

Agenda Item No 6

Local Development Framework Sub-Committee

17 November 2025

Report of the Chief Executive

North Warwickshire Local Plan Review (Regulation 18) Issues and Options

1 Summary

- 1.1 The report brings the Draft Issues and Options, Regulation 18, for the review of the North Warwickshire Local Plan. The report seeks member approval to commence consultation from 18 November 2025 until 14 January 2026.

Recommendation to the Sub-committee:

- a That the Issues and Options (Regulation 18) be approved for consultation; and**
- b Any representations be reported back to the sub-committee as soon as possible after the close of the consultation.**

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Adopted Local Plan

- 3.1 The North Warwickshire Local Plan was adopted in September 2021.
- 3.2 Members will recall that at the meeting of this sub-committee on 1 July Members considered a report looking to see which policies within the adopted Local Plan require changing and a report on 9 September outlining the work moving towards an updated Local Plan.

4 Issues and Options Paper

- ...
- 4.1 The Issues and Options paper is attached as Appendix 1 of this report. It then has a set of appendices, A and B. Each of the adopted Local Plan policies are discussed with options listed below along with a question section. In addition, there is the identification of potential new policy areas. A brief outline of the policy or issue is provided along with some options and then some questions.
- 4.2 Each of the questions in the Issues and Options Papers will be part of the online response form. It is proposed to encourage as many responses as

possible via the online form as this will help to reduce the time for digitising the representations and getting them back to members. The representations made will be brought back to Members as quickly as possible.

- 4.3 In terms of site allocations it is important to note the Issues and Options paper is in the main not site specific. There are some site specifics mentioned in relation to some of the new policy areas and to some employment sites. These are provided as options.
- 4.4 Along side the Issues and Options Paper the call for sites information will also be published. This is so the range of sites that have been put forward for development can be viewed. This information has already been circulated to all Members with large scale plans being put into each of the Members rooms. It consists of a map and a list of the sites with reference numbers, size and the use being suggested. It must be stressed that no decision on which sites will be included in the future Local Plan has yet been taken as this will be part of the next stage of the plan forming the Regulation 19 stage. Which is in essence the Local Plan that will form the basis of a formal plan being submitted to the Planning Inspectorate for Examination in Public later in the year.

5 Duty to Cooperate

- 5.1 The Duty to Co-operate is particularly important in considering the wider than local issues. It is a legal requirement and must be fulfilled at the time of submission of the Local Plan. It cannot be retrospectively applied. The Local Plan if it does not meet and go through this gate the Local Plan will be found to be unsound even before discussion of the merits of the Local Plan can take place. Therefore, this is a key risk for the Council (and any other council) not following this requirement.
- 5.2 Although it is not an agreement to agree Local Plan Inspectors want proof of discussions and information setting out the issues. They need a clear indication of what is agreed and what is not. This will be provided through Statements of Common Ground with every organisation. Many will be with individual organisations, but some may be with group of organisations.
- 5.3 When working with organisations it has always been the view of this Council that being part of the process even if we disagree with the work or outcome is the right thing to do. However, just being part of the process does not mean that the Council agrees to the work nor agrees to the outcome of the work. Any issues with proving the Duty to Co-operate has been carried out is important as it could impact on both the local authority preparing the Plan and the local authority which is disagreeing and any future plans it may want to produce.

6 Consultation

- 6.1 Consultation on the Regulation 18 Issues and Options, if approved, will begin from 18 November. Due to Christmas, it is proposed to extend the closing date to 14 January 2026.
- 6.2 Consultation will be carried out as widely as possible using a range of means in accordance with the Council's Statement of Community Involvement (SCI) which was updated in July 2025. The Council's website, social media as well as drop-in events throughout the Borough will be utilised. In addition, there will be specific consultation with parish and town councils, neighbours, utility companies and other specific bodies. This will be their opportunity to let us know where there are any known constraints or opportunities that can be exploited.
- 6.3 The draft Sustainability Appraisal (SA) and draft Habitat Regulations Assessment (HRA) will be drafted during this time as an approved document is required to prepare the initial SA. There will therefore be a further consultation on the Draft SA and Draft HRA following the consultation on the Regulation 18 Issues and Options.
- 6.4 Evidence sitting behind the production of the Local Plan is not all available at the present time. The evidence will develop especially when site specific details begin to emerge in the development of the next stage a Draft Local Plan Regulation 19. This version will have wording for policies and justifications as well as site specific allocations.

7 Next Steps

1. The consultation, if approved, will commence on Tuesday 18th November 2025 and close on Wednesday 14 January 2026.
2. Parish and Town Councils will be invited to a separate briefing
3. Drop-in sessions will be carried out across the Borough mainly in the New Year to avoid Christmas events in many of the venues that we use. If venues are free however, we will try to ensure some are organised before Christmas.
4. Member briefings will be carried out to start to discuss site allocations as well as any new evidence that is emerging.
5. Following receipt of the Draft SA and Draft HRA there will be a further consultation.

8 Report Implications

8.1 Finance and Value for Money Implications

- 8.1.1 Any costs will be covered from within existing budgets.

8.2 Legal, Data Protection and Human Rights Implications

- 8.2.1 The process for making and reviewing a Development Plan or Local Plan is set out in a range of Acts, Regulations and Guidance. The plan making process is going to change but it is intended to use the transitional arrangements to submit a revised Local Plan before the deadline of December 2026.

8.3 Environment, Sustainability and Health Implications

- 8.3.1 A Sustainability Appraisal will be required to accompany the Local Plan.

8.4 Human Resources Implications

- 8.4.1 The Local Plan work is very resource intensive. At the same time there are changes in the team. It will be a challenging period but with interim support this will help to get through this period.

8.5 Risk Management Implications

- 8.5.1 The review of the Local Plan is not expected to lead to a major movement or change in the way it is expressed so one would expect that the risks should be minimal to its delivery. However, as with the current Local Plan, funding for infrastructure improvements and particularly to the strategic road network, will be key issues that will need to be addressed, and the risks assessed. This will be partly achieved through a review of the Strategic Transport Assessment which will be carried out in partnership with the highway authorities once sites have been sieved through the HELAA process. Other risks to the process are as follow:

- 1 Key staff leaving the Council. This has been mitigated through the employment of interim staff.
- 2 Delay in the timeline. Regular meetings with members and the employment of interim staff will help to ensure the timeline is met.

- 8.5.2 The risk in not following due process in terms of the Duty to Co-operate has been referred to as a risk above if it is not followed correctly.

8.6 Equalities Implications

- 8.6.1 A detailed Equalities Assessment will be carried out on the Draft Local Plan once the changes are more refined.

8.7 Links to Council's Priorities

- 8.7.1 The production of the Local Plan is one of the five key priorities for the Borough Council in 2025/26.

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Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act,
2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date

DRAFT

**Issues and Options
(Regulation 18)
for the review of the
North Warwickshire
Local Plan 2021**



North Warwickshire
Borough Council

October 2025

Summary

- i. North Warwickshire Borough Council adopted the North Warwickshire Local Plan in September 2021. These Issues and Options mark the first formal stage (Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012) of reviewing that Local Plan. Members of the LDF Sub-committee considered a report looking initially what may need changing or updating ([1st July 2025: Local Development Framework Sub Committee | North Warwickshire Borough Council](#)) and this has formed the outline of this Issues and Options Paper.
- ii. This consultation is an "Issues and Options" paper to gauge public opinion on the scope of the plan and the need for policy changes.
- iii. This consultation will last for a minimum of 6 weeks.
- iv. The representations received during this Issues and Options (Regulation 18) consultation will help the Borough Council to develop and update its policies and sites for the next stage of the Local Plan process. The next stage will be a Draft Local Plan under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Issues and Options (Regulation 18) Consultation
North Warwickshire Borough Council

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1 Introduction

- 1.1 The North Warwickshire Local Plan 2021-2033 ("the adopted Local Plan") was adopted by Full Council on the 29th September 2021. The adopted Local Plan forms part of the Borough Council's statutory development plan and sets the overall spatial strategy for the Borough of North Warwickshire for the period 2019 to 2033 (commonly referred to as the "Plan period"). Just under half of the Plan period has elapsed so far.
- 1.2 Paragraph 34 of the National Planning Policy Framework 2024 ("the NPPF 2024") mandates that policies in local plans be reviewed at least every five years to assess if they need updating. These reviews should determine if the policies remain relevant and effectively address current needs. The NPPF 2024 also requires updates if local housing needs have significantly changed.

2 Review of the Local Plan

- 2.1 A report was considered by the LDF Sub-committee on 1 July 2025 on the adopted Local Plan to consider which policies require updating. That report forms the basis of this Issues and Options Paper.
- 2.2 The adopted North Warwickshire Local Plan 2011-2033 will remain in force until the new local plan ("the Local Plan Review") is adopted by the Borough Council and comes into effect. Policies being reviewed will gain more weight as they go through the review process, particularly where there are no representations. Any saved policies will be transferred in whole into the Local Plan Review.
- 2.3 Neighbourhood Plans that have been made (adopted) will continue to be in place after the Local Plan Review is adopted. However, parts of neighbourhood plans may be superseded by the Local Plan Review.
- 2.4 There are currently ten Neighbourhood Plans, which have formally been adopted by North Warwickshire Borough Council (NWBC) and now form part of the development plan for North Warwickshire:
 - Arley Neighbourhood Plan (Adopted December 2016)
 - Austrey Neighbourhood Plan (Adopted June 2017)
 - Coleshill Neighbourhood Plan (Adopted June 2017)
 - Dordon Neighbourhood Plan (Adopted December 2023)
 - Fillongley Neighbourhood Plan (Adopted August 2019)
 - Hartshill Neighbourhood Plan (Adopted March 2017)
 - Mancetter Neighbourhood Plan (Adopted September 2017)
 - Nether Whitacre Neighbourhood Plan (Adopted January 2024)
 - Polesworth Neighbourhood Plan (Adopted June 2025)
 - Water Orton Neighbourhood Plan (Adopted June 2022)
- 2.5 There are 2 Neighbourhood Plans currently under review:
 - Fillongley Neighbourhood Plan Review
 - Austrey Neighbourhood Plan Review

2.6 In addition, there are the following designated areas:

- Atherstone Town Council
- Corley Parish Council
- Curdworth Parish Council
- Kingsbury Parish Council

3 Timetable

3.1 Table 1 below provides the expected timeline that the review process will take. This timeline will be updated through the Local Development Scheme and will rely on evidence being provided at the right time in order that consultations can be carried out in a timely manner.

Table 1 Review Timeline

Regulation 18 – Issues and Options consultation for the Local Plan Review	November / December 2025
Regulation 19 – Draft Local Plan Review	April / May 2026
Submission to Secretary of State	Late Summer / Autumn 2026

4 Local Plan Period

4.1 The NPPF 2024 states that “Strategic Policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure” (paragraph 22). The adopted Local Plan runs until 2033. From the start of the current review a 15-year period will take the Local Plan Review to 2040. However, given that the Local Plan Review is unlikely to be adopted before the end of 2026 a longer period should also be considered, either up to 2045 or further to 2050 to give some longer-term stability and security to development expectations.

	Options for Plan end date
Option 1	End date of 2045
Option 2	End date of 2050

Question 1	Do you agree with Option 1 or Option 2? Please state which option you prefer and why.
Question 1a	If not, what end date should the Plan use and why?

5 Policies requiring some modifications

5.1 The following section goes through the policies in the adopted Local Plan in order setting out any issues that need to be addressed. There is a small introduction and then a short discussion of the issues and then an outline of the possible options. The options are not exhaustive and responses to the consultation may highlight additional ways forward.

