

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



North Warwickshire
Borough Council

November 2025

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

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 at 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.

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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 whether 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 Local Plan 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

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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 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 (SRN). 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 for initially two phases of improvements (a scheme known by National Highways as the Dordon to Atherstone Scheme). 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.
- 6.5 External funding will be the key to delivering improvements to the SRN, as external growth is adding to the issues along those routes and cannot be attributed solely to the growth within North Warwickshire. Requesting contributions from developers of allocations or sites that come forward for development in the future could affect the amount of on-site infrastructure that can be provided. Any contribution sought should be equivalent to the impact of the development on the SRN.
- 6.6 Policy LP1 currently states there is a need to provide the required social infrastructure in terms of schools, health and social facilities alongside development. This reflects the NPPF's theme of sustainable developments and it is important that this continues and underpins the Local Plan Review. The need to make developments places where residents want to live and businesses want to do business is very important. The next section looks at a diverse range of broad growth options.
- 6.7 Around the Borough there are other local authorities seeking to accommodate growth who are looking at new settlements or very large sustainable urban extensions close to or adjoining the Borough boundary. These may not be located within the Borough but may affect the Borough in terms of the use of services and facilities, and the impact on both strategic and rural highways, as well as impacting

on the rural character of this Borough. Those developments will be kept under review as this Local Plan Review progresses.

- 6.8 As part of the consultation process utility companies and service providers will be asked for information on the capacity of their facilities, as well as what new infrastructure is required to deal with any growth that takes place within the Borough. This includes education and health facilities.

Growth Options

- 6.9 Moving forward from the A5 funding decision, what are the growth options for the Borough? Six broad growth 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

- 6.10 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.
- 6.11 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 both within and outside the Borough.

Pros	Cons
Outside of the Green Belt so no release of Green Belt land required	Costs of the required improvements to the SRN 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 a 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.

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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 railway services are reviewed when 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? Yes or No Please explain your answer

Option 2 Focus on main road corridors

- 6.12 This option builds on Option 1 above but not only looks to the A5 but also includes the other main transport corridors. It looks to concentrate most of the development along the main strategic road transport corridors including the A5, M6, M6Toll/M42, the M42/A42, A38 and A446.
- 6.13 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.
- 6.14 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 western half of the Borough. Work on the London to Birmingham civil structures, bridges 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. The A446 is also a constraint to growth and would need substantial improvements to complete the dualling over the River Cole. This means any major development proposed along these corridors could face delays in delivery until completion of the HS2 main works at the earliest.

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6.15 The existing SRN is under pressure both in terms of current congestion and constraints. The Strategic Transport Assessment (STA) which focussed on the growth within the A5 corridor for the adopted Local Plan identified constraints to growth and the need for substantial road improvements. These issues are likely to be very similar in other locations around the Borough. An updated STA will be carried out as part of assessing the impact of specific development sites in the next stage of this Local Plan Review and will determine what improvements are required as a result of the development being proposed through this review.

Pros	Cons
Direct access to the strategic highway network.	Transport corridors move away from the main settlements in the Borough and into 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 SRN 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.	External funding/investment is likely to be required for road improvements in the Borough.
	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.
	The A5 and A446 are used as diversion routes, if there are problems on any local motorways.

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	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.
	All roads part of the SRN require improvements but that comes at a substantial cost and the need to work with National Highways.

Questions on Growth Option 2	
LP1 / 2	Do you agree with this option? Yes or No Please explain your answer.
LP1 / 3	Should the A51 Tamworth to Junction 9 of the M42 be included? If not, why?

Option 3 Public transport centres/corridors

- 6.16 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.
- 6.17 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, however, any improvements that may come as a result of this work 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 A5 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 enhanced bus services and 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 following the introduction of Great British Railways, who will manage	Green Belt surrounds Water Orton and Coleshill.

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passenger services and rail infrastructure as well as service negotiations following the opening of HS2.	
Potential to improve pedestrian and cycle connections to the stations.	Substantial investment required to provide a proper service from Polesworth and access to all platforms at both Polesworth and Atherstone stations.
By providing housing close to stations could potentially help to alleviate road congestion.	The ability to provide additional services to Polesworth Station may be restricted until the railway services are reviewed when 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? Yes or No Please explain your answer.
LP1 / 5	Should Polesworth Station and its potential re-opening be included? If not, why?

Option 4 *Disperse development throughout the Borough*

- 6.18 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 throughout 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.

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Questions on Growth Option 4	
LP1 / 6	Do you agree with this option? Yes or No Please explain your answer.
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?

Option 5 *New settlements or village proposals*

- 6.19 A new main settlement would require a substantial area of land to accommodate all the homes and relevant infrastructure, services and facilities 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 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 in existing settlements is detailed in the latest Settlement Sustainability Assessment (see section on Policy LP2 below and Board Report documents for Local Development Framework Sub-Committee on 17th November 2025). 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 where people want to live. A similar Plan will be required for the Local Plan Review.
- 6.20 This growth option would look to the development of a new main settlement or new village. At the present time through the Call for Sites there is only one suggested new settlement (Thorpe Constantine). 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).
- 6.21 There is one further potential site that is big enough to develop a new village – Call for Sites reference number CFS168 (see Map 2, Appendix A). For both of the above sites the limited transport infrastructure will be an issue.

<i>Pros</i>	<i>Cons</i>
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 main settlement relies on additional land being brought forward in the adjoining district of Lichfield.

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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.
Reduces the impact on existing services and facilities in the other settlements in the Borough.	Other provision must be made 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? Yes or No? Please explain your answer.
LP1 / 10	Do you think the Borough Council should support: 1. A new main settlement in partnership with Lichfield District Council? Yes or No, or 2. A new village to the west of Warton/east of the M42? Yes or No Please explain your answer
LP1 / 11	Are there any locations that should be explored? Please list and provide contact details of the landowners.

Option 6 *Hybrid*

- 6.22 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.
- 6.23 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 of, 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,	Will lead to the release of Green Belt land.

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flexibility and methods for maximising housing delivery.	
A hierarchy of settlements already exists in the adopted Local Plan to help enable and deliver this option.	May result in development on the easiest to develop sites with least costs, infrastructure, service delivery and / or improvements required. 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 Section 106 developer 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? Yes or No Please explain your answer.
LP1 / 13	If you agree, should this option use the adopted Local Plan settlement hierarchy, or some other approach?
LP1 / 13a	If another approach, 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 Sustainability Assessment (SSA) 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.

