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BOROUGH PLAN REVIEW



for Nuneaton and Bedworth

Nuneaton & Bedworth Borough Council

Borough Plan Review Preferred Options

2024-2039

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- Work in partnership with landowners and agents.

Monitoring

7.21 The indicators and targets that will be monitored for this policy are outlined in Table 2.

Monitoring ref	Indicator	Target
DS3a	Development outside defined settlement boundaries	Zero new unallocated development (except those considered acceptable in the policy) outside development boundaries

Table 2. Indicators and targets to be monitored for Policy DS3

Strategic Policy DS4 – Overall development needs

The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2024 and 2039:

- 9,690 homes based on 646 dwellings per annum (to be reviewed when the HEDNA 2022 is published).
- 80.5 ha of employment land for industrial and distribution/warehousing development (to be reviewed when the HEDNA 2022 is published).
- 2ha of employment land for office space.

As per the provision identified in the Gypsy and Traveller DPD, the following levels of development will be planned for:

- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025/26; and
- At least a further 5 permanent residential pitches beyond those required by 2025/26 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2036/37.

A further 5.6ha of land will be allocated as future cemetery land burial space (allocation CEM-1) to meet the Borough’s needs up to 2039 and beyond.

Housing land

7.22 The starting point for determining the housing target for the Borough is the National Planning Policy Framework (NPPF) (2021) and the associated National Planning Practice Guidance (NPPG). The NPPF states that to

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

- 7.23 The ‘standard method’ set out in the NPPG utilises the 2014 household projections over a 10 year period and applies the most recent affordability ratios. In December 2020, the NPPG was updated to apply a 35 per cent uplift to the 20 most populated urban authority areas in England. Coventry is subject to the 35 per cent uplift. The ‘standard method’ figures for the Coventry and Warwickshire authorities (incorporating the affordability ratios released in March 2022) are provided below.

Local Authority	Standard method annual requirement (2014 household projections with March 2022 affordability ratios)
Coventry	2,325
North Warwickshire	176
Nuneaton and Bedworth	435
Rugby	516
Stratford-on-Avon	564
Warwick	675

- 7.24 In order to provide a more-up-date assessment of housing need within the Coventry and Warwickshire housing market area, the Coventry and Warwickshire authorities appointed Icen Projects to undertake an updated Housing and Economic Development Needs Assessment (HEDNA). This will provide a more up-to-date assessment of local housing need for each authority. This work is ongoing and is not expected to be published until the updated 2021 Census information is issued which the Office of National Statistics aims to release in early summer. The updated 2021 Census information will need to inform the updated sub-regional HEDNA work which will propose housing need requirements for each of the six local planning authorities. Where any authority in the housing market area is able to demonstrate that they are unable to meet their housing or employment land requirement figure and can quantify the unmet need, the Council will co-operate with such authorities in order to fulfil its obligations under the Duty to Co-operate. Key considerations forming the basis of such discussions will be the availability of land, the level to which the land is constrained, the capacity of infrastructure serving the area and other issues such as the scope for potential market saturation.