LP1 Sustainable Development

- 6.1 It is not considered that LP1 requires updating as the essence and the wording of the policy complies with the NPPF 2024 and seeks to link infrastructure led growth within the Borough. However, the growth options behind the adopted Local Plan need to be reassessed as the premise of infrastructure led growth is now difficult to determine with the withdrawal of funding for improvements to the A5.
- 6.2 The adopted Local Plan was predicated on the delivery of improvements to the A5, which is part of the strategic road network. This corridor was seen as the most appropriate area for growth as it lay outside of the Green Belt and could deliver the growth for both the Borough, and at the time, some of the growth for Birmingham, Tamworth and Coventry. Funding was identified in March 2020 through the central Government's Budget (scheme known by National Highways as the Dordon to Atherstone Scheme) for initially two phases of improvements. This funding allowed the adopted Local Plan to move through the examination process and be adopted.
- 6.3 In April 2025 the funding for phases 1 and 2 (out of 4 phases) was withdrawn due to a trebling of the costs of the identified scheme and the benefit cost ratio being low. The Local Plan Review must reconsider where the best location for growth should now be.
- 6.4 Whichever option and approach is finally taken it must be on the understanding and realisation that housing need and delivery is a priority, along with the Governments 'Growth' agenda. It could be argued that this will inevitably mean the focus is on those options that are most likely to enable and encourage delivery over the short term, particularly in light of the current delays and difficulties arising with the loss of infrastructure funding for the A5.

Growth Options

- 6.5 Moving forward from the A5 funding decision, what are the growth options for the Borough? Six options are outlined below varying from keeping the focus of development along the A5, through to the creation of a new settlement. The pros and cons of each option are then identified.

Option 1 *Focus on the A5 Corridor*

- 6.6 Although the funding from the Government has been withdrawn, the A5 corridor is still one of the key transport corridors within the Borough lying outside of the Green Belt. Sites may be large and come forward in a slow and managed way rather than all at one time. Any traffic implications may therefore be incremental in coming forward. Development in North Warwickshire will only be part of the overall picture of the growth of traffic along the A5, as it is part of the strategic road network (SRN) which is outside of the control of the Borough.
- 6.7 This option would involve seeking contributions for interventions to the strategic road network to enable it to deal with the growth from each site within North Warwickshire. These interventions however may not fully consider the cumulative impact of the traffic growth.

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Pros	Cons
Outside of the Green Belt so no release of Green Belt land required	Costs of the required improvements have trebled in price just for part of the required improvements making it unlikely that growth from just North Warwickshire will provide sufficient funding or benefit cost ratio (BCR) to make all the previously identified strategic improvements to the A5.
This option focuses development to two of the most sustainable settlements in the Borough with broad range of services and facilities.	Asking developers for funding for improvements to the A5 could impact on the ability to provide other necessary infrastructure for the sites, i.e. schools, health facilities, etc.
Can help to improve active travel as being close to employment sites, services and facilities.	Further opportunities for growth around Atherstone may be prohibitive due to the availability of land outside of flood zone 3, archaeological, historical and biodiversity assets.
The A5 is part of the strategic road network (SRN) and theoretically should be able to cope with further growth.	Increased pressure for a more continuous thread of development and urban character along the A5 corridor.
Polesworth and Atherstone have a railway station. Therefore, the corridor is served by one fully operational railway station and one that could potentially be provided with a good service.	Both railway stations will require substantial investment to provide access to all platforms, as well as providing a proper service from Polesworth. The ability to provide additional services to Polesworth Station may be restricted until the franchise process is reviewed and HS2 is up and running.
	The A5 is used as a diversion route if there are problems on any local motorways.
	The timeline for external funding sources to come forward for road or rail improvements does not necessarily correspond to the need to deliver homes in a timely manner.

	Question on Growth Option 1
LP1 / 1	Do you agree with this option? If so, why?

Option 2 Focus on main road corridors and junctions

- 6.8 This option builds on Option 1 above but not only looks to the A5 but also includes the other main transport corridors and junctions. It looks to concentrate most of the development along the main strategic road transport corridors including the A5, M6, M6Toll/M42, the M42/A42, the A38 and A446.

- 6.9 This option includes both sustainable settlement locations, as in Option 1, and rural, more unsustainable locations reflecting the presence of strategic motorways and A roads cutting through the Borough. Care is needed to avoid creating or continuing the “ribbon” development along the strategic A road corridors resulting in the coalescence of settlements, or more sporadic isolated development around motorway junctions in predominantly rural locations, unrelated to any local services and facilities, such as Junctions 9 and 11 of the M42 and the A51 between Tamworth and Junction 9.
- 6.10 This Option also faces some issues in delivery, due to the ongoing work for HS2 also being focussed along the motorway/main road corridor through the eastern half of the Borough. Work on the London to Birmingham Civil Structures, ridges and viaducts is not expected to be completed before the end of 2028 and work on the northern section beyond Water Orton to Lichfield, predominantly around and close to Junction 9 of the M42, has been delayed with work not recommencing until 2029. This means any major development proposed along these corridors could face delays in delivery until completion of the HS2 main works at the earliest.

Pros	Cons
Direct access to the strategic highway network.	Motorway junctions tend to be away from the main settlements in the Borough in more rural open locations.
There are 3 fully operational railway stations (Atherstone, Coleshill and Water Orton) with Polesworth having the ability to be re-opened.	Some land will be in the Green Belt and so will require Green Belt release
Could help to improve active travel if improvements are made to public transport and the ability to walk and cycle safely between home and work/services and facilities safely.	Costs of any required improvements to the SRN have increased substantially over recent years, making it unlikely that growth from just North Warwickshire will provide sufficient funding or benefit cost ratio (BCR) to make all of the strategic improvements to any of the main transport routes.
The roads are all part of the strategic road network (SRN) and theoretically should be able to cope with a degree of growth.	Asking developers for funding for improvements to the A5 could impact on the ability to provide other necessary infrastructure for the sites, i.e. schools, health facilities, etc.
Could direct development towards areas with land capacity and availability, where there has been less or nil housing growth, but major strategic employment growth, relieving pressure on existing main settlements.	Pressure for a more continuous thread of development and urban character along each of the transport corridors will change the character of the Borough. (“Ribbon Development” potentially)
	Could encourage and entrench further the use of cars due to the location of services and facilities as well as work opportunities.

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	The A5 is used as a diversion route if there are problems on any local motorways.
	The timeline for external funding sources to come forward for road improvements does not necessarily correspond to the need to deliver homes in a timely manner.

	Questions on Growth Option 2
LP1 / 2	Do you agree with this option? If so, why?
LP1 / 3	Should the A51 Tamworth to Coleshill / Junction 9 M42 be included? If not, why?

Option 3 Public transport centres/corridor

- 6.10 Option 3 looks to the existing railway stations and public transport hubs within the Borough. There are three operational railway stations (Atherstone, Coleshill Parkway and Water Orton). There is also the South Street Bus Station in Atherstone.
- 6.11 Polesworth is not included in this option at the current time as it only has a parliamentary train which keeps the station open. Warwickshire County Council is investigating the station's future, but any improvements that may come as a result of this work it could take many years to be brought forward. There would also need to be train time adjustments/improvements to ensure a good level of service. These improvements may come forward once HS2 train services start. At the present time this could be mid-2030's at the earliest.

Pros	Cons
It will encourage the use of public transport.	Overall improvements to the train services may not be seen on the West Coast Mainline until after the HS2 services begin.
Polesworth and Atherstone have a railway station. Therefore, the corridor is served by one fully operational railway station and one that could potentially be provided with a good service.	Bus services do not provide regular hourly services to many of the settlements within the Borough. Nor do they provide services to fit with the overnight shift patterns of firms within the Borough. This makes making decisions about commuting difficult.
Additional population may provide support for the improvements to the railway stations even if timelines do not align.	Commuting services in and out of Water Orton are not frequent.
Potential to improve services through franchise negotiations	Green Belt surrounds Water Orton and Coleshill.
Potential to improve pedestrian and cycle connections to the stations	Both Polesworth and Atherstone stations will require substantial investment to provide access to all platforms as well as

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	providing a proper service from Polesworth.
Potentially by providing housing close to the stations could help to alleviate road congestion	The ability to provide additional services to Polesworth Station may be restricted until the franchise process is reviewed and HS2 is up and running.
	The timeline for external funding sources to come forward for rail improvements does not necessarily correspond to the need to deliver homes in a timely manner.

	Questions on Growth Option 3
LP1 / 4	Do you agree with this option? If so, why?
LP1 / 5	Should Polesworth Station and its potential re opening be included? If not, why?

Option 4 Disperse development throughout the Borough

- 6.12 This option involves widespread dispersal of development, with every settlement with a Development Boundary having some development appropriate to its scale/size.

Pros	Cons
Possibly quick delivery.	Potentially putting housing in unsustainable locations.
Provides even a small element of growth in a wide range of locations.	Large scale infrastructure will be difficult to deliver if development is spread through the Borough.
Scale of development can be made proportionate to the size of settlement.	Potential impact on existing services and facilities capacity, efficiencies and ability to accommodate increased pressures across a wider dispersed area.
Potential for some limited financial and economic boost to smaller settlements.	WCC have already objected to Rugby's Local Plan based on dispersal because of the issues of delivering services and facilities, in particular, secondary education, adult social care and early years education.
	Bus provision across the Borough is varied, and in some locations cannot be relied upon for a daily commute to work or to provide access to services and facilities.

	Questions on Growth Option 4
LP1 / 6	Do you agree with this option? If so, why?
LP1 / 7	Should each settlement accommodate: 1 specific site allocations; Yes or No or, 2 a specific number of units; Yes or No or, 3 a mixture of the two approaches? Yes or No Please explain your answer

LP1 / 8	How would you determine the appropriate level of development for each of the Borough's settlements?
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Option 5 *New Settlements or village proposals*

- 6.13 A new main settlement would require a substantial area of land to accommodate all the homes and relevant infrastructure to make it a place that people would want to live and work without the need to travel outside of that settlement for work and all leisure facilities. A new village is a smaller settlement but, as seen by the Settlement Sustainability Assessment, would need to have a good range of services and facilities including a primary school, health facilities, some retail, leisure and community facilities to be able to start to accommodate any major growth. The full list of services, facilities and infrastructure is detailed in the 'Settlement Appraisal' document (see section on Policy LP2 below and Board Report documents for Local Development Framework Sub-Committee on 17th November 2025, detailing the latest Settlement Appraisal). In addition, the "Infrastructure Delivery Plan" 2020, produced for the adopted Local Plan provides details on the wide range of services and facilities needed to make places function efficiently and effectively and in a way that creates sustainable communities and where people want to live. A similar plan will be required for the Local Plan Review.
- 6.14 This option would look to the development of a new settlement or new village. At the present time through the call for sites there is one potential new settlement (Thorpe Constantine) if land in the adjoining local authority is also brought forward. This lies to the very north of the Borough around Seckington and No Man's Heath and comprises Call for Sites reference numbers CFS71, CFS107 & CFS43 (see Map 1, Appendix A). 380 hectares lay within North Warwickshire with a further 544 hectares within the Lichfield Borough Council area. This option potentially could deliver 7,000 homes within the Borough with a further 10,000 beyond in Lichfield. The sites' proximity to the new Business Park/Logistics estate at Mercia Park on Junction 11 of the M42 (lying just outside the Borough) would potentially address some of the employment needs generated.
- 6.15 There is one further potential site that is big enough to develop a new main settlement – Call for Sites reference number CFS168 (see Map 2, Appendix A). This is on land to the east of the M42 to the west of Warton and is around 180 hectares. This potentially could deliver over 3,600 new homes but would need to provide a primary school, at least one shop and community building as well as play and open space. For both of the above sites the limited transport infrastructure will be an issue.

Criteria for search

- 6.16 It is suggested that for a new main settlement there are two clear criteria that must initially be complied with in the search for a suitable location. There will of course be several individual criteria for site selection but initially these two would be the starting point:
1. Needs to be an area to deliver a minimum of 4,000 dwellings plus services and facilities, as well as land for commercial uses and land for future growth. The Town & Country Planning Associations suggests that a place needs to

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be large enough to support a secondary school. This means the number of homes will be in the range 4,000-5,000 at least.