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- 7.3 The withdrawal of Government funding towards the A5 improvements has delayed the delivery of some of the adopted Local Plan 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 on greenfield sites that have 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 enable them to accommodate continued similar levels of growth in the future. An appraisal may assist in identifying where growth has been uncharacteristically larger (significantly higher) than previous growth, impacting on the character of the settlement. The Sustainability Appraisal being prepared for the next stage of the local plan review process along with an updated Infrastructure Delivery Plan should help address this issue.
- 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 2024 policy and introduction of “Grey Belt” status.
- 7.6 Nevertheless, although the existing settlement hierarchy is broadly compliant with the NPPF 2024, other alternatives should be considered. As stated above, the updated SSA, helps provide the data and evidence underpinning the selection of settlements that are sustainable and can accommodate some growth. 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 adopted 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?

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	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 National Planning Policy Guidance (NPPG) on Grey Belt, issued in February 2025, provides a clearer definition of 'Merging Towns' and clarifies that if a site is just positioned between two towns, then it does not necessarily 'strongly' serve purpose (b) (to prevent neighbouring towns merging into one another). 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 between settlements within the Green Belt that are not 'towns' and so may not be considered to "strongly contribute" to purposes (a), (b) or (d) the Green Belt. In such cases it may be advisable to consider the option of identifying such areas as "Strategic Gaps" as currently exists between Polesworth/Dordon and Tamworth, to help protect settlement identities within North Warwickshire.
- 8.5 As well as preventing neighbouring towns from merging, Green Belt policy also seeks to preserve the setting and special character of historic towns. The Green Belt Study identifies Coleshill as a historic town. However, other settlements within

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.

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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.

Extensions to the Green Belt

- 8.6 Green Belt boundaries can be changed in local plans, but only under "exceptional circumstances" during a local plan review. This typically happens when the local authority needs to meet a specific development need, such as for housing, and can demonstrate that it has first examined all other reasonable options for meeting that need before releasing land from the Green Belt. This normally involves a change to an existing development boundary around a settlement. However, is there a case in North Warwickshire to add to the land identified as Green Belt? The outer boundary of the Green belt runs through the Borough southeast to northwest south of the A5 corridor. As the purpose of the Green Belt was to provide a ring around the metropolitan area, any additional Green Belt would need to be contiguous or joined to the current Green Belt.

Options for LP3	
Option 1	Maintain adopted policy LP3 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.
Option 4	Extend the Green Belt beyond its current outer boundary.

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'.
LP3 / 5	Should the Green Belt outer boundary be extended? Yes or No. If yes, please explain where and why the boundary should be altered.

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

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Tamworth including winning a major appeal on land between Dordon and the M42 for employment. However, it is important within this review to consider whether there are any reasons/issues for any land in the strategic gap to be released for development.

- 9.2 There are two issues to consider. The first issue is the need for additional lorry parking (discussed further below under LP34). A site for this use has been put forward through the Call for Sites, located to the west of the M42, to the north of the motorway services (see Call for Sites reference number CFS136 – Map 3, Appendix A). However, 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 Green Lane, is south of a single line of homes on the north side of Green Lane, Birchmoor (to the west of the M42). It is currently being used as an open grazing field.

Questions on LP4	
LP4 / 1	Do you agree with the principle of removing land from the Strategic Gap to provide for additional lorry parking? Yes / No.
LP4 / 1a	Do you agree with removing the land south of Green Lane (mentioned above) from the Strategic Gap to provide additional lorry parking? Yes / No. If no, are there any other locations that should be considered for this use? Please list and provide contact details of the landowners.
LP4 / 2	Should land be released within the Strategic Gap for an alternative use? Yes / No. If yes, please state the location and use.

- 9.3 The second issue is that with the pressure for further development, particularly along the A5 corridor, there is increasing 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.

- 9.4 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	Retain the existing Strategic Gap but do not designate any new ones.
Option 2	Retain the existing Strategic Gap and identify new ones along major transport corridors. Potential additional Gaps to be designated between: <ul style="list-style-type: none"> a. Grendon/Baddesley and Dordon b. Grendon/Baddesley and Atherstone c. Coleshill Corridor (west of Coleshill between M42 junctions 7a and 9).

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	d. Coleshill to Arden Cross (HS2 Interchange Station)
Option 3	Identify Strategic Gaps throughout the Borough.
Option 4	Remove all Strategic Gaps.

	Questions on LP4
LP4 / 3	Do you support the principle of maintaining gaps between settlements, where possible? Yes / No.
LP4 / 3a	If yes, which of Options 1 to 3 do you agree with?
LP4 / 4	If no, do you agree with removing all Strategic Gaps (Option 4)?
LP4 / 5	Apart from those listed in Option 2 would you propose any additional Strategic Gaps? If yes, 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 the 9598 dwellings have either been completed or are 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 number of homes to be completed each year towards the latter years of the Plan period (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 improvements can still be developed, with bids for grant support continuing and the adopted allocations will be retained on that basis. However, this means that delivery of the sites in the adopted Local Plan will be over a longer Plan period.
- 10.3 Since the Local Plan was adopted there has been work on updating the housing evidence to support a review of the Local Plan. This is in the form of the Coventry and Warwickshire Housing and Employment Development Needs Assessment 2022 (HEDNA 2022). In addition, the government has updated the Standard Housing

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Method for assessing the number of homes required for each local authority area. For North Warwickshire, the housing requirement using the Standard Housing Method equates to 364 dwellings per annum (dpa). This takes into account current and previous plan requirements and targets, leading to an annual housing number which local authorities should use as the starting point for their future housing requirement. The NPPG that applied in 2022 did allow for authorities to diverge from the Standard Housing Method where this could be justified by exceptional circumstances.

10.4 The government expects the Standard Housing 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.

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	Option 4: HEDNA 2014 ONS Household based	Option 5: HEDNA Trend Based
1	2025 - 26	479	479	364	176	119
2	2026 - 27	479	479	364	176	119
3	2027 - 28	479	479	364	176	119
4	2028 - 29	479	479	364	176	119
5	2029 - 30	479	479	364	176	119
6	2030 - 31	479	479	364	176	119
7	2031 - 32	479	479	364	176	119
8	2032 - 33	479	479	364	176	119
9	2033 - 34	479	364	364	176	119
10	2034 - 35	479	364	364	176	119
11	2035 - 36	479	364	364	176	119
12	2036 - 37	479	364	364	176	119
13	2037 - 38	479	364	364	176	119
14	2038 - 39	479	364	364	176	119
15	2039 - 40	479	364	364	176	119
16	2040 - 41	479	364	364	176	119
17	2041 - 42	479	364	364	176	119
18	2042 - 43	479	364	364	176	119
19	2043 - 44	479	364	364	176	119
20	2044 - 45	479	364	364	176	119
		9580	8200	7280	3520	2380

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- 10.5 The Borough Council has only delivered 364 dwellings twice over a 16-year period, although the adopted Local Plan should be delivering well over this figure using the stepped trajectory. As part of this review, although the starting point should be the standard housing method, the Borough Council could consider whether this is the most appropriate starting point for a future housing requirement. As a result, the next section talks through the housing evidence from the HEDNA 2022, which is currently being used by Coventry City Council in the production of their Local Plan and to ascertain whether this is a more appropriate approach for North Warwickshire.
- 10.6 The recent HEDNA 2022 indicates that North Warwickshire should be looking to deliver 176 dwellings per annum (dpa), based on 2014 ONS projections, or a lower trend-based figure of 119 dpa. This latter figure is much lower than both the Standard Housing 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 may not be acceptable as an option for the future because it is so much lower than the Standard Housing Method figure. Nevertheless, use of the HEDNA 2022 housing need (based on the Standard Housing Method using 2014-based Household Projections) and the ‘trend-based’ projection have been included as options.
- 10.7 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).
- 10.8 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.

