Future demand
- **Audit**
  - Findings: Using Sport England Toolkit template, write to all schools and known sports clubs.
  - Pitch Quality Assessments
  - Built Facilities Assessments
  - Analysis of provision – shortfalls / surpluses based on the borough's seven locality areas, team generation rates, etc.
- **Recommendations and Action Plan**
  - Develop an action plan that follows the SMARTER principle (Specific, Measurable, Achievable, Resourced, Time-Orientated, Evaluated, Reviewed)

### ***Sports Facilities work***

4.6 The Council is currently updating the sport and community facilities evidence base through an updated study, which will be in line with the latest Sport England Guidance. The following are the objectives that will be delivered by the study:

- Set out the relevant planning policy context and guidance for sports facilities, also including context for community facilities.
- Work with NBBC Officers to develop Plans showing the location and extent of the following;
  - a) Community Facilities

b) Outdoor Sports Facilities

c) Non-Pitch Sports Facilities (swimming pools, sports halls, athletics track, Indoor/ outdoor tennis, outdoor netball, indoor/ outdoor bowls, rinks, martial arts facilities.

- Assess the quality, usage, accessibility, availability of sports and community facilities and future developmental opportunities in accordance with Sport England guidance Applying Sport England guidance (Assessing Needs and Opportunities (2014)) should be considered a minimum, however the methodology section of the tender submission should identify specific approaches to how this will be achieved).
- Project forward future requirements for sports/ community facilities in accordance with Sport England guidance, taking account of projected growth. The project should meet all the requirements of the Sport England Assessing Needs and Opportunities Guide (2014) for Indoor and Outdoor Sports Facilities Checklist
- Consultation with the community and key stakeholders to identify demand and need for both open spaces and indoor sport/ community facilities in accordance with relevant best practice guidance
- Identification of strategic options for addressing needs/securing provision for sport / community facilities;
- A realistic yet creative assessment of the potential use of developer contributions (S. 106 or CIL) in monetary / land terms (sites, equipment, improvement, maintenance etc.) in addressing any shortfall in need for sports/ community facilities.

## **5 SPORT, ACTIVE RECREATION AND WELLBEING STRATEGY 2012 - 2017**

- 5.1 The Strategy attempts to identify those corporate issues and priorities that can be affected positively by the work of the Council over the life of the sports strategy (2012 – 2017). From a planning policy perspective, the Strategy outlines the importance of Sports provision within the Borough. However, the paramount relevance to the development of the policy is the need for an update on the latest assessment of provision.

- 5.2 The Strategy makes reference to the use of CIL in providing for funding for sports provision. At this stage this is an approach that would be preferable from a policy perspective, however it is acknowledged that viability testing and consultation will need to be undertaken.
- 5.3 The Strategy also supports the policy by highlighting the fact that participation in sport is an issue, this combined with health is a key factor identified within the strategy. The Strategy itself recommends a number of actions, which are considered overly focused for inclusion within the Borough Plan. However, close working with the officers in the sports team will allow any planning policy opportunities to be explored where appropriate. This could be developed through a delivery type document such as a Supplementary Planning Document. However given the work that needs to be undertaken on these actions the policy is proposed to be flexible and take account of future work.

## **6 ISSUES AND OPTIONS CONSULTATION**

- 6.1 The Issues and Options have assisted in developing this policy by taking forward some of the issues that were identified at that stage as well as the consultation responses. Overall there were 26 comments received on leisure and recreation and 44 comments on social issues.
- 6.2 In relation to the comments on leisure and recreation 73% agreed with the issues identified, while 19% disagreed. The issues relating to this subject area are set out below.

### Issue LR1

While Riversley Park and the Miners Welfare Park serve the whole Borough, other recreation grounds are unevenly distributed with most concentrated in the north around Barpool and neighbouring areas. There is sufficient outdoor sports provision in the Borough to meet existing need but it is under utilised. Etone Sports centre has the only artificial sports pitch in the Borough.

### Issue LR2

There is a good green corridor network running through the middle of the Borough linked to the Coventry Canal. Others include the Nuneaton Ashby disused railway. There are however no corridors in Bulkington or the south west of the Borough which reduces biodiversity and opportunities for leisure activities in this area.

