

Nuneaton & Bedworth Borough Council - Borough Plan Review 2021-2039

Schedule of Main Modifications suggested by the Council

Introduction

This schedule contains the Main Modifications to the submitted version of the Borough Plan Review (2021-2039) and associated evidence base, which Nuneaton and Bedworth Borough Council has suggested to the Inspectors to consider, and which the Council consider are required to make the DPD sound and legally compliant.

Most of the amendments are due to updates since Publication, following the submission of planning applications; housing land supply amendments due to discussions during appeals, (including updated discussions with landowner/developers for intended commencement and housing yields), or following requests from consultees during the Publication consultation.

The Main Modifications are clearly set out with deletions being shown as strikethrough and new text being underlined and in bold. The format of the Main Modifications is in line with guidance published by the Planning Inspectorate <u>Procedure Guide for Local Plan</u> <u>Examinations - GOV.UK (www.gov.uk)</u>.

Appendices iii and iv applies to Main Mods.

- iii. Amended Housing trajectory (appendix B of Borough Plan Document)
- iv. Amended Employment Trajectory (appendix C of Borough Plan Document)

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Chapter Six: Development Strategy - Suggested Main Modifications

Suggested Main Mod. Ref.	section			on Policy box / No. table / map		Suggested Main Modification Text	Reason for Modification
	 6.0 Development strategy: Strategic Policy DS3 – Overall development needs. Housing Delivery. 	Table 3: Housing delivery	21	REPLACE all of the figures shown in the 'Total' column and INSERT amended figures in Table 3: Housing Delivery to read: Status Total Net Completions (1 1,725 1,790 April 2021 – 31 1,725 1,790 March 2023) Committed supply of dwellings (at 1 April 2023) 4,070 Residual need for plan period 3,813 Strategic housing allocations 4,737 allocations 4,769 Non-strategic 636 housing allocations 5,458 Windfall sites 546 630 10% deduction for non-delivery on small sites Total Housing Supply 11,522 12,2127 12,2127	To ensure the housing delivery figures, for the plan period, are up to date.		
	6.0 Development strategy:	Supporting text. Paragraph	21	REPLACE figure within paragraph to read:	To ensure the housing delivery figures, for the plan		

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
	Strategic Policy DS3 – Overall development needs. Housing delivery.	6.26.		6.26 Table 3 demonstrates the provision of approximately <u>11,522</u> <u>12,085</u> -dwellings through the Borough Plan Review. Such supply is in excess of the minimum housing requirement of 9,810 homes within Strategic Policy DS3 – Overall Development Needs. This buffer provides flexibility in the housing supply across the plan period in the unforeseen event that some of the identified sites do not come forward as predicted.	period, are up to date.
	6.0 Development strategy: Strategic Policy DS3 – Overall development needs. Housing delivery.	Supporting text. Paragraph 6.27.	21	REPLACE figure to read: 6.27 In the two years prior to April 2023, the Council has delivered 1,725 1,790 new homes within the Borough, at an average rate of 895 dwellings per annum. Housing delivery has increased significantly since 2021. In the ten years before the plan period the average number of homes completed each year had been 424 dwellings. This increase in the number of homes completed annually is primarily due to a large number of strategic allocations, from the adopted Borough Plan 2011-2031, delivering homes in the early part of this plan period.	To ensure the housing delivery figures, for the plan period, are up to date.
	6.0 Development strategy: Strategic Policy DS3 – Overall development needs.	Supporting text. Paragraph 6.29	21 and 22	DELETE text and REPLACE figure in the paragraph to read: 6.29 The NPPF requires the Council to maintain a five year supply of housing sites. At the point of submission of the plan, for the five years 2023 – 2027, based on the projected completions in the trajectory, there is a <u>10.1</u> 10.9 year supply (with a 20% buffer). This is justified given the plan seeks to ensure the continued delivery of strategic sites allocated within the adopted Borough Plan, of which the majority are either under construction, benefit from planning	This is no longer a requirement of the NPPF (December 2023). To ensure the housing delivery figures, for the plan

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
	Housing delivery.			permission or are at an advanced stage in the application process. Therefore, it is realistic that the majority of strategic sites will deliver a significant number of units over the next five years.	period, are up to date.
	6.0 Development strategy: Strategic Policy DS3 – Overall development needs. Housing delivery.	Footnote 25.	21	REPLACE year to read: Windfall sites only include the years <u>2026/27</u> (2024 (anticipated year of adoption) – 2039 to avoid double counting.	No windfall figure included in first 3 years of deliverable tranche to avoid potential double counting with permissioned sites, following comments in representations from Richborough ref.110.2.

