

BOROUGH PLAN BACKGROUND PAPER – Scale and Location of Growth & Settlement Hierarchy and Roles

NUNEATON AND BEDWORTH BOROUGH COUNCIL

2015

Contents

Introduction..... 3

National Planning Policy Framework 3

 National Planning Policy Framework 3

The Scale of Growth 4

 Housing..... 4

 Employment Land 5

 Town Centres..... 6

Determining the appropriate locations to meet housing and employment land needs 9

 Housing..... 9

 Submission - Stage 1 Overarching Principles 10

 Submission Stage 2 Detailed Criteria 12

 Employment Land 17

 Town Centres..... 21

Settlement Hierarchy 21

Appendix A – Housing Sites Assessed at final site assessment stage for Preferred options 22

Appendix B – Bedworth Woodlands 23

INTRODUCTION

The purpose of this technical paper is to draw together the key datasets/ information that have been used in developing the Scale and Location of Growth and the Settlement Hierarchy and roles.

NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework (NPPF) sets out the fundamental planning requirements that need to be considered through the planning process, the table below highlights the key points relating to this topic from the NPPF and how the policy for the Borough Plan as a whole, is meeting this requirement.

National Planning Policy Framework

NPPF Requirement	NPPF sub-requirement	Relationship with policy
Paragraph 156 <i>“Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include policies to deliver:</i>	<i>The homes and jobs needed in the area”</i>	This policy recognises the need to meet the objectively assessed need for and meets the need.
Paragraph 161 <i>“Local planning authorities should use this evidence base to assess:</i>	<i>The needs for land or floorspace for economic development, including the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including retail and leisure development”</i>	The policy identifies land to meet floorspace requirements in relation to employment land.

THE SCALE OF GROWTH

Housing

In November 2011 the Council set a housing development target of 7,900 and a jobs growth target of 1.5% (equating to 75ha of employment land¹) as the basis for undertaking work on the Borough Plan. This followed a decision to review the development targets for the Borough after the abolition of the Regional Spatial Strategy. To identify a more localised set of targets Oxford Economics were commissioned to develop an input-output based econometric model that would enable different levels of jobs growth to be tested and the implications of that growth (in terms of job creation, unemployment, commuting patterns, population change and housing requirements) to be assessed. In very simple terms, the model works by identifying the number of jobs required to achieve a target level of growth – 5 target scenarios were tested (a baseline of 0.3% growth, 0.5%, 1%, 1.5% and 2%). The jobs are then apportioned to different sectors in line with national trends, local specialisms and future aspirations. Consideration is then given to who will take up the jobs – residents, commuters or migrants moving into the area. The estimated impacts on the housing market were then assessed.

The housing and employment targets were consulted on during the summer of 2013 as part of the consultation on the Borough Plan Preferred Options.

In November 2013 (post the Preferred Options consultation) a Strategic Housing Market Assessment (SHMA) for the Coventry and Warwickshire Housing Market Area was completed. This identified an objectively assessed need of 9,900 for Nuneaton and Bedworth for the period 2011-2031. For the sub-region as a whole the figure was 76,000. The study was reviewed in September 2014 following the release of the ONS sub national population projections. This identified a housing market area need of 80,080. For Nuneaton and Bedworth the figure identified was 8,440 however through the shadow Economic Prosperity Board (EPB) (which was endorsed by the Council on 4th February 2015) it was agreed that the distribution identified in the November 2013 study should be used as the basis for plan making within the sub-region. This is because the distribution identified in the September 2014 study was unlikely to be deliverable. In September 2015 a further update to the SHMA was undertaken which identified a need of 8, 580 dwellings for Nuneaton and Bedworth. However factoring in economic uplift and supporting affordability the objectively assessed need for the Borough amounts to 10, 040. The table below summarises the changes since the Preferred Option stage plan.

Month/ Year	Status of Plan	Sub Regional Housing Market Area Need	Objectively Assessed Need for Nuneaton and Bedworth	Agreed Need for Borough
2013 (Summer)	Preferred Options	Not applicable – forecast was	7900	7900

¹ Inclusive of a 20ha buffer.

Month/ Year	Status of Plan	Sub Regional Housing Market Area Need	Objectively Assessed Need for Nuneaton and Bedworth	Agreed Need for Borough
		generated on local basis		
2013 (November)	Post Preferred Options consultation	76, 000	9, 900	
2014 (September)	Post Preferred Options consultation	80, 080	8, 440	9, 900
2015 (September)	Post Preferred Options consultation	88, 160 (91, 960 factoring in economic and improving affordability)	8, 580	10, 040 (due to economic uplift and improving affordability)

Employment Land

In November 2011 the Council set a jobs growth target of 1.5% (equating to 75ha of employment land^[1]) as the basis for undertaking work on the Borough Plan. This aligns with the process of calculating the housing figures for the Preferred Options consultation.