2. Be accessible to key transport routes, in particular train stations, the motorway system and trunk roads.

Pros	Cons
Delivery of infrastructure is clear and focussed	Development can take many years to start and to build momentum and deliver the number of homes required.
Costs of infrastructure can be clearly linked to the development taking place	The option of a new settlements relies on additional land being brought forward in the adjoining district of Lichfield.
It can provide a forward plan of where development will take place over a prolonged period of time.	With regard to the sites at Thorpe Constantine, the loss of Grade 2 agricultural land.
It reduces the impact on existing services and facilities in the other settlements in the Borough.	Other provision must be provided in the short term in order to maintain a 5 year housing supply.
The new settlement can be planned to be sustainable from the start and include energy efficiency, IT connections, walking, cycling, open spaces, services and facilities.	Within a rural authority the impact will be very significant.
It will give a clear focus of where new development will take place rather than continually bolting on to existing settlements beyond the adopted plan period.	Significant public infrastructure funding will be required initially to both improve existing transport infrastructure and deliver new infrastructure on a scale sufficient to help kick start the development.

	Questions on Growth Option 5
LP1 / 9	Do you agree with this option? If so, why?
LP1 / 10	Do you think the Borough Council should deliver: 1 a new settlement in partnership with Lichfield DC; Yes or No or, 2 a new village to the east of Warton/west of M42? Yes or No
LP1 / 11	Are there any other locations that should be explored? Please list and provide contact details of the landowners.

Option 6 Hybrid

- 6.17 This option looks to bring forward development across all the Borough. In some locations development will be limited whilst growth will be encouraged in others. This option would mean that settlements across the whole hierarchy would be expected to contribute to delivering homes.
- 6.18 The starting position for this option would likely need to be the Settlement Hierarchy in the adopted Local Plan (adopted Local Plan policy LP2), but alternative approaches or hybrid options (involving this option) could be considered. This may include identifying additional settlements within the Borough to widen site locations and/or including new settlements. Settlements could also be required to address a

specific number of dwellings, based on the size of the settlement, or a related percentage, subject to any national planning constraints or infrastructure capacity assessments instead or in addition to identifying specific sites for allocations.

Pros	Cons
Is more likely to deliver more homes across the whole of the Plan period.	Dilutes the ability of gaining large scale investment.
Allows different approaches to be taken for different settlement sizes, increasing market opportunity, flexibility and methods for maximising housing delivery.	Will lead to the release of Green Belt land.
A hierarchy of settlements already exists in the adopted Local Plan to help enable and deliver this option.	May result in development on easiest developed sites with least costs, or infrastructure, service delivery and improvement requirements. A wide range of sites would need careful management not to simply result in the smaller, easier and/or more viable and profitable greenfield sites coming forward early in the plan period, delaying or constraining delivery of more difficult, larger strategic or less 'marketable' sites and locations.
May help support some smaller settlements in retaining/supporting their existing services and facilities, (particularly where S106 contributions can be targeted directly at local services/facilities).	The market for housing within North Warwickshire may be of insufficient capacity to deliver the scale of 'no-hold' growth this may generate if all options are accommodated.
May encourage local business and economic growth through enabling a wider range of individual, small and medium size developers to access/compete for differing types of sites within the market.	Sustainability of some settlements and site options may be questionable. Spreading development widely has increased infrastructure, service and facilities costs.

	Question on Growth Option 6
LP1 / 12	Do you agree with this option? If so, why?
LP1 / 13	If you agree, should this option use the adopted Local Plan settlement hierarchy, or some other approach? Yes/No. If no, please explain what approach you would take/use? *

*See also the following options for Policy LP2, Settlement Hierarchy approach.

LP2 Settlement Hierarchy

- 7.1 The adopted LP2 policy seeks to direct development towards settlements at an appropriate size and scale to their available services, facilities and transport accessibility. This means development has tended to be directed towards the most sustainable settlements reflecting, their position in the settlement hierarchy, particularly the large strategic sites in the Borough's main settlements. The larger

strategic sites require significant investment in transport infrastructure and improvements and other major services and facilities for education and health.

- 7.2 The Settlement Appraisal provides evidence on the services and facilities within the various settlements within the Borough. This was initially prepared in 2010 but has been updated in 2016, 2018, 2022 and 2025. It indicates there has been very little change in the overall outcome of the study.
- 7.3 The withdrawal of Government funding towards the A5 improvements has delayed the delivery of some of the 2021 NWLP allocated sites. This has led to increased pressure on many of the lower category settlements for development. With the current housing crisis and pressures, some of the settlements falling into the lower categories in the hierarchy have received planning applications directed towards greenfield sites with reduced infrastructure and services costs or contributions, enabling a more rapid decision and delivery. However, this does not lead to sustainable long-term communities with all the relevant infrastructure and service support.
- 7.4 Some settlements have grown potentially beyond their infrastructure, services and facilities capacity to continue to accommodate continued similar levels of growth in the future. An appraisal will assist in identifying where growth has been uncharacteristically larger (significantly higher) than previous growth, impacting on the character of the village.
- 7.5 The appraisal may also identify those settlements where growth has been limited over recent years, and where some further growth could potentially be accommodated. This should also consider Green Belt settlements in light of the recent changes to NPPF policy and introduction of “Grey Belt” status.
- 7.6 Nevertheless, although the existing settlement hierarchy is broadly compliant with the current NPPF 2024, the option of considering other alternatives should be considered. The settlement appraisal, which supports/provides the data and evidence underpinning the selection of settlements that are sustainable and can accommodate some growth, has been updated. This provides some information on the status of the settlements within the Borough and indicates whether the level of services, facilities and infrastructure have changed and whether there is the opportunity or justification for increasing, or even reducing the number of settlements identified within the hierarchy. However, these changes are unlikely to be significant and will not affect the principle of the hierarchical approach detailed in the policy.
- 7.7 Although the intention is to undertake only a partial review of the Local Plan, maintaining policy and strategy as much as possible, even if/where no change is really necessary and where evidence indicates little or no changes to circumstances (services/infrastructure) that warrant a major shift in approach to distribution and delivery of development needs, there is still the need to offer and consider options that may offer an alternative approach that may address needs and delivery better. The following options therefore are highlighted for consideration in relation to the adopted settlement hierarchy approach.

	Options for LP2
Option 1	Maintain Policy LP2 and the current Settlement Hierarchy
Option 2	Alter where some settlements sit within the settlement hierarchy

	Questions on LP2
LP2 / 1	Should we maintain, increase or reduce the number of settlements in the hierarchy as a result of the updated settlement appraisal? 1 Maintain 2 Increase 3 Reduce
LP2 / 2	Should the hierarchy change in another way? Yes / No. Please explain

LP3 Green Belt

- 8.1 In December 2024, a revised National Planning Policy Framework was published (NPPF 2024), which introduced new rules for Green Belt development including a focus on affordable housing. The changes introduced the concept of "Grey Belt" land, which is land within the Green Belt that does not significantly contribute to purposes (a), (b), or (d) of the Green Belt's five purposes¹ and may be eligible for development under specific criteria. The introduction of Grey Belt thus allows for development in less sensitive areas of the Green Belt.
- 8.2 This means that as part of the Local Plan Review the Green Belt must be assessed against the 5 purposes of Green Belt land to determine areas of Grey Belt and areas to remain fully within the Green Belt. Consultants are preparing a report on the Green Belt that includes consideration of the Grey Belt. The report also looks to the issue of additional / new Green Belt in compensation for the potential loss of Green Belt elsewhere in the Borough. This is to be published alongside the Regulation 19 version of the Local Plan Review.
- 8.3 The introduction of Grey Belt land will need to be represented in some manner on the Policies Map along with some change to policy wording.
- 8.4 The NPPG 2024 on Grey Belt provides a clearer definition of 'Merging Towns' and clarifies that if a site is just positioned between two towns, then it does not 'strongly' serve purpose (b) (to prevent neighbouring towns merging into one another). Moreover, to strongly contribute to purpose (b), a site must be considered to form a substantial part of the gap between towns, and even then, the key matter is visual separation, i.e. the perception of towns merging. This raises issues around gaps that lie within the Green Belt but may not be clearly between "historic towns" and therefore don't "strongly contribute" to the Green Belt. In such cases it may be advisable to consider the option of identifying such areas as "Strategic Gaps" as

¹ The five purposes of Green Belt are to: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

currently exists between Polesworth/Dordon and Tamworth, to help protect settlement identities within North Warwickshire.

- 8.5 Green Belt policy considers the impact on towns and also historic towns. Two of its purposes are to preserve the setting and special character of historic towns and to prevent neighbouring towns from merging. The Green Belt Study identifies Coleshill as a historic town. Other settlements within the Borough's Green Belt do not fall within the definition of a town so are not taken into consideration when considering development preventing towns from merging.

	Options for LP3
Option 1	Maintain adopted Policy and seek no further release of Green Belt for development needs except where NPPF policy exceptions enable development proposals and/or where capacity outside the Green Belt is not available.
Option 2	Look at Grey Belt and the potential for site opportunities in sustainable settlements within the Green Belt, where the identification of Grey Belt may enable housing sites to be considered, allocated and Green Belt 'released'.
Option 3	Maintain current Green Belt constraints but provide a criteria list/requirement to identify where site opportunities/proposals may be permissible and supported.

	Questions on LP3
LP3 / 1	Should the Plan identify potential Grey Belt areas and remaining Green Belt areas?
LP3 / 2	Should Policy LP3 be amended to refer to the introduction of Grey Belt and how this will be determined in North Warwickshire (i.e. no map with areas identified/designated)?
LP3 / 3	Should individual sites or zones (for identified development needs) within the Grey Belt be considered or left to a criteria list within an amended Policy LP3?
LP3 / 4	If left to policy to determine, what criteria should be considered/added to policy LP3 to help identify or support development proposals in the 'Grey Belt'.

LP4 Strategic Gap

- 9.1 The Strategic Gap in the adopted Local Plan was developed from the previous Meaningful Gap policy in the Core Strategy 2014. Monitoring information indicates that it is being successful in maintaining the gap between Polesworth / Dordon and Tamworth.
- 9.2 There are however two issues. The first is should we allow part of the strategic gap north of the current motorway services, to the west of the M42, to be developed and provide additional lorry parking (see Call for Sites reference number CFS136 – Map 3, Appendix A). This would require land to be taken out of the Strategic Gap. The land in question is some 2.43 hectares directly adjoining the current Moto Services site. This is part of a parcel of land to the south of a single line of homes to the north

of Green Lane, Birchmoor to the west of the M42. It is currently being used as an open grazing field.

- 9.3 The need for lorry parking is discussed further below under LP34.

	Questions on LP4
LP4 / 1	Do you agree with the removal of land from the Strategic Gap to provide for additional lorry parking?
LP4 / 2	Or should land be released within the Strategic Gap for an alternative use? Please state the use.

- 9.4 The second issue is that with the pressure for further development, particularly along the A5 corridor, there is increasing potential and pressure on the gaps and identities of the settlements along that corridor. This affects the settlements of Dordon, Grendon, Atherstone and Mancetter and potentially between Mancetter and Nuneaton. There are therefore several options for extending the 'Strategic Gap' approach, which could help maintain the settlement identities and separation along the A5 corridor. This would help avoid the coalescence of developments leading to ribbon style development without clear green gaps between settlements.

- 9.5 Other alternative locations could also be considered, particularly where potential Green Belt relaxation through Grey Belt release or designation may reduce the protection other settlements within the Borough may currently have from development expansion from adjoining urban areas/settlements outside the Borough. Potential locations could look at the Coleshill corridor, west of Coleshill between M42 junctions 7a and 9.

	Options for LP4
Option 1	Do not designate any new Strategic Gaps.
Option 2	Identify Strategic Gaps along major transport corridors. Potential additional Gaps to be designated between: - a Grendon/Baddesley and Dordon - b Grendon/Baddesley and Atherstone - c Coleshill Corridor (west of Coleshill between M42 junctions 7a and 9). - d Coleshill to Arden Cross (HS2 Interchange Station)
Option 3	Identify Strategic Gaps throughout the Borough.

	Questions on LP4
LP4 / 3	Do you support the principle of maintaining gaps between settlements, where possible?
LP4 / 4	Do you agree with the identification of further Strategic Gaps within the Borough? Yes/No – please explain your response
LP4 / 5	Where would you propose additional Strategic Gaps? Please state the area and explain why.

LP5 Amount of development

Overall Housing Numbers

- 10.1 The adopted Local Plan makes provision for a minimum of 9598 new dwellings which is an annualised housing requirement of 479 dwellings. 48% of 9598 have either having been completed or in the pipeline. This means there is around 4952 units remaining to be delivered (Annual Monitoring Report 2023/24). The adopted Local Plan includes a housing trajectory that increases the amount each year the number of homes to be completed. This annual housing requirement increases towards the latter years of the local plan (2019-2033) as shown in Table 1 below.

