



Cabinet Member for Housing and Communities

Time and Date

10.30 am on Friday, 9th July, 2021

Place

Diamond Rooms 1 and 2 - Council House

Please note that in line with current COVID regulations, there will be limited public access to the meeting to ensure social distancing. If you wish to attend in person, please contact the Governance Services Officers indicated at the end of the agenda.

Public Business

1. **Apologies**

2. **Declarations of Interest**

3. **Minutes** (Pages 3 - 6)

a) To agree the minutes of the meeting held on 11 June, 2021

b) Matters arising

4. **Community Infrastructure Levy (CIL)** (Pages 7 - 14)

Report of the Director of Street Scene and Regulatory Services

NOTE: In accordance with the Constitution, Councillor N Akhtar, Chair of the Scrutiny Co-ordination Committee, has been invited to attend the meeting for this item of business to agree the need for urgency such that call-in arrangements will not apply. The reason for urgency is that a formal decision on this is needed prior to the Local Development Scheme report being considered by Cabinet on 13 July 2021.

5. **Response to Nuneaton and Bedworth Borough Council (NBBC) Public Consultation** (Pages 15 - 70)

Report of the Director of Street Scene and Regulatory Services

6. **Outstanding Issues**

There are no outstanding issues

7. **Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

Private Business

Nil

Julie Newman, Director of Law and Governance, Council House Coventry

Thursday, 1 July 2021

Note: The person to contact about the agenda and documents for this meeting is Usha Patel Governance Services Officer, Email: usha.patel@coventry.gov.uk

Membership: Councillor D Welsh

By invitation Councillors R Bailey and M Lapsa (Shadow Cabinet Members) and Councillor L Bigham (Chair of Communities and Neighbourhoods Scrutiny Board (4)

Public Access

Please note that in line with current COVID regulations, there will be limited public access to the meeting to ensure social distancing.

Any member of the public who would like to attend the meeting in person is required to contact the following officers in advance of the meeting regarding arrangements for public attendance. A guide to attending public meeting can be found here:

<https://www.coventry.gov.uk/publicAttendanceMeetings>

Usha Patel

Governance Services Officer,

Email: usha.patel@coventry.gov.uk

Coventry City Council
Minutes of the Meeting of Cabinet Member for Housing and Communities held at
10.30 am on Friday, 11 June 2021

Present:

Members: Councillor D Welsh (Chair)

Shadow Cabinet

Members: Councillor R Bailey
Councillor M Lapsa

Other Members: Councillor N Akhtar (Chair of Scrutiny Co-ordination Committee)
Councillor L Bigham (Chair of Communities and Neighbourhoods Scrutiny Board (4))

Employees Present:

O Aremu, Law and Governance
S Bennett, Law and Governance
V Birchall, Sport, Culture and Destination
F Mackenzie, Sport, Culture and Destination
U Patel, Law and Governance

Public Business

1. Declarations of Interest

There were no declarations of interest.

2. Minutes

The minutes of the meeting held on 12 February 2021 were agreed as a true record. There were no matters arising.

3. Acceptance of Grant Funding from the National Lottery Heritage Fund towards the project to transform St. Marys Guildhall

The Cabinet Member considered a report of the Director of Business, Investment and Culture which sought approval to the acceptance of grant funding from the National Lottery Heritage Fund towards the project to transform St Mary's Guildhall.

In February 2020, Cabinet approved up to £3 million capital support for a £5.6m project comprising improvement works to St Mary's Guildhall and the associated planned improvements to interpretation and public engagement activities.

The funding was approved to be financed through prudential borrowing to bridge any gap after other fundraising had been undertaken. The Council has since

successfully achieved £1.6m funding received from the Get Britain Building Fund and raised £2.2m funding from the Department for Culture, Media and Sport.

The Council was successful in its Stage One application for £78,000 from the National Lottery Heritage Fund, which enabled officers to develop a Stage Two application for revenue and capital funding. The Council has now been offered the full amount requested from the National Lottery Heritage Fund of £1.423m, reducing the need for borrowing.

The report sought to approval to accept the national Lottery Heritage Fund grant, to support both the capital and revenue elements of the project, along with the delegations necessary to implement this decision.

The Cabinet Member and Members present welcomed the grant funding as it would support the restoration project and help to transform St Marys Guildhall into a heritage asset for the city. In addition, they commended officers for the work undertaken to gain this incredible opportunity to secure the funding. The Cabinet Member also thanked all the partner agencies involved with this transformation project.

In accordance with the Constitution, Councillor N Akhtar, Chair of the Scrutiny Co-ordination Committee attended the meeting for this item and agreed the need for urgency so that call-in arrangements would not apply. The reason for urgency was that Cabinet was scheduled to meet the day after the grant agreement needed to be signed off under its expiry date.

RESOLVED that the Cabinet Member for Housing and Communities:

- 1. Accepts the award from the National Heritage Lottery Fund for £1.423m towards the St Mary's Guildhall capital project and operational plan, together with the terms and conditions attached to the grant.**
- 2. Delegates authority to the Director of Business, Investment and Culture, following consultation with the Director of Law and Governance, and the Director of Finance to negotiate, complete and seal such legal documents as are necessary to give full effect to the decision.**

4. Outstanding Issues

There were no outstanding issues.

5. Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved

There were no other items of public business.

(Meeting closed at 10.40 am)

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Public report
Cabinet Member

Cabinet Member for Housing and Communities

09 July 2021

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor D Welsh

Director Approving Submission of the report:

Director of Streetscene and Regulatory Services

Ward(s) affected:

All

Title:

Community Infrastructure Levy (CIL)

Is this a key decision?

No.

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant

Executive Summary:

This report reviews the findings of the Community Infrastructure Levy (CIL) Viability Reports and concludes that there is insufficient viability to take forward a CIL Scheme in Coventry, and proposes that no further work be undertaken on bringing forward a Scheme at this time.

Recommendations:

The Cabinet Member is requested to:

1. Note the work of the CIL Working Group and the findings of the CIL Viability Reports
2. Conclude the work on investigating implementing CIL in Coventry as there is insufficient scope to introduce a changing scheme.

List of Appendices included:

None

Background papers:

CIL Viability Report 2017
CIL Viability Report Addendum 2019

Both Viability Reports can be found here:

https://www.coventry.gov.uk/downloads/download/6842/cil_viability_reports

Other useful documents:

None.

Has it been or will it be considered by Scrutiny?

No.

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No.

Will this report go to Council?

No.

Report title: Community Infrastructure Levy (CIL)

1. Context (or background)

What is CIL?

- 1.1 CIL is a charge that can be made on development in addition to Section 106 developer contributions. All development is potentially liable, with some limited exemptions, and the levy is calculated on a m2 basis, meaning all applicable developments contribute. Once collected the Levy can be spent on infrastructure projects anywhere in the city, and a portion is given to a Parish Council if the development falls within their boundary.
- 1.2 In order to establish a Levy, Councils must first be able to demonstrate that there is sufficient value in development to the extent that the addition of a levy on top of all other costs would not render typical schemes unviable. Should the evidence demonstrate this, then a draft Charging Schedule can be publicly consulted upon, changes made and eventually culminating in an independent Examination in Public.
- 1.3 When considering the implementation of CIL, Councils must also consider the consequences of the introduction of a new charge. Developments previously allocated or expected may not come forward as they are now less attractive to developers, and development patterns may change to avoid higher cost areas.
- 1.4 Once adopted CIL is a non-negotiable Levy that is paid upon commencement of an development, with prescribed phasing for larger payments. This inflexibility means that there is greater certainty of how much Levy each application will contribute. However, it also means that should a scheme be experiencing viability issues then any appropriate renegotiation will focus on Section 106 provisions, such as education, highways or affordable housing contributions.

CIL Evidence Base

- 1.5 As part of the 2017 Local Development Scheme, Coventry City Council committed to investigating the introduction of a Community Infrastructure Levy. A Members Working Group was established to guide the work of officers and, following a tendering process, Dixon Searle Partnership (DSP) were commissioned to produce a viability report which was delivered to the Council in 2017.
- 1.6 The 2017 Viability Report modelled viability in a range of scenarios, looking at costs and value in a variety of locations and with differing development typologies. The Report concluded that there was a viability difference between wards in the West and South compared to the North and East, and that development in the West and South had a greater scope for a Levy being applied. Based on the evidence gathered in 2017 a draft Charging Schedule was proposed.
- 1.7 The Report also concluded that the two Sustainable Urban Extensions (SUEs) brought forward by the Local Plan were unable to provide a Levy due to the on-site infrastructure burden required to bring forward the sites. They were therefore excluded from the draft Charging Schedule. It should be noted that this it is quite common for SUEs to be excluded from Charging Schedules for this reason.
- 1.8 However, changes to the National Planning Policy Framework regarding the provision of Affordable Housing, as well as further work on the average values of Section 106

requests, necessitated an Addendum to the Viability Report to be commissioned from DSP. This was delivered to the Council in 2019. The Addendum reviewed the viability of residential development only and did not consider any other types of development that had been identified in the original report.

- 1.9 The 2019 Addendum found that changes since the 2017 Viability Report had rendered residential schemes less viable and that, where the median level of Section 106 was applied, there was now only one development type in the West/South that had sufficient scope for a Levy to be applied, and none in the East/North area. When modelled with the highest level of Section 106 being applied, this remaining typology was also rendered unviable for a Levy.
- 1.10 The 2017 Viability Report also considered other development types and concluded that there was sufficient value in large format retail and Purpose Built Student Accommodation (PBSA) for a charge to be applied to them in a draft Schedule. Given the current retail climate officers no longer consider it prudent to apply a Levy to retail developments based on 2017 evidence.
- 1.11 PBSA development has continued at pace in the city centre, and current Covid-related occupation issues aside, the developments remain attractive to developers and occupiers alike. The 2019 Addendum did not reconsider the viability of such developments as the principle changes to the NPPF related to Affordable Housing, which PBSAs are not obliged to provide under government guidelines.
- 1.12 Whilst we may assume that there remains some residual viability in PBSA developments, probably reduced from 2017 levels due to increasing build costs, we must also consider the possible consequences of such a charge. Every student residing in purpose built accommodation is one less student in a House in Multiple Occupancy (HMO), thereby easing the pressure on the conversion of existing housing stock to HMOs or even allowing for the conversion of HMOs back to family housing. By adding a levy to PBSA we would increase the likelihood of such development not coming forward, and those wider benefits not being felt by residents across the city.