The housing and employment targets were consulted on during the summer of 2013 as part of the consultation on the Borough Plan Preferred Options.

In November 2013 a SHMA for the Coventry and Warwickshire Housing Market Area was completed which has an impact on the employment needs of the area. This identified an objectively assessed housing need of 9,900 for Nuneaton and Bedworth for the period 2011-2031. As stated above, this level of growth was subsequently supported through the shadow Economic Prosperity Board (EPB) (which was endorsed by the Council on 4th February 2015) and it was agreed that the distribution identified in the November 2013 study should be used as the basis for plan making within the sub-region.

As part of the process of demonstrating a balanced link between the amount of housing planned for and the amount of employment land that is allocated the economic land growth target has also been reviewed following the completion of the SHMA. Using the housing target of 9,900 dwellings in the SHMA generates a comparable jobs growth target of 0.7% which equates to the allocation of 52ha of employment land (outputs from development forecasting work associated with employment work are located in the Employment Land Review 2014). The 52ha

^[1] Inclusive of a 20ha buffer.

includes an additional 21ha that has been added to take account of land being removed from the existing employment land portfolio.

When subtracting the existing completions and commitments that have occurred from 2011 the Council will need to allocate a further 31ha. The proposed allocation (51 ha) is in excess of the 31ha requirement. However the proposed allocation is considered to:

- Offer a wider employment land portfolio for businesses/ developers to invest in which will assist in meeting the Council's economic objectives.
- Aligns with the NPPG in that the basis for employment land allocations should not simply focus on employment forecasts and should take account of qualitative information. Feedback during the commercial engagement of the ELR (2014) emphasised the need for a large employment land target.
- Takes account the Sub-Regional Employment Land Study which recommends releasing land on a phased basis to assist with meeting Coventry and Warwickshire Strategic Economic Plan requirements.

Town Centres

The NPPF (paragraph 23) states that planning policies should be positive and promote competitive town centre environments, as well as setting out policies for the management and growth of centre over the plan period. As the previous town centre growth figures proposed in the Borough Plan were RSS based, it was necessary to assess whether these figures were still appropriate for the Borough. The Council commissioned an update to the previous town centre and retail studies in order to gain an up-to-date view of the Borough's requirements. The retail and leisure update was undertaken by Strategic Perspectives and the office update by DTZ.

The retail and leisure study provided a strategic assessment of the quantitative and qualitative need for new retail (comparisons and convenience goods) floorspace and commercial leisure uses in the Borough and its two main centres, Nuneaton and Bedworth. The update helps to provide, "adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area" (NPPF, Paragraph 158) over the plan period. The assessment of the economic capacity for new retail floorspace within the Borough takes account of the different population projections by Experian and Oxford Economics, as well as the overall trading performance of existing retail floorspace and stores at the base year of 2013. The result of this provides Borough wide figures, as well as forecast capacity for Nuneaton and Bedworth town centres. As two different population projections were used along with considerations as to whether stores in the Borough were overtrading or not, a range of figures has been set out for convenience and comparison floorspace. The figures provided for the café, restaurant and bars capacity are indicative figures rather than a target level that needs to be achieved. The forecast need should be directed to Nuneaton and Bedworth town centres first to help increase competition and choice and stimulate their daytime and evening economy. The overall Town Centre requirements are scaled down in comparison to the Preferred Options to reflect what is considered a more realistic target.

However, meeting the forecasted need is dependent on the level of market demand and confidence in the centre. For other leisure activities in the Borough, it is likely

that existing facilities will absorb the demand from a growing population and that any forecast capacity will be dependent on the level of market interest and demand. If demand does exist leisure uses should be directed to the town centres in order to strengthen the daytime and evening economy by increasing footfall, linked trips and spend. This would also stimulate market interest from other operators seeking space in the town centre.

The town centre office requirements study provides an updated estimate of the likely future office space requirements in the Borough's main town centres, taking account of market demand and supply dynamics. The report concluded that the previous target of 30,000sqm is unlikely to be required within the plan period. It also suggests that little new office floorspace will be realised in the early part of the plan period. The report recommends a figure of 15,000sqm of office floorspace in order that the target for the Borough Plan remains aspirational, but more realistic, by taking account of the current economic climate and current impediments to delivery.