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text		Reason for Modification
	6.0 Development strategy: Strategic Policy DS3 – Overall development	Table 1: Employment land supply.	25	AMEND Table 5: Employment land supply. AMEND 2021/22 - 2022/23 completions and Extant planning permissions - April 2023. AMEND Extant allocations and Total supply.		To reflect updated AMR. Site Agent Opus Land Ltd., consultation response to Reg 19
	needs.				Land (ha)	ref.121.15 to reflect
				2021/22 – 2022/23 completions	2.12 <u>2.33</u>	submitted planning
	Employment			Extant planning permissions - April 2023	34.69 <u>34.48</u>	applications and
	land supply.			Reuse of vacant floorspace	0	subsequent internal red line
				Vacant plots within employment areas	2.99	amendment.
				Extant allocations - April 2023	52.15 <u>53.25</u>	amenument.
				Windfall allowance	15.1	
				Total supply	107.05 <u>108.15</u>	
	6.0 Development strategy: Strategic Policy DS3 – Overall development needs. Employment land supply.	Supporting text. Paragraph 6.44	25	AMEND paragraph to read: 6.44 Calculating the identified employment land need and the supply position there is a surplus of 19.15ha <u>20.30ha</u> of employment land.		Site Agent Opus Land Ltd., consultation response to Reg 19 ref.121.15 and to reflect submitted planning applications and subsequent internal red line amendment.

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text		Reason for Modification
	6.0 Development strategy: Strategic Policy DS3 – Overall development needs.	Table 6: Surplus employment land.	25	AMEND table 6: Surplus employment la AMEND total identified supply 107.05-<u>1</u> AMEND Surplus 19.20-<u>20.30</u> As per all above AMEND to read:		
	Supply demand balance.			Total employment land needed (2021- 2039) Total identified supply Surplus	Land (ha) 87.85 <u>107.05</u> <u>108.15</u> <u>19.20</u> 20.30	
	6.0 Development strategy: Strategic Policy DS4 - Residential allocations	DS4 Policy box	28/29	REPLACE approximate dwellings figure for 'SHA5 West of Bulkington' in table to read: <u>375</u> 348 ADD text after approximate dwellings for 'Adjacent to the employment allocation (SEA6) Bowling Green Lane' to read: 150 (<u>including extra care units</u> , remainder as employment) REPLACE approximate dwellings figure for 'Adjacent to the employment allocation (SEA2)' in table to read: <u>73</u> 75 -(remainder as employment)		Based on the latest evidence from approved or current planning applications or from discussions with the landowners over how sites can be delivered viably and meet a range of needs for the Borough. The table needs amending to be consistent with

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
		•		REPLACE approximate dwelling figure for NSRA1 to read: <u>122</u> 124	other parts of the Plan.
				ADD text after approximate dwellings for NSRA2 to read: 123: (including extra care units)	
				REPLACE approximate dwellings figure for 'NSRA7' to read: <u>30</u> 33	
				REPLACE approximate dwellings figure for 'NSRA9' to read: <u>42</u> 25	
				ADD text after approximate dwellings for NSRA10 to read: 25: (or potentially extra care units)	
				AMEND Total Strategic Allocations 4,769 4,794 AMEND Total Non-strategic Allocations 689 701	
				As per all above AMEND figures and some wording in Policy as follows:	
				Strategic Policy DS4 - Residential allocations The following strategic sites will be allocated for residential development and associated infrastructure uses, as shown on the proposals map. Further specific policies for each of the strategic allocations are detailed within Chapter 7.	
				Strategic Allocations for Housing Land	