Conclusion

- 1.13 Based on the evidence it is not considered practicable to pursue the introduction of a Levy on residential development in the City due to the lack of sufficient viability to bring forward a comprehensive regime. This has been rendered even more critical given the current pandemic and material shortages, which have slowed development across the country.
- 1.14 Where value has been identified in the 2017 Viability Report for other development types, only Purpose Built Student Accommodation remains a potentially viable opportunity. However, as outlined in paragraphs above, officers do not believe the potential benefits outweigh the potential risks.
- 1.15 It is therefore concluded that the evidence shows that there is insufficient scope to bring forward a draft Charging Schedule and that the investigation into CIL should draw to a close.
- 1.16 Finally, it should be noted that it is the governments current intention to abolish CIL, and Section 106, and replace them with a new mechanism, as yet undefined. This intention was outlined in the "Planning for the Future" White Paper consulted upon at the end of 2020 and was confirmed as part of a Planning Bill in the Queen's Speech that opened Parliament in May 2021.

2. Options considered and recommended proposal

- 2.1 The Council could choose to continue with the charging schedule outlined in the Addendum, the next stage of which would be public consultation. However, given the residential levy recommendation in the most recent Addendum is limited to a single size and broad location of development it is not considered that sufficient value can be raised from a Levy. Furthermore, it is likely to fetter that specific form of development as developers avoid bringing those sites forward in preference to more profitable locations.
- 2.2 The Council could seek to update the Viability Report to assess whether there have been viability changes since the assessment took place. This is not recommended as we know that the current economic climate has driven up the cost of development sufficient for us to have no expectation of greater viability in residential development schemes.
- 2.3 It is therefore recommended to note the work undertaken and conclude that the introduction of CIL charging schedule is not appropriate for Coventry.

3 Results of consultation undertaken

- 3.1 No consultation has been undertaken as part of this report.

4 Timetable for implementing this decision

- 4.1 There is no timetable for implementing this decision as no further actions are recommended.

5 Comments from the Director of Finance and the Director of Law and Governance

5.1 Financial implications

There are no financial implications associated with this report.

5.2 Legal implications

There are no legal implications associated with this report.

6 Other implications

6.1 How will this contribute to achievement of the Council's Plan?

This report itself does not respond to any of the council key priorities or objectives within the One Coventry Corporate Plan.

6.2 How is risk being managed?

There are no risks associated with this report

6.3 What is the impact on the organisation?

No direct impact.

6.4 Equalities / EIA

A full Equality and Impact Assessment (ECA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

6.5 Implications for (or impact on) climate change and the environment

There are no implications identified.

6.6 Implications for partner organisations?

There are no implications identified.

Report author:

Name and job title:

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Head of Planning Policy & Environment

Service

Streetscene and Regulatory Services

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Enquiries should be directed to the above person.

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Rob Back	Strategic Lead Planning and Major Development	Streetscene and Regulatory Services	24/06/2021	25/06/2021
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Mark Williams	Lead Accountant, Business Partnering,	Finance	24/06/2021	25/06/2021

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Andrew Walster	Director of Street Scene and Regulatory Services	-	24/06/2021	24/06/2021
Councillor D Welsh	Cabinet Member for Housing and Communities	-		01/07/2021

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Public report
Cabinet Member

Cabinet Member for Housing and Communities

09 July 2021

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor D Welsh

Director Approving Submission of the report:

Director of Streetscene and Regulatory Services

Ward(s) affected:

All

Title:

Response to Nuneaton and Bedworth Borough Council (NBBC) Public Consultation

Is this a key decision?

No.

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant

Executive Summary:

This report proposes a response to the Issues and Options consultation currently being undertaken by Nuneaton and Bedworth Borough Council.

Recommendations:

The Cabinet Member is requested to:

1. Approve the submission of the proposed response in Appendix II

List of Appendices included:

Appendix I – NBBC Issues and Options consultation
Appendix II - draft response to consultation

Background papers:

None.

Other useful documents:

None.

Has it been or will it be considered by Scrutiny?

No.

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No.

Will this report go to Council?

No.

Report title: Response to Nuneaton and Bedworth Borough Council (NBBC) Public Consultation

1. Context (or background)

- 1.1 NBBC adopted their current Local Plan in June 2019 and have recently triggered a Local Plan review. The first stage of the Review is an Issues and Options public consultation, which launched 11 June 2021 and closes 06 August 2021. The consultation document can be found in Appendix I.
- 1.2 Coventry and Nuneaton & Bedworth are part of the same Housing Market Area (HMA), along with Stratford, Rugby, Warwick and North Warwickshire, and as such both authorities have a Duty to Cooperate. Evidence of cooperative working is a key part of the Local Plan process and therefore it is appropriate for Coventry City Council to respond to this consultation.
- 1.3 As part of the Duty to Cooperate a Memorandum of Understanding (MoU) was agreed between all authorities in the HMA to apportion the un-met Housing Need of Coventry, and this was taken into account in the drafting and examination of all Local Plans in the HMA, including the current NBBC Local Plan.
- 1.4 As part of the NBBC Issues and Options consultation it is stated in paragraph 7.8 that NBBC will be *“withdrawing from the current memorandum of understanding (MoU) and will seek to negotiate an appropriate arrangement with sub-regional partners.”*
- 1.5 Given that the MoU is an integral part of meeting the sub-region’s Housing Need it is important that the Council respond to this intention formally through the consultation process, and a draft response can be found in Appendix II.
- 1.6 It should be noted that, although disappointed with the decision to withdraw from the MoU, Coventry City Council remain committed to working proactively and constructively with neighbouring authorities.

2. Options considered and recommended proposal

- 2.1 The Cabinet Member could choose not to respond to this particular consultation. However, as the matter raised in the above points concerns meeting the City Council’s un-met Housing Need, it is considered important to make an appropriate representation to the consultation.

3 Results of consultation undertaken

- 3.1 No consultation has been undertaken as part of this report.

4 Timetable for implementing this decision

- 4.1 The consultation closes on 06 August 2021 and so a response will be submitted prior to this.

5 Comments from the Director of Finance and the Director of Law and Governance

- 5.1 Financial implications

There are no financial implications associated with this report.

5.2 Legal implications

There are no legal implications associated with this report.

6 Other implications

6.1 How will this contribute to achievement of the Council's Plan?

This report itself does not respond to any of the council key priorities or objectives within the One Coventry Corporate Plan.

6.2 How is risk being managed?

There are no risks associated with this report

6.3 What is the impact on the organisation?

No direct impact.

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6.5 Implications for (or impact on) climate change and the environment

There are no implications identified.

6.6 Implications for partner organisations?

There are no implications identified.

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Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	24/06/2021	24/06/2021
Andrew Walster	Director of Street Scene and Regulatory Services	-	24/06/2021	24/06/2021
Councillor D Welsh	Cabinet Member for Housing and Communities	-		07/07/20121

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Borough Plan Review

Issues & Options consultation draft



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1 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. The Council has committed to undertaking an immediate review of the adopted Borough Plan following the publication of the updated National Planning Policy Framework. All aspects of the updated National Planning Policy Framework (NPPF) and the changes proposed in the consultation that ran from 30th January 2021 to 27th March 2021 will need to be re-examined.
- 1.2 The current Local Development Scheme (2020) sets out the timetable for the production of a review of the Borough Plan 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.
- 1.3 The process of reviewing the Borough Plan is one in which it is not necessarily required that every part of the Borough Plan needs reviewing. Some of the policies may remain whilst others may need some text to be changed, removed and/or added but others may need to be completely rewritten or removed in their entirety. This is the first stage of the process and does not make decisions on what needs to be changed, only the issues that need to be taken into account in reviewing the Borough Plan and the options that are available to address these issues.
- 1.4 This document is the Issues and Options consultation draft of the Borough Plan review DPD. To support this document the Council has produced a Sustainability Appraisal report and this can be viewed alongside this document.

2 Vision & Objectives

Vision

- 2.1 The vision proposed for the Borough Plan is that by the end of the plan period Nuneaton and Bedworth Borough will be a place of sustainable economic growth with diverse job prospects with healthy and safe communities offering housing for all supported by an integrated infrastructure network. The environment of the Borough will be improved through greater sustainable transport options, more/improved open spaces and leisure facilities, increased tree planting and reduced pollution levels.

Objectives

- 2.2 The following objectives are proposed in order to achieve the vision for the Borough Plan:

Objective 1 - 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.

Objective 2 - To seek employment opportunities that will support the diversification of the borough's economy and improve job opportunities for residents.

Objective 3 - 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 so that they are vibrant.

Objective 4 - To provide a steady and adequate level of suitable housing for all.

Objective 5 - To ensure that all new development and investment contributes to a significant improvement in infrastructure and facilities that serve the borough.

Objective 6 - To improve cycling and walking networks, increase open space and leisure access, and reduce crime.

Objective 7 - To ensure that new development enhances and improves the historic and natural environments.

Objective 8 - To address climate change by driving sustainability in all new development.

Objective 9 - To contribute to the nation's goal of net zero emissions by 2050 through more electric car charging points, increasing renewable energy production, and increased tree planting.

- 2.3 These objectives are interrelated and in combination they will contribute to realising the vision for the DPD. The objectives are not set out in order of priority.