Preferred Options Town Centre requirements

- 30, 000 sq.m of office floorspace within Nuneaton Town Centre
- For retail floorspace:

Sqm (gross)	Comparison ²		Convenience ³	
	2006 - 2021	2021 – 2026	2006 - 2021	2021- 2026
Nuneaton	20,000	10,000 - 15,000		
Bedworth	2,500	1,250 - 1,875		
District & Local Centres	2,500	1,250 - 1,875	1,350 - 2,750	650 - 1,300

Submission Town Centres requirements:

Office, retail and leisure capacity forecasts:

- 15,000sqm of office floorspace
 - Nuneaton 13,000sqm -14,000sqm
 - Bedworth 1,000sqm - 2,000sqm
- 13,470sqm - 16,460sqm of comparison floorspace
 - Nuneaton 11,420sqm - 13,950sqm
 - Bedworth 1,570sqm - 1,925sqm
- 1,750sqm - 3,580sqm of convenience floorspace
 - Nuneaton 910sqm - 2500sqm
 - Bedworth 460sqm - 540sqm
- 2,666sqm - 3,065sqm of café, restaurant and bar floorspace
 - Nuneaton 2,324sqm - 2,672sqm
 - Bedworth 324sqm – 393sqm

² **Comparison retailing** is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

³ **Convenience retailing** is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.

DETERMINING THE APPROPRIATE LOCATIONS TO MEET HOUSING AND EMPLOYMENT LAND NEEDS

The Preferred Options housing allocations were identified through a three stage process (see 'Strategic Housing Site Selection Paper' associated with the Preferred Options). Since the Preferred Options the changes in housing numbers as well as the review of evidence has resulted in the need for additional housing allocations and changes in employment land allocations.

Housing

The process to identify strategic housing sites focused on:

- Taking account of new evidence on the scale of growth, infrastructure requirements, historic environment and biodiversity;
- The need to identify extra land capacity to meet updated housing targets;
- To review the approach to distribution;
- To take account of comments made during the Preferred Options consultation;
- To assess sites promoted through the Preferred Options Borough Plan consultation and as a result of the 'Call for Sites'.

From a housing perspective, the sites consulted on during the Preferred Options were reassessed to:

- a) Consider whether they were still deliverable and suitable
- b) Consider whether they could be expanded or accommodate additional growth

In addition those sites that were ruled out prior to the Preferred Options (see Appendix A for 10 sites that were assessed) were re-assessed. Sites submitted through the call for sites in the SHLAA were also considered.

The overarching aim of the site selection process is to identify sites in sustainable locations that will contribute towards meeting the Spatial Objectives of the Plan. For this reason Green Belt land was assessed alongside other greenfield land as it was not known whether there would be sufficient capacity in sustainable locations on non Green Belt greenfield land.

It is recognised that exceptional circumstances are required to release Green Belt land for development. The following exceptional circumstances are considered to be relevant:

- To achieve sustainable development;
- The need to promote sustainable patterns of development and identify sites in sustainable locations;
- The Green Belt does not meet all the purposes of Green Belt in this location;
- To meet objectively assessed need for housing;
- The need to distribute development across the main settlements in the Borough.

Submission - Stage 1 Overarching Principles

The five overarching principles used as criteria to assess potential land for new development in Stage 1 are set out below. This section also shows how the criteria were reviewed for the Submission stage.

Criteria	Preferred Options	Submission
1. An Economically Driven Plan that Meets the Needs of Nuneaton and Bedworth	A Borough Plan that focuses on meeting the needs of, and benefits, Nuneaton and Bedworth Borough. The Plan will be driven by economic aspirations to create a strong, diverse and growing economy with housing development and investment in infrastructure having an enabling role to achieve this aspiration.	It is recognised through the Duty to Co-operate that the Council will need to consider the economic and housing needs of the wider housing market area.
2. Settlement Hierarchy and Role	<p>A settlement hierarchy that recognises the current role and function of different settlements in terms of employment, retail, leisure, services and other infrastructure.</p> <p>The following hierarchy of settlements is suggested:</p> <ol style="list-style-type: none"> 1. Nuneaton 2. Bedworth 3. Bulkington 4. Keresley, Ash Green/Neals Green <p>Development will be directed to Nuneaton as a priority. Other development will reflect the role and function of the settlement in the hierarchy and its ability to accommodate change.</p>	It is recognised that there may be a need to develop sites in lower order settlements.
3. Urban Focus with Urban Extensions	Development focused on the existing urban area but not at the expense of 'town cramming'. This will be	It is recognised that there may not be sufficient capacity on strategic sites and so smaller sites may