Table 2: Local Plan (2021) Stepped Housing Trajectory

<i>Years covered</i>	<i>Dwellings per annum (dpa)</i>	<i>Total per period</i>
2011-16	203	1015
2016-24	265	2120
2024-25	390	390
2025-26	700	700
2026-27	725	725
2027-33	775	4650
	Total	9625

- 10.2 The housing requirement reflects that the adopted Local Plan makes provision for meeting unmet needs from other areas (Coventry, Tamworth and Birmingham) with the trajectory showing expected delivery reflecting the funding and delivery of improvements to the A5. However, following the withdrawal of funding towards the A5 improvements required to enable these developments, this delivery is now in doubt. The infrastructure requirements and improvement can still be developer led, with bids for grant support continuing and the adopted allocations will be retained on that basis. This means that delivery of sites from the adopted Local Plan will be over a longer Plan period.
- 10.3 The standard housing method takes into account current and previous plan requirements and targets, so as a result the housing requirement in the Local Plan Review will be based on the standard housing method, as required by the NPPF 2024.
- 10.4 The government expects the standard method to be used as the starting point for local plans and to only in exceptional circumstances use a different approach. This will mean future allocations in the Local Plan Review over the next 15 to 25 years (depending on the Plan period to be agreed) will be seeking to deliver 364 dwellings per annum equivalent numbers. For a 20-year Plan period this equates to a requirement of around 7280 dwellings, as shown in Table 3 below.
- 10.5 The NPPF 2024 requires local planning authorities to determine the minimum number of homes needed and apply strategic policies informed by a local housing need assessment, conducted using the standard method outlined in the NPPF 2024.

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For North Warwickshire this indicates a local housing need/requirement of 364 dwellings per annum (dpa).

- 10.7 The recent Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA 2022), which post-dates the adopted Local Plan, indicates that North Warwickshire should be looking either for 176 dpa, based on 2014 ONS projections, or a lower trend-based 119 dpa. This latter figure is much lower than both the Standard Method (using 2014-based Household Projections) and the new Standard Housing method required by the NPPF 2024. Simply using the trend-based 119 dwellings figure will not be acceptable as an option for the future because it is so much lower than the standard method. As a result, it will not be included in the options.
- 10.8 The HEDNA 2022 also indicates there is a potential case for higher housing provision than the overall housing need figures, to manage cross-boundary commuting and to boost the delivery of affordable housing. Nevertheless, there also is potential for considering a lower figure to reflect both the low growth that the Borough has traditionally had, due to its part rural nature, lower population and positive employment situation (with 1.36 jobs per economically active resident).
- 10.9 The final housing requirement will be determined by the provision of infrastructure, especially in terms of how much development can be delivered on the current and future highway network, the precise details of which cannot be determined until the potential sites have been confirmed.

Table 3: Yearly Housing Figure

	Year	Option 1: Annualised Local Plan figure carried forward to 2045	Option 2: Annualised Local Plan to 2033 and then 2024 Standard method up to 2045	Option 3: Local Housing Need 2024 Standard Method
1	2025 - 26	479	479	364
2	2026 - 27	479	479	364
3	2027 - 28	479	479	364
4	2028 - 29	479	479	364
5	2029 - 30	479	479	364
6	2030 - 31	479	479	364
7	2031 - 32	479	479	364
8	2032 - 33	479	479	364
9	2033 - 34	479	364	364
10	2034 - 35	479	364	364
11	2035 - 36	479	364	364
12	2036 - 37	479	364	364
13	2037 - 38	479	364	364
14	2038 - 39	479	364	364
15	2039 - 40	479	364	364

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16	2040 - 41	479	364	364
17	2041 - 42	479	364	364
18	2042 - 43	479	364	364
19	2043 - 44	479	364	364
20	2044 - 45	479	364	364
		9580	8200	7280

Duty to Cooperate

- 10.10 The Duty to Cooperate could also have a potential impact on the final housing requirement for the Borough as the above is only the starting point for assessing what should the housing requirement be in the Local Plan Review. At the present time no Council have indicated that they require North Warwickshire to deliver additional homes because they cannot accommodate them within their boundaries. Coventry City Council have prepared a draft local plan and are confident they can provide for their housing needs. Birmingham City Council has over provided homes over recent years, and early indications are that they consider they can deliver their requirement in their next plan period. Tamworth Borough Council are working on evidence to indicate if they can provide for their future needs. As they are a small Borough with constrained boundaries this may be an issue, but it is yet undetermined and unquantified. Therefore, this is matter that will need addressing as part our consideration going forward.
- 10.11 The main issue for the Borough in any option including dealing with its own needs and those of others will be how it can deliver homes in a sustainable way when funding for the A5 improvements has been withdrawn. This is explored more under the Growth Options in LP1 above.

	Options for LP5 - Housing Numbers
Option 1	Use the adopted Local Plan housing requirement and extend any undelivered housing allocations over the new plan period.
Option 2	Use the current 479 annualised housing figure from the adopted Local Plan going forward to 2033 and then have a figure of 364 per annum thereafter.
Option 3	Use the standard method housing figure of 364 dwellings per annum as the starting point for the new housing requirement (to 2045 this would mean a housing number of 7280).

	Questions on LP5 - Housing Numbers
LP5 / 1	How many homes should we be planning for? Please provide an overall number or an annual housing figure and an explanation of your figures.
LP5 / 2	Which option do you prefer for LP5 and housing numbers?
LP5 / 3	If you don't agree with any of the options relating to housing numbers, what other option for would you use and why?

Settlements with no housing allocations being proposed

- 10.12 When preparing the Local Plan Review there may be settlements where there are no proposed housing allocations. As a way of ensuring that some development

takes place in all settlements across the Borough, including those in the Green Belt, should the Borough Council indicate the number of homes that should be delivered by the end of the Plan period for each settlement?

- 10.13 If a settlement does not have any allocations within the Local Plan Review (where no suitable sites have been submitted through the 'Call for Sites') a housing figure could be given to that community for them to determine the location of those homes through a Neighbourhood Plan. However, there are only 10 adopted (made) Neighbourhood Plans within the Borough and although a further 3 areas have been designated, no Plans for those areas have yet been produced. In addition, none of the adopted Neighbourhood Plans have allocated land for housing.

	Question on LP5 - Housing Numbers
LP5 / 4	Should each of the designated Neighbourhood Plan areas be given a minimum housing figure? Yes / No – please explain your response.

Employment Land

- 10.14 The latest information is contained in the North Warwickshire Borough Council Annual Monitoring Report (AMR) 2023-2024. This records the position as at 31st March 2024. The total supply for employment land stands at 170.51 hectares, which includes completions since 2019. Without including completions there is still a supply of around 80 hectares, with the approved MIRA site (57.2 hectares) pending S106.
- 10.14 The HEDNA 2022 identifies the employment land needs as 61.4 hectares up to 2041 and 88.4 hectares up to 2050. It also indicates a major strategic employment requirement for the Warwickshire area, but this is not divided between the local authorities within the sub-region/area. This growth reflects the demand for strategic logistics and employment sites in the West Midlands Strategic Sites Study (WMSESS) in 2023/24.
- 10.15 The ICENI Alignment Paper, drafted to combine/integrate the WMSESS study with the Coventry and Warwickshire HEDNA, indicates the following;
- Strategic Need – Provision of 50 to 100 hectares potential need up to 2041 is indicated for Area 5 in the WMSESS, the majority of which lies within North Warwickshire.
 - Local Industrial Residual Need – Once an existing 34 hectares supply is considered, the Local Industrial Residual Need is 26 hectares up to 2041, 36 hectares up to 2045 and 48 hectares up to 2050.
- 10.16 Additional work undertaken by ICENI specifically for North Warwickshire's needs has identified a shortfall of 31.3 hectares, 42.0 hectares and 54.8 hectares of land for local employment to 2041, 2045 and 2050 respectively. It also confirms there is a further residual need of 50 to 100 hectares for strategic employment sites as noted above.
- 10.17 Much of the employment needs assessments are based on past trends, which for past employment growth in North Warwickshire has been significant – with two regional logistics and business parks (Hams Hall and Birch Coppice) having been

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developed and expanded within the Borough. There are concerns that continuation of this level of growth raises issues for and impacts on North Warwickshire.

- 10.18 The question should be asked over whether it is appropriate for North Warwickshire to apply a “past trends” approach to employment needs and demands when the Borough Council currently has 1.36 jobs per (economically active) resident.
- 10.19 Should the focus be on the employment needs of the Borough’s residents instead of an approach that encourages the continuation of potentially more strategic employment growth, without first examining the ability and potential of delivery within the wider region and sub region? It is important to consider and understand the reasons for the past growth that was based on the existence of major brownfield/pdl, former energy generation sites and minerals/mining sites now redeveloped and for which similar examples no longer exist within the Borough. The focus today should perhaps be on ensuring the new employment sites bring jobs with differing skill opportunities which allows to broaden the employment base within the Borough.
- 10.20 This approach potentially forces continued delivery of development at a scale that requires release of undeveloped greenfield and Green Belt land to the detriment of the rural character of the Borough and is unsustainable in nature.

	Options for LP5 - Employment Land
Option 1	Apply the HEDNA 2022 need as the requirement – either 61.4 hectares up to 2041 or 88.4 hectares up to 2050.
Option 2	Apply the ICENI Alignment Paper need as the requirement – 26 hectares up to 2041, 36 hectares up to 2045 or 48 hectares up to 2050.
Option 3	Apply the ICENI North Warwickshire Study need as the requirement – 31.3 hectares up to 2041, 42.0 hectares up to 2045 or 54.8 hectares to 2050.
Option 4	Apply a further residual need of 50-100 hectares for strategic sites (as identified in the ICENI North Warwickshire study) as a ‘strategic’ requirement in combination with one of the above.
Option 5	Maintain a criteria-based Policy approach to strategic employment site delivery.

	Questions on LP5 – Employment Land
LP5 / 5	How much employment land should we be planning for? a. Minimum employment land need only? b. The HEDNA 2022 need c. The ICENI Alignment Paper need d. ICENI North Warwickshire Study need
LP5 / 6	Please explain your answer to LP5 / 5
LP5 / 7	Should a further 50-100 hectares be provided for strategic employment sites (as identified in the ICENI North Warwickshire Study)?
LP5 / 8	What Plan period should we be planning for in terms of employment land?
LP5 / 9	Is applying a “past trends” approach to employment needs and demands the appropriate approach for North Warwickshire? Yes / No? – please explain your response.

Gypsy and Travellers

- 10.21 The latest available Gypsy and Traveller Accommodation Assessment 2019 (GTAA 2019) identify a requirement of 19 traveller pitches between 2019 and 2033. Based on the GTAA 2019 a phased requirement of pitches is proposed up to 2033 as indicated in Table 4 below. However, a significant number of pitches, 25 in total, have already been delivered (see Table 8 - Annual Monitoring Report 2023/24).

Table 4: [OBJ] Need for Gypsy and Traveller households in North Warwickshire that met the Planning Definition by 5-year period

5 yr period	0 - 5	6 - 10	11 - 14	
Years	2019-24	2024-29	2029-33	Total
No of Pitches	9	3	7	19
per /annum requirement	1.8	0.6	1.4	

- 10.22 The main issue is whether a new GTAA should be undertaken or, alternatively, the current 5-year need in the GTAA 2019 be rolled forward from 2033 up to the end of the next Plan period.
- 10.23 The delivery of pitches through planning applications predominantly reflects inward migration, whereas the GTAA 2019 was based in needs within the Borough, but only up to 2033. In light of recent pressures, the maintenance of a policy to address pressure from inward migration will continue to be likely, but there is also the NPPF requirement and Planning Policy for Traveller Sites 2024 (PPTS 2024) requirements to address traveller needs both for residential and stopping places (transit and/or emergency sites). The existing identified Emergency Site/Transit site, approved at Oldbury Road, within Ansley parish, is currently out of commission and unavailable for transit or emergency purposes at least on a temporary basis.
- 10.24 Options for meeting any future need for pitches is covered under Policy LP10.