3 Broad Issues

Key Characteristics

- 3.1 Nuneaton and Bedworth Borough is located in northern Warwickshire, in the West Midlands, containing the second largest population (125,300, 2011 Census, but estimated in mid-2019 to be 129,883) in the County but is the smallest in geographical area at 79.3km². The Borough is predominately urban in character and consists of the two market towns of Nuneaton and Bedworth and the large village of Bulkington situated in the Green Belt to the east of Bedworth.
- 3.2 Some of the key characteristics of the Borough are set out below. Some of these characteristics are also issues and challenges facing the Borough and these are considered in more detail further on in this document.
- Nuneaton and Bedworth have good transport links and are situated at the heart of the motorway network and both towns are easily accessible from the M1, M5, M6, M42 and the M69. The Borough is a 19-minute drive to Birmingham International Airport, and a 37-minute drive to Nottingham East Midlands Airport. Nuneaton also has direct links to London (60-80 minutes) via the West Coast mainline, and also Birmingham, Leicester, Cambridge and Stanstead Airport. A branch line also provides direct services from Nuneaton and Bedworth stations to Coventry Arena, Coventry, and Leamington Spa.
 - The Borough has a diverse economy. The most common business sector is Manufacturing. Other significant sectors are Wholesale & Retail Trade; Health & Social Work; Transport and Storage; and Communication. The business base of the Borough's local economy is a mixture of small and medium-sized firms.
 - Nuneaton and Bedworth Borough has the highest levels of deprivation in Warwickshire.
 - In the health profile for the Borough in 2019, male and female life expectancy remains below the average in England at 77.61 for males and 82.34 for females compared to 79.67 for males and 83.33 for females as a national average.
 - There are no green spaces in Nuneaton and Bedworth which have a Green Flag Award.
 - The Borough contains 1 European Site (Ensor's Pool Special Area of Protection), 2 SSSIs, and 3 Local Nature Reserves.

- The Borough contains 92 Listed Buildings, 2 Registered Historic Parks and Gardens, and five Conservation Areas that are designated for their 'special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance'.

Broad Issues within the Borough

3.3 There are a number of broad issues that were set out in the adopted Borough Plan categorised into three main topics, local community, local economy, and local environment. Many of these persist today and the current known issues are set out below. Some of the issues from the adopted Borough Plan are absent because current data to support that issue is not available.

Local Community

- 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.
- There will be an on-going need for family accommodation.
- 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.
- 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 public footpaths along the A444.
- Life expectancy is lower than the national average. Mortality rates are higher than the national average. Poor health, lack of physical activity and obesity, all of which are high in the borough, contribute to this.
- 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 in some parts of the borough is poor. Air Quality Management Areas (AQMAs) are designated at the Leicester Road Gyratory and at Central Avenue / Midland Road in Nuneaton. Other areas are also being monitored for their nitrogen dioxide levels.
- 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 rates are the highest in Warwickshire.

Local Economy

- The population and the number of households is growing, and this is projected to continue.
- The economy is based on a declining manufacturing base.
- Household earnings are lower than the West Midlands' average.
- Access to some employment sites such as Attleborough Fields, Prologis and other employment sites outside the borough is difficult without a car.
- Improvements in public transport along the north-south corridor are required to improve accessibility to job opportunities.
- Some residents have a poor skills base. Educational attainment is the lower than the Great Britain average although significant improvement has been seen and the gap is closing. Those leaving without any qualifications has dropped to below the Great Britain average.
- 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.

Local Environment

- Extreme weather events, such as those experienced in Warwickshire in 1998, 1999, 2005, 2007, 2008 and 2012, are becoming more frequent.
- Scope to deliver additional housing within the existing urban area is limited and greenfield development may potentially 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 ha of derelict land and more than 3000 potentially contaminated sites.
- There are a limited number of historic buildings of national importance but many others are important to local history.
- Some built heritage has suffered from poor quality modification and a lack of maintenance and repair. 2 listed buildings are on English Heritage's Buildings at Risk Register.
- Large areas of Nuneaton Town Centre fall within flood zones.

Specific Issues within the Borough

- 3.4 Following on from the broad issues above, the next chapters set out the key, specific issues that a new Borough Plan needs to address, either because of the need to plan for a longer period than the current Borough Plan or because there are changed circumstances since the production of the current Borough Plan. Then, in each chapter, options for addressing the issue(s) identified are set out. The subsequent chapters dealing with each issue are set out alphabetically and not in any order of priority.

4 Duration of Borough Plan

Issues

- 4.1 The NPPF of 2019 states that policies in Local Plans should be reviewed no later than five years after the date of adoption and that strategic policies should look ahead over a minimum 15-year period from adoption. However, proposed additional text from 2021 states that where larger scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years). The current Borough Plan was adopted in 2019 and covers the period until 2031.
- 4.2 The Council proposes that the timeframe for the new Borough Plan should be 2023 - 2038, this would be a 15-year Plan period. To support the extension of the Borough Plan some of the supporting evidence¹ would need to be updated to inform any related policies.

Options

- 4.3 The 15-year period set out in the NPPF is a minimum and the Borough Plan could seek to cover a greater period. However, the result of a longer timeframe risks the evidence upon which it is based being unreliable over this period and the Plan may need reviewing quicker than the five years by which plans should normally be reviewed. Although legislation, guidance, and other matters change so frequently that a plan may not last 5 years anyway without a review. The 2021 proposed changes to the NPPF suggest a minimum 30-year period is needed where growth such as new settlements are required. This is not the case for Nuneaton and Bedworth and it is considered that a 15-year period is appropriate.

Questions

Question 1

Do you agree that a Plan period of 2023 - 2038 is appropriate? If not, which other plan period would you recommend?

¹ Existing evidence is available at https://www.nuneatonandbedworth.gov.uk/info/21014/planning_policy/389/borough_plan_examination/3

Question 2

Do you agree that the existing evidence base set out above needs to be updated or replaced?

Question 3

Are there any other evidence base studies which require updating? If so, what are they?

5 Employment

Issues

5.1 The adopted Borough Plan sets out that between 2011 and 2031 at least 107.8 hectares of employment land would be provided and the plan allocates 86.3 hectares for the development of new employment. Six sites are allocated in the Borough Plan for employment uses and these along with their status as of 31st March 2021 is set out in table 1 below.

Table 1: Status of allocated employment sites

Allocated Employment Site	Status
EMP1 – Fautlands	Outline application approved.
EMP2 – Wilsons Lane	Outline application submitted – to be determined
EMP3 – Prologis Extension	Outline application submitted – to be determined
EMP4 – Coventry Road	No application
EMP6 – School Lane/Longford Road	Full application submitted – to be determined
EMP7 – Bowling Green Lane	No application

5.2 There is nothing to suggest that the strategic employment sites above will not be developed by 2031 and thus the 86.3 hectares of new employment development will be provided. At this stage it is not known how much additional employment land will be needed to be developed beyond 2031 to meet the timeframe of the new Borough Plan. However, should there be a need for new land to be identified and released for this then the options for these need to be considered.

5.3 Beyond the provision of new employment areas, it is important that existing employment areas are not lost to a level which detrimentally affects the intent to provide new employment, that is, if losses are too great of existing employment land than this would nullify the provision of new land. So, the current Borough Plan sets out those employment areas that are deemed no longer ideal for employment uses and can be redeveloped as well as to restrict the loss of employment land on other employment estates (those outside of these identified estates acceptable to lose) to uses other than B1, B2 and B8.

- 5.4 The loss of B1, B2 and B8 employment land to other uses within the borough has taken place, and recently uses such as gyms and nurseries have made use of redundant employment units. This sort of diversification of employment areas can bring life back to units that would otherwise have no use and create uses outside of the traditional normal working times, that is, evenings and weekends, but can come with issues such as parking. These changes of use tend to be on the older industrial estates and within the smaller sized units.

Options

New Employment Areas

- 5.5 The provision of further land for employment uses is not likely to be provided on land already within the urban area and any additional land will be on land not previously built on, that is, greenfield land. This land would be classed as countryside and, potentially, Green Belt land. The first option for the provision of new employment areas could be achieved through an expansion of existing employment estates. These estates or indeed estate (depending on the amount of land being sought) that could be expanded would have to be on the edge of the built-up areas. Most of the existing employment areas are immediately adjacent to Green Belt and thus, this option would be likely to require land to be removed from the Green Belt. Chapter 6 next deals with the Green Belt and the options for dealing with this type of land are considered there – a balance between competing options may have to be made as different options between chapters may not be complementary.
- 5.6 Alternatively, the focus for new employment land could be on the main arterial road routes through the borough to facilitate connection to wider markets. So, the focus could be in the north of the borough adjacent to the A5 or in the south of the borough around the M6 junction. The former of these would need the creation of a new standalone industrial estate whilst the latter could be achieved through the extension of existing estates but not necessarily so to the exclusion of the option of a standalone estate. These two options would then in themselves direct new employment to either Nuneaton (A5) or Bedworth and/or north of Coventry (M6).

Existing Employment Areas

- 5.7 Diversification of existing employment areas can be an important part of the local economy, allowing businesses and uses that would otherwise not be able to be viable in the town centres to trade. The current Borough Plan through Policy E2 seeks to resist non-employment uses on existing industrial estates and make any applicant for such a use go through six

criteria to justify such an application. However, in all cases where this part of the policy (Policy E2) has been used then planning permission has been granted. Continuation of this is an option and this may be appropriate. Yet, for uses such as gyms, nurseries, and soft play areas a former industrial unit may be ideal. So, alternatively should the new Borough Plan amend the way in which non-employment uses are handled and if so how. Although how the new use class E may effect this is unknown.

- 5.8 The complete opposite from the above (which is to leave things as they are) is to remove any policy restrictions on changes within existing employment areas and just deal with any planning application on its own merits. This would enable any change of use application just to be dealt with on its effects on the environment but could lead to unrestricted loss of employment uses. In-between these options the restrictions of the existing policy (Policy E2) could be lessened so that specific prescribed uses are allowed. Alternatively, certain employment areas could be prescribed within which non-employment uses are set out as acceptable and these uses could then be located within them. Finally, an option is not to prescribe employment estates but to restrict the number of non-employment uses in each employment area. The issues with these latter two options are the difficulty in working out which employment estates are acceptable and what criteria to use to filter them and on what basis to calculate the number of non-employment uses an estate could take.