Criteria	Preferred Options	Submission
	<p>achieved for instance by:</p> <ul style="list-style-type: none"> • Protecting and enhancing important open spaces and historic assets (such as conservation areas) • Bringing back into use derelict and contaminated land • Minimising the impacts on air quality • Maximising opportunities to link in to the Green Infrastructure Network (eg by using rivers and canals as attractive focal points for open space) • Ensuring there are no serious impacts on local infrastructure. <p>It will not be possible to accommodate all the new growth within existing urban areas. A limited number of sustainable strategic urban extensions on Greenfield sites will also be required. Strategic urban extensions offer the best opportunity of facilitating the delivery of the infrastructure required to support the growth.</p>	<p>be required to ensure that the development targets are met.</p>
<p>4. Protecting Green Belt Land</p>	<p>Protect from development land that most closely adheres to the 5 purposes of Green Belt designation as determined by the National Planning Policy Framework. This would mean that Green Belt performing 4 of the 5 functions of Green Belt, identified and evidenced in the Coventry Joint Green Belt Study or Land Use</p>	<p>No change. It is recognised that sites within the Green Belt will require exceptional circumstances for release.</p>

Criteria	Preferred Options	Submission
	Designations Study would not be considered for development.	
5. Maintain Separation of Settlements	Maintain a strategic gap between the 3 settlements within the Borough, between Nuneaton and Bedworth and Coventry and between Nuneaton and Hinckley, to retain the distinct identity of different settlements.	No change.

For the Submission, sites promoted through the consultation on the Preferred Options Borough Plan and the 'Call for Sites' were assessed against the overarching principles. Those that are inconsistent with the revised overarching principles were excluded from further assessment.

The Potential Development Areas have not been re-assessed at Stage 1 as no changes have been made that would exclude these sites from being assessed at Stage 2.

Submission Stage 2 Detailed Criteria

The detailed criteria are based around the strategic objectives of the Plan but also taking account of national policy including sustainable development principles. The criteria remained the same as for the Preferred Options stage but some changes have been made to the scoring to take account of new evidence. Also, three new criteria have been added to the assessment:

- Is the site compatible with the scale of the settlement?
- Is the site large enough to provide affordable housing?
- If the site is located in the Green Belt, will the site leave a defensible Green Belt boundary?

Sites that were not excluded at Stage 1 were assessed against the detailed criteria.

Review the capacity of the strategic sites

The site capacity of Arbury (HSG2) and North of Nuneaton (HSG1) are less than the land area can accommodate. Overall, there may be capacity for up to 1395 dwellings.

- The site at Arbury is currently earmarked for 1000 dwellings and supporting infrastructure. The area could accommodate up to 1795 dwellings and supporting infrastructure. This could give an extra capacity of up to 795 dwellings. However, there are issues relating to the impact of development on Ensor's Pool SAC/SSSI and Arbury Hall Grade II* Registered Park and Garden that may limit the capacity of the site.

- The site at North of Nuneaton is currently earmarked for up to 3000 dwellings and supporting infrastructure. The site could accommodate up to 3800 dwellings and supporting infrastructure. This is an extra 800 new homes.

Site	Maximum additional Dwelling Capacity
SHS2 Arbury	+ 795
SHS4 North of Nuneaton	+ 800
Total	+ 1595

1. The pros, cons and risks for expanding these sites are set out below:

Option 1		
Pros	Cons	Risks
<p>The land take was identified in the Preferred Options but not needed in total. There is capacity for up to 1595 dwellings.</p> <p>No change to locational strategy.</p> <p>Much work has been carried out to understand infrastructure requirements for these sites and infrastructure providers have not identified a tipping point at which development is not deliverable.</p>	<p>Will further concentrate development to Nuneaton.</p> <p>This option on its own will not deliver the shortfall.</p>	<p>Ensor's Pool and historic environment constraints may limit the capacity of SHS2 Arbury.</p> <p>Planning applications on parts of HSG1 North of Nuneaton are at a lower density than initially calculated.</p>

Reconsider sites recommended 10 Preferred Options sites

Following the re-assessment, two further potential development areas are considered to be suitable for further consideration:

- PDA 6 Bedworth Woodlands. This site could accommodate 1223 new homes and supporting infrastructure.
- PDA 8 Wilsons Lane, Exhall. This site could accommodate 298 new homes and supporting infrastructure.

The capacity of these sites has been reviewed in the light of new information. For example, at Bedworth Woodlands, a new local wildlife site has been designated. This reduces the land area available for new development. Parts of these sites, but not all, were promoted by landowners through the Preferred Options consultation and Call for Sites.