	Options for LP5 - Gypsy and Travellers
Option 1	Roll forward pitch requirements from the most recent (2019) GTAA.
Option 2	Undertake a fresh GTAA with a new survey based on the PPTS 2024.

	Question on LP5 - Gypsy and Travellers
LP5 / 10	Should future pitch needs be based on the latest GTAA 2019 (extended up to the end of the next Plan period), or is a fresh GTAA required?

LP6 Additional Employment Land

- 11.01 As part of the adopted Local Plan Examination, no amount of additional employment land for large users, beyond that being allocated, could be determined or ascertained. Therefore, the Inspector identified a need to have a policy which allowed strategic employment sites to come forward in the absence of any indication of the amount of land that should be allocated. Existing Policy LP6 talks about

significant weight being given to proposals supporting economic growth and productivity where evidence demonstrates an immediate need.

- 11.2 A 2015 West Midlands Strategic Employment Sites Study (WMSESS 2015) proposed several 'Areas' for sites that could deliver needs identified at that time. For North Warwickshire there were 3 sites: Birch Coppice, St Modwen's to the southeast of Junction 10 M42 and Hams Hall expansion. All 3 sites have now been delivered.
- 11.3 Since the WMSESS 2015 a further study was commissioned in 2021 by Staffordshire County Council and the Black Country, Coventry and Warwickshire and Greater Birmingham and Solihull LEP's prepared by Avison Young / Arcadis. This second study was seen by those who commissioned the work as Phase 2 of the work envisaged in the WMSESS 2015. However, there were many shortcomings with the work, and a further Study was commissioned by 25 organisations across the West Midlands, including North Warwickshire BC. This is known as the West Midlands Strategic Employment Sites Study 2024 (WMSESS 2024). The WMSESS 2024 was published in 2024 and looked at the current supply situation; assessment of need; addressing modern industry's requirements; confirming the overall quantum and type of sites required; criteria for identifying sites; identifying priority areas for additional provision; stakeholder engagement; and providing additional policy advice.
- 11.4 The WMSESS 2024 identifies several "Opportunity Areas" (OA's) within the West Midlands. These 9 road-based OAs are set out in Appendix B. Area 5 within the WMSESS 2024 follows the M42 corridor within the Borough and encompasses land covered by the Strategic Gap, designated Green Belt, and land which is not in categories 1, 2, 3 or 4 of Local Plan policy LP2. Priority Area 7 includes land along the M6 / A45 / M45 / A46 Coventry / Rugby to the southeast of the Borough. This evidence does not automatically override other policies but recognises that there are locational requirements specific to certain employment uses and economic benefits to addressing needs in those locations. Any weight accorded to proposed employment provision by virtue of this policy will of course be considered in the context of the policies in the Plan as a whole in arriving at a balanced assessment.
- 11.5 Demonstrating whether a site can deliver for an immediate need is an important part of the assessment. It will be important for the Borough Council to know who the occupier is and how quickly they intend to occupy the premises. It will be important for developers to provide evidence and demonstrate the clear need for the business to be located within the identified area or specific site. In terms of the site, it will need to be demonstrated, and robust evidence provided, as to why this is the only site within the East or West Midlands where a particular occupier could be located. If a site is going to be released outside of an allocation process, then it must be understood that this is a very high bar to pass.

	Options for LP6
Option 1	Maintain the adopted Local Plan policy LP6 and criteria-based approach.
Option 2	Add additional wording to make the policy clearer. The policy could be changed as follows:

Proposals for employment development (offices, industrial, storage /distribution) within the existing employment areas will be supported subject to Policy LP2 of the North Warwickshire Local Plan 2021 (NWLP 2021).

Proposals for employment development outside the Existing Employment areas and within development boundaries will be supported where these do not have an unacceptable adverse impact on the amenities of any nearby residential properties or the wider environment and the local highway network.

Exceptionally, to provide the degree of flexibility required by the NPPF, proposals for employment development on unidentified land outside of the development boundaries will be supported where the following criteria are met:

- a) it is demonstrated to the satisfaction of the Council that there is:
 - (i) an immediate requirement for the employment land of the type proposed in North Warwickshire; and,
 - (ii) either the development will be occupied by named end user/s and this will be secured by Section 106 legal as appropriate; or the development is required for the reasons set out in the NPPF 2024 para 82c (or its replacement), namely it is to accommodate needs not anticipated in this plan,

AND

- (b) it is demonstrated to the satisfaction of the Council that the immediate requirement cannot be met on any of the following within the search area of West and East Midlands area:
 - (i) previous developed land;
 - (ii) an existing employment area as identified in the plan or NWLP 2021; or
 - (iii) land allocated for employment development in the Local Plan; or,
 - (iv) on land with planning permission for employment development.

AND

The development is in an appropriate location and:

- (i) is accessible to the Market Towns within the Borough (where the larger populations reside) or will be made accessible by a choice of means of transport, including sustainable transport modes, as a consequence of planning permission being granted for the development; and
- (ii) has direct access to the strategic highway network and an acceptable impact on the capacity of that network, including any junctions; and

	(iii) will not be detrimental to the wider environment or the amenities of any nearby residential properties as a result of loss of privacy, overshadowing or an overbearing impact, activity levels, noise, vibration, pollution, odours or lighting. (iv) a detailed master plan of the site will be agreed prior to planning permission is approved, which will include location of buildings and parking, colours of buildings, lighting and advertisements (including their position and illumination on buildings).
Option 3	Delete the policy and rely on other policies within the Local Plan (and the NPPF 2024).

	Questions for LP6
LP6 / 1	Do you agree policy LP6 should continue? Yes / No. Please explain your response.
LP6 / 2	Do you agree with Option 2 and the suggested wording? Yes / No.

LP7 Housing Development

- 12.1 The adopted Local Plan policy is broadly compliant with the current NPPF in terms of providing a mix of types and tenures that reflect the needs of the Borough. However, a revised Strategic Housing Market Assessment (SHMA) is to be developed and if new evidence indicates any necessary amendments/changes these can be accommodated through minor changes to the Policy. The policy is also considered to generally conform with the current HEDNA 2022.

	Options for LP7
Option 1	Maintain the adopted policy LP7
Option 2	Revise the policy requirements and update, review tenure, type and special needs requirements.

	Questions on LP7
LP7 / 1	Do you agree that the adopted Policy is broadly compliant with the NPPF 2024? If not, why not?
LP7 / 2	Is there anything missing from the adopted Policy that needs to be included and addressed? Please explain.

LP8 Windfall

- 13.1 Evidence shows that sites of fewer than five homes/0.2 ha and sites not allocated in the local plan consistently deliver at least 60 new homes a year in the Borough. These sites are called “windfalls”, which are reflected in the adopted Local Plan housing policy and supply. The only proposed changed to the policy is to consider whether the windfall housing figure should remain as 60 dwellings per annum. The figure of 60 units per annum was determined through the examination for the adopted Local Plan. In the Annual Monitoring Report this figure has exceeded 60 dwellings per annum every year as can be seen in Table 5 below.

Table 5: Amount of Windfall

Year	Number of new Windfall Applications		No of windfall sites on list	Number of completions	
	Small site	Large site		Small site	Large site
2019/20	50	9	95	44	183
2020/21	34	7	147	30	96
2021/22	55	4	94	23	339
2022/23	45	3	182*	22	123
2023/24	27	0	162*	24	203
Average			136	29	189

Source: Table 20 from the Annual Monitoring Report 2024

Note: Small sites - less than 0.2 hectares and / or have 5 units or less

Large sites - greater than 0.2 hectares and / or more than 5 units

* All sites excluding Allocated Local Plan sites

- 13.2 As can be seen in Table 5 above the number of windfalls has reduced following the adoption of the adopted Local Plan with no large sites coming forward in 2023/24.

	Options for LP8
Option 1	Maintain the windfall figure of 60 units per annum
Option 2	Increase the amount of windfall to 100 units per annum

	Questions on LP8
LP8 / 1	Which option do you support/agree with? 1 Option 1 or, 2 Option 2?
LP8 / 2	If neither option is supported, how would you address and include windfall housing numbers within the housing requirement?

LP9 Affordable Housing Provision

- 14.1 The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA 2022) provides an estimate of the need for affordable housing. For North Warwickshire, the HEDNA 2022 indicates a need of 133 affordable homes per annum. This forms part of overall housing need, rather than being additional to it. Nevertheless, the evidence shows considerable need for affordable housing, particularly in the social or affordable rented tenures (together making up 98% of affordable housing need). It will be important for the Local Plan Review to maximise the number of new affordable homes that are built, particularly rented, where possible.
- 14.2 The Strategic Housing Market Assessment 2015 (SHMA 2015) is currently being updated. When this has been updated the data will be incorporated into the Local Plan Review and will update the previous data. The SHMA 2015 estimated an overall (annual) affordable housing net need of 92 dwellings per annum (dpa) for the 2011-31 period for North Warwickshire and, in applying the 2012-based Subnational Population Projections, this increases to 163 dpa (including all tenures/types).
- 14.3 Notwithstanding the figures above, at the previous Local Plan Examination the updated Economic Viability Assessment (2018) and the Inspector's Report clearly

indicated that, despite the high level of indicated need, the percentage of affordable homes required by developments should be limited to between 30% and 40%, beyond which developments become unviable. This clearly indicates that the current affordable housing percentages sought in the adopted policy LP9 are broadly correct.

- 14.4 Similarly, considering the high indicated level of need for affordable rental properties, the 85% affordable rent and 15% intermediate tenure split in the adopted policy is also considered broadly correct. A higher percentage is considered difficult to achieve due to the broadened definition of affordable housing to include 'discounted market sales housing' such as 'First Homes', for direct purchase. But it is useful to note that the nationally mandated requirement for 25% of Section 106 agreements to deliver at least 25% First Homes has been removed, as such, a higher percentage of affordable rent could be sought, if this does not impact on the viability of housing proposals.
- 14.5 The introduction of a requirement for at least 50% of the housing to be affordable on major development sites within Green Belt should also be recognised and could be referenced in the policy, along with the clarifying NPPF 2024 text, 'unless this would make the development of these sites unviable'. However, as any housing allocations to be brought forward in the Local Plan Review would also involve the removal of Green Belt status where this applied, this national policy approach would only apply to those housing applications and proposals that come forward outside of the Plan-making process. This suggests the requirement may be noted but would be inappropriate for inclusion in a local plan policy.

	Options for LP9
Option 1	Maintain the adopted policy as currently worded.
Option 2	Revise the policy requirements and update and review the tenure and levels of the affordable housing percentages.
Option 3	Include a reference to 50% affordable requirements for housing sites/proposals that come forward in Grey Belt locations, to reflect the NPPF 2024 (for applications made on non-allocated sites).

	Questions on LP9
LP9 / 1	Which option do you support/agree with? 1 Option 1; or 2 Option 2
LP9 / 2	If Option 1 or 2 are not supported, how would you address affordable housing?
LP9 / 3	Should the 50% affordable requirements for housing sites/proposals in Grey Belt locations be included in the Policy or left to the NPPF 2024?

LP10 Gypsy & Travellers

- 15.1 The adopted policy includes reference to the size of sites and pitch numbers, requiring them to be "appropriate in scale and size to the nearest settlement in the settlement hierarchy and its range of services and infrastructure" and that policy approach has also had a number of negative impacts. Firstly, it has not helped sites to come forward; secondly, it does not accurately reflect the traveller communities'

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preference for smaller family sites (as reflected by many of the smaller planning appeals that have been forthcoming over recent years); and thirdly, it has meant that sites close to local service centres have been able to grow quite substantially, resulting in a lack of community cohesion and conflict between the brick-and-mortar community and the Gypsy and Travellers community. As social cohesion and placemaking are key cornerstone of the NPPF 2024 the Borough Council seeks views on restricting the size of residential Gypsy and Traveller sites to no more than the following in any one location. Having said that, the adopted policy sets criteria for assessing the suitability of sites and is considered to be broadly compliant with the NPPF 2024 and Planning Policy for Traveller Sites 2024 (PPTS 2024).

	Options for LP10
Option 1	Maintain the adopted Local Plan policy as it is.
Option 2	Update and review the policy.