Strategic Housing Allocation (SHA)Site NameApproximate DwellingsSHA1Top Farm1,700SHA2Arbury1,525SHA3Tuttle Hill350SHA4Hospital Lane445SHA5West of Bulkington348 375SHA6Hawkesbury Golf176Course (remaining land)Adjacent to the employment allocation (SEA6)Bowling Green LaneAdjacent to the employment allocation (SEA6)Wilsons Lane73,75 (remainder as employment)Adjacent to the employment allocation (SEA2)Wilsons Lane73,75 (remainder as employment)Adjacent to the employment allocation (SEA2)Wilsons Lane73,76 (remainder as employment)Adjacent to the employment allocation (SEA2)Arf69 4,794Along with the Strategic Development Allocations listed above and identified on the policies map, the following non-strategic sites are allocated for residential development within the plan period. Some of the non-strategic housing sites have site specific considerations, which are outlined in the supporting text below. These include the loss of playing fields which might require compensation, or biodiversity and heritage considerations, including the setting of the Coventry Canal. Opportunity should be taken to	Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	•	Suggested Main N	Iodification Text		Reason for Modification	
SHA1Top Farm1,700SHA2Arbury1,525SHA3Tuttle Hill350SHA4Hospital Lane445SHA5West of Bulkington348-375SHA6Hawkesbury Golf176Course (remaining land)150 (including extra care units, remainder as employment allocation (SEA6)150 (including extra care units, remainder as employment)Adjacent to the employment allocation (SEA6)Wilsons Lane73 75 (remainder as employment)Adjacent to the allocation (SEA2)Wilsons Lane73 75 (remainder as employment)Adjacent to the allocation (SEA2)SHA64,769 4,794Along with the Strategic Development Allocations listed above and identified on the policies map, the following non-strategic sites are allocated for residential development within the plan period. Some of the non-strategic housing sites have site specific considerations, which are outlined in the supporting text below. These include the loss of playing fields which might require 					Housing	Site Name			
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SHA4Hospital Lane445SHA5West of Bulkington348-375SHA6Hawkesbury Golf176Course (remaining land)150 (including extra care units, remainder as employment allocation (SEA6)Bowling Green Lane150 (including extra care units, remainder as employment)Adjacent to the employment allocation (SEA2)Wilsons Lane73.75 (remainder as employment)Adjacent to the employment allocation (SEA2)Wilsons Lane73.75 (remainder as employment)Along with the Strategic Allocations4,769 4,794Along with the Strategic Development Allocations listed above and identified on the policies map, the following non-strategic sites are allocated for residential development within the plan period. Some of the non-strategic housing sites have site specific considerations, which are outlined in the supporting text below. These include the loss of playing fields which might require compensation, or biodiversity and heritage considerations, including					SHA2		1,525		
SHA5West of Bulkington348-375SHA6Hawkesbury Golf Course (remaining land)176Adjacent to the employment allocation (SEA6)Bowling Green Lane150 (including extra care units, remainder as employment)Adjacent to the employment allocation (SEA6)Wilsons Lane73.76 (remainder as employment)Adjacent to the employment allocation (SEA2)Wilsons Lane74.769 4.769Along with the Strategic Allocations4.769 4.7694.794Along with the Strategic Development Allocations listed above and identified on the policies map, the following non-strategic sites are allocated for residential development within the plan period. Some of the non-strategic housing sites have site specific considerations, which are outlined in the supporting text below. These include the loss of playing fields which might require compensation, or biodiversity and heritage considerations, including					SHA3	Tuttle Hill	350		
SHA6Hawkesbury Golf Course (remaining land)176Adjacent to the employment allocation (SEA6)Bowling Green Lane150 (including extra care units, remainder as employment)Adjacent to the employment allocation (SEA6)Wilsons Lane73 75 (remainder as employment)Adjacent to the allocation (SEA2)Total Strategic Allocations4,769 4,794Along with the Strategic Development Allocations listed above and identified on the policies map, the following non-strategic sites are allocated for residential development within the plan period. Some of the non-strategic housing sites have site specific considerations, which are outlined in the supporting text below. These include the loss of playing fields which might require compensation, or biodiversity and heritage considerations, including					SHA4	Hospital Lane	445		
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use, enhance and sustain these assets, or in exceptional circumstances, compensate, where possible, as part of any development proposal. Any planning applications that come forward					and identified on the sites are allocated for Some of the non- considerations, whice These include the compensation, or bio the setting of the Co- use, enhance and circumstances, com	nd identified on the policies map, the following non-strategic ites are allocated for residential development within the plan period, ome of the non-strategic housing sites have site specific onsiderations, which are outlined in the supporting text below, hese include the loss of playing fields which might require ompensation, or biodiversity and heritage considerations, including he setting of the Coventry Canal. Opportunity should be taken to se, enhance and sustain these assets, or in exceptional ircumstances, compensate, where possible, as part of any			