Site	Dwelling Capacity
PDA6 Bedworth Woodlands	1223
PDA 8 Wilsons Lane, Bedworth	298

Total	1521
--------------	------

2. The pros, cons and risks for Option 2 are set out below:

Pros	Cons	Risks
<p>Considerable work has been undertaken to indicate the suitability of these sites.</p> <p>Provides a wider housing offer for Bedworth.</p> <p>May increase potential for maintaining five year land supply as wider range of sites.</p> <p>No change to locational strategy.</p> <p>The site at Bedworth Woodlands is not Green Belt land.</p>	<p>Additional infrastructure needs will need to be assessed in taking these sites forward</p> <p>This option on its own will not deliver the shortfall.</p>	<p>Biodiversity constraints and/or mitigation may further limit the capacity of Bedworth Woodlands.</p> <p>Deliverability is uncertain as only small parts of the site were promoted through the Preferred Options consultation or Call for Sites.</p> <p>Wilsons Lane, Exhall may be more suited to employment development.</p>

Further information about the Woodlands site can be found at Appendix B.

Alternative Sites promoted through Preferred Options Consultation and Call for Sites:

About 80 sites were promoted by landowners for consideration either through the consultation on the Preferred Options Borough Plan or through the Call for Sites in February and March 2014. Not all the sites submitted were promoted for residential use and in some cases the same site was submitted on more than one occasion.

The alternative sites underwent the Stage 1 and Stage 2 assessments. After consideration of the assessment work the following recommendations are made. The sites recommended for development have been the subject of a sustainability appraisal and habitat regulations assessment.

Sites Recommended for Development			
Site	Dwelling Capacity	Pros	Cons
For site locations see Strategic Housing Land Availability Assessment (2013)			
NB31 Land at Attleborough (NUN137)	281	Not Green Belt	Flood zones – can be avoided Grade 2 Agricultural land. Nuneaton

Sites Recommended for Development			
Site	Dwelling Capacity	Pros	Cons
For site locations see Strategic Housing Land Availability Assessment (2013)			
NB34 Land rear of 222 The Long Shoot (NUN165)	120-131	Not Green Belt Planning permission is approved subject to S106 for 120 dwellings	Lack of integration Nuneaton
NB 20 /119 Hawkesbury Golf Course and Blackhorse Road, Bedworth (NUN119, NUN147 & NUN181). This is PDA9.	240-486	Bedworth Planning applications made	Green Belt Mineshafts Medieval village Hazard area Integration
NB13 /14 /37 /107 Land between Coventry Road and Bedworth Road, Bulkington (NUN199, NUN151, NUN173 & NUN169)	389	No major constraints	Green Belt Bulkington less accessible
	1030-1287		

Sites Suitable in Principle with the exception of a lack of defensive Green Belt boundary (including sites that are out of scale but could be made smaller). At this stage, the sites are not recommended for development but may be considered if further additional land is required.			
Site	Dwelling Capacity	Pros	Cons
NB5 Land at Blackberry Lane, Ash Green (NUN133)	321		Out of scale for Ash Green but smaller site Lack of defensible GB boundary
NB 12 Burbages Lane, Neals Green (NUN162 & NUN222)	65		Potential LWS Lack of defensible GB boundary
NB26 Burbages Lane / Wheelwright Lane, Neals Green (NUN286)	77	No known constraints	Lack of defensible GB boundary
NB40 Between St Giles Road and A444 (NUN122 southern portion)	402		Flood zones – can be avoided Out of scale for Ash Green but smaller site Lack of defensible

Sites Suitable in Principle with the exception of a lack of defensive Green Belt boundary (including sites that are out of scale but could be made smaller). At this stage, the sites are not recommended for development but may be considered if further additional land is required.			
Site	Dwelling Capacity	Pros	Cons
			GB boundary
NB49 Land off Golf Drive, Nuneaton (part NUN275)	178		Nuneaton Surface water flooding Grade 2 agricultural land Lack of defensible GB boundary
NB54 Rear of 28-48 Burbages Lane, Ash Green (New)	37	Partly garden land/paddock	Grade 2 agricultural land Lack of defensible GB boundary
NB69 North of Oberon Close, Nuneaton (NUN275)	285		Lack of defensible GB boundary
NB70 Exhall Road, Keresley (NUN178)	116		Lack of defensible GB boundary Should not join Keresley and Ash Green

The pros, cons and risks for this option are set out below:

Pros	Cons
<p>Potential to meet the housing needs for the lower tier settlements recognising that some of these settlements make use of the offer of Coventry in terms of shops, services and facilities. These are therefore considered to be sustainable locations.</p> <p>May increase potential for maintaining five year land supply as wider range of sites.</p>	<p>Infrastructure providers prefer concentrating new infrastructure for larger sites rather than spreading across a large number of sites.</p> <p>Change to locational strategy.</p>

Recommendations for the Submission

The Strategic Housing Sites from the Preferred Options should continue to be allocated. In addition, the Northern site taking account of the pros, cons and risks of the options for meeting the shortfall, the following is considered the most sustainable and deliverable way to meet the Objectively Assessed Needs of the Borough.