- 7.25 Notwithstanding the above, and given the uncertainties associated with publication of the 2021 Census information and the implications for the sub-regional HEDNA work, Nuneaton and Bedworth Borough Council has appointed Icen Projects to undertake a bespoke assessment of housing and employment need to inform this Preferred Options document. Based on interim conclusions (published in advance of the 2021 Census outputs), Icen have calculated an 'alternative standard projection' which is based on more detailed analysis of household projections and demographics. This analysis indicates a housing requirement figure of 646 dwellings per annum (dpa) for the Nuneaton and Bedworth Borough area. The detailed analysis undertaken by Icen considers that recent population growth is higher for Nuneaton and Bedworth Borough than reflected in the 2014 based household projections. However, it also recognises that a number of data sources do point to Coventry's population having been overestimated. The analysis utilises dwelling completions since 2011 and data from the Patients Register. As concerns have been raised regarding the accuracy of the Office of National Statistics' population estimates for Coventry (and as recognised by the Office for Statistics Regulation), the updated Icen analysis is considered to be the best starting point currently for determining housing need over a new plan period.
- 7.26 A 646 dpa figure returns a total housing need requirement for the 15 year plan period of 9,690 dwellings. This will need to comprise housing allocations, existing sites with full and outline planning permission, prior notification/approvals, strategic and non-strategic housing allocations, with an allowance for windfall developments and non-delivery on small sites.
- 7.27 Based on the latest published Housing Trajectory information (2021)³⁰, there is considered to be 8,492 dwellings of deliverable capacity for 2023/24 and beyond – thereby providing deliverable capacity for a new plan period based on an adoption date of February 2024. This includes sites with full planning permission, outline planning permission, deliverable strategic allocations and an allowance of 22dpa windfall, but applying a 10% deduction allowance for non-completions on small sites (i.e. 18dpa). Accounting for this deliverable capacity provides a remaining shortfall of 1,198 dwellings up to 2039 which will need to be met through additional housing allocations (via strategic and non-strategic housing allocations). Additional windfall beyond 2031, or indeed an allowance for non-delivery on smaller sites, has not been accounted for and would provide additional capacity to meet the need up to 2039. The Council will be undertaking

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https://www.nuneatonandbedworth.gov.uk/downloads/file/4530/housing_trajectory_for_five_year_housing_land_supply_2021

Strategic development strategy

further analysis regarding windfall development as the majority of completions delivered since plan adoption have not been via housing allocations in the Borough Plan as many of those are yet to deliver completions. This would indicate that a 22dpa windfall allowance (utilised for the adopted Borough Plan and Housing Trajectory) is very conservative and a higher figure may be expected.

Employment land

- 7.28 In terms of employment land need, IcenI have modelled employment land needs over the proposed plan period. Economic forecasts project economic growth of almost £800m between 2021-2039, with an increase of 5,000 jobs in the Borough. This sees employment in the Borough recovering to pre-pandemic levels in 2024 and growing broadly in line with the long term trends, with 3,800 jobs created between 2024-2039.
- 7.29 IcenI's analysis indicates a very strong demand for industrial and warehouse/distribution premises in the Borough over the plan period. Utilising a 5 year 'completions trend' projection, this indicates a need of 35,300m² for industrial land and 293,900m² of warehousing/distribution land. Accounting for a 0.5 ratio of developable land for industrial land and a 0.4 ratio for warehousing and distribution, this delivers a total need of 7.1ha of industrial land and 73.5ha of warehousing/distribution, equating to an overall employment land need for Nuneaton and Bedworth Borough of 80.5ha.
- 7.30 The strategic employment allocations set out in Policy DS6 deliver 79.3ha of employment land. This excludes any windfall proposals. Based on IcenI's analysis of gross completions of employment land within the Borough over the last 10 years, an average of 1.08ha per annum of windfall employment land has been delivered. This is expected to be a proxy for future years. Subsequently, this is expected to provide additional employment land capacity to meet the remaining 1.2ha shortfall and will likely offer additional capacity/resilience should there be additional demand over the 80.5ha target.

- 7.31 As per Icení's report, the need for strategic warehousing will need to be established at sub-regional level and further discussions are to take place in terms of how this is to be distributed. Based on past trends, the delivery of strategic warehousing in the Borough has been relatively low and the extent of Green Belt restricts opportunities for delivering further employment land of sufficient scale to deliver strategic warehousing to serve sub-regional need. Further constraints analysis would need to be undertaken at sub-regional level to determine the potential scope for accommodating strategic warehousing for each local authority area.
- 7.32 Icení's analysis indicates relatively weak demand for office development in the Borough, with likely demand for occupation by small and medium sized enterprises. This is due to the availability of high quality office space in other authority areas, with limited demand and delivery of office space in the Borough over the last 10 years. Icení's analysis estimates a potential office need for the Borough of 2ha up to 2039. Again, any such demand is likely to be delivered as windfall development. The provision of office space is a focus for the emerging Transforming Nuneaton and Transforming Bedworth regeneration initiatives and it is expected that these will at least offer significant contributions towards the 2ha target. Additional office space is also likely to be delivered on some of the larger strategic employment allocations to complement industrial or distribution/warehousing activities.