### Issue LR3

Access to some of the Borough's leisure facilities is restricted for people without a car. Public transport to Bermuda Park for instance is limited and there are no public footpaths along the A444.

- 6.3 The issues to do with green infrastructure such as the cycle network and wider Green Infrastructure networks are picked up in the Green Infrastructure policy. However, of relevance to the development of the policy is the issues around sports provision. Access to sporting facilities in certain locations within the Borough was identified as an issue. The policy is limited at this stage in that the evidence base studies that would have supplemented the Issues and Options are still to be complete. This is primarily down to requiring information on the specific location for growth. Therefore the policy simply identifies the emerging studies and the need to take into account their findings.
- 6.4 The issues relating to social factors are set out below:

### Issue S1

There is a massive gap between the north and south of Warwickshire. Nuneaton and Bedworth in the north is in the top 30% most deprived Boroughs in the Country. Stratford upon Avon by contrast falls just outside the top 10% least deprived areas. Within Nuneaton and Bedworth there is also a divide between the East and West with the most deprived areas located in the west. Parts of Abbey, Camp Hill and Kingswood in particular fall within the top 10% most deprived areas in England while Bar Pool (within the locality of Arbury and Stockingford) falls in the top 4%.

### Issue S2

Life expectancy in the Borough is the lowest in Warwickshire and lower than the national average. There are notable variations across the Borough with those living in the most deprived areas expected to live 5-6 years less than those in the least deprived areas. Comparisons with elsewhere in Warwickshire highlight even bigger differences. Males in Leam Valley in Rugby are expected to live 19 years longer than those in Abbey (in Abbey and Wembrook). Links can be made to poor health, lack of physical activity and obesity, all of which are high in the Borough.

### Issue S3

Fear of crime and actual crime in the Borough is the highest in Warwickshire. The Borough also has the highest levels of anti social behaviour with most incidents linked to rowdy/ nuisance behaviour. This can have a significant negative impact on community well being.

### Issue S4

Community cohesion within the Borough needs to be improved. People's satisfaction with their local area is the lowest in Warwickshire and only 56% feel they belong to their neighbourhood.

- 6.5 Issue S1 is covered by the Borough Plan as a whole, specifically the growth work seeks to assist in narrowing the gap. However reducing deprivation is an aspiration of the policy. By incorporating measures such as a Health Impact Assessment (HIA) in the health policy and access to facilities and leisure type elements in this policy, it is hoped that this will contribute to the overall aims of the plan regarding deprivation.
- 6.6 Factors around life expectancy raised in Issue S2 are hoped to improve by implementing this policy, as physical activity can help to improve overall health and wellbeing. It is acknowledged that the elements outlined above, such as HIA of applications are only part of the larger solution to deprivation

and life expectancy and that it requires a holistic approach in to tackle this issue effectively.

- 6.7 Issue S3 is picked up within the Sustainable Design and Construction policy and community cohesion and satisfaction in the area is part of the Borough Plan as a whole. In general, comments on the social element of the Issues and Options identified concerns that the issues could actually be tackled, although in general there was support for the issues identified. Concerns were also presented around building additional dwellings and the effect this can have on social issues. In developing the policy the inclusion of a HIA as part of residential applications is considered to assist the applicant in considering the health impacts of their proposal. Obesity and lack of physical activity were flagged up as issues. This correlates with the issue of obesity being identified by health professionals as a key health factor in the Borough. The overall health policy is considered to offer assistance to tackling obesity. Some points flagged up to the Council as being absent from the policy were access to children's facilities and doctors surgeries.
- 6.8 Issue S4 relates to access to actual facilities, which is covered through the Infrastructure Delivery plan and Infrastructure policy and therefore this was not repeated within the health policy.