- North of Nuneaton (3530 dwellings) (HSG 1)
- Arbury (1000 dwellings) (HSG 2)
- Gipsy Lane (518 dwellings) (HSG 3)
- Woodlands (1223 dwellings) (HSG 4)
- Hospital Lane (676 dwellings) (HSG 5)
- School Lane (298 dwellings) (HSG 6)

This amounts to 7, 245, the remainder of the 10, 040 is made up from housing completions since 2011 and commitments as well as urban sites that are deemed deliverable through the SHLAA (see the Authority Monitoring Report and 5 year land supply for more information).

Employment Land

The Employment Land Review 2014 undertook a full review of potential employment site allocations, these were based on the Preferred Options allocations as well as the call for sites process.

The table below summaries the key findings from the assessment of proposed sites (full site appraisals are located in Appendix I of the Employment Land Review). The sites are displayed from a 'total score' perspective, however, recommending sites on the basis of a score was viewed to be overly simplistic. For every site there are issues to address or consider which need to be factored in to a need to identify a set of sites to meet the Borough requirements. The Borough Plan is strategic, consequently, it is recommended that only sites over 3 hectares be taken forward in the Plan. The Preferred Options sites vary in terms of their performance, with ECO 2 and 3 still scoring well, however ECO 1 scores poorly. Based on this assessment it is recommended that ECO 1 is not taken forward within the Borough Plan. It is recommended that ECO 3 (referred to in the submission document as EMP 3) remain part of the portfolio of future sites. ECO 2 scores well however there are some site constraints, particularly regarding the HSE limitations and landscape scoring. This is likely to limit the amount/ type of employment land that can be accommodated on the site. However, during the commercial engagement this site was well received. Therefore, it is suggested that this remain part of the sites to be progressed in the Borough Plan. However, it is recommended that additional work be undertaken to understand the risks associated with the site and how this may reduce the overall site capacity. It is considered that the site size should be reduced and in the Submission version of the Plan only ECO 2a East is allocated (referred to in the Submission document as EMP 1)

The below set of sites were considered in the Employment Land Review as other potentially deliverable sites.

- Phoenix Way off A444

- North West Junction of Coventry Road/ Wilsons Lane combined with South of Wilsons Lane
- Land north of New Road
- Land at Barker's Farm, Newland Lane
- Land west of Bowling Green Lane
- Land east of Bowling Green Lane
- Land east of St Giles Road

These sites represent sound options for the Borough in meeting future employment requirements, although some do present issues regarding the coalescence of settlements. The allocation of ECO 2a East (referred to in the submission document as EMP 1) and 3 (referred to in the submission document as EMP 3) represents allocations in two different parts of the Borough, however 'Phoenix Way off A444' also offers very good economic potential without the concerns of coalescence of settlements. Consequently it was considered appropriate to allocate Phoenix Lane off A444.

Site Name	Site Area (ha)	Total Score
ECO3 (referred to in the submission document as EMP 3)	3.55	37
Land north of Winding House Lane	1.38	37
Phoenix Way off A444 (referred to in the submission document as EMP 2)	22.62	35
North west Junction of Coventry Road / Wilsons Lane	2.63	35
South of Wilsons Lane	2.3	35
ECO2	41.23	35
ECO2a EAST (referred to in the submission document as EMP 1)	24.17	35
Land north of New Road	28.58	35
Land at Barker's Farm, Newland Lane	18.17	35
Land west of Bowling Green Lane	20.86	35

Site Name	Site Area (ha)	Total Score
Land east of Bowling Green Lane	11.69	35
Land east of St Giles Road	23.01	35
North West junction of Coventry Road & Wilsons Lane, Exhall & South of Wilsons Lane, Exhall	4.93	35
Land east of Woodford Close	3.99	34
ECO2b WEST	17.06	34
Court Farm	24.5	33
West of Poplars Farm	3.32	33
East of Poplars Farm	40.13	33
McDonnell Drive site 2	0.6	33
Bowling Green Lane/St Giles Road	56.83	33
Land at Burbages Lane	2.2	33
Land west of Poplars Farm & Land east of the Poplars Farm	43.45	33
Newland Hall Farm, Newland Lane, Ash Green & Land north of New Road & Land at Barker's Farm, Newland Lane	72.22	33
McDonnell Drive, Bedworth (east and west)	0.84	33
Land at Woodford Close & Land at Bowling Green Lane and St Giles Road, Exhall	60.82	33