Gypsies and Travellers

- 7.33 Under the 2004 Housing Act, the council is required to produce an assessment of the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople, and then identify and plan for the provision of permanent and transit sites to meet those needs.
- 7.34 The 2021 Gypsy, Traveller and Travelling Showperson Accommodation Assessment has been used to calculate the number of pitches and plots required by 2036/37 and the Gypsy and Traveller Site Allocations Development Plan Document (due to be adopted in 2023) uses this as the basis for setting out the need and where the need will be met. The accommodation assessment will be updated every five years and these subsequent updates will be used to calculate the number of pitches and plots required in the future and, if necessary, these will in turn be used to update this separate DPD.

Cemetery Land

- 7.35 The Open Space Strategy 2011 - 2021 identified a need for additional burial space for the next 50 - 100 years. A review of additional burial space capacity

is due to be undertaken but latest estimates are that there is insufficient burial space capacity to meet the Borough's needs over the plan period. It is therefore proposed that land is safeguarded for burial space over the plan period and beyond. This is address further in Policy CEM-1.

Borough Plan objectives

7.36 This policy delivers the following Borough Plan objectives:

- Objective 1
- Objective 2
- Objective 4

Evidence base

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

- Icen Projects (2022) *Housing and Economic Development Needs Assessment for Nuneaton and Bedworth Borough.*
- NBBC (2021) *Nuneaton and Bedworth Housing Trajectory.*
- NBBC (2021) *Nuneaton and Bedworth Authority Monitoring Report 2020/21.*
- Arc4 (2021). *Nuneaton and Bedworth Borough Gypsy and Traveller and Travelling Showperson Accommodation Assessment.*
- Cushman and Wakefield (2022) *Retail, Leisure and Office Study for Nuneaton and Bedworth Borough.*
- Nuneaton and Bedworth Borough Council (2011) – *Open Space Strategy 2011-2021.*

Delivery mechanisms

7.38 The delivery mechanisms for this policy are as follows:

- The Economic Development Strategy will include a work programme to assist in the delivery of strategic employment sites and town centre projects as well as proactively attracting investment.
- Gypsy and Traveller Site Development Plan Document (due to be adopted in 2023 and as per any subsequent updates).
- Maintenance of a 5 year supply and delivery of the housing target for the plan period.
- Work in partnership with landowners and agents.

Monitoring

7.39 The indicators and targets that will be monitored for this policy are outlined in Table 3.

Monitoring ref	Indicator	Target
DS4a	Housing completions	9,690 dwelling completions
DS4b	Development of employment land	82.8 ha of land is developed for employment uses
DS4c	Gypsy and Traveller accommodation	14 residential pitches provided.
DS4d	Housing land supply	Continuous five year land supply of housing

Table 3: Indicators and targets to be monitored for Policy DS4

Policy DS5 – Residential allocations

The following sites will be allocated for residential development and associated infrastructure uses as shown on the proposals map (strategic allocations) and in Appendix A (non-strategic sites).

Strategic Housing Allocations

Strategic Housing Allocation (SHA)	Site name	Alternative site ref	Dwellings
SHA-1	Top Farm	WED-4	1700
SHA-2	Arbury	ARB-4	1525
SHA-3	Judkins	ABB-2	400
SHA-4	Hospital Lane	HEA-4	398
SHA-5	West of Bulkington	BUL-12, BUL-13, BUL-14	348
SHA-6	Hawkesbury Golf Course (remaining land)	POP-3	176
SEA-6	Bowling Green Lane	HEA-1	150 (remainder as employment)
SEA-2	Wilsons Lane	EXH-6	73 (remainder as employment)

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

Monitoring

7.47 The indicators and targets that will be monitored for this policy are outlined in Table 5.

Monitoring ref	Indicator	Target
DS6a	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report.	82.8 ha of land is developed for employment uses.