Duty to Cooperate

- 10.9 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 the housing requirement should 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 recently issued a further Regulation 18 Focussed Preferred Options consultation and confirm in that document they can now provide for their own housing needs as they have delivered more homes than expected over recent years. 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 a matter that will need addressing as part our consideration going forward.

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- 10.10 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 policy LP1 above.

Options for LP5 - Housing Numbers	
Option 1	Use the adopted Local Plan housing requirement (479 dpa) and extend any undelivered housing allocations over the new Plan period.
Option 2	Use the current housing figure from the adopted Local Plan (479 dpa) going forward to 2033 and then use a figure of 364 per annum thereafter.
Option 3	Use the Standard Housing Method 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).
Option 4	Use the HEDNA 2022 applying the Standard Housing Method using the 2014-based Household Projections (176 dpa).
Option 5	Use the HEDNA 2022 trend-based projections (119 dpa).

Questions on LP5 - Housing Numbers	
LP5 / 1	Which Option do you prefer for LP5 and housing numbers?
LP5 / 2	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 / 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

- 10.11 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?
- 10.12 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

- 10.13 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 Employment Sites Study (WMSESS) in 2023/24.
- 10.15 The Coventry & Warwickshire HEDNA 2022–WMSESS Alignment Paper 2024, drafted to combine/integrate the WMSESS study with the HEDNA 2022 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 consultants specifically for North Warwickshire's needs, the North Warwickshire Employment Sites Study 2025 (NWESS 2025), 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. The study 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 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 that should be asked is 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 of that need within the wider region and sub-region? It is important to consider and understand the reasons for the past growth, which was based on the existence of major brownfield/previously developed land (PDL), former energy generation sites and minerals/mining sites which have now been redeveloped and for which similar

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sites no longer exist within the Borough. The focus today should perhaps be on ensuring the new employment sites bring jobs with differing skill opportunities to facilitate a broadening of the employment base within the Borough.

- 10.20 The past 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. In addressing this issue the NWESS 2025 looks at the need for local employment derived from past completions trends of smaller units, alongside an employment forecast based office need plus an allowance for some larger units that occur on local or smaller sites, rather than being delivered on larger strategic sites.
- 10.21 The NPPF 2024 also notes that where “exceptional circumstances” may arise for larger scale strategic development, primarily within the Green Belt, and/or where there is significant new evidence and justification of strategic need, a local plan review should address this issue (paragraphs 146 to 148 and Chapters 3 & 11) through strategic policies. The Planning Inspector at the adopted Local Plan Examination identified a need to have a policy which allowed strategic employment sites to come forward, subject to the local authority and applicant having examined all other reasonable options for meeting its/the identified need. This issue around exceptions and exceptional circumstances is addressed further in Options for Policy LP10.

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 Coventry & Warwickshire HEDNA – WMSESS 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 North Warwickshire Employment Sites Study 2025 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 North Warwickshire Employment Sites Study 2025) 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	<p>Which option do you prefer?</p> <ol style="list-style-type: none"> 1. Option 1 - Apply the HEDNA 2022 need as the requirement – either 61.4 hectares up to 2041 or 88.4 hectares up to 2050. 2. Option 2 - Apply the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper need as the requirement – 26 hectares up to 2041, 36 hectares up to 2045 or 48 hectares up to 2050. 3. Option 3 - Apply the North Warwickshire Employment Sites Study 2025 need as the requirement – 31.3 hectares up to 2041, 42.0 hectares up to 2045 or 54.8 hectares to 2050.

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	4. Option 5 - Maintain a criteria-based Policy approach to strategic employment site delivery.
LP5 / 6	Please explain your answer to LP5 / 5.
LP5 / 7	With regard to Option 4, should a further 50-100 hectares be provided for strategic employment sites (as identified in the North Warwickshire Employment Sites Study 2025 Study)? Yes / No.
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

10.22 The latest available Gypsy and Traveller Accommodation Assessment 2019 (GTAA 2019) identifies a requirement of 19 traveller pitches between 2019 and 2033. Based on the GTAA 2019 a phased requirement of pitches was 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: 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	

10.23 GTAA 2019 was based on needs within the Borough. It is important to consider whether a new GTAA should be undertaken or, alternatively, the current 5-year need in the GTAA 2019 be rolled forward to the end of the Local Plan Review period. The current Government “Planning policy for traveller sites” 2024 (PPTS) notes that *‘Local planning authorities should, in producing their Local Plan:*

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets, and*
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.*

The current GTAA has assessed needs up to 2040 based on the Gypsy and Traveller population present in the Borough at the time of the assessment in 2019. The local plan review covering the period up to 2045 or 2050 would mean a 5 or 10-year period lacking an assessment of need. How to identify needs requirements and address the supply issue is seen as an integral part of the Local Plan Review (see Options in LP10).

10.24 In addition, there is also an NPPF 2024 and PPTS 2024 requirement to address traveller needs for 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

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purposes at least on a temporary basis. This issue will need to be considered as part of the pitch requirements/needs addressed in the Local Plan Review.

10.25 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, for stopping and residential pitches.
Option 2	Undertake a fresh GTAA with a new survey based on the PPTS 2024.

Question on LP5 - Gypsy and Travellers	
LP5 / 10	Which option do you prefer?
LP5 / 11	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" (OAs) within the West Midlands. These 9 road-based OAs are set out in Appendix B. Area 5 within the

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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	<p>Add additional wording to make the policy clearer. The policy could be changed as follows:</p> <p>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 (NWLPL 2021).</p> <p>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.</p> <p>To provide the degree of flexibility required by the NPPF, proposals for employment development based on an exceptional need, on unidentified land outside of the development boundaries will be supported where all the following criteria are met:</p> <p>a) it is demonstrated to the satisfaction of the Council that there is:</p> <p>(i) an immediate requirement for the employment land of the type proposed in North Warwickshire; and,</p> <p>(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,</p>

	<p><u>AND</u></p> <p>(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:</p> <p>(i) previous developed land; or</p> <p>(ii) an existing employment area as identified in the plan or NWLP 2021; or</p> <p>(iii) land allocated for employment development in the Local Plan; or,</p> <p>(iv) on land with planning permission for employment development.</p> <p><u>AND</u></p> <p>c) The development is in an appropriate location <u>and</u>:</p> <p>(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; <u>and</u></p> <p>(ii) has direct access to the strategic highway network and an acceptable impact on the capacity of that network, including any junctions; <u>and</u></p> <p>(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, <u>and</u></p> <p>(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).*</p> <p>Note: All the criteria listed in a), b) and c) need to be met for the development proposal to meet the policy requirements.</p>
Option 3	Delete the policy and rely on other policies within the Local Plan (and the NPPF 2024).