Questions

Question 4

Which of the options set out below do you favour for the location of future employment areas? Please set out why.

Option 1 – Provide new employment through extension of existing employment estates with no focus on a particular area within the borough.

Option 2 – Provide new employment in close proximity to the A5.

Option 3 – Provide new employment in close proximity to junction 3 of the M6.

Question 5

Are there any other reasonable options for the locating of new employment areas that have not been set out above?

Question 6

Which of the options set out below do you favour for dealing with non-employment uses on existing industrial estates? Please set out why.

- Option 1 - Continuation of the protection of existing employment uses from non-employment uses.
- Option 2 - Set out the types of non-employment uses that would be allowable in existing employment uses.
- Option 3 - Set out the existing employment areas within which non-employment uses would be acceptable.
- Option 4 - Restrict the number of non-employment uses that each employment area can accommodate.
- Option 5 - Remove any form of protection of existing employment uses from non-employment uses.

6 Green Belt

Issues

- 6.1 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.
- 6.2 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.
- 6.3 In the current Borough Plan parts of the Green Belt were released to provide the employment and housing needs of the borough – see figure 1 below. This was based on a raft of evidence including the Sub-regional Joint Green Belt Study and the Sustainability Appraisals. The amount of new housing and employment that may be needed in the new Borough Plan are not yet established and will be ascertained through a future Housing and Economic Development Needs Assessment. However, final numbers will dictate whether all the development can be accommodated within the urban areas, and if not, how much greenfield land is required and whether further Green Belt release is appropriate.

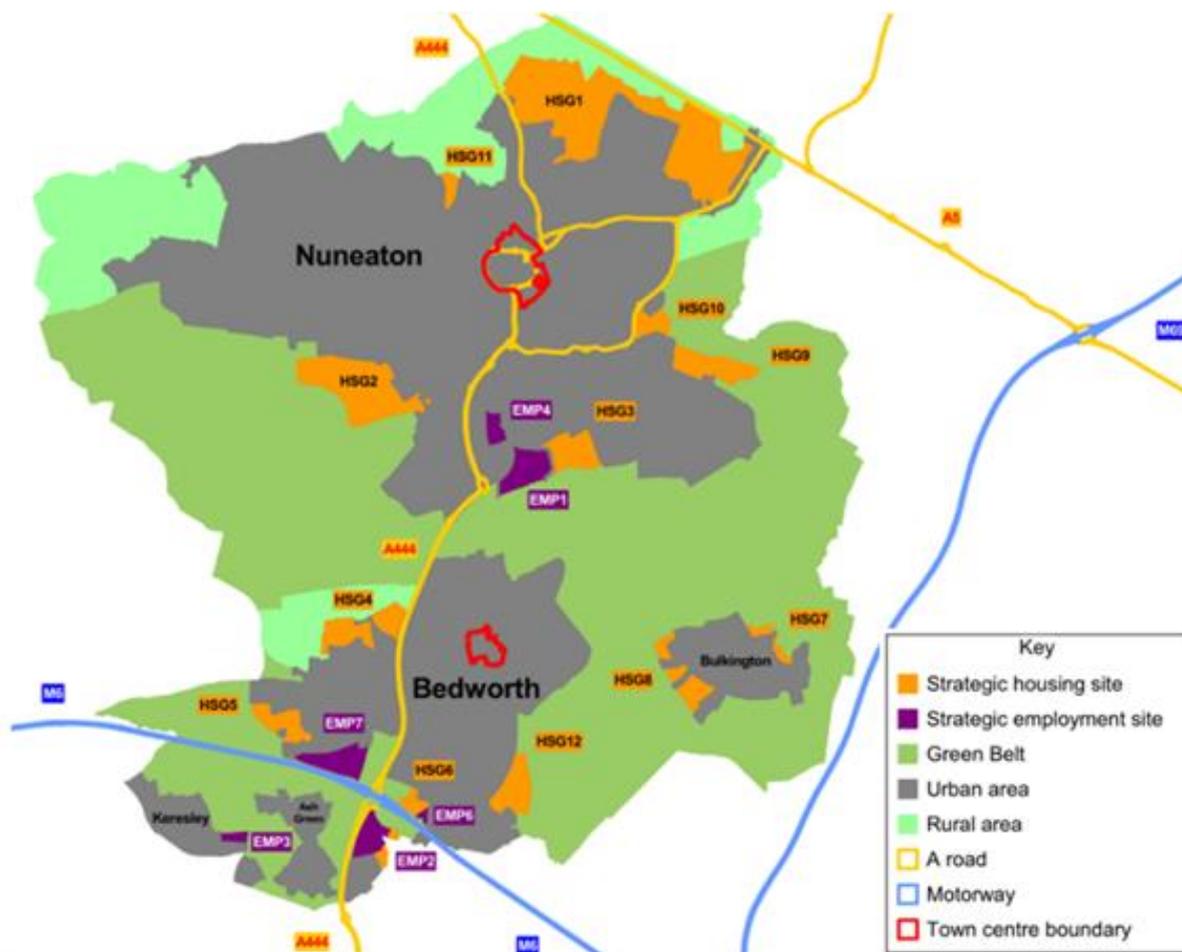


Fig 1 – Green Belt, urban and rural areas and existing Borough Plan allocations

Options

- 6.4 To address the needs for new development in the borough beyond 2031 there may be a need for more greenfield land to be released for this development and this may be land that is designated as Green Belt. However, this should only be under exceptional circumstances. Therefore, a sequential approach could be used to find land to be released for new development. Such a sequential approach would be different for housing and employment uses. New housing could be located in the existing urban area whilst for new employment developments building within the existing urban areas may not be achievable if significant landholdings are required to deliver the required development.
- 6.5 The first place to look for new residential developments is within the existing urban area. The current Borough Plan accounted for relatively little 'windfall' development i.e. proposals that come forward on sites that are not allocated

in the plan. The predicted level of windfall development was around 22 dwellings per annum. However, more recent trends have seen greater levels of redevelopment of underused urban land and small scale infills. The impact of the pandemic and Brexit may accelerate the use of redundant or underused land going forward. Therefore, there may be greater scope for windfall development in future. Similarly, the Borough Plan did not make any allowance for residential developments coming forward in town centres. Again, the effects of the pandemic and Brexit are likely to change the role and function of town centres, with greater diversification from primarily retail uses. Additional residential town centre development is proposed as part of the Transforming Nuneaton initiatives. Based on this, the urban areas of the Borough as a starting point for locating new residential development is realistic. However, it may not be possible to provide some housing types that are needed such as the larger, family housing due to issues such as land availability and viability issues.

- 6.6 Beyond the existing urban areas there are rural/countryside areas ('greenfield land') which remains undeveloped. The majority of this land is designated as 'Green Belt'. The non-Green Belt land areas are relatively limited, located to the north-west of Bedworth and to the north of Nuneaton – see figure 1 above. In planning policy terms, the non-Green Belt status means that they are less constrained for development than Green Belt sites. However, they may not always be the most sustainable location for new development in the round, given their location, character, constraints etc. and so would have to be viewed on a case-by-case basis. Notwithstanding, Green Belt locations would then normally be the last choice for new developments given the strength of the designation.

Table 2: Proposed sequential approach to locating new development

Sequential Approach with Decreasing Priority	New Employment Development	New Housing Development
↓	Existing Urban Areas	Existing Urban Areas
	Countryside	Countryside
	Green Belt	Green Belt

- 6.7 The emphasis of protecting the Green Belt may be incompatible with other priorities; it is likely that some form of compromise between competing priorities will have to be found. Notwithstanding this, an alternative for

dealing with the Green Belt is to primarily focus on sustainability, irrespective of Green Belt designation. This would examine key factors such as access to existing services, sustainable transport options, access to open spaces and so forth. This may, by default, focus development to the urban area and those areas adjoining it (no matter whether the land is designated as Green Belt or not).

- 6.8 Another option is to focus on the urban area first and then assess any greenfield land on its sustainability, irrespective of the land's Green Belt designation. As with any option, sites of designated landscape, ecological, geological and/or historic value would need to be afforded the necessary level of protection in accordance with national policy.
- 6.9 Ultimately, Green Belt is a key issue for the Borough Plan Review and so the broad framework to locate new development and how to treat the Green Belt needs to inform any final development strategy.

Questions

Question 7

Which of the options set out below do you favour for the locating of new residential uses? Please set out why.

- Option 1 - Prioritise the existing urban areas of the Borough followed by land in the countryside that is not Green Belt, and then Green Belt land.
- Option 2 - Prioritise the existing urban areas of the Borough followed by land in the countryside no matter whether it is designated as Green Belt or not.
- Option 3 - Prioritise to the most sustainable locations no matter whether it is designated as an urban area, countryside, or Green Belt.

Question 8

Which of the options set out below do you favour for the locating of new employment uses? Please set out why.

- Option A - Prioritise land that is in the countryside that is not Green Belt followed by Green Belt land.
- Option B - Prioritise land that is in the countryside no matter whether it is designated as Green Belt or not.
- Option C - Prioritise to the most sustainable locations no matter whether it is designated as countryside or Green Belt.

Question 9

Is there another reasonable hierarchy for selecting land for development, particularly housing, but including employment uses? If so, what would this look like?

7 Housing

Issues

Housing Need

- 7.1 The methodology for calculating housing need is set out in Government guidance via the National Planning Policy Framework and the associated National Planning Practice Guidance.
- 7.2 The adopted Borough Plan sets out that between 2011 and 2031, at least 14,060 homes would be delivered. This housing need figure was based on the 'objectively assessed need' methodology, as required by the 2012 National Planning Policy Framework. Based on a 2015 Strategic Housing Market Assessment, the total objectively assessed need for the Borough's need alone for the period 2011-2031 was projected to be 10,040 dwellings equating to 502 dwellings per annum. The 502 dwellings per annum figure was made up of three components: demographic based need (423 dwellings), supporting economic growth (73 dwellings) and improving deliverability (6 dwellings). Warwickshire authorities accepted that Coventry City Council was unable to accommodate its full housing need and the housing need requirements were adjusted (as per table 3 below) to account for Coventry's unmet need. As a result, Nuneaton and Bedworth's housing figure increased from 10,040 dwellings to 14,060 dwellings.