	Questions on LP10
LP10 / 1	Is the adopted Local Plan Policy in conformity with the NPPF 2024 and Planning Policy for Traveller Sites 2024 (PPTS 2024)? Yes or No - please explain.
LP10 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024 and PPTS 2024?

Site Size

- 15.2 As stated above, the adopted policy approach of requiring the size of sites and pitch numbers to be “appropriate in scale and size to the nearest settlement in the settlement hierarchy and its range of services and infrastructure” has its shortcomings. In addition, it is not clear what is meant by ‘appropriate in scale and size’. It is suggested that the Local Plan Review could clarify what this means. One option is to provide a specific number of statics, tourers and day rooms on any one site.

	Options for LP10						
Option 3	To determine what is ‘appropriate in scale and size to the nearest settlement’ using the following suggested maximum provisions:						
	Settlement Category	Static	Tourer	Visitor Pitch	Total pitches	Day Room	Distance from development boundary
	1	10	10	4	24	10	500 metres
	2	4	4	2	10	2	0 metres
	3	4	4	2	10	2	0 metres
	4	2	2	2	6	1	0 metres
	5	1	1	1	3	1	N/A
Option 4	Use an alternative number of statics, tourers, dayrooms and visitor pitches.						

	Question on LP10
LP10 / 3	Do you agree with Option 1 as a way to determine size of sites? If not, please provide an alternative way forward to determine what is appropriate.

New Sites / Pitches

- 15.3 Just like for bricks and mortar homes, pitches for the Gypsy and Traveller community are required to meet their future needs. There are a shortage of authorised sites at a national, regional and local level and as a consequence many Gypsy and Travellers live on unauthorised or unsuitable sites. If suitable sites can be found through the planning process it will reduce illegal encampments, which often cause conflict with the settled community. Despite the Call for Sites process, no sites have come forward to be considered for Gypsy and Traveller use, temporary or permanent.
- 15.4 There are a number of potential options to help address the shortage of pitches. These may include requiring larger or major residential developments to provide a proportion of pitches, and / or set aside areas for small family pitch opportunities. This approach could help mitigate the impact of large site proposals for significant numbers of pitches and is similar to the approach taken to achieve 'self-build' plot opportunities.
- 15.5 Other alternatives would be to encourage the redevelopment of former farmstead sites and buildings, similar to those enabled for residential redevelopment under "Class Q", or through the inclusion of a 'rural exceptions site' policy which would enable permanent sites to come forward in areas where Gypsy and Traveller sites would not normally be allowed. Finally, potential for intensification or extension of existing sites should also be considered. Accommodating the needs of existing families may be better met through extension to existing sites, increasing densities on existing sites and the extension of larger sites to provide the opportunity to operate partly as a transit site. In summary, the options for providing additional pitches include:

	Options for LP10
Option 5	The continued application of a criteria-based policy to assist the provision of sites (i.e. policy LP10).
Option 6	Allocate part of large strategic sites to accommodate Gypsy and Traveller pitches on a percentage basis.
Option 7	Allocate part of large strategic sites to accommodate areas for small family pitch opportunities (similar to the approach taken to achieve 'self-build' plot opportunities).
Option 8	Use of former farmstead sites and buildings.
Option 9	Inclusion of a 'Rural Exception Sites' policy for Gypsy and Traveller sites.
Option 10	Consider extensions to existing sites.
Option 11	Seek redundant or vacant public sector land, where appropriate for potential Gypsy and Traveller use, even small sites that may only accommodate 1 or 2 pitches at most.

	Questions on LP10
LP10 / 4	Which of the Options do you agree with as a way to provide sites for the Gypsy and Travellers community? • Option 5 (planning applications) - Yes / No • Option 6 (large and strategic sites with sites provided proportionate to the overall scale of the development) - Yes / No • Option 7 (large and strategic sites – family pitches / areas provided) - Yes / No • Option 8 (former farmstead sites) - Yes / No • Option 9 (new Rural Exception Sites policy) - Yes / No • Option 10 (site extensions, potentially allocated) - Yes / No • Option 11 (seek to allocate new small sites) - Yes / No
LP10 / 5	If you answered yes to Option 6 or 7, should the requirement apply to housing allocations in the adopted Local Plan that are rolled forward into the Local Plan Review?
LP10 / 6	Do you have any other suggestions relating to how additional pitches can be provided?

Transit Sites

- 15.6 The policy may also need to be clarified in respect of Transit sites. The adopted Local Plan policy does not mention transit sites as at the time it was adopted there were sufficient sites to meet the identified need. However, due to a number of reasons so transit provision is currently available, as such, there may be a requirement for a specific Transit or Emergency Stopping policy to address this issue.

	Option for LP10
Option 12	Identify negotiated Stopping Places within the Borough (transit/emergency need)

	Question on LP10
LP10 / 7	Should we adopt a negotiated stopping policy, which allows caravans to be sited at a suitable location for an agreed and limited period?

LP11 Economic Regeneration

- 16.1 The adopted Local Plan policy seeks to support economic regeneration, farm diversification and broadening employment uses and opportunities. The Policy seeks to protect and retain employment uses once approved, where appropriate and reasonable, particularly in rural areas and is considered to be broadly compliant with the NPPF 2024.
- 16.2 There may be the need for some minor amendments to reflect/note recent changes to permitted development rights, including the increase to the permitted floor space

for changing agricultural buildings to flexible commercial use (Class R) from 500 to 1,000 square meters, and the increase to the maximum floor space allowed per residential dwelling under Class Q rights to 150 square meters, however, such changes are not considered significant.

	Options for LP11
Option 1	Maintain the adopted policy as currently worded.
Option 2	Revise the policy requirements and update and review the text considering recent relaxations to the General Permitted Development Order (GPDO).

	Questions on LP11
LP11 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes / No - please explain.
LP11 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?
LP11 / 3	Should the policy reflect/refer to the GPDO 2024 changes in relation Class R and Class Q developments?

LP12 Employment Areas

- 17.1 The adopted Local Plan policy identifies the major industrial and employment sites within the Borough for safeguarding against loss through redevelopment/inappropriate changes of use. This policy seeks to control some use changes within certain estates in relation to B8 warehousing uses but is still considered to conform with the NPPF 2024. The only issue considered to arise is whether the current list of estate sites within the policy is fixed, or whether other sites should be considered for inclusion in the policy.
- 17.2 The adopted Policies Map does not identify Indurent Park (formerly known as St Modwen's Tamworth Park) as an Employment Park. The site is made up of 7 units, providing over 705,000 sq. ft. over two areas east and west of Kingsbury Road and was granted planning consent at appeal prior to the final adoption of the adopted Local Plan. Since completion the site should be considered as an option to be included within policy LP12 as part of the designated employment sites. Other sites may also be appropriate for consideration for inclusion.

	Options for LP12
Option 1	Maintain the adopted policy and list of industrial estates as currently worded.
Option 2	Revise the policy requirements and update and review the list of industrial estates to add other sites/estates as appropriate (e.g. Indurent Park).

	Questions on LP12
LP12 / 1	Is the adopted Local Plan policy LP12 in conformity with the current NPPF 2024. Yes or No - please explain.
LP12 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP12 / 3	Are there other major industrial and employment sites that should be identified included within the policy? Yes or No - please explain.
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LP13 Rural Employment

- 18.1 The focus of adopted Local Plan policy is on farm diversification and controls over the re-use and adaptation of existing rural buildings. The policy may require some minor amendments to better reflect redevelopment of barns, agricultural buildings and farm complexes under Class Q for residential conversions and Class R for commercial conversions (as outlined above). Nevertheless, the policy still broadly conforms with the NPPF 2024, addressing issues of sustainability, heritage, design and accessibility.

	Options for LP13
Option 1	Maintain the adopted policy as currently worded.
Option 2	Revise the policy requirements and update and review the text considering recent relaxations to the General Permitted Development Order (GPDO).

	Questions for LP13
LP13 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No - please explain.
LP13 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?
LP13 / 3	Should the policy reflect/make reference to the GPDO 2024 changes in relation to farm redevelopments?

LP14 Landscape

- 19.1 The adopted Local Plan policy sets criteria for assessing the suitability of site proposals in relation to the landscape, including guidance in the Landscape Character Assessment 2010 and other listed guidance or evidence base documents. The policy is broadly compliant with the NPPF 2024 but may benefit from some minor changes to reflect the updated Landscape Character and Sensitivity Assessment 2025 (draft only, pending completion) and any other relevant documents currently under preparation.

	Options for LP14
Option 1	Maintain the adopted policy as currently worded.
Option 2	Revise the policy requirements and update and review the text once the updated Landscape Character Review and Landscape Sensitivity Assessment study has been completed.

	Questions on LP14
LP14 / 1	Is the adopted Local plan Policy in conformity with the current NPPF 2024. Yes or No - please explain.
LP14 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF?

LP15 Historic Environment

- 20.1 The adopted Local Plan policy deals with the implications of development affecting the Borough's historic environment, local character, identity and distinctiveness. The policy is considered to conform with the NPPF 2024 and the only minor amendments sought are in relation to better reflecting the local evidence base in relation to Warwickshire Historic Farmsteads.
- 20.2 Historic farmsteads that have retained traditional buildings and / or their historic form make a positive contribution to the rural building stock, landscape, local character and distinctiveness of the Borough. Whilst such buildings have been more prone to both neglect and development than any other historic building type, the West Midlands Farmsteads and Landscapes Project 2011 (WMFLP 2011) identify that 84% of farmstead sites within Warwickshire have retained some or all their working buildings.
- 20.3 Given the potential importance of historic farmsteads to the rural character of the Borough, their presence and the need to protect them could be better highlighted in the Local Plan policies. For example, policy LP15 could be revised to include them in the list of heritage assets to be conserved and enhanced. Additionally, either as a further revision to that policy, or as a new standalone policy, guidance could be provided on their re-use and / or re-development – to make it clear that where a proposal affects a historic farmstead particular regard will be had to the significance of the surviving historic form and buildings and their contribution to the wider landscape and that sensitive conversion of surviving buildings to appropriate uses will be looked upon favourably as a means to conserving such assets. Indeed, the WMFLP 2011 notes that 'historic farmsteads are assets which, through agricultural and other new uses, have significant potential to make an important contribution to the rural economy and communities away from market towns and other rural centres.
- 20.4 Further work will also need to be undertaken on any future development allocations and proposals as part of the Historic Environment Assessments (HEAs) to support the Local Plan Review process. This work may also inform further changes to the adopted policy, although these are expected to be minor in nature and more relevant to site specific issues and potential allocations, when identified.

	Options for LP15
Option 1	Maintain the adopted policy as currently worded.
Option 2	Revise the policy only to include specific reference to conserving and enhancing Historic Farmsteads.
Option 3	Revise the policy only to take account of any changes required as a result of the latest evidence base and work undertaken as part of the HEA for the Local Plan Review.
Option 4	Revise the policy in accordance with both Options 2 and 3.
Option 5	Option 2, 3 or 4 along with additional wording to provide guidance on the re-use and / or re-development of proposals affecting historic farmsteads.

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Option 6	Option 2, 3 or 4 along with a new standalone Historic Farmsteads policy to provide guidance on the re-use and / or re-development of proposals affecting historic farmsteads.
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	Questions on LP15
LP15 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No – please explain.
LP15 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?
LP15 / 3	Which of the 6 Options above do you agree with, if none, please state what you would change and why.

LP16 Natural Environment

- 21.1 The adopted Local Plan policy deals with the implications of development affecting the Borough's natural environment and assets. The policy is broadly compliant with national and local policy but would benefit from updating due to a revised evidence base, especially the approach to Bio-diversity Net Gain (BNG) funding. The policy should also include references to the National Capital Assessment Partnership (NCAP), the Natural Capital Investment Strategy (NCIS) and the draft Local Nature Recovery Strategy (LNRS). The policy is otherwise considered to be in conformity with the NPPF 2024.

	Options for LP16
Option 1	Policy and reasoned justification to remain unchanged.
Option 2	Reasoned justification updated to reflect the Local Nature Recovery Strategy (LNRS), which is currently being developed, the NCAP (Nature Capital Action Plan) and the NCIS (Nature Capital Investment Strategy).