Table 5: Indicators and targets to be monitored for Policy DS6

Policy DS7 - Green Belt

Development in the Green Belt

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

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

Any development proposals considered not inappropriate for locating within the Green Belt should demonstrate how their plans will retain the five key purposes of the Green Belt. Any proposed development in Green Belt will need to maintain openness and demonstrate compensatory improvements to the environmental quality and accessibility of the land.

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

7.48 Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt which was initially established in 1975 and covers almost 1500 sq m, surrounding the Black Country, Coventry, Birmingham and Solihull. The Borough contains large amounts of Green Belt land, most of which is located to

the south of Nuneaton, and also surrounds the main areas of Bedworth, Bulkington and Ash Green.

- 7.49 Nationally, the government attaches great importance to the Green Belt, which serves the main goal of preventing urban sprawl and keeping land permanently open.
- 7.50 The five key purposes of Green Belts are:
- to check the unrestricted sprawl of large built-up areas,
 - to prevent neighbouring towns merging into one another,
 - to assist in safeguarding the countryside from encroachment,
 - to preserve the setting and special character of historic towns,
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Alterations to the Green Belt boundary

- 7.51 Alterations to the Green Belt boundary are only approved in exceptional circumstances and must be done during the local plan making process.
- 7.52 For the adopted Borough Plan (2019), Green Belt release was considered necessary to meet the overall housing and employment needs determined at the time. The objectively assessed need for the Borough, which was informed by demographic based need, supporting economic growth, improving affordability, and accommodating overspill from Coventry's unmet need, delivered an average housing need figure of 735 dwellings per annum. Based on the limited capacity/few approved planning applications available and the need to deliver a sustainable development strategy for the Borough with the Coventry overspill, the Inspector considered that there were exceptional circumstances to justify Green Belt release at the time. The main evidence base used to base decisions on Green Belt release was the Joint Green Belt Study (2015), which assessed all Green Belt parcels in the sub-region and the contribution they made to the five purposes³¹ of the Green Belt as set out in national guidance.
- 7.53 Sites that were released from the Green Belt through the 2019 Borough Plan offer significant housing and employment capacity for the Borough Plan Review plan period. Having regard to those sites, existing permissions, sites submitted through the 'call for sites' process and the up-to-date assessment of housing need, it is considered that exceptional circumstances do not exist to justify further Green Belt release.

³¹ LUC (2015). *Joint Green Belt Study*.

7.54 Additional sites may be required to be removed from the Green Belt to provide pitches for Gypsy and Travellers in order to meet the identified pitch requirements. This is addressed in the Gypsy & Traveller Development Plan Document (due to be adopted in February 2023).

Development in the remaining Green Belt

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

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

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

Borough Plan objectives

7.57 This policy delivers the following Borough Plan objectives:

- Objective 7
- Objective 8.

Evidence base

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

- LUC (2015). *Joint Green Belt Study*.
- Nuneaton and Bedworth Borough Council (2016). *Strategic Housing Land Availability Assessment (SHLAA)*.

Delivery mechanisms

7.59 The delivery mechanisms for this policy are as follows:

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

Monitoring

7.60 The indicators and targets that will be monitored for this policy are outlined in Table 6.

Monitoring ref	Indicator	Target
DS7a	Number of applications granted planning permission in Green Belt land although considered inappropriate development	Zero

Table 6: Indicators and targets to be monitored for Policy DS7

Policy DS8 – Monitoring of housing delivery

The council will monitor the delivery of housing and publish progress against the trajectory. 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, particularly of the two largest strategic sites, to review the requirements and phasing of infrastructure provision, where such re-phasing would assist with viability.
- Working with developers, site promoters and other interested parties to help unlock potential sources of funding for identified infrastructure, 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 brought 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.