Table 3: Calculated need for new housing

Location	2015 Strategic Housing Market Assessment		Agreed Local Plan housing figures (2011-2031) (via signed Memorandum of Understanding)		
	Average annualised total	Total OAN (2011-2031)	Redistributed figure	Total for plan period	Average total per annum
Coventry	2,120	42,400	-17,800	24,600	1,230
North Warwickshire*	237	4,700	+580	5,280	264
Nuneaton and Bedworth	502	10,040	+4,020	14,060	703
Rugby	480	9,600	+2,800	12,400	620

Stratford-on-Avon*	659	13,180	0	13,180	659
Warwick	600	12,000	+6,640	18,640	932

* North Warwickshire Borough Council and Stratford on Avon District Council also accommodated overspill growth from the Greater Birmingham Housing Market Area.

- 7.3 In 2018, the Government introduced the 'standard method' as a replacement to the previous 'objectively assessed need' method of calculating housing need and this was carried forward into the 2019 NPPF. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way that addresses projected household growth and historic under-supply. The formula uses 2014 household growth projections and incorporates an adjustment to take account of affordability by applying median workplace-based affordability ratios. The National Planning Practice Guidance (NPPG) states that "the standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure". The NPPG confirms that the standard method is not mandatory, but there is an expectation it will be used and that any other method will be used only in exceptional circumstances.
- 7.4 In August 2020 the Government proposed significant changes to the planning system through the Planning White Paper 'Planning for the Future', and the 'Changes to the Current Planning System' consultation document. Much of the focus of these proposed changes was to deliver additional new housing. The Planning White Paper proposed binding, Government set housing targets based on a renewed standard method (as a starting point) with any necessary revisions to take account of the extent of land constraints, opportunities for brownfield development and greater densification.
- 7.5 On 16th December 2020, the Government published its response to the proposals in the 'Changes to the Current Planning System' consultation. The response confirms that there remains a commitment to deliver 300,000 homes a year, however the Government does not intend to proceed with the changes consulted upon to the 'standard method' in August 2020. Instead, it proposes to continue with the existing 'standard method' approach (that is, based on 2014 household projections with the most recent affordability ratios applied). However, in addition to this approach, a 35 per cent uplift to the 'standard method' has been applied to the 20 most populated urban areas in England. Coventry would be subject to the 35 per cent uplift. The NPPG was updated on 16th December 2020 to reflect the new standard methodology. As the only authority in the housing market area with the 35 per cent uplift applied, Coventry would see its figure increase from 1,722 dwellings per annum to 2,325 dwellings per annum.

The starting point for Nuneaton and Bedworth would remain at 429 dwellings per annum. The latest 'standard method' figures for the Coventry and Warwickshire authorities (incorporating the latest affordability ratios release in March 2021) are provided below.

Table 4: Latest predicted need for new housing

Local authority	Annual requirement - March 2021 'standard method'
Coventry	2,325
North Warwickshire	169
Nuneaton and Bedworth	429
Rugby	510
Stratford-on-Avon	567
Warwick	625

- 7.6 The NPPG states that the increase in dwellings for the urban areas is expected to be met by the urban areas themselves rather than the surrounding areas ("unless there was conflict with national policy and legal obligations"). Within the 'Planning for the Future' White Paper, it sets out that the legal Duty to Co-operate would be abolished. However, the Government has not provided a response to the White Paper proposals at the time of publication.
- 7.7 Until the Duty to Co-operate is formally revoked, the Council will have a legal obligation to co-operate with other planning authorities on strategic housing matters such as housing delivery. As part of the Coventry, Solihull, and Warwickshire Strategic Planning group, officers are progressing strategic evidence base for various workstreams including housing growth, economy, infrastructure, climate change and place making.
- 7.8 As with employment, it is not yet known how much additional housing will be needed beyond 2031 to meet the timeframe of the new Borough Plan as this will be ascertained through a Housing and Economic Development Needs Assessment (HEDNA) which is to be produced by late 2021. The HEDNA will provide an update of the SHMA information covering housing need as well as types and mixes of housing required. In particular, the HEDNA will need to further explore the issue of demographic projections for Coventry and Warwickshire authorities to address concerns raised in relation to potential historic over-estimation of Coventry's population growth. The Office for Statistics Regulation recently published its report² providing a review of how the Office for National Statistics assesses

² <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf>

population estimates and projections. The report identified that “more needs to be done to investigate the root and scale of the issues associated with students and outward migration”, with a number of recommendations. It is likely therefore that population estimates and projections, which inform the household growth projections used for the standard method calculation, may change in future. This will need to be a specific focus for the HEDNA. As a result of the OSR recommendations, and the other policy changes enacted since the 2012 NPPF, Nuneaton and Bedworth Borough Council will be withdrawing from the current memorandum of understanding (MOU) and will seek to negotiate an appropriate arrangement with sub-regional partners.

- 7.9 It must also be noted that the national census took place in March 2021 which will provide more up-to-date household information that will be used to assist in calculating housing need. However, those initial findings are unlikely to be released until March 2022, with final outputs to be released in March 2023. Should there be a need for new land to be identified and released for this then the options for these need to be considered.
- 7.10 As referenced previously, the Borough Plan accounted for a limited amount of ‘windfall’ developments (i.e. proposals that come forward for unallocated sites, typically within the urban area) based on past trends. At that time, it was projected that around 22 dwellings per annum of windfall development should be accounted for from 2021-2031 (220 dwellings over the plan period). However, in recent years, a number of proposals have come forward on unallocated sites within the urban area, exceeding the 22 dwellings per annum figure. The impact of the pandemic and/or Brexit remains uncertain, however they may drive regeneration or renewal of underused or vacant urban land, which could feasibly be suitable for residential uses. Furthermore, the role and function of the town centres is likely to shift from primarily retail focused to more diverse uses such as residential and leisure uses. Town centre residential development is a focus for the Transforming Nuneaton and Transforming Bedworth initiatives and government policy/funding initiatives support town centre residential development. On that basis, it is considered that urban capacity should be a key focus for the borough plan review to investigate potential sites suitable for residential development within the urban areas. This is to help minimise release of greenfield sites as far as possible and drive the ‘brownfield first’ approach as set out in national policy guidance. However, these sites may not always be appropriate for larger family or aspirational/executive houses that have been required, and continue to be needed, within the Borough. The Borough Plan Review will therefore need to consider how such housing can feasibly be delivered in the Borough. If greenfield release is necessary, the Borough Plan Review will need to consider spatial options to address the distribution

of these development sites. These spatial options are explored in further detail in below.

- 7.11 For a revised plan period of 2023 – 2038, the housing requirement would need to be recalculated based on the 'standard method' figure. Based on the latest standard method figure available, for the 15 year plan period, the standard method minimum total would be 6,435 dwellings at 429 dwellings per annum. This would form the basis of the housing component of the Housing and Economic Development Needs Assessment (HEDNA).

Housing Provision – Borough Plan allocations and delivery to date

- 7.12 In order to meet the 2011-2031 OAN housing requirement figure of 14,060 dwellings, at the point of adoption the plan allocated sufficient land to deliver a projected 14,836 dwellings over the Plan period. The additional provision in dwellings provided a degree of flexibility to accommodate potential non-delivery on some sites. Based on the Council's latest 2020 Housing Trajectory, allocated and permitted sites account for 15,743 dwellings (14,654 up to 2031 and 1,089 to be delivered after 2031). In the main, the strategic sites are key to the overall delivery of new dwellings in the borough as they account for 10,151 dwellings (9,167 up to 2031, 984 post 2031). The status of these strategic sites as of 1st May 2021 is set out below in table 5. Non-strategic housing sites, permitted sites and windfall sites account for the remainder of the provision. Between 1st April 2011 and 31st March 2020, there were 3,642 completions, with a projected 11,012 dwellings to be delivered between 2020/21 and 2030/31.

Table 5: Status of allocated strategic housing sites (as of 1st May 2021)

Strategic Housing Allocation	Allocated no. of dwellings*	Status
HSG1 – North of Nuneaton	4,419	Outline application to be determined for 1700 dwellings (Top Farm). Remainder approved or under construction
HSG2 – Arbury	1,525	No application(s) submitted
HSG3 – Gipsy Lane	575	Outline application approved
HSG4 – Woodlands	689	Full application for 9 dwellings refused (subject to appeal). No applications submitted for other areas within the allocation
HSG5 – Hospital Lane	398	No application(s) submitted

HSG6 - School Lane/ Longford Road	220	Reserved matters approved for 129 dwellings. No application for remaining parcel.
HSG7 – East of Bulkington	196	No application(s) submitted
HSG8 – West of Bulkington	495	Part approved – full application for 188 dwellings.
HSG9 – Golf Drive	621	Full application approved
HSG10 – Attleborough Fields	360	Outline application approved. Reserved matters application submitted and to be determined
HSG11 – Tuttle Hill	200	Outline application submitted for 400 dwellings - to be determined
HSG12 – Former Hawkesbury Golf Course	380	Full application approved for 204 dwellings. Outline application for additional 296 dwellings – to be determined

* allocated housing numbers are listed in the Borough Plan policies as 'at least' figures apart from HSG4 and HSG9 which are 'approximate' figures

7.13 As part of the Borough Plan Review, it is proposed to undertake a review of the allocated sites to reassess their suitability for allocation. Non-delivery of strategic sites can have a significant impact on the Council's ability to maintain the required five years' worth of housing land supply. Given that the allocations have now been in place for over 2 years, it is important to determine why certain sites have not progressed to the planning application stage. The 2019 NPPF requires that plans are deliverable over the plan period and so deliverability will be a key focus for the review of sites. If allocated sites are considered unsuitable for allocation as part of the Borough Plan Review, then additional sites may be required to meet the subsequent shortfall in provision, depending on the final housing need figure.