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				Assessment.	s of Nuneaton and Bedwor locations for Housing Land	th's Heritage Sites	has outline permission which includes extra care
				Non-strategic Residential Allocation (NSRA)	Site Name	Approximate Dwellings	units.
				NSRA1	Former Bedworth Rugby Club, Smarts Road, Bedworth	124-<u>122</u>	
				NSRA2	Former Manor Park Community School, Nuneaton	123: (<u>including</u> <u>extra care</u> <u>units)</u>	
				NSRA3	West of Coventry Road/Wilsons Lane, Exhall	95	Re NSRA10: Based on discussions with
				NSRA4	Vicarage St Development Site, Nuneaton	65	the landowner/promoter
				NSRA5	Land rear of Burbage Lane	47	•
				NSRA6	Land at Bucks Hill, Nuneaton	40	(Deeley Group) over how this site
				NSRA7	Abbey Street, Nuneaton	33 <u>30</u>	can be delivered viably and meet a
				NSRA8	Land rear of Lilleburne Drive and Willow Close, Nuneaton	29	range of needs for the Borough ref. 120.2.
				NSRA9	Former New Inn Public House, Bulkington	25 <u>42</u>	

Suggested Main Mod. Ref.	Policy / sub- section	 Paragraph / Page Suggested Main Modification Text Policy box / No. table / map 					Reason for Modification
			NSRA10	Land at Bermuda Road, Nuneaton	25: (or potentially extra care units)	To make reference to the housing trajectory in relation to the strategic and	
				NSRA11	Upper Abbey Street, Nuneaton	22	non-strategic housing allocations
				NSRA12	Kingswood Road, Nuneaton	20	listed in the tables.
				NSRA13	Armson Road, Exhall	16	
				NSRA14	Mill Street/Bridge Street, Nuneaton	15	
				NSRA15	Bennetts Road, Kerseley	10	
				Total Non-st	rategic Allocations	689 701	
				Housing Lane <u>The housing</u> <u>Appendix B.</u>	ving text after the Non-strateg e Table to read: t <mark>rajectory, for the plan period,</mark>	can be found in	
	6.0 Development strategy: Strategic Policy DS4 - Residential allocations.	Supporting text	29	REPLACE th read: Dwellings: 12	e dwellings figure in the secor 4- <u>122</u>	nd bullet point to	To align with planning permission.
	NSRA1: Former						

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
	Bedworth Rugby club				
	6.0 Development strategy: Strategic Policy DS4 - Residential allocations. NSRA2: Former Manor Park Community School.	Supporting text. Bullet points.	30	 REPLACE the dwellings figure in the second bullet point to read: Dwellings: 123 58 residential and 65 extra-care. 	Site has outline permission which includes extra care units.
	6.0 Development strategy: Strategic Policy DS4 - Residential allocations. NSRA9: Former New Inn Public House, Bulkington	Supporting text.	40	 REPLACE the dwellings figure in the second bullet to read: Dwellings 29 <u>42.</u> 	The quantity has bene updated due to an extant planning permission/current planning application and to bring the Policy in line with other parts of the Plan.

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
	6.0 Development strategy: Strategic Policy DS5 – Employment allocations	DS5 Policy box	48	AMEND in Policy box DS5: under row: SEA6 Bowling Green Lane, size to read: 19.89 20.99	To reflect the red line plan submitted for planning applications for housing and employment sites. Also due to same red line amendment requested by landowner/promoter in response to Reg 19 L&Q Estates ref 121.15.
	6.0 Development strategy: Strategic Policy DS7 – Monitoring of housing delivery	DS7 Policy box	53	 ADD, DELETE and REPLACE the text in the Policy box to be amended in its entirety to read: The Council will monitor the delivery of housing and publish progress against the trajectory (as shown in Appendix B). Where it is apparent that delivery rates are falling short of what was anticipated, then the Council will take the necessary action to address any shortfall. Such action may include (but are not limited to): Working with developers and site promoters <u>on the allocated sites</u>, particularly of the two largest strategic sites, to review the requirements and phasing of infrastructure provision, where such re-phasing would assist with viability <u>and</u> 	To provide clarity that the policy and proposed steps should be read in order.