Site Name	Site Area (ha)	Total Score
Land North of St Giles Road	1.70	32
McDonnell Drive site 1	0.24	32
Judkins Quarry	5	31
Hazell Way / Bermuda Road	5.79	31
Land at Crowhill, Off Golf Drive, rear of Wentworth Drive (South)	7.91	31
Land at Crowhill, Off Golf Drive, rear of Wentworth Drive (North)	4.76	31
Lane at Whitestone Farm, Bulkington Lane	8.59	31
Land at Barker's Farm, Newland Lane	1.09	31
Land to the rear of Crowhill, off Golf Drive, Nuneaton, South & Land at Crowhill, off Golf Drive, Nuneaton North	12.67	31
Land at Barker's Farm, Newland Lane	10.7	30
Land at Barker's Farm, Newland Lane (combination sites)	40.37	30
Wood Barn Farm	4.33	29
Land at Whitestone Farm, Bulkington Lane	61.72	29
Land East of Coventry Welsh Rugby Club	0.32	28
Parrots Grove	2.55	27

Site Name	Site Area (ha)	Total Score
ECO1	15.96	27
Land at Whitestone Farm, Bulkington Lane	46.3	26
Newland Hall Farm, Newland Lane, Ash Green	32.94	26
Land at Whitestone Farm, Bulkington Lane (all sites)	116.61	26
The Croft, Park Lane	0.26	25

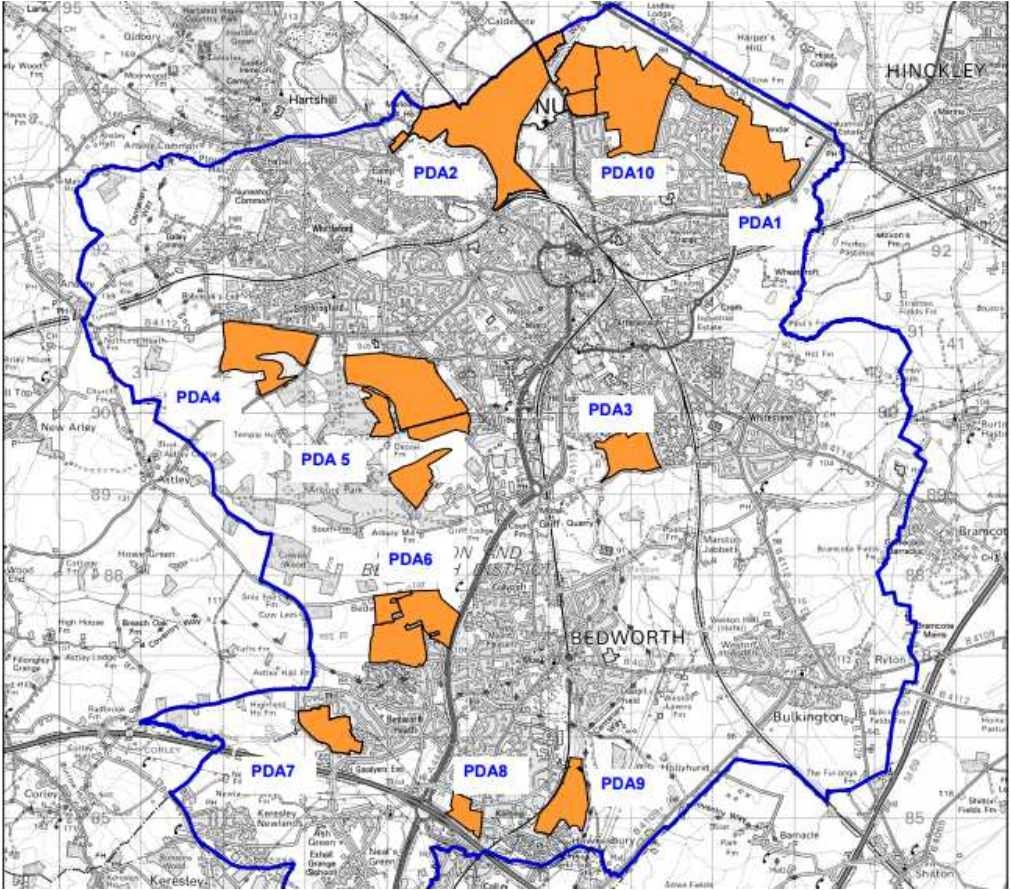
Town Centres

The delivery of Town Centre needs is addressed through policy NB 6.

SETTLEMENT HIERARCHY

The Settlement Hierarchy seeks to support the site allocations in the Borough. The hierarchy has been developed taking into account the existing roles and services offered by each location and as such seeks to direct non allocated developed to the appropriate settlement.

APPENDIX A – HOUSING SITES ASSESSED AT FINAL SITE ASSESSMENT STAGE FOR PREFERRED OPTIONS



APPENDIX B – BEDWORTH WOODLANDS

The Woodlands site has a long and complex history. In summary, although temporarily subject to Green Belt policy in the early 1980s (in the Green Belt Local (Subject) Plan for Warwickshire 1982), the site does not appear to have ever had full Green Belt status.