Types of Housing Required

Affordable Housing and 'First Homes'

7.14 The updated HEDNA will help the Council to ascertain the different types of housing that will be required over the plan period including for private/market and affordable housing.

7.15 Affordable housing is principally housing for sale or rent for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). Within the Borough, there is a clear need for affordable housing. As of March

2021, 1,780 people are on the Council’s up-to-date Housing Register/waiting list. The following table sets out the indicative need for various property types:

Table 6: Indicative need for housing

Property type	Affordable housing need
1 bedroom	45%
2 bedroom	35%
3 bedroom	15%
4 or more bedroom	5%

- 7.16 The existing Borough Plan Policy H2 requires that developments of over 15 dwellings provide 25% affordable housing. The Council’s adopted Affordable Housing SPD (July 2020) requires that of the 25% total affordable housing, 74% is provided as affordable/social rent, and 26% as ‘intermediate’ housing (primarily delivered as shared ownership). This is to help meet the acute need for affordable housing based on the Housing Register information. The affordable housing is to be met on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.
- 7.17 In April 2021, the Government confirmed that it intended to pursue a ‘First Homes’ policy approach. First Homes are intended to be homes available to buy for first time buyers, with a minimum discount of 30% below their full market value (up to a maximum of £250,000 after the discount). Local authorities will have the ability to prioritise these homes for local people and/or key workers, as required locally, and require higher discounts if they can demonstrate a local need. These homes will be subject to restrictions which ensure that the homes retain their discount in perpetuity i.e. sold on to other eligible purchases at a discounted price to ensure that communities continue to benefit from the affordable homes for future generations. The Government has confirmed that it intends to set out in policy that 25% of all homes delivered through development contributions secured via s106 should be sold as First Homes (i.e. 25% of the total 25% policy requirement). The Government is yet to confirm exactly how the remaining 75% is to be allocated, but has indicated that the social rent may need to be prioritised over other affordable housing types. A Written Ministerial Statement is to be issued in due course which will confirm how the planning system will be changed to accommodate the First Homes requirement, as well as other affordable housing requirements. The Borough Plan Review will therefore need to accommodate such changes.

Market Housing

7.18 The last evidence from the 2013 Strategic Housing Market Assessment (SHMA) indicated the following modelled market housing need up to 2031.

Table 7: Modelled market need for housing

Property type	Modelled market housing need
1 bedroom	4.7%
2 bedroom	33.1%
3 bedroom	53.3%
4 or more bedroom	8.9%

7.19 Again, the HEDNA will provide a more up-to-date assessment of the market housing requirements for the updated plan period. Nonetheless, the latest evidence would indicate the greatest need for 3 bedroom properties, followed by 2 bedroom properties. Furthermore, the business community have previously expressed concern about the lack of ‘executive’ or ‘aspirational’ homes in attracting investment to the Borough. Again, these issues would need to be addressed through the Borough Plan Review.

Options

7.20 The NPPF requires that “strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.”

7.21 The existing 2019 NPPF provides the soundness tests that plan reviews are required to meet to be found ‘sound’. One test is that the plan is ‘justified’ – i.e., “an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence”. Another test is that the plan is ‘effective’ i.e., “deliverable over the plan period and based on effective joint working on cross-boundary strategic matters...”. It is therefore necessary to consider various spatial options for delivering future housing if the Borough’s finalised housing need cannot be accommodated within the existing allocations or permitted sites, or indeed if certain allocations are no longer suitable or deliverable.

7.22 It should be noted, however, that if the Government continues with the approach to abolish the 'duty to co-operate' and impose binding, nationally-set targets for local authorities based on the standard method, Nuneaton and Bedworth may not be required to allocate additional sites beyond the existing settlement boundary (including the Borough Plan allocations) if need is confirmed as 429 dwellings per annum.

Spatial Options

- Option 1 - locating new residential development within existing settlement boundaries
- Option 2 - small scale, sustainable urban extensions focused on key transport infrastructure (e.g. the M6, A roads, railway stations, cycle routes etc)
- Option 3 - locating new residential development in non-Green Belt areas

Questions

Question 10

Do you agree that there should be a review of the existing allocated sites?
Please state why.

Question 11

Which of the spatial options do you favour for the location of future housing?
Please set out why.

Question 12

Are there any other potential spatial options that need to be considered? If so, please specify.

8 Net Zero Carbon Emissions

Issues

- 8.1 On 27 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. The previous target set in this Act was to achieve a target of at least an 80% reduction from 1990 levels. Net zero requires a change in our use of fossil fuels but also means any emissions would be balanced by schemes to offset an equivalent amount of greenhouse gases from the atmosphere, such as planting trees or using technology like carbon capture and storage. To support this offsetting DEFRA consulted on an England Tree Strategy, June 2020 which seeks to increase tree planting across the UK to 30,000 hectares per year by 2025. In a similar vein changes to the NPPF (National Planning Policy Framework) are being proposed that would seek new streets to be tree-lined and trees incorporated into new developments.
- 8.2 Alongside tree planting, there needs to be fundamental changes in the way in which we heat our homes, produce electricity, move between places, and consume resources. This section of the document does not address these other issues, transport is dealt with later on and other matters are being addressed at a national level. Although, the current Borough Plan already does have a policy to facilitate renewable and low carbon energy projects (which there is no intent to remove).

Options

- 8.3 The current Borough Plan addresses trees and their retention and includes more details on new planting expectations on strategic sites. However, it does not set specific quantities for tree planting, be that by area or number of trees. Therefore, what forms part of a planning application is not strictly set out by the Borough Plan and it is considered that continuation of this may not be in the best interest of facilitating greater tree planting. Large scale developments are already creating new open space and planting new trees, but the quantity of tree is on a case-by-case basis with no standardisation (notwithstanding the requirements of the Council's Open Space and Green Infrastructure Supplementary Planning Document). Therefore, there could be an explicit requirement in the new Borough Plan for a certain number of trees within large scale developments.

- 8.4 Furthermore, the proposed changes to the NPPF suggests that new developments can incorporate trees in forms such as community orchards. DEFRA (Department for Environment Food and Rural Affairs) define an orchard as a site where at least five fruit trees are present with no more than 20 metres between their crown edges. Given this definition it would not be unreasonable to expect any new tree planting in large-scale new development to contain an orchard within that tree planting. This would not create an extra burden as it would be incorporated within existing planting requirements and has clear wildlife benefits. At this juncture large scale developments remains undefined but perhaps the requirement could be set for any development that creates open space.
- 8.5 A final option to tree planting in the new Borough Plan could be to change nothing and continue to leave the quantity (and type) of new tree planting on a case-by-case basis. The problem with this is that all that may be achieved is a scale of tree planting the same as that already taking place but it is clear that the UK Government wishes to see this increase.

Questions

Question 13

Should the new Borough Plan seek to set targets for tree planting in large scale developments (option 1)? If not, why not. If so, should these targets be based on area or number of trees?

Question 14

Should the new Borough Plan seek to require an orchard in large scale developments (option 2)? If not, why not.

Question 15

Is there a definition of large-scale development that would be appropriate to use? If so, please set out what this is.

Question 16

Should the Borough Plan set no targets for tree planting in the Borough (option 3)? If so, why so?

9 Town Centres

Issues

- 9.1 Town centres have historically been the commercial and retail focus for areas outside of the large cities and have relied upon a certain scale and regularity of 'footfall' to make them viable. However, this footfall has been declining, firstly through provision for these types of businesses being provided elsewhere, such as out of town or edge of town centre supermarkets and retail parks and, secondly, a growing move to services and goods being available online. For these reasons town centres cannot remain as they were and they need to evolve to reflect the changing needs and desires of the local community. Therefore, the uses in the town centres need to diversify so that there are other reasons to travel to them, so, for example, increased leisure and recreational uses. Alongside this, town centres should be offering greater range and opportunity as places for people to live. Not only does this diversify the town centres but it helps deliver much needed housing in sustainable locations on disused or underused land and creates a community that is on the 'doorstep' of the facilities that the town centres offer.
- 9.2 This diversification of the town centres has been acknowledged and addressed in the Transforming Nuneaton and Bedworth Visioning documents. To support the regeneration of Bedworth, the Council's 'Bedworth Town Centre Vision' work has looked at the potential for drawing greater inward investment to the town centre.
- 9.3 As to the regeneration of Nuneaton town centre, this has been provisionally funded £13,362,736 from the UK Government's Future High Street Fund. Furthermore, on 3rd March 2021 Nuneaton was awarded £23.2 million from the Towns Fund to help create a Town Deal to help grow the town's economy.
- 9.4 A planning application has been made to redevelop part of the former Heart of England Co-op Society's department store and offices, the Abbey Street Car Park, and land on Abbey Street and Queens Road in Nuneaton (reference 037658). This proposes to build a hotel alongside mixed uses of leisure, retail, and residential. Plans for the redevelopment of other parts of the town centre are progressing and, recently, details on the masterplan for Vicarage Street have been released. To support the redevelopment of both town centres a Town Centres Area Action Plan Development Plan Document is being developed in which, amongst other things, key sites for redevelopment are identified and their future use specified.