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
				 Working with developers, site promoters and other interested parties to help unlock potential sources of funding for identified infrastructure, or; considering the use of compulsory purchase powers to help address known land acquisition issues; or 	
				 bringing forward additional sites where it can be demonstrated that such sites will assist with delivery to address short-term needs. Where additional housing sites need to be brough forward, initial priority will be given to sustainable sites, including town centre redevelopment opportunities in Nuneaton and edge of settlement sites, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits 	
				Once the above have been considered sequentially, the Council will then look at bringing forward additional sites where it can be demonstrated that such sites will assist with delivery to address short terms needs. It will need to be demonstrated that these sites are sustainable and deliverable in the short term and sites must be considered in the following order:	
				 Town centre redevelopment opportunities in Nuneaton; Edge of settlement sites within the Settlement Boundaries (following the settlement hierarchy set out in Policy DS2); Only when the above two steps have been fully explored, and sustainable sites have not been identified, will consideration be given to edge of settlement sites within the rural areas of the Borough or 	

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
				 areas located beyond the defined settlement boundaries. The development of edge of settlement sites in the rural areas beyond the defined settlement boundaries will be permitted, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. 	
	6.0 Development strategy: Strategic Policy DS8 Review	DS8 Policy box	53/54	 Split the first bullet point in the Policy box into two and add new fourth bullet and rearrange bullets to read: If there is clear evidence that the Borough's local housing need or employment need has changed significantly since the adoption of the plan. Strategic employment land need will be reviewed following publication by the Council of a West Midlands Strategic Employment Land Needs Study. Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed. Any other reason that would render the plan, or part of it, significantly out of date. 	These are two separate trigger points for a quicker review so should be stated separately, following comments in representation from Richborough ref.110.4 and Taylor Wimpey 129.5. New third bullet is to account for emerging evidence regarding strategic employment land need in the West Midlands region and following representation comments from:

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					North Warwickshire Borough Council ref. 1.2, Coventry City Council ref. 2.1 and 2.2, Rugby Borough Council ref 3.2, Warwick District Council and Stratford-upon-Avon District Council ref. 4.2, Coventry and Warwickshire Chamber of Commerce ref.17.1, Nurton Developments Ltd. ref. 104.1, Arbury - Agent/promoter of SHA2 ref. 106.7 and 106.19, Holt Property Ltd. ref .109.18, L&Q Estates ref. 115.2, 115.4, 115.5, 115.6, 115.13,115.16, CEG Land Promotion 116.4, Stoford Properties Ltd

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
					ref.136.3 and 136.410.
	6.0 Development strategy: Policy DS8 – Review	New Paragraph in supporting text.	54	ADD as new paragraph at the end of supporting text to read: The Council is working with other local authorities in the West Midlands region and the West Midlands Combined Authority to identify the land need for large scale industrial and logistics. Following publication by NBBC of a West Midlands Strategic Employment Land Needs Study, the Council will continue to work with other West Midlands local authorities to meet the identified need.	To account for emerging evidence regarding strategic employment land need in the West Midlands region and following representation comments from: North Warwickshire Borough Council ref. 1.2, Coventry City Council ref. 2.1 and 2.2, Rugby Borough Council ref. 3.2, Warwick District Council and Stratford-upon-Avon District Council ref. 4.2, Coventry and Warwickshire Chamber of Commerce ref.17.1, Nurton Developments Ltd. ref. 104.1, Arbury -

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
					Agent/promoter of SHA2 ref. 106.7 and 106.19, Holt Property Ltd. ref .109.18, L&Q Estates ref. 115.2, 115.4, 115.5, 115.6, 115.13,115.16, CEG Land Promotion 116.4, Stoford Properties Ltd ref.136.3 and 136.410.

Chapter Seven: Strategic Allocations – Suggested Main Modifications

Suggested Main Mod. Ref.	Policy/Sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
	7.0 Strategic allocations: Strategic Policy SHA5 – West of Bulkington	SHA5 Policy box.	78	REPLACE the figure in key development principle 1 to read: Provision of at least <u>348-<u>375</u> dwellings in a mix of dwelling types and sizes</u>	The figures align with the permissions for development on the site.
	7.0 Strategic allocations: Strategic Policy SHA5 – West of Bulkington	7.76	80	REPLACE the figure in the supporting text to read: The site covers 18.2ha and is effectively spilt into two parcels. The site will deliver approximately <u>348</u> . <u>375</u> new dwellings in a mix of sizes and tenures.	The figures align with the permissions for development on the site.
	7.0 Strategic allocations: Strategic Policy SEA6 – Bowling Green Lane	SEA6 Policy box.	97	 AMEND Policy box criterion 1 and 2 to read: 1. Provision of approximately 19.89ha <u>20.99ha</u> of employment land. 2. Provision of approximately 6 ha of land to deliver at least <u>approximately</u> 150 dwellings <u>(including extra care units).</u> 	To more closely align with the outstanding Outline applications currently being considered and discussions with the landowner over how this site can be delivered viably and meet a range of needs for the Borough and following comments from landowner/promoter