	Questions for LP6
LP6 / 1	Which option do you prefer? Please explain your response.
LP6 / 2	Do you agree with Option 2 and the suggested wording? Yes / No. If not, please explain what changes you suggest.

LP7 Housing Development

- 12.1 The adopted Local Plan policy is broadly compliant with the NPPF 2024 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.

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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 / 1a	Which option do you prefer?
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 change 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	All sites	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?
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 NPPF 2024 introduced a requirement for at least 50% of the housing to be affordable on major development sites within Green Belt. It is suggested that this requirement may be noted in the reasoned justification for the policy but not included in the policy itself. This is because a local plan should not duplicate national guidance.

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 Green Belt locations, to reflect the NPPF 2024 (for applications made on non-allocated sites).

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Option 4	Apply Option 2 and Option 3 (both revise the policy requirements, tenure, levels of the affordable housing percentages <u>and</u> include a reference to 50% affordable requirements for sites that come forward in Grey Belt locations, to reflect the NPPF 2024).
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	Questions on LP9
LP9 / 1	Which option do you support/agree with?
LP9 / 2	If none of the options are supported, how would you address affordable housing?

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”, however, that policy approach has had a number of negative impacts. Firstly, it has not helped sites to come forward; secondly, it does not accurately reflect the traveller communities’ 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 bricks-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 as it stands 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 / 1a	Which option do you prefer?
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.

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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 / 3a	Which option do you prefer (Option 3 or Option 4)?
LP10 / 3	Do you agree with Option 3 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 A Gypsy and Traveller 'pitch' is defined as the space required to accommodate one household. Typically, a pitch will provide space for a mobile home, a touring caravan, vehicle parking and a day room / amenity block. Just like for bricks and mortar homes, pitches for the Gypsy and Traveller community are required to meet their future needs. 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

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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? (choose all that apply)
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, no 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 / 7a	Do you agree with Option 12? Yes / No.
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? Yes / No - please explain.

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 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 / 1a	Do you agree with Option 1? Yes / No.
LP11 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes / No.
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? Yes / No.

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.

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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 / 1a	Which option do you agree with?
LP12 / 1	Is the adopted Local Plan policy LP12 in conformity with the current NPPF 2024. Yes or No.
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 within the policy? Yes or No - please explain.

LP13 Rural Employment

18.1 In view of the loss of many rural buildings and the impact on rural character, the Borough Council would like to encourage these buildings to be retained in their original use. However, Government guidance encourages farm diversification and has relaxed many requirements, such as permitted development, in order to enable changes to, or redevelopment of, these rural buildings. 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).
Option 3	Seek to retain traditional rural buildings for their original use.

Questions for LP13	
LP13 / 1a	Which option do you agree with – Option 1 or Option 2?
LP13 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No.
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? Yes or No - please explain.
LP13 / 4	Should the policy be amended to seek retention of traditional buildings in accordance with option 3 above? Yes or No - please explain.

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 and adding historic farmsteads and industrial heritage sites to the list of heritage assets identified in the policy.
- 20.2 Historic farmsteads that have retained traditional buildings and / or their historic plan layout 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) identifies 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

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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 to include specific reference to conserving and enhancing Historic Farmsteads.
Option 3	Revise the policy to include specific reference to conserving and enhancing industrial heritage sites.
Option 4	Revise the policy 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 5	Revise the policy with additional wording to provide guidance on the re-use and / or re-development of proposals affecting historic farmsteads.
Option 6	Create a new standalone Historic Farmsteads policy to provide guidance on the re-use and / or re-development of proposals affecting historic farmsteads.

Questions on LP15	
LP15 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024. Yes or No.
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	Do you agree with Option 1? Yes / No.
LP15 / 4	If you think the policy should be changed, which of the following Options do you agree with (choose all that apply): <ol style="list-style-type: none"> 1. Option 2 – Add reference to industrial heritage sites (Yes / No) 2. Option 3 – Add reference to historic farmsteads (Yes / No) 3. Option 4 – update in line with latest evidence base (Yes / No)
LP15 / 5	Which of the following do you agree with (choose one): <ol style="list-style-type: none"> 1. Revise the policy to add guidance on proposals affecting Historic Farmsteads 2. Create a new standalone Historic Farmsteads policy 3. Do not provide specific guidance on Historic Farmsteads
LP15 / 6	Are there any other changes that should be made to the policy? Yes / No. If yes, 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 / 1a	Which option do you agree with / prefer?
LP16 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes or No.
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 / 1a	Which option do you agree with / prefer?
LP17 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes or No.
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 / 1a	Which option do you agree with / prefer?
LP18 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes or No.
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 / 1a	Which option do you agree with / prefer?
LP19 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes or No.
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.

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Option 2	Update or replace the policy as it not considered necessary or in conformity with the NPPF 2024.
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Questions on LP20	
LP20 / 1a	Which option do you agree with / prefer?
LP20 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes or No.
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 / 1a	Which Option do you prefer?
LP21 / 1	Do you agree the adopted Local Plan policy is in conformity with the NPPF 2024 and can be maintained? Yes or No.
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.

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Option 2	Update or replace the policy as it is not considered necessary or in conformity with the NPPF 2024.
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	Questions on LP22
LP22 / 1a	Which Option do you agree with?
LP22 / 1	Do you agree the policy is in conformity with the NPPF 2024 and should be maintained? Yes or No.
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 / 1a	Which Option do you agree with?
LP23 / 1	Do you agree the policy is in conformity with the NPPF 2024 and should be maintained? Yes or No.
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 / 1a	Which Option do you agree with?
LP24 / 1	Do you agree the policy is in conformity with the NPPF 2024 and should be maintained? Yes or No.

LP24 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?
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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 / 1a	Which Option do you agree with?
LP25 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No.
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

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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 future 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	Which option do you agree with?
LP26 / 2	Please explain your answer.