- 9.5 In September 2020 the use class order was amended so that a new use class, E, the Commercial, Business and Service use class, was created encompassing the use classes of A1/2/3, B1, D1(a-b) and 'indoor sport' from D2(e). This allows many of the typical retail uses in a town centre, so, shops, financial and professional services, and restaurants and cafes to change to other uses like indoor sport, medical or health services, nurseries and offices (among other things) without the need for planning permission. This may help to diversify town centres without direct involvement from the Borough Council.
- 9.6 Further to this, current temporary permitted development rights exist until 31st July 2021 to allow shops, financial and professional services, and offices to change to residential use, so, for the former uses of A1, A2, and B1(a) to change to C3 (dwelling houses). Between 3rd December 2020 and 28th January 2021 the Government consulted on additional changes to the permitted development rights of all of those uses that fall within use class E. The change being proposed is to allow for the change of use from any use, or mix of uses, within the Commercial, Business and Service use class (Class E) to residential use (C3). The Government states that this will go significantly beyond existing rights, allowing for restaurants, indoor sports, and creches (and such like) to use permitted development rights to change to residential. Pubs, theatres, and live music venues are all outside of use class E and, thus, this would not apply to them.
- 9.7 On 31st March 2021 the Government announced that legislation for England would be brought forward to allow this right from 1st August 2021. The new right would allow for limited local consideration by the local planning authority of specific planning matters through the prior approval process. These considerations include:
- Flooding;
 - Impacts of noise from commercial premises;
 - Provision of adequate natural light to all habitable rooms;
 - In conservation areas only - "consideration of the impact of the loss of the ground floor commercial, business and service use"; and
 - Impact "of the loss of health centres and registered nurseries on the provision of such local services".

Buildings with over 1,500 square metres of floorspace would be exempt from the new rules. This is a change on the consultation proposals which had said that no size limit would be in place.

Options

- 9.8 The current Borough Plan addresses town centres through policies TC1 and TC2. These policies set out the requirements for new office, retail, and leisure floor space in each town centre and the way in which primary and secondary shopping frontages will be protected from uses other than A1-A5 with particular emphasis on protecting the primary frontages. However, with the change to the use classes and thus to uses that can change without the need for planning permission to be sought this is no longer appropriate. Therefore, it is suggested that the policies need to be updated to refer to use class E. Yet, on its own this would not achieve the same as the current policies in some respect.
- 9.9 Although use class E contains the former use classes A1, A2, and A3 (amongst other things) it excludes use classes A4 (pubs and wine bars) and A5 (hot food takeaways) and these have become *sui generis*. So, an option is to amend these policies to include these specific uses alongside class E. This amendment would enable all the former A1-A5 use classes to have priority in the defined town centres along with the new uses covered in use class E, such as indoor sport, recreation or fitness, and creches. With this option, it would allow those uses already prioritised in the town centre to continue but it would expand this prioritisation to the additional uses in use class E. There is no obvious reason to exclude these additional uses (beyond A1-A5) now set out in use class E when those uses can change to these additional uses without the need for planning permission to be sought. Furthermore, it would seem to go contrary to a desire to diversify the town centres.
- 9.10 An alternative option is to exclude uses A4 and A5 from being sought preferentially for the town centres and focus solely on the new use class E. However, in doing so this has the potential for uses previously found to be acceptable in the town centres then to have to justify their presence – in some cases changes in the A use classes needed planning permission anyway but this could make it harder for new A4 and A5 type uses to be located in the town centres.
- 9.11 Conversely, acceptable uses in the town centres could be expanded to include not only use class E and A4 and A5 uses but those in the new use class F1; so, uses such as libraries, museums, places of worship and so forth that may also be acceptable uses in a town centre.
- 9.12 The importance of changing the town centres includes an increase in residential development, mainly by apartment living. The current Local Plan does not specify an amount of housing to be delivered in the town centres but it is considered that this should be changed so that clarity is given that
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town centre locations are acceptable for new housing. This is particularly pertinent given the proposed changes to the permitted development rights which, once enacted through legislation, would allow anything in use class E to change to residential via the prior approval process. It is considered that the Borough Plan Review needs to acknowledge this and consider how best to address this in any town centres policy.

- 9.13 All of the above deals with the types of uses that the new Borough Plan could set out as acceptable in the primary and secondary shopping frontages in the town centres. However, there also needs to be consideration if designating areas for shopping frontages remains relevant and/or necessary. With the creation of use class E there is an argument that the diversity within this use class nullifies the need to designate frontages for shopping. Alternatively, the existing areas designated for shopping frontages could be redrawn (following assessment) to ascertain if their current extent remains appropriate. Finally, it all could be left as it is.

Questions

Question 17

Which of the options set out below do you favour for the protection of primary and secondary frontages in the town centres? Please set out why.

- Option 1 – Set out that use class E and use classes A4 and A5 (as was) are acceptable uses.
- Option 2 - Set out that use class E are acceptable uses but not use classes A4 and A5 (as was).
- Option 3 - Set out that use classes E and F1 are acceptable uses.
- Option 4 - Set out that use class E and C3 (residential) uses are acceptable.

Question 18

Are there other uses not set out above that should be included as acceptable in primary and secondary frontages in the town centres? If so, which ones and why.

Question 19

Which of the options set out below is appropriate for setting out the extent of the primary and secondary frontages in the town centres? Please set out why.

- Option A – Remove any designations of primary and secondary frontages.

Option B - Reassess and redraw the extent of the primary and secondary frontages.

Option C - Retain the designation of primary and secondary frontages as set out in current Borough Plan.

10 Transport

Issues

- 10.1 As part of the UK's commitment to achieve net zero carbon emissions by 2050 there needs to be a major shift in transport. The growth in online services and the business that can be conducted away from a traditional work environment means that a reduction in travel may take place that helps to reduce travel levels. However, this is likely to be relatively small and cannot replace many of the current journeys needed to be undertaken for work and leisure activities. Yet, a reduction in travel should be the first step in dealing with transport in the borough, after that the focus should be on using forms of transport other than the car.
- 10.2 Walking and cycling have great potential to replace the car for short journeys, that is journeys that have not been taken for leisure and exercise. However, to do this there needs to be an improvement in the connection between places. To facilitate walking there needs to be safe and pleasant walks between the places where people live and the places where people wish to travel to, which on a daily basis for many is work and shopping for essential goods, such as food stuffs. For cycling, roads can be an unforgiving place for inexperienced cyclists and dedicated cycle paths/routes are more likely to increase cyclist numbers than on-road lanes. But, again they need to link between where people live and where they wish to go to.
- 10.3 The next priority for transport should be public transport, which includes bus and trains options. The borough is fortunate in that it has a number of railway stations and good bus routes. However, to build upon this, new large-scale developments must be designed and built to allow new residents to make use of these public transport options. Also, the two forms of public transport must be integrated to allow for greater distance to be travelled.
- 10.4 Beyond these transport options set out above there is the private car. To move towards zero emissions the UK Government has banned the sale of new petrol and diesel cars (cars powered wholly by these fuels) from 2030 and hybrids from 2035. This will mean that electric cars will become the norm before too long. In expectation of this the UK Government consulted on a change to the building regulations in England (15th July 2019) requiring all new-build homes to be fitted with an electric car charge point as well as electric car infrastructure being provided at those buildings undergoing a change of use to create a new dwelling, and for residential buildings undergoing major renovation. Similarly, every new non-residential building or a non-residential building undergoing major renovation would also have

to provide electric charging infrastructure. The exact details of these proposals can be found in the Electric Vehicle Charging in Residential and Non-Residential Buildings document by the Department for Transport. The consultation has closed but no outcome to this has been published.

Options

- 10.5 Policy SA1 of the current Borough Plan sets out the development principles that all strategic sites should meet, and this is then followed by a specific policy on each strategic site. Policy HS2 of the current Borough Plan deals with strategic accessibility and sustainable transport and sets out a 15% modal shift away from car use. Electric vehicle charging points are supported but not required by policy HS2, although they are required through the adopted Air Quality SPD and emerging Transport Demand Management Matters – Parking Standards SPD.
- 10.6 The supporting text to policy SA1 refers to footpaths and cycleways and that opportunities for these should be pursued as part of the development of a strategic site. The policies that follow this policy on each strategic site then do set out requirements for footpaths and cycleways. However, the importance of this form of infrastructure is such that it should be set out in policy SA1, setting out the overarching requirements for strategic sites. Many of the strategic sites have been developed but it is important for those that have not been (to make it absolutely clear of the expectation) and for any new strategic sites. Similarly, policy HS2 should make explicit that the sustainable transport options should be walking and cycling, in particular.
- 10.7 The change to electric vehicles is already progressing and to facilitate this sufficient and appropriate infrastructure needs to be in place. Proposals have been tabled to ensure that all new developments provide electric vehicle charging points and although a decision has not been made on making this a requirement through the building regulations it seems the only reasonable approach to providing appropriate and sufficient infrastructure on new developments. It was expected that the provisions would be in place in the first half of 2020, however, even though they remain unestablished there is good chance they will be prior to the new Borough Plan being adopted (2023). In terms of the current Borough Plan, firstly it is considered that the current requirement to support electric vehicle charging points is insufficient and, secondly, that, notwithstanding what may or may not be required in changes to the building regulations, there should be a planning policy requirement to install more electric vehicle charging points in new developments.

10.8 Finally, the alternative is to leave the existing policies as they are and not to amend them. The risk with this is that they fail to properly reflect what is required to facilitate the required change in transport to attain net zero carbon emissions.

Questions

Question 20

Should policies SA1 and HS2 be amended to give greater emphasis to the importance of cycling and walking connections/infrastructure being provided (option 1)? If not, why not.

Question 21

Should the new Borough Plan be amended from that set out in policy HS2 to require new developments to install vehicle charging points (option 2)? If so, what should the requirement be. If not, why not.

Question 22

Should the new Borough Plan leave policies SA1, SA2 and HS2 unchanged (option 3)?

11 Other Matters

Infrastructure

- 11.1 The current Borough Plan accounts for infrastructure requirements up to 2031. The Council has produced an Infrastructure Delivery Plan (IDP) and supporting Infrastructure Delivery Schedule (IDS) which sets out the types of infrastructure required, key delivery partners and estimated costs. The infrastructure types included transport, education, healthcare, sports and leisure, open spaces (including parks, cemeteries and allotments), green infrastructure, waste, water and energy.
- 11.2 With a revised plan period, the infrastructure requirements will need to be reassessed (i.e. potentially up to 2038). To deliver this, it is proposed that the Council will formally reconvene the Infrastructure Planning and Delivery Group (IPDG). The IPDG was the working group of all infrastructure providers/ consultees that contributed to the IDP and the IDS. This will help the Council to further understand what additional infrastructure is required, how much it will cost and how it can best be delivered. Further technical work may need to be undertaken to inform an updated IDP/IDS.