				Opus Land Ltd. ref. 121.16.
7.0 Stra allocatio Strategi SEA6: E Green L	ns: 7.125 c Policy Bowling		AMEND Paragraph 7.125 to read: 7.125 The site comprises 26ha of open land and will deliver 19.89ha 20.99ha for employment uses,	To more closely align with the outstanding Outline applications currently being considered and discussions with the landowner over how this site can be delivered viably and meet a range of needs for the Borough and following comments from landowner/promoter Opus Land Ltd. ref. 121.16.

Chapter Eight: Housing – Suggested Main Modifications

Suggested Main Mod. Ref.	Policy/sub section.	Paragraph/ Policy box/table /map	Page No.	Suggested Main Modification Text	Reason for Modification
	8.0 Housing: Policy H2 – Affordable housing	H2 Policy box.	106	DELETE wording at end of first paragraph of Policy under heading 'Proportion of affordable housing' to read: Proportion of affordable housing The Council is committed to improving housing affordability in Nuneaton and Bedworth Borough. The Council will seek at least 25% of new dwellings to be delivered as affordable where residential development proposals consist of 15 dwellings or more. For residential development proposals that consist of between, 11 to 14 dwellings, a contribution of two affordable housing units will be required, irrespective of any demolitions.	To reflect the need to credit the existing floorspace lost as per PPG Paragraph: 027 Reference ID: 23b- 027-20190315 following comments from Home Builders Federation in representation ref.16.10.

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
	12.0 Natural environment: Policy NE3 – Biodiversity and geodiversity	NE3 Policy box.	170	 AMEND, DELETE and ADD to Policy box subheading and text to read: <u>Biodiversity Net Gain offsetting</u> All applicable development must demonstrate a minimum 10% Biodiversity Net Gain with offsite net gain offsetting will being required as a last resort once all available options in the mitigation hierarchy have been explored. Developers must use Warwickshire County Council biodiversity offsetting metrics (until such time this is superseded by the mandatory use of the national metrics) the Statutory Metric to quantify the impact, and to calculate an appropriate level of compensation to replace the lost habitat. If the habitat loss cannot be replaced on site, the replacement habitat should be provided, in the Borough, in the following order: A location adjoining and/or linking a biodiversity strategic location. A location which significantly increases connectivity between LBAP habitats – and/or any emerging Nature Recovery network location that aligns with targeted areas and corridors for increased ecological connectivity. If this is not possible then the Warwickshire, Coventry and Solihull Green Infrastructure hierarchy is to be applied. 	For clarity. 'Biodiversity net gain offsetting' does not make sense and to update Policy to emerging National Policy and Warwickshire County Council evidence base work on net gain. Also updates to Policy and supporting text following comments in representation from Warwickshire Wildlife Trust ref. 12.9, the Environment Agency 13.12 and Home Builders Federation ref. 16.18, FCC Environment UK Ltd (owner of SHA3) ref 108.9, ref. Gladman Developments Ltd. 111.11, Seven Homes ref. 122.10.

Chapter Twelve: Natural Environment – Suggested Main Modifications

Appendix B: Housing Trajectory – Suggested Main Modifications

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	Page No.	Suggested Main Modification Text	Reason for Modification
	Appendix B - Housing Trajectory	Graph	209	Replace 'housing trajectory' (graph). (See appendix iii of Minor Mods.) Appendix B - Housing Trajectory Housing Repire	To ensure the housing delivery figures, for the plan period, are up to date following comments in representation ref.16.4.

Appendix C: Employment Trajectory – Suggested Main Modifications

Suggested Main Mod. Ref.	Policy / sub- section	Paragraph / Policy box / table / map	BPR Page No.	Suggested Main Modification Text	Reason for Modification
	Appendix C - Employment Trajectory	Graph	210	Replace 'employment trajectory' figure (graph). (See appendix iv of Minor Mods.)	To ensure the employment delivery
				Employment Land Trajectory	figures, for the plan period, are up to date.