9.42 The delivery mechanisms for this policy are as follows:

- Adopted supplementary planning document on affordable housing.
- Work with the council’s Housing team to seek to negotiate with developers for suitable tenure, types and sizes of affordable housing that are viable and meet current local need.

Monitoring

9.43 The indicators and targets that will be monitored for this policy are outlined in Table 8.

Monitoring ref	Indicator	Target
H2a	Developments of 11 to 14 dwellings and 15+ dwellings where 2 units and 25 % respectively of affordable housing is negotiated	100 %
H2b	Intermediate affordable housing completions	Percentage of intermediate dwellings per annum as required
H2c	Social or affordable rented housing completions	Percentage of social or affordable rented dwellings per annum as required

Table 8: Indicators and targets to be monitored for Policy H2

Policy H3 – Gypsies and Travellers

Provision for Gypsy and Traveller pitches is expected to be delivered in line with the Gypsy and Traveller Site Allocations DPD. Outside of the allocations in the DPD, permission will be granted where there is a demonstrable need for the development and the development satisfies all relevant development plan policies. The following criteria will be used to determine suitable sites for new gypsy and traveller pitches if there is insufficient provision to meet the minimum needs identified in Strategic Policy GT1 – Overall Need of the Gypsy and Traveller Site Allocations DPD.

1. The number of pitches or plots is relative to the size and scale of the site.
2. The number of pitches or plots is relative to the size and density of the surrounding settled community.
3. The site is not located in areas of high flood risk.
4. The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets.
5. The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected.

6. The site has suitable access to the highway network.
7. The site is located where air or noise pollution will not affect the health and well-being of site residents, and neighbouring uses will not be affected by air or noise pollution as a result of the Gypsy and Traveller development.
8. The site is accessible to town and district centres, local services and facilities such as schools and health facilities, fresh food and employment, by walking, cycling and public transport, in line with 'Policy TC3 - Hierarchy of centres', or it can be demonstrated that the site is sustainable in other ways.
9. The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made, in consultation with Severn Trent and the Environment Agency.

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

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

9.46 The 2021 Gypsy, Traveller and Travelling Showperson Accommodation Assessment showed a need to find an overall requirement for 20 permanent pitches for the period up to 2036/37 and no need for transit pitches for the same period⁴⁵. This need and how it would be met through the allocation of land for new pitches is set out in a separate Gypsy and Traveller Site Allocations DPD. This separate DPD sets out a strategy for the location of new gypsy and traveller pitches and the locations within which it is preferred that new pitches are provided. The criteria in Policy H3 will be applied if insufficient provision is found to meet the minimum needs identified in the DPD then Policy H3 – Gypsies and Travellers of the Borough Plan in order to determine the acceptability of those windfall proposals.

Borough Plan objectives

9.47 This policy delivers the following Borough Plan objectives:

- Objective 4.

Evidence base

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

⁴⁵ Nuneaton and Bedworth Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2021 Update (2021) (*final Report May 2021.*)

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

Delivery mechanisms

9.49 The delivery mechanisms for this policy will be as per the Gypsy and Traveller Site Allocation Development Plan Document (due to be adopted in 2023).

Monitoring

9.50 The indicators and targets that will be monitored for this policy are outlined in Table 9.

Monitoring ref	Indicator	Target
H3a	Gypsy and traveller accommodation.	11 residential pitches provided.
H3b	Unauthorised pitches.	None.
H3c	Unauthorised encampments.	None.
H3d	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report	A minimum of six additional residential pitches permitted and available for use by 2025/26 and a minimum of 11 additional residential pitches permitted and available by 2036/37.

Table 9: Indicators and targets to be monitored for Policy H3