	Questions on LP16
LP16 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No - please explain.
LP16 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP17 Green Infrastructure

- 22.1 The adopted Local Plan policy is broadly compliant with the NPPF 2024 but will need some minor updating to better reflect the updated sub-regional green infrastructure study (the Warwickshire, Coventry & Solihull Sub-Regional Green Infrastructure Strategy August 2024).

	Options for LP17
Option 1	Policy to remain unchanged, subject to minor updates.
Option 2	Update or replace the policy as it is not considered necessary or in conformity with the NPPF 2024?

	Questions on LP17
LP17 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No - please explain.
LP17 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP18 Tame Valley Wetlands Nature Improvement Area including Kingsbury Water Park

- 23.1 The adopted Local Plan policy recognises the importance of the site to both the local area and region, providing support for its continued existence and reflecting its location within the Green Belt, enabling replacement of the buildings within the envelope of the site if required. Dealing with a specific local site and use considered appropriate within the Green Belt, the policy is considered to conform with the NPPF 2024.

	Options for LP18
Option 1	Adopted policy remains unchanged, subject to minor updates.
Option 2	Update or replace the policy as it is not considered necessary or in conformity with the NPPF 2024?

	Questions on LP18
LP18 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No - please explain.
LP18 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP19 Local Nature Reserves.

- 24.1 The adopted Local Plan policy is simply designating those sites identifies within the Borough as 'Local Nature Reserves'. No further amendments or updates are proposed, and the policy is considered to comply with the NPPF 2024.

	Options for LP19
Option 1	Adopted Policy remains unchanged, subject to minor updates.
Option 2	Update or replace the policy as not considered necessary or in conformity with the NPPF 2024?

	Questions on LP19
LP19 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No - please explain.
LP19 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP20 Green Spaces

- 25.1 The adopted Local Plan policy designates those sites within the Borough identified as 'Green Space' in accordance with the NPPF 2024 (paragraph 107). No further

amendments or updates are proposed, and the policy is considered to comply with the NPPF 2024.

	Options for LP20
Option 1	Policy to remain unchanged, subject to minor updates.
Option 2	Update or replace the policy as it not considered necessary or in conformity with the NPPF 2024.

	Questions on LP20
LP20 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No - please explain.
LP20 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP21 Services and Facilities

- 26.1 The adopted Local Plan policy is broadly compliant with the NPPF 2024 in terms of identifying and protecting from loss defined areas and commercial frontages containing services and facilities within settlements. No further amendments or updates are proposed or considered necessary at this time. Nevertheless, recent years has seen the loss of and decline in available services and facilities such as retail, banking/financial type services, post offices etc and to help improve the sustainability of the Borough's existing smaller settlements the policy could consider how to encourage new development to directly address these losses.

	Options for LP21
Option 1	Retain the adopted Local Plan policy as it is, to protect and avoid loss of services and facilities, where possible.
Option 2	Retain and expand the policy, to require new developments to provide new and additional services where previous losses have occurred, to address sustainability issues.

	Questions on LP21
LP21 / 1	Do you agree the adopted Local Plan policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP21 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP22 Open Spaces and Recreational Provision

- 27.1 The adopted Local Plan policy is considered to be broadly compliant with the NPPF 2024 in terms of requiring residential development to address open space and recreational needs and to protect and, where possible, enhance existing amenity and recreational open space.
- 27.2 The adopted Open Space and Recreation Supplementary Planning Document (SPD) may need to be updated to either reflect new allocations, or address costing and viability issues that have evolved since the Local Plan was adopted. No further amendments or updates to the policy are proposed and the policy is considered to comply with the NPPF 2024.

	Options for LP22
Option 1	Policy to remain unchanged, subject to minor updates.
Option 2	Update or replace the policy as it is not considered necessary or in conformity with the NPPF 2024.

	Questions on LP22
LP22 / 1	Do you agree the policy is in conformity with the NPPF 2024 and should be maintained? Yes or No - please explain.
LP22 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP23 Transport Assessments and Travel Plans

- 28.1 The adopted Local Plan policy dealing with transport assessments for development proposals is considered to comply with the NPPF 2024, reflecting the section on 'Considering development proposals' (paragraph 118). No change is proposed. Confirmation, comments or responses to this approach are sought.

	Options for LP23
Option 1	Policy to remain unchanged, subject to minor updates.
Option 2	Update or replace the policy as it is not considered necessary or in conformity with the NPPF.

	Questions on LP23
LP23 / 1	Do you agree the policy is in conformity with the NPPF 2024 and should be maintained? Yes or No - please explain.
LP23 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP24 Stations

- 29.1 The adopted Local Plan policy deals with issues affecting existing and potential new railway stations. Predominantly being site specific related, the policy is considered to comply with the NPPF 2024, according with the section on 'Promoting sustainable transport' (Chapter 9). No major change is therefore proposed, although one of the new station proposals, at Arley, is likely to be dropped following publication of the Counties Rail Strategy, which promotes a new station in the Galley Common/Stockingford area (now in the early stages of planning). Confirmation, comments or responses to this approach are sought.

	Options for LP24
Option 1	Policy to remain unchanged, subject to minor updates.
Option 2	Update or replace the policy as it is not considered necessary or in conformity with the NPPF.

	Questions on LP24
LP24 / 1	Do you agree the policy is in conformity with the NPPF 2024 and should be maintained? Yes or No - please explain.
LP24 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP25 Railway Lines

- 30.1 The adopted Local Plan policy deals with railway lines and the safeguarding of railway routes, both new, such as HS2, and former routes that have potential to accommodate alternative sustainable transport uses in accordance with Chapters 8, 9 and 11 of the NPPF 2024 ('Promoting healthy and safe communities', 'Promoting sustainable transport' and 'Making effective use of land'). No change is proposed. Confirmation, comments or responses to this approach are sought.

	Options for LP25
Option 1	Policy to remain unchanged, subject to minor updates.
Option 2	Update or replace the policy as it is not considered necessary or in conformity with the NPPF 2024.

	Questions on LP25
LP25 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP25 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP26 Strategic Road Improvements

- 31.1 The adopted Local Plan was built on the premise of improvements being required at a strategic level to accommodate the amount of development being proposed along the A5. The Local Plan Inspector sought comfort from the fact that part of the works would be funded to assist in the delivery of the homes along the A5 corridor and this enabled the adopted Local Plan to progress through to adoption. The funding was announced in March 2020, with £79.5 million being earmarked for phases 1 and 2 out of the 4 phases of improvements identified along the A5. As the road is part of the strategic road network, National Highways took on the role of progressing the scheme.
- 31.2 A scheme was developed to determine whether the improvements were financially cost effective and to ascertain the overall costs. It was determined that phases 1 and 2 (known by National Highways as the 'Dordon to Atherstone Scheme') had tripled in cost, making the benefit costs ratio too low to progress further. In April 2025, the government then removed the funding which had previously been made available for the proposed improvements to the A5. As a result, Policy LP26, which deals with strategic road improvements, needs to be updated and amended to reflect the changed situation.
- 31.2 Funding for A5 improvements, which are considered necessary in light of growth along the corridor inside and outside of the Borough, will continue to be bid for by

the County Highway Authority and lobbied for, through the A5 Partnership of Local and Highway Authorities, to be included in the Road Investment Strategy (RIS) process, a five-year road investment cycle. In addition, Midlands Connect completed a Strategic Outline Business Case in 2022/23, setting out the case for investment and a range of potential interventions to support funding bids and growth along the corridor. Funding will also need to be sought through developer contributions, targeting developments along the A5 corridor where appropriate, to help address the shortfall in funding, where viability permits.

- 31.3 Nevertheless, it is still expected that land should be safeguarded through the reserve Site RH1 to enable the potential for improvements, potential longer term dualling, subject to funding and delivery, as part of any planning application on the site.

	Options for LP26
Option 1	No change to the adopted policy, maintaining the intention to safeguard the land within reserve site RH1 and working alongside “appropriate agencies” to develop options and funding opportunities (RIS) to dual the A5 in this location.
Option 2	Reflect the loss of funding and changed circumstances and drop the potential for dualling or major improvements along the A5.
Option 3	Maintain the adopted policy but amend to reflect changes to the financing requirements necessary and seek private sector contributions from all developments accessing onto or directly impacting and generating traffic along the A5 corridor and retain the longer-term aspiration for dualling along the corridor.

	Questions on LP26
LP26 / 1	Do you agree with Option 1 and policy LP26 remaining unchanged until such time that full consideration can be made of potential public funding opportunities to address A5 dualling? Yes or No - please explain.
LP26 / 2	Do you consider that, as a result of the cancellation of public funding and changed circumstances the policy should be dropped? Yes or No - please explain.
LP26 / 3	Do you consider that, irrespective of cancellation of public funding and changed circumstances, the policy should be maintained through seeking private sector contributions (at an appropriate attributable level) towards the dualling from all developments accessing/using the A5? Yes or No - please explain.

LP27 Walking and Cycling

- 32.1 The adopted Local Plan policy addresses both the need for sustainable transport alternatives to be considered as part of development proposals/applications and the commitment to undertaking further work to develop a Walking and Cycling Strategy for the Borough. The policy is considered to fully conform with the NPPF 2024, reflecting guidance Chapters 8, 9 and 11 of the NPPF 2024 (‘Promoting healthy and

safe communities', 'Promoting sustainable transport' and 'Making effective use of land'). No change is proposed. Confirmation, comments or responses to this approach are sought.

	Options for LP27
Option 1	Policy to remain unchanged, subject to minor updates.
Option 2	Update or replace the policy as not considered necessary or in conformity with the NPPF 2024.

	Questions on LP27
LP27 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP27 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP28 Level Crossings

- 33.1 The adopted Local Plan policy seeks to address the impact of loss level crossings (principally ungated and unmanned crossings) across the railway lines within the Borough. Where closure by Network Rail is triggered by or is a direct result of development proposals and associated safety concerns over increased use, the policy seeks alternative replacement facilities (footbridges, diversionary route layouts) or contributions towards them. The policy is considered to comply with the NPPF 2024, according with Chapter 9 ('Promoting sustainable transport') by addressing highway safety and access issues. No major change is therefore proposed to the policy.

	Options for LP28
Option 1	Policy to remain unchanged, subject to any minor updates required.
Option 2	Update or replace the policy as not considered necessary or in conformity with the NPPF 2024.

	Questions on LP28
LP28 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP28 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP29 Development Considerations

- 34.1 Adopted Local Plan policy LP29 is a local policy typically used in considering planning applications in a detailed manner. This type of policy is used to assess development once a planning application has been submitted rather than being a strategic policy for the Borough.
- 34.2 The government is looking to introduce National Planning Development Management Policies (NPDMP), as identified in the Levelling-up and Regeneration Act 2023 (LURA). It is expected the government will consult later in 2025 on what these new national policies will cover and that they will directly influence planning decisions by overriding local policies where there is a conflict. They essentially look

to avoid duplication of the same or similar policies across numerous local authority Local Plans.

	Option for LP29
Option 1	Policy to remain unchanged until it is clear what the NPDMP's will include.

	Questions on LP29
LP29 / 1	Do you agree with Option 1 and policy LP29 remaining unchanged until such time that full consideration can be made of the conformity with national policy?
LP29 / 2	Are there any changes to LP29 that should be introduced at the present time? Yes / No - please explain.

LP30 Built Form

- 35.1 As with LP29, this policy is concerned with how built development and its form impacts an area. With the introduction of the NPDMP's, similar circumstances are likely to apply to this policy, in that the NPDMP will directly influence planning decisions by overriding local policies where there is a conflict. Nevertheless, the Policy should be retained until the NPDMP's are introduced that address the issues covered by the policy.

	Option for LP30
Option 1	Policy to remain unchanged until it is clear what the NPDMP's will include.

	Questions on LP30
LP30 / 1	Do you agree with Option 1 and policy LP29 remaining unchanged until such time that full consideration can be made of the conformity with national policy?
LP30 / 2	Are there any changes to LP29 that should be introduction at the present time? Yes / No - please explain.