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 / 1a	Which Option do you agree with?
LP27 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No.
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 the loss of level crossings (principally ungated and unmanned crossings) over 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 / 1a	Which Option do you agree with?
LP28 / 1	Do you agree the policy is in conformity with the NPPF 2024 and can be maintained? Yes or No.
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 the policy remaining unchanged until it is clear what the NPDMP's will include?
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 the policy remaining unchanged until it is clear what the NPDMP's will include?
LP30 / 2	Are there any changes to LP30 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.
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.

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	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.
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 via local plan policies. This can be kept under review.

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

	Questions on LP33
LP33 / 1a	Which Option do you prefer?
LP33 / 1	Do you agree that the existing 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.
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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).
- 39.4 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	Existing policy to remain unchanged.
Option 2	<p>Amend the policy to include the following in the Local Plan Review:</p> <p>Lorry Park facilities and services</p> <p>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.</p> <p>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.</p>

	<p>New lorry parking facilities will be expected to provide the following:</p> <ul style="list-style-type: none"> • 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. <p>In all cases the lorry parking is expected to have no adverse impact on:</p> <ol style="list-style-type: none"> 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. <p>Reserve Site</p> <p>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.</p>
Option 3	Existing policy to remain unchanged and have a new separate standalone policy on Lorry Parking (for suggested wording see Option 2).

Questions on LP34	
LP34 / 1	Which Option do you prefer?
LP34 / 2	Do you agree with the policy wording suggested at Option 2? Yes / No. If no, please explain how it should be changed.
LP34 / 3	Should the policy (existing policy amended or new separate policy) include a requirement for commercial sites to provide servicing on-site? Yes / No - please explain.

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

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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.

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	Which Option do you prefer?
LP35 / 2	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.

Solar and Wind Farms

- 40.5 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

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

- 40.6 Additionally, with the removal of the restrictions that had previously been in place on onshore wind development (through revisions to 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. The NPPF 2024 also encourages local plans to identify suitable areas to accommodate renewable and low carbon energy proposals.
- 40.7 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.
- 40.8 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).
- 40.9 Wind farm proposals have less impact on the loss of high-quality agricultural land in respect of land take compared with solar farms. Nevertheless, they can have a major impact on the visual character of the Borough that requires sensitive assessment, which is addressed in the current policy.

Options for LP35	
Option 3	Do not make changes to the policy to identify suitable areas for renewable and low carbon energy proposals, or the use of BMV agricultural land.
Option 4	Make changes to the policy seeking to identify suitable areas for renewable and low carbon energy proposals.
Option 5	Make changes to the policy seeking to avoid the use of BMV agricultural land to accommodate renewable and low carbon energy proposals.
Option 6	Make changes to the policy seeking to both identify suitable areas for renewable and low carbon energy proposals AND avoid the use of BMV agricultural land to accommodate renewable and low carbon energy proposals.

Questions on LP35	
LP35 / 3	Which Option do you prefer?
LP35 / 4	Should the adopted policy be amended to identify areas that major wind farm proposals and / or other renewable and low carbon energy proposals should avoid? Yes or No - please explain.

Battery Energy Storage Sites

- 40.10 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 a

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standalone 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. Their location and delivery are subject to the capacity available within the National Grid, which may delay implementation. Proposals should ensure they apply the most up to date and safest technology available when implemented.

- 40.11 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, with potential for impacts on rural character.
- 40.12 Concerns have been raised locally about rural locations, design and fire safety risks associated with battery storage sites. If support for such proposals is to be given, there is a need for them to include a full fire safety and risk assessment, a full landscaping plan, including screening, bunding and embankments, as well as planting to help minimize visual impact on rural character and appearance. The economic benefit of avoiding BMV (best and most versatile) agricultural land as well as areas of more sensitive landscape and views, should also therefore be considered. As a result of these concerns, should a policy seek to encourage these uses within existing or new employment sites, or on previously developed land before the use of a greenfield site is considered?

Options for LP35	
Option 7	Do not have a policy on battery storage.
Option 8	Add a new standalone policy on battery storage.
Option 9	Add additional wording on battery storage to policy LP35.
Option 10	Do not have a specific site allocation policy for battery storage.
Option 11	Rely on the criteria-based policy alone to address and determine proposals for battery storage sites.

Questions on LP35	
LP35 / 5	Which Option do you agree with? Option 7 – no policy Option 8 – standalone policy Option 9 – 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.
LP35 / 7	Should battery storage proposals be required to have a higher expectation/requirement for landscaping in rural areas (to minimise impacts on rural character)? Yes/No - please explain.
LP35 / 8	Do you prefer Option 10 or Option 11? Please explain reasons for your preference.

- 40.13 Where sites have been submitted for renewable energy purposes as part of the “Call for Sites” process, should these sites be considered for inclusion as allocations within the Local Plan Review, particularly where these are sited in association with and ancillary to other sustainable energy projects or major and strategic employment proposals and sites?

Options for Battery Storage Sites	
Option 12	Allocate sites for renewable energy purposes as part of the Local Plan Review.

Question on Battery Storage Sites	
LP35 / 9	Do you agree with Option 12? Yes or No - please explain.

LP36 Information and Communication Technologies

- 41.1 Local planning guidance and policy generally require new residential developments to be connected to gigabit-capable broadband infrastructure, which provides download speeds of at least 1 gigabit per second (1000 Mbps) by 2030. This is often achieved through full fibre connections but can also be delivered via technologies like cable or fixed wireless. See [CBP-8392.pdf](#) and [New build developments: delivering gigabit-capable connections - GOV.UK](#). It is subject to a cost cap/threshold of £2,000 cost per dwelling and where a developer is unable to secure a gigabit-capable connection they will be required to install the next best technology connections available.
- 41.2 It should also be noted that since 2022 the Building Regulations also now mandate the installation of gigabit-ready physical infrastructure and gigabit-capable connections in new build developments (The Building etc. (Amendment) (England) (No. 2) Regulations 2022.gov.uk).
- 41.3 Superfast broadband is defined as over 30 Mbps, while ultrafast broadband is defined as over 100 Mbps. Adopted policy LP36 currently notes 30Mbps as a minimum requirement. However, considering the changes in national policy, it would be advisable to update the policy to reflect the change to 1000Mbps (1Gbps). The policy is still considered broadly in conformity with the NPPF 2024, subject to a minor update outlined in Option 1 below.

Options for LP36	
Option 1	Retain the adopted policy on Information and Communication Technologies, with the following suggested change to replace the reference to ‘minimum download speed’ in the policy text: “Where a developer is unable to secure a gigabit-capable connection not exceeding the cost cap of £2,000 per dwelling, ^{footnote 1} a developer will be required to install the next best technology connections available, provided this can be done without that connection also exceeding the cost cap.”
Option 2	Delete the policy considering the changes to Building Regulations requiring the installation of gigabit-ready physical infrastructure and gigabit-capable connections in new build developments.