## **7 PREFERRED OPTIONS**

- 7.1 As there was no standalone health or sport and active recreation policy within the Borough Plan Preferred Options, there are limited comments in this respect. However, many other policies dealt with issues surrounding these topics, even if this was in an indirect way. There were a number of comments relating to the health and wellbeing of residents and their opportunities to engage with physical activity within the Borough, these are set out below:
- The Plan should use canal-side areas to create homes and businesses, as access between the two could very easily be made by walking or cycling. This would both be a more attractive environment to travel to and from work, as well as far less polluted, as the transport networks would be situated away from roads and cause no pollution themselves. Consequently, this would lead to less pollution through increased use of sustainable travel, and more active people, delivering better health to residents of the Borough.
  - Focus more on woodlands, rather than just open green spaces when considering Green Infrastructure.
  - Loss of greenfields does not improve quality of life or provide opportunities for healthier and active lifestyles.

- Using bus services forms an important element of a sustainable and healthy lifestyle. A brisk walk each day to a local bus stop, and again at the destination, repeated twice daily, goes a significant way to maintaining appropriate levels of physical activity. This is not recognised in the draft Plan.
- I urge that the proposals build with life quality and health improvement in mind, that the current travel infrastructure be done in conjunction with any new development, especially encouraging safe cycleways to and from town and the station
- The Borough Plan will not raise education or health levels, will encourage the use of the car, raise unemployment levels and take the only remaining, accessible piece of land in the area.
- Develop land rear of Nuneaton Football/Rugby Club alongside River Anker as a sporting facility. All weather and grass football pitches are desperately needed for the local community. The land is currently a wasted resource. Need a footpath from Attleborough Road to Nuneaton FC.
- Further work needs to be undertaken in identifying shortfalls in typologies. This should be done in conjunction with the Leisure department, County Sports Partnership, CSW and the various sports National Governing Bodies. The process could take several months and should result in a costed prioritised list of sites, where external and internal investment should be sought and made. This may necessitate the refresh of the playing pitch strategy and factoring in the proposed growth in terms of numbers and location.
- Disagree with plan to build 676 houses at Hospital Lane: a vast amount of beautiful green woody areas will be replaced by large houses and an even noisier secondary school. Live close to the primary school, and every morning and evening faced with a barrage of parents parking across mine and my neighbours front drive. Adding a secondary school would add more chaos. Bought our house because of the beautiful fields at the back as well as a lovely place to walk the dogs and play football with my child. The fields provide a large recreational opportunity to many residents in and around this area. Re-consider building on such a valuable piece of land that many people in this area enjoy.
- The land in PDA7 is graded as “good quality”, productive arable land, and is also used by many residents as a leisure area: dog walking,

children on bikes, playing football, etc. What will the social and economic impact be due to the loss of this land?

## **8 SUSTAINABILITY APPRASIAL**

- 8.1 The Sustainability Appraisal identified the policy as resulting in a direct positive effect on human health objective because it will require major development proposals to consider the impact on existing health facilities together with an indirect positive effect on the provision to sports and recreations facilities and access to services. There were no identified affects on economic and social factors associated with access to employment and affordable housing. There were uncertain effects identified on a number of environmental matters as these are factors associated with integrated implementation of other policies in the Borough Plan.
- 8.2 The Policy has been assessed against the SA objectives. The Policy will result in a direct positive effect on human health objective as it will require major development proposals to consider the impact on existing health facilities together with an indirect positive effect on the provision to sports and recreations facilities and access to services.
- 8.3 The Policy will not affect economic and social factors associated with access to employment and affordable housing.
- 8.4 The Policy will have an uncertain effect on a number of environmental matters as these are factors associated with the integrated implementation of other policies in the Borough Plan.

## **9 DELIVERY MECHANISMS**

- 9.1 The following delivery mechanisms are relevant for this policy:
- Agreement with Warwickshire Public Health to be developed regarding assessment of HIA
  - Supplementary Planning Document 'Planning for a healthier area – Nuneaton and Bedworth'
  - Continue partnership arrangements with healthcare providers and Warwickshire police
  - Continue to work with the Sports Development Team
  - Open space requirements for strategic housing sites;
  - Delivery of Open Spaces Strategy & Playing Pitch Strategy
  - Delivery of Green Infrastructure Plan;
  - Delivery of Allotments Strategy