- In the 1989 Bedworth Local Plan it was designated Area of Restraint.
- In the 1993 Local Plan it was allocated for housing.
- Up until the Proposed Modifications stage of the 2006 Local Plan it was designated Area of Restraint.
- In the final adopted Plan in 2006 it was given a countryside designation.

In the process of preparing the 2006 Local Plan the Woodlands Action Group and CPRE put forward a case to have the Woodlands designated Green Belt. However it was considered at the time that the Local Plan was not the correct document in which to pursue this re-categorisation.

The 2006 Inspector's report states

'the Regional Spatial Strategy will take the place of the Structure Plan in this as in many other respects' (because of changes to the Planning system in 2004) and that 'If this were not to be so in this particular case, because the changes are too local to be part of regional planning strategy, the Council would be authorised to make the changes required under a future Local Development Framework'.

In December 2008 the Council resolved that the following motion be adopted "This Council confirms its long commitment that the Woodlands be returned to the Green Belt". This was reaffirmed at a meeting of the Council in April 2012. As a result Cabinet took the decision to include a proposal in the Borough Plan Preferred Options document to reflect this.

Green Belt Assessment

Purpose of Green Belt

The Nuneaton and Bedworth Land Use Designation Study Volume 3: Site Analysis and Selection (2011) assessed the Woodlands against the 5 purposes of Green Belt contained in national policy to identify the extent to which the site contributed to the functions of Green Belt. In summary, the purposes are to:

- Check the unrestricted sprawl of large built up areas
- Prevent neighbouring towns from merging into one another
- Assist in safeguarding the countryside from encroachment
- Preserve the setting and special character of historic towns
- Assist urban regeneration, by encouraging the recycling of derelict and other urban land.

The study concluded that the Woodlands performs 3 of the 5 identified functions of Green Belt in that it;

- prevents sprawl south-west north from Bedworth Heath and west from Bedworth
- restricts the countryside from encroachment from the north of Bedworth Heath
- contributes to urban regeneration by encouraging the recycling of derelict and other urban land.

It was considered that the site has moderate conformance with Green Belt criteria and is not considered appropriate for Green Belt designation.

Demonstrating Exceptional Circumstances

Paragraph 83 of the National Planning Policy Framework states that Green Belt boundaries should only be altered in exceptional circumstances. An assessment has been undertaken with reference to paragraph 82 of the NPPF to identify whether there are exceptional circumstances to justify designating the Woodlands as Green Belt. To prove exceptional circumstances there would be a need to:

- demonstrate why normal planning and development management policies would not be adequate
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary
- show what the consequences of the proposal would be for sustainable development
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas
- show how the Green Belt would meet the other objectives of the NPPF.

The findings of the assessment show that exceptional circumstances do not exist because in the context of the tests in paragraph 82 of the NPPF;

- There would be adequate protection afforded to the site by other policies within the Plan. This includes NB2: Scale and Location of Growth, NB19: Biodiversity and Geodiversity and NB25 Landscape Character.
- There has been no major change in circumstances that make the exceptional circumstance necessary.
- Designating the site as Green Belt may result in the loss of a sustainable location for development.
- There is no necessity and no risks from an adjoining Local Authority area.
- The site has environmental value but other policies in the Plan will provide the necessary protection.

Case Law

There is a significant amount of case law on the meaning of exceptional circumstances including *Carpets of Worth Ltd v Wyre Forest District Council* (1991), *Lang Homes Ltd v Avon County Council* (1993), *COPAS v Royal Borough of Windsor and Maidenhead* (2001) and *R (Hague) v Warwick District Council* (2008). The case law demonstrates that exceptional circumstances are required for any revision of a Green Belt boundary and that what is capable of amounting to exceptional

circumstances is a matter of law, and a plan-maker may err in law if they fail to adopt a lawful approach to exceptional circumstances.

Case law shows that there can be no exceptional circumstances to justify changing a Green Belt boundary unless it is necessary to change it; and it cannot be necessary to change it unless something has fundamentally changed since the boundary was drawn demonstrating that whilst a site did not fulfil a Green Belt function when the matter was last reviewed, it does now.

Conclusions

Policies contained in the emerging Borough Plan offer the Woodlands protection against any negative impact on the 3 Green Belt purposes that the site has been identified to meet. Designating the Woodlands as Green Belt is likely to result in the need to designate less sustainable locations for development. There are no exceptional circumstances that warrant the designation of Bedworth Woodlands as Green Belt and no change in circumstances to justify exceptional circumstances.