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Questions on LP36	
LP36 / 1a	Which Option do you prefer?
LP36 / 1	Is the adopted Local Plan policy in conformity with the current NPPF 2024? Yes or No.
LP36 / 2	If you consider the policy is not in conformity, how should the policy be amended to help accord with the NPPF 2024?

LP37 Housing Allocations

- 42.1 The adopted Local Plan policy LP37 relates to housing allocations that are expected to be delivered by 2033, the end date of the adopted Local Plan. Some changes will be necessary to reflect where site allocations have come forward for development and been completed, as well as updated to reflect any new allocations that will subsequently be required. New allocations will be required to fulfil the housing number in the Local Plan Review as discussed in Policy LP5 above.
- 42.2 The final policy in the Local Plan Review will be a list of site allocations, including their size and capacity available/planned/expected to be delivered by the end of the new Plan period.
- 42.3 A Call for Sites has been made for sites that are available for potential development. The Call for Sites closed on 31st March 2025. 173 sites were submitted for a variety of uses including for housing. There were a few duplications of parts of sites but only one site was a full duplication, and a site plan was also not received for one site so had to be discounted. The total amount of sites at the end of the Call for Sites period was 170. The full list of sites, site areas and potential end use is provided as part of the evidence base and available on the Council's website. No decision on the merits of the sites has yet been made.
- 42.4 As some of the submitted sites are currently part of allocations in the adopted Local Plan it is not proposed that these allocations are withdrawn but are carried forward as allocations in the Local Plan Review.
- 42.5 The following table provides information on the allocations from the adopted Local Plan.
- 42.6 Of the adopted Local Plan allocated housing sites above, it is proposed to automatically carry forward the following allocations: H2, H3, H4, H8 and H10. It is proposed that sites already with planning permission and/or under construction will not continue as an allocation but will be included in the committed housing supply.

Options for LP37	
Option 1	Retain adopted housing allocations where undeveloped, deleting those now completed or under construction, and adding additional sites where appropriate.
Option 2	Drop all adopted allocations and seek to replace the policy and sites with a wholly new policy and fresh, alternative sites.

Questions on LP37	
LP37 / 1a	Which Option do you prefer?

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LP37 / 1	Do you agree the adopted housing allocations should continue?
LP37 / 2	If not, why not?
LP37 / 3	Are there sites that you feel should be allocated for housing? If so, please identify them, provide contact details for the site and explain why it should be allocated.

Table 6: Update on Housing Allocations As of 31st March 2025

Site Ref	Location	Area (ha)	Total Number of units	With PP	Under construction	Completed	Latest Situation
H1	Land at Holly Lane Atherstone	32.7	620	123	15	50	Detailed planning application approved for 123 dwellings and is under construction. 50 completed, 15 under construction. Outline planning application approved for an additional 499 dwellings. Total number for the whole site including the above approved for 620 dwellings. Phase 2 now submitted (PAP/2024/0349) for 250 dwellings
H2	Land to north-west of Atherstone off Whittington Lane	71.2	1282	0	0	0	Master planning underway with Council, highway improvements scheduled 2026 following part consent on adjoining site (same ownership). Initial onsite works to begin 2026/27.
H3	Allotments adjacent to Memorial Park, Coleshill	1.4	30	0	0	0	Initial design layout undertaken. Site in public ownership, possible schemes under discussion. Expected application 2025 to 2028. Possible schemes discussed but no further progress
H4	Land to east of Polesworth and Dordon	160.8	1675	31	0	31	Master planning underway with Council. Trunk Road highway improvements design underway, scheduled 2026/27. 31 completed
H5	Land west of Robey's Lane, adjacent Tamworth	66.1	1270	0	0	0	Planning application has been approved subject to a S106. (Further provided update below)
H6	Site at Lindridge Road adj. Langley SUE, Wishaw	6.7	141	0	50	71	Planning permission now granted for recent application. (PAP/2022/0371 for 178 dwellings). Work started 2024/25 by Taylor Wimpey. 71 completed, 50 under construction

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H7	Land at Church Farm, Baddesley	2.2	47	0	0	0	Planning application has been granted 2024/25_subject to S106.
H8	Land north of Grendon Community Hall (former Youth Centre) Boot Hill Grendon	0.3	7	0	0	0	County Council site. Discussions on potential application held. Delivery not expected till late 2026/27 or later.
H9	Land between Church Rd and Nuneaton Rd, Hartshill	30.4	400	0	0	0	Planning application PAP/2018/0140 recommended approval at Board. Site is allocated within Neighbourhood Plan also and the County Highway Authority has not objected to the highway arrangements. Issues remain due to conflicts with the re-opened Quarry operations adjoining the site.
H10	Land south of Coleshill Road, Ansley Common	17.2	450	0	0	0	PAP/2024/0528 submitted for 62 dwellings and pending.
H11	Former School redevelopment site (excluding original historic school building) Water Orton	2.8	48	48	0	0	Brownfield site. Planning Application now submitted (PAP/2023/0266). Decision pending S106 negotiations. Potential start 2026.
H12	Land at Village Farm, Birmingham Road	0.6	12	0	8	0	Planning permission granted and 8 out of the 9 houses are under construction
H14	Land north-east of Manor Farm Buildings Main Road, Newton Regis	1.0	24	0	10	24	Completed
H15	Land south of Shuttington Village Hall	1.2	24	13	0	11	Planning permission granted - PAP/2019/0022. Under construction
H16	Land north of Orton Rd	4.2	128	128	10	51	Planning permission granted and under construction - PAP/2022/0282 51 completed, 10 under construction
H17	Land south of Islington Farm, r/o 115 Tamworth Rd	1.3	26	28	0	28	Site completed - PAP/2020/0420
Total Allocations			6183	406	96	242	

Note: Since March 2025: Site H1 approval given for 250 dwellings on phase 2.

Site H5 Land off Robey's Lane has gained full planning permission following the signing of a S106 agreement leading to 27% of allocations now having planning permission.

LP38 Reserve Housing Sites

- 43.1 The adopted Local Plan reserve housing sites may be either carried forward and maintained as reserve sites or be included in LP37 as full housing allocations. This will depend on the circumstances affecting each site.
- 43.2 In the case of Reserve Site RH1 there are still issues to be addressed in relation to highway requirements and improvements at Spon Lane. However, these issues may be addressed within the new policy as part of any application requirements. Further discussions and studies will need to be undertaken with the highway authorities to see if this site can be developed, especially considering the recent loss of funding support for improvement works along the A5.
- 43.3 Reserve Site RH2 at Ansley Common has two current pending applications on part of the site. There remain issues around access that may partially be addressed via

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adjoining sites. However, further work with the County highway authority will be necessary to establish the potential for all, or part of the site to come forward as an allocation.