Biodiversity

- 11.3 The current Borough Plan, through Policy NE3, seeks biodiversity features to be conserved, enhanced, restored and, where appropriate, created. If an assessment indicates that a development will have an adverse impact on biodiversity, then a net gain to biodiversity should be created as part of that development. The current NPPF seeks plans to identify and pursue opportunities for securing measurable net gains for biodiversity. However, the Environment Bill, which is expected to become law this year, will require the planning system to deliver increased levels of biodiversity net gain. Schedule 14 of the Environment Bill makes provision for grants of planning permission in England to be subject to a condition to secure that a biodiversity gain of 10% is met. As a result of this it is considered that the new Borough Plan should require new development also to meet a 10% biodiversity gain, as a minimum.

Questions

Question 23

Should the new Borough Plan require, through policy, new development to meet, as a minimum, a 10% biodiversity gain? If not, what should be the target for biodiversity gain?

Design Codes

11.4 The proposed changes to the NPPF (2021) referred to in the introduction make new, increased reference to design codes/guides, codes and guides that set out design criteria for new development. The changes propose that local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code and which reflect local character and design preferences. The concept is that these local design codes would provide a local framework for creating beautiful and distinctive places through a consistent and high-quality standard of design. The guidance is that for these design codes to carry weight in decision-making they should be produced either as part of a plan or as supplementary planning documents. Given the technical nature and complexity that these design codes are likely to contain it is considered at this stage that they would be best placed as supplementary planning documents.

Questions

Question 24

Do you agree that design codes are best dealt with as supplementary planning documents?

Omitted Topics

11.5 This document focusses on the topics that the Council feels are key to address in the new Borough Plan. However, there are other matters that the new Borough Plan will address but at this stage are not being proposed to be updated/amended from the form they are in the current Borough Plan.

So, matters such as open space provision, and protection of our heritage are not being proposed to be amended.

Questions

Question 25

Do you agree that the key issues for the Borough Plan review have been identified ?

Question 26

Are there any other issues that need to be considered and addressed ?

12 Conclusion

12.1 This document sets out the key issues and options that the Council considers that the review of the Borough Plan should focus on. As part of the review the timescale of the current Borough Plan will have to be extended and the effect this will have on the need for new housing and employment is unknown at present. However, the important matters that will need addressing because of the extended timescale and changes to legislation and policy since the current Borough Plan was being produced and finalised have been set out in this document. The document sets out 26 questions that people are being invited to answer to help the Council produce the next version of the new Borough Plan, namely a 'publication' version of the Borough Plan.

Appendices

Appendix 1 – Status of the strategic sites allocated in the Borough Plan

Ref	Planning app no.	Address	Position at May 2021	Total capacity
HSG1	032246	The Long Shoot, between 48-130 Davidson Developments, Nuneaton	Complete.	66
HSG1	032399	The Long Shoot, land rear of 28-44, (Bellway Phase 1)	Under construction.	125
HSG1	033184	Site 18C002: Land at Lower Farm, Weddington Road, Nuneaton (Milby Hall at the Farm)	Under construction.	193
HSG1	033184	Site 18C002: Land at Lower Farm, Weddington Road, Nuneaton (Cotton Grange at The Farm)	Complete.	221
HSG1	032992	Site 31B007 Land off, The Long Shoot (Bellway Phase 2), Nuneaton	Under construction.	250
HSG1	033758	Site 29B002 - Land off, Weddington Road, Nuneaton, (South of Lower) (Barratt - St James' Gate)	Under construction.	245
HSG1	034571	Dubh-Linn, 431 Higham Lane	Complete.	1
HSG1	034360	Site 31B004 - Land rear of 194-262, The Long Shoot, Nuneaton (Davidsons)	Under construction.	120
HSG1	034361	Site 31B004 - Land rear of 194-262", The Long Shoot, Nuneaton (Davidsons)	Under construction.	35
HSG1	034969	Cresswells Farm, The Long Shoot, Nuneaton, (Jelsons Ltd)	Under construction.	150
HSG1	034076	Site 31A002 - Land off, Higham Lane, Nuneaton, (adj Nuneaton Fields Farm) (Persimmon Homes Eaton Place)	Under construction.	453
HSG1	035279	Remaining land at Top Farm	Outline application submitted – to be determined.	1700
HSG1	034615	Calendar Farm	Outline application approved.	850
	036921		Reserved matters application for 450 dwellings approved.	
HSG1	036873	Land to rear of 28-44 The Long Shoot, Nuneaton (Bellways Phase 3)	Permission granted	75
HSG1 total				4,409
HSG2	-	Arbury	No application submitted.	1640

Ref	Planning app no.	Address	Position at May 2021	Total capacity
HSG3	035037	Gipsy Lane	Outline application approved.	575
HSG4	-	Woodlands	No application submitted.	689
HSG5	-	Hospital Lane	No application submitted.	398
HSG6	035503	School Lane/Longford Road	Outline application for up to 150 dwellings for part of allocation approved.	220
	037022		Reserved matters application for 133 dwellings submitted – resolution to grant.	
HSG7	-	Land East of Bulkington	No application submitted.	196
HSG8	036491	Land West of Bulkington	Full application for northern parcel of the site only (188 dwellings) – resolution to grant.	495
HSG9	037122	Golf Drive	Hybrid application – full for 621 dwellings and outline for community centre – resolution to grant	621
HSG10	033926	Site 52D067 - Land off (Land adj Crematorium), Eastboro Way, Nuneaton	Outline application approved. Reserved matters application submitted and to be determined	360
HSG11	035595	Land adjacent Judkins Quarry, Tuttle Hill	Outline application submitted – to be determined.	200 [400 applied for]
HSG12	036870	Former Hawkesbury Golf course	Full application for 204 dwellings – resolution to grant.	380 [500 applied for]
	037807		Outline application for 296 dwellings to be determined	
EMP1	034901	Faultlands	Outline application approved.	
EMP2	037237	Phoenix Way/Wilsons Lane	Outline application submitted – to be determined.	73
EMP3	038023	Prologis Extension	Outline application submitted – to be determined	
EMP4		Coventry Road	No application submitted	

Ref	Planning app no.	Address	Position at May 2021	Total capacity
EMP6	037021	School Lane/Longford Road, Bedworth	Full application submitted – to be determined.	
EMP7		Bowling Green Lane, Bedworth	No application submitted.	
Total dwellings on strategic allocations				10,256

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Nuneaton and Bedworth Borough Council Borough Plan review

Issues and Options consultation response

In broad terms Coventry City Council considers that the majority of the matters considered in the Issues and Options consultation relate to local choices to be made by NBBC based on up to date evidence and detailed site appraisal and therefore it would not be appropriate to comment in detail at this stage. Similarly, there are more strategic choices which will need to be made as a result of ongoing work with partners to update the evidence base, for example the updated Housing and Economic Development Needs Assessment (HEDNA) which has recently been jointly commissioned by Nuneaton, Coventry, Rugby, Warwick, Stratford and North Warwickshire councils. Further discussions on dealing with strategic matters are underway in terms of advancing a variety of workstreams across the wider sub-region through the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO). The outcomes of this research will enable NBBC to make informed choices as work on the plan review progresses.

Memorandum of Understanding (MoU)

In order to be able to demonstrate compliance with the statutory Duty to Cooperate and thus achieve sound plans it was essential that each Council signed two Memorandums of Understanding committing to delivering the unmet housing and employment needs of Coventry City Council. This was duly undertaken at the appropriate stage for each local authority and demonstrated the solid partnership working and positive co-operation between the parties involved.

Coventry City Council is therefore extremely disappointed to see in paragraph 7.8 of the Issues and Options document that NBBC will be '*withdrawing from the current memorandum of understanding (MoU) and will seek to negotiate an appropriate arrangement with sub-regional partners*'.

Paragraphs 7.6 and 7.7 reference the 'Planning for the Future' White Paper and its intention to abolish the Duty to Cooperate. There is no certainty as to what outcomes will result from the White Paper in the proposed Planning Bill, if any. Recent difficulties regarding planning reform, including the MCHLG Committee paper on the Paper, show the complexities of the matter and the political uncertainties in bringing anything forward. We are still some time away from knowing the proposed content of a Planning Bill, let alone it being passed into statute.

Similarly, the recent independent review of Office for National Statistics population estimates and projections is cited. At the time of consultation there is no indication of the scale or root of the issue, with the ONS yet to respond to the review. Furthermore, as reiterated in both the independent review and in the Issues and Options consultation, the government proscribes the use of the 2014 population projections as part of the Standard Methodology. As such, without there being a change in government policy, any amendment to future ONS methodology would not have an impact on the overall Housing Needs of individual authorities in the HMA.

Given the withdrawal from the MoU is based on the above two factors, the outcomes of which are entirely unknown, such action is considered premature and without a basis in evidence.

Coventry City Council urges NBBC to reconsider its position with regard to the MoU so as not to undermine the strong partnership approaches which have been established, and to continue to constructively engage in dialogue to address any issues, using an informed, evidenced approach.

Other Matters

In terms of the proposed plan period (2021 – 2038), Coventry City Council would comment that the NPPF requires a minimum plan period of 15 years from adoption. This plan period gives little room for flexibility. The HEDNA is focusing upon a period up to 2043 so it would seem pragmatic to align with this instead.

It is noted that paragraph 7.11 of the Issues and Options document cites the latest standard method figure which at 429 dwellings per annum would equate to 6,435 dwellings over the proposed 15 years plan period. The paragraph states that this would form the basis of the housing component of the HEDNA. Whilst this is true, this figure would be a minimum and this position would not negate any ongoing discussions over unmet need arising from other authorities and the Duty to Co-operate would still need to be complied with.

In terms of the Sustainability Appraisal which accompanies the Issues and Options report, this will need to have regard to the wider context within which Nuneaton and Bedworth sits including the findings of any updated evidence with regard to the HEDNA and any cross boundary considerations which might arise from this work.