LP31 Frontages, Signage & External Installations

- 36.1 Policy LP31 is a local policy typically used in considering planning applications in a detailed manner. This type of policy is used to assess development once a planning application has been submitted rather than being a strategic policy for the Borough. It is considered the policy conforms with the NPPF 2024, specifically Chapter 12 ('Achieving well-designed places').

	Option for LP31
Option 1	Policy to remain unchanged until it is clear what the NPDMP's will include.

	Questions on LP31
LP31 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP31 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP32 New Agricultural & Equestrian Buildings

37.1 The adopted Local Plan policy is a local policy dealing with new agricultural buildings in circumstances where planning permission is required. The policy is used to encourage planning applications to consider impacts on rural character and re-use existing buildings where possible. This type of policy is used to assess development once a planning application has been submitted rather than being a strategic policy for the Borough. It is considered to comply with the NPPF 2024 paragraphs 88 and 89.

	Option for LP32
Option 1	Policy to remain unchanged until it is clear what the NPDMP's will include.

	Questions on LP32
LP32 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP32 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP33 Water Management

- 38.1 The adopted Local Plan policy is broadly compliant with the NPPF 2024 in terms of requiring development to address the challenge of climate change (section 14, 'Planning and flood risk', paragraphs 170 to 182).
- 38.2 The Environment Act 2021 sets out changes to the water environment. Each sewerage undertaker now has a statutory requirement to prepare a Drainage and Wastewater Management Plan (DWMP) setting out the capacity of a sewer system, future demands, resilience and other measures. The Severn Trent DWMP was published in 2023.
- 38.3 An increasing focus is also being put upon reducing Storm Overflows from sewer networks. The Environment Act sets out how the Secretary of State must prepare a plan for the purpose of reducing discharge from storm overflows. The Severn Trent Storm Overflows Discharge Reduction Plan (SODRP) 2023 has now been published. The DWMP outlines how the Plan aligns with the SODRP. The policy may need minor updating to reflect this issue and reflect increased concerns and focus on wastewater management and climate change.
- 38.4 The Environment Act 2021 sets a target to reduce the use of public water supply in England by 20% (per head of population) by 2037-38 from the 2019-20

baseline. The current revised draft water resources plans would deliver a 22% reduction in water use per person by this time. In addition, the Government is seeking to reduce business water consumption by 9% by 2037-38 from 2019-20 levels as part of delivery of the water demand target. At the present time it is unclear how this will be achieved, but it is expected this will be through the Building Control process rather than the planning system. This can be kept under review.

	Options for LP33
Option 1	Adopted policy to remain unchanged, subject to any minor updates required.
Option 2	Reflect the forthcoming proposed government changes.

	Questions on LP33
LP33 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP33 / 2	Should we require non-residential development to meet emerging higher water efficiency standards to reduce water usage? Please explain and provide or identify evidence to support local differences to current national policy.

LP34 Parking

- 39.1 It is suggested that this policy only requires updating in relation to lorry parking which was considered through the drafting of the Draft Employment Development Plan Document (Draft Employment DPD), which has now been subsumed into the Local Plan Review. It is not considered that any further changes are required to the policy, as it is broadly in conformity with the NPPF 2024 (paragraph 109 - 'ensuring parking and other transport considerations are integral to the design of schemes and contribute to making high quality places'). Nevertheless, the parking standards may be amended to reflect the revised evidence base and to reflect responses dealing with the lorry parking issue.
- 39.2 The lack of long and short-term affordable lorry parking and servicing facilities (places to eat/wash/etc) within the Borough and surrounding areas is an issue highlighted by the Department of Transport in a number of surveys over recent years. As the work of the Draft Employment DPD has been subsumed into the Local Plan Review there is a need to look at opportunities for site allocations to address this need, but also, consider how businesses that may generate/attract HGV traffic to their site can help to address this issue.
- 39.3 As stated above (see LP4 – Strategic Gap), one option to address the shortfall in lorry parking is to allocate part of the strategic gap north of the current motorway services at Junction 10 of the M42 for such a purpose (see Map 3, Appendix A).
- 39.3 Another option is to require new commercial developments to include additional on-site parking and servicing facilities for visiting/delivery lorries, appropriate to the scale of the development. This would involve not simply maintaining a requirement for parking for the numbers of lorries generated by the commercial business/operations, but to also address and accommodate HGV traffic attracted (deliveries) to the site.

	Options for LP34
Option 1	Adopted policy to remain unchanged.
Option 2	Include the following new policy in the Local Plan Review: Lorry Park facilities and services Dedicated lorry parking to cater for the safe and timely delivery of goods in and out of sites will be expected to be provided on all employment-related sites. These will include welfare facilities and security, as appropriate, for both short and long driver breaks. Expansion of existing authorised lorry parking facilities will be supported where it can be successfully assimilated into the local environment and have no adverse impacts. New lorry parking facilities will be expected to provide the following: • A small-scale ancillary amenity building providing unisex shower and toilet facilities, maintained and available for use every day of the year; • Monitored CCTV; • Lighting, no higher than the height of a single decker lorry, focussed on the internal area of the site; and, • An internal layout that allows for all vehicles to enter and leave the site in a forward gear. In all cases the lorry parking is expected to have no adverse impact on: 1 the local and strategic road network; 2 residential properties, particularly in terms of noise, lighting and general disturbance, both internally and externally; and, 3 the landscape character of the area, especially but not exclusively, the effect of lighting in an otherwise dark area. Reserve Site Some 2.43 hectares are reserved for lorry parking to the north of the motorway service area at junction 10 of the M42. The site will require the provision of a noise barrier to the homes in Green Lane, Birchmoor, as well as substantial screen planting. All lighting will be no higher than 2 metres from ground level and directed completely within the site to avoid any issues with neighbouring residential areas or the nearby motorway.
Option 3	Have a specific stand alone Lorry Parking policy.

	Questions on LP34
LP34 / 1	Do you agree that the adopted policy is in conformity with the NPPF 2024 and can be maintained? Yes or No - please explain.
LP34 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?
LP34 / 3	Should the policy include additional reference to lorry parking and a requirement for commercial sites to provide servicing on-site? Yes or No - please explain.
LP34 / 4	Should there be a separate stand alone Lorry Parking policy?

LP35 Renewable Energy & Energy Efficiency

- 40.1 The adopted Local Plan policy supports proposals for renewable energy and energy efficiency and seeks new development to provide 10% of operational energy from on-site renewables, energy efficiency and low carbon heating improvements. It is considered the policy continues to comply with the NPPF 2024 in respect of Chapter 14 ('Meeting the challenge of climate change, flooding and coastal change'). Nevertheless, the wording of LP35 will require the removal of EV charging points from the policy, as this is now covered by Part S of the Building Regulations, which requires infrastructure for electric vehicle (EV) charging to be provided in new and majorly renovated buildings, with specific requirements varying by building type.
- 40.2 In addition, the NPPF 2024 also notes in paragraph 167 that 'elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed'. This may need to be reflected in additional criteria within the policy. It is also likely that all or part of the policy requirements will be addressed by the forthcoming National Planning Development Management Policies (NPDMP) and Building Regulation reviews.
- 40.3 The UK Government is working towards making solar panels compulsory for almost all new builds from 2027 onwards (subject to practical limitations like significant shading). The goal is for new builds to have the ability to generate renewable electricity (rather than explicitly directing developers to install solar panels). The forthcoming Future Homes Standard, expected to be published in Autumn 2025, will likely include this requirement. In advance of this policy approach becoming a national standard, it may be relevant to include a requirement in any emerging new policy, particularly considering the Governments intentions and the length of time involved in the Local Plan Review process. This will also provide an element of "future proofing" to the policy.
- 40.4 The Future Homes Standard is also focused on significantly improving the energy efficiency of new homes and reducing carbon emissions by 75-85% compared to 2013 levels. This will be achieved through measures such as requiring high levels of building fabric efficiency and the installation of low-carbon heating systems like heat pumps, alongside renewable electricity generation.
- 40.4 A further issue that has arisen within the Borough and is becoming a more pertinent concern with the introduction of the term "Grey Belt" within the Green Belt nationally, is the pressure for major renewable energy proposals for solar farms and battery storage farms. In a predominantly rural area, the impact of major renewable energy

developments on rural character and the loss of high-grade agricultural land for food production are issues that need to be considered.

- 40.10 With regard to agricultural land, the NPPF 2024 favours the use of land that is not higher-quality agricultural land preserved for farming (known as “best and most versatile” (BMV) land in England and Wales). Given this and the potential land take of renewable energy projects, it would be preferable to avoid BMV land.

	Options for LP35
Option 1	Adopted policy to remain unchanged until it is clear what the NPDMP's will include and what the Future Homes Standard will seek/require.
Option 2	Policy to be updated to reflect minor updates – remove reference to EV charging points, require solar panels in new builds and highlight the need for renewable energy projects to demonstrate very special circumstances when located within the Green Belt.

	Question on LP35
LP35 / 1	Should the policy include a requirement that all new builds should include solar panels or have the ability to generate renewable electricity, effectively adopting the 'Future Homes Standard' prior to its adoption by the Government? Yes or No - please explain.
LP35 / 2	Should the policy include assessment criteria for major renewable energy proposals, including solar farms and battery storage farms, to include the potential loss of BMV agricultural land (as defined in the NPPF 2024, i.e. Grades 1, 2 and 3a land), as well as the impact of proposals on the rural character and landscape of the Borough? Yes or No - please explain.

Solar and Wind Farms

- 40.5 With the removal of the restrictions that had previously been in place on onshore wind development (through revisions in the NPPF 2024), the potential for wind farm proposals now needs to be considered. The national policy change effectively places onshore wind on the same footing as other energy development projects, meaning that applications will be assessed against the same criteria.
- 40.6 The adopted policy will need to be amended to reflect the changes in the NPPF 2024, highlight any specific issues proposals will need to address, and identify any sensitive areas within the Borough that proposals should avoid (notwithstanding that locations are, to a major extent, determined on viable wind speeds).
- 40.7 Wind farm proposals have less impact on the loss of high-quality agricultural land in respect of land take. They may, nevertheless, have a major impact on the visual character of the Borough that requires sensitive assessment.

	Options for LP35
Option 3	Do not make changes to the wording of adopted policy LP 35.
Option 4	Include wording in the policy to provide criteria for the location of wind farms

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	Questions on LP35
LP35 / 3	Should the adopted policy be amended to specifically refer to, or include criteria for major wind farm proposals, including the assessment of impact on the rural character and landscape of the Borough? Yes or No - please explain.
LP35 / 4	Should the adopted policy be amended to identify areas that major wind farm proposals should avoid, or areas where such proposals may be both viable and potentially acceptable? Yes or No - please explain.

Battery Energy Storage Sites

- 40.8 Since the adoption of the Local Plan, there are increasingly more planning applications for the siting of battery storage. These Battery Energy Storage Sites (BESS) are often required in conjunction with solar farm proposals, or on stand alone basis, to provide a storage opportunity for numerous facilities within an area. The Borough Council recognizes that these facilities will be required in the future to support the transition away from fossil fuels to clean energy solutions to help address the impacts of climate change.
- 40.9 However, as a result of the need for links to the national grid major transmission stations and the location of solar farms producing energy, the battery storage sites are often located in rural, countryside locations, particularly in North Warwickshire. They are distinctive, with a very industrial character and design, effectively simply large container type box structures, of single or multiple tiers, of significant scale in area/footprint (although they can be smaller), more akin to major container transit warehousing sites found close to rail hubs, ports and freight transfer and transport facilities.
- 40.11 If support for such major proposals is to be given, there is a need for them to include a full landscaping plan, using screening, bunding and embankments as well as planting to help minimize visual impact on rural character and appearance. The economic benefit of avoiding BMV land as well as areas of more sensitive landscape and views, should also therefore be considered

	Options for LP35
Option 5	Do not have a policy on battery storage.
Option 6	Add a new standalone policy on battery storage.
Option 7	Add additional wording on battery storage to LP35 Renewable Energy.

	Questions on LP35
LP35 / 5	Which Option do you agree with? Option 1 – no policy, Option 2 – stand alone policy, Option 3 – part of LP35?
LP35 / 6	If treated as a standalone policy, should proposals be required to avoid BMV (best and most versatile) agricultural land? Yes / No - please explain.