43.4 Reserve Site RH3, covering the Atherstone Football ground, has several constraints (including lying part within Flood Zones 2 and 3) that make the site a difficult option to bring forward for immediate redevelopment. There is the option for the Reserve Site status to be withdrawn and the site (which is owned by North Warwickshire Borough Council), to be allocated or reserved as available for community-linked recreational and leisure uses.

43.5 The relevant options for these reserve sites are therefore considered as follows:

Options for LP38	
Option 1	Maintain all of the adopted Reserve Housing allocations.
Option 2	Bring all of the Reserve sites forward as full housing allocations.
Option 3	Delete some or all or all the Reserve Housing allocations.
Option 4	Delete only Reserve Housing site RH3 at Atherstone Football Ground and retain as a reserve site for Leisure/Recreation uses only.

Question on LP38	
LP38 / 1	Which do you prefer – Option 1, Option 2 or Option 3?
LP38 / 2	Do you agree with Option 4? Yes or No – please explain.

43.6 In addition to the reserve sites noted above, there may be further sites that would be more appropriate to identify as a reserve housing site rather than as new or maintained allocations in Policy LP37. Of the listed sites still relevant in Policy LP37, there are a number that are unlikely to come forward in the near future in their entirety but may have the potential for partial delivery and implementation where least affected by the uses and reasons preventing the whole of the site being developed/delivered.

43.7 One such site is Site H9 between Castle Road and Nuneaton Road. This site is constrained as a result of the adjoining quarry, which has been brought back into use and operation. There is currently a decision ‘pending’ on an outline planning application on the site. Considering the current issues affecting the site (and application) an option for retaining the site on a ‘reserve’ basis, awaiting delivery once the use conflict has been resolved, is proposed as an option below.

43.8 The suggested Reserve Site RH9 would need to exclude the new replacement secondary school and associated facilities, along with the Snow Hill Wood Local Wildlife Site (LWS). The original proposal was for the development site to contribute towards the delivery of the secondary school and alternative access. With the delivery of the school through public education grants this is no longer necessary and, when the site can be delivered, the requirement for education contributions and natural environmental or BNG contributions should address future needs.

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	Option for LP38
Option 5	Create a new Reserve Site RH9, with access onto Castle Road, replacing the adopted housing allocation H9.

	Question on LP38
LP38 / 3	Do you agree with Option 5? Yes or No – please explain.

LP39 Employment Allocations - Sites E1 to E4

44.1 Table 7 below shows the list of the adopted Local Plan employment allocations. It provides an update on each of the sites.

Table 7: Current Situation with the NWLP 2021 Employment Allocations

LP39 Employment Allocations			
		Area (ha)	Update
E1	Land south of Rowlands Way east of Aldi	6.8	This site planning permission has recently expired.
E2	Land to the west of Birch Coppice, Dordon	5.1	Preliminary discussions have taken place with the Borough Council and the Allotment holders. Alternative sites have been explored for allotments.
E3	Land including site of playing fields south of A5 Dordon, adjacent to Hall End Farm	3.45	No progress has been made on bringing this site forward
E4	Land to the south of Horiba MIRA Technology Park & Enterprise Zone	42	Site area is now 60 hectares and has planning permission subject to the signing of a S106 agreement
TOTAL		57.35	

44.2 The Borough Council had started to prepare a Draft Employment Development Plan Document (Draft Employment DPD) to be an interim process dealing with various issues relating to employment. That Plan had been through an Issues and Options consultation with a draft of the document having been prepared, however, that Plan has now been subsumed into this Local Plan Review.

44.3 In terms of the adopted employment allocations, it is proposed that these be treated similarly to the allocated housing sites. Where sites have extant planning consent, and/or work has commenced, they will be treated as part of the current employment commitments in terms of employment land supply. Where sites have yet to receive planning consent, they will be carried forward for inclusion as allocations in the Local Plan Review, unless circumstances and landowner/developer intentions have changed.

44.4 The following table provides an update on the allocated employment sites from the adopted Local Plan and any proposed changes put forward within the Draft Employment DPD:

Table 8: Existing Employment Allocations

Allocation	Commentary
E1 (Land south of Rowlands Way east of Aldi)	The planning consent has recently expired, and it is proposed the allocation be carried forward into the new Local Plan. Further discussions will be required to confirm the current development intentions of the landowner (Aldi) following recent announcements regarding changes in their operations at its Atherstone HQ distribution hub.
E2 (Land to the west of Birch Coppice, Dordon)	This site will be carried forward. With the Council as part of landowner of the site, relocation of the allotments to land north of the A5, closer to Dordon, will still be required. It is envisaged to extend the site on its west side (see further details below).
E3 (Playing fields south of A5 Dordon etc.)	With recent support funding from Sport England and from CISWO (The Coal Industry Social Welfare Organisation) towards site improvements, the future of the Birch Coppice Miners Social Welfare Centre Dordon (owners/operators of the E3 site) is more positive. With less pressure for relocation or redevelopment from members, it is unlikely that the site will become available soon for employment uses and an option to drop the site as an employment allocation and not carry it forward into the new Local Plan should be considered. To avoid future loss of the facility to other redevelopment uses, the site could then be identified principally for leisure and recreation uses to help maintain and support the current facility and site use.
E4 (Land to the south of Horiba MIRA)	Although the site has received in principle planning permission, subject to the signing of a S106 agreement, following a decision by the Council at the planning and development board 9 th June 2025, until the agreement has been signed the site should be retained and carried forward into the new Local Plan as an allocation. This helps secure the employment supply and support the future growth and development of the MIRA complex and Enterprise Zone.

44.5 Some 5.1 hectares were allocated on Site E2, land to the west of Birch Coppice, for employment use as part of the adopted Local Plan. Birch Coppice is one of the major distribution sites in North Warwickshire. It also has a rail freight interchange depot. In addition to carrying forward the allocation of E2, it is proposed to extend the site westwards. A new policy would include an extension to site allocation E2 by a minimum of 2.07 hectares to the west, towards the route of the High-Pressure Gas (HPG) main, which travels across the A5 and southwards past Freasley to the east.

44.6 The extension could be increased up to a total of 2.47 hectares depending on the advice from the HSE as to the type and extent of development that can be accommodated within a reasonably safe distance of the HPG main. This is included as an option below. Suggested wording for the policy is also provided below.

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- 44.7 The impact on nearby homes will be an important consideration and any adverse impacts must be mitigated to minimise these impacts as far as possible. This will include height of the proposed buildings (including structures), overshadowing, lighting and noise.
- 44.8 Some 1.5 hectares of the allocation are currently used as allotments. These will need to be replaced subject to further consultation, with alternative provision being provided at a more accessible location close to existing residential areas. The existing allotments must be replaced and relocated to an alternative location prior to any redevelopment proposal being granted. In association with employment proposals E2 and E3, land north of the A5 off Browns Lane's is considered a potential suitable location for the allotments and is identified for their replacement and identified on the adopted Local Plan Policies Map as Site OS1.
- 44.9 The Draft Employment DPD also proposed a new employment site allocation proposal on land south and east of Indurent Park, south of the A5 and west of the adopted employment allocation E2. This larger allocation (beyond the extension to E2 noted above) has been carried forward and included in this Issues and Options consultation document for consideration as a new policy, titled allocation 'EP2' within the section on "New Policy Areas" below (see 'Extension to Indurent Park' at paragraphs 51.1 to 51.4 below).

Options for LP39	
Option 1	Retain adopted employment allocations where undeveloped, deleting those now completed or under construction.
Option 2	Delete all adopted allocations and draft a new employment policy with replacement employment sites (a mix of carried forward sites from the adopted Local Plan and/or new sites).
Option 3	<p>As Option 1 plus allocate an extension to allocation E2 with the following wording:</p> <p>Some 2.07 hectares of additional land are allocated for employment purposes on land to the immediate west of Birch Coppice Business Park, south of the A5 at Dordon as an extension to employment site allocation E2 from the NWLP 2021, making an oversite of some 7.2 hectares.</p> <p>Landscaping will be required along the A5 and to the residential properties on the A5.</p> <p>The allotments, along with appropriate services and associated infrastructure, must be replaced and relocated to the alternative location to the north of the A5, identified as site OS1 on the policies map, prior to the start of construction.</p> <p>Site OS1 - A Site to accommodate allotments/open space/recreation uses involving re- location from land south of A5 to land north of A5, to facilitate improved recreational provision and facilitating employment and/or mixed development opportunities especially on sites E2 and E3.</p>

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	Access to the site can be provided through the adjoining Indurent Park site from Kingsbury Road. (Refer to suggested new policy area paras 51 below)
Option 4	As Option 1 plus allocate an extension to allocation E2 and delete employment allocation E3 and allocate or reserve it for leisure and recreation uses only.

	Question on LP39
LP39 / 1	Which option do you prefer – Option 1, Option 2, 3 or Option 4? Please explain reasons for your preference.

Strategic Sites

- 44.10 In addition to sites addressing local employment needs, there is significant pressure for the Borough to accommodate strategic employment site options due to its position within the ‘Golden Triangle’ for logistics and warehousing (an area within 4.5 hours of the ports of England and Wales), its location close to major motorway corridors and junctions and its accessibility to the strategic rail network (with two major rail freight terminals within the Borough).
- 44.11 Strategic employment studies and needs assessments have identified the Borough as a suitable location to accommodate some of the regional and sub-regional needs. The Coventry & Warwickshire Housing and Employment Development Needs Assessment (HEDNA 2022) identified a need for 61.4 hectares of local employment land and 551 hectares for strategic B8 needs across the Coventry and Warwickshire area up to 2041, with 88.4 hectares of local employment land and 735 hectares of strategic B8 land up to 2050.
- 44.12 The level of strategic need and options to recognize and address this in the Local Plan Review is discussed in LP6 – Strategic Employment and LP5 - Employment needs. There remains, nevertheless, the option whether to identify and allocate strategic sites in the Local Plan Review or simply rely on a criteria-based policy to address speculative applications where and when they are submitted within the Borough to address the needs identified regionally.

	Option for LP39 - Strategic Site Allocations
Option 1	Allocate a site(s) for strategic employment needs.
Option 2	Only allocate for local employment relying on LP6 for wider than local employment needs.

	Question on LP39
LP39 / 2	Please state which option you prefer and explain reasons for your preference.

New Policy Areas

- 45.1 The following sections identify potential new policies for inclusion within the Local Plan Review.
- 45.2 As referred to previously some of the work from the Draft Employment DPD has been subsumed into this Local Plan Review and provides the basis for some of the options and suggested new policy areas included in the section below.

New Policy – Tranquillity and Tranquil Areas

- 46.1 The NPPF 2024 allows us to consider the likely effects of development (including cumulative impacts) on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise. This includes concerns over impacts from noise and light pollution. A recent appeal at Daw Mill in a central Borough location (between Fillongley, Arley and Furnace End) addressed/raised these issues and highlighted concerns reflecting the national guidance on unsustainable and sensitive locations.
- 46.2 Daw Mill is a former deep mine colliery with associated land for sidings and storage that has now closed. The site was required to be returned to its prior agricultural use, but this has not been realised, and the site underwent a planning appeal for redevelopment for employment/commercial purposes and a rail distribution depot.
- 46.3 The appeal was dismissed and part of the dismissal related to tranquillity and the potential significant adverse impacts of the development on the area’s quality of life for residents and those who enjoy the countryside. Paragraph 198 of the NPPF 2024 indicates that planning policies should “identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”, and to seek to “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”.
- 46.4 In light of the national guidance and direction indicated by the Daw Mill appeal, it is proposed the Council consider applying a “Tranquil” type designation over the most sensitive, central (and potentially northern) rural areas of the Borough, where these are under greatest pressure from surrounding urban metropolitan growth areas, as indicated by the ‘Tranquil Area Assessment’ Map produced by the CPRE² and attached as Map 4 in Appendix A. The designation would look to restrain major developments likely to generate significant light or noise pollution.

Options for Tranquillity and Tranquil Areas	
Option 1	Designate a core rural area within the central (and northern) parts of the Borough, between the main settlements (Category 1 and 2 settlements in the adopted Local Plan) within and adjoining the Borough, to minimise the adverse impacts of new and redevelopment proposals on the Boroughs ‘tranquil’ areas. The suggested area is shown on Appendix A Map 4.

² CPRE is the Campaign for the Preservation of Rural England

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Option 2	Do not designate a 'tranquil' area within the Borough and retain the current situation, relying on national policy and guidance to address this issue.
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Questions on Tranquillity Tranquil Areas	
TA / 1	Which Option do you prefer?
TA / 2	If yes, do you agree with the suggested area as shown on Appendix A Map 4?
TA / 3	If you don't agree with the suggested area as shown on Appendix A Map 4, please describe or provide a map showing the area you consider should be designated a tranquil area.
TA / 4	What should the policy say? Please provide wording for a policy or suggested criteria it should include.

New Policy – Mancetter Quarry

- 47.1 The former Tarmac operated Mancetter Quarry site of approximately 96 hectares has recently ended quarrying operations and is entering the restoration stage as required by various planning conditions. The site has also been used by Tarmac previously as part of a trial project (in the adjoining restored Jubilee and Purley Quarries) to explore the concept of Corporate Natural Capital Accounting (CNCA), the aim being that the restored quarry will create value for the local community and the national economy. See link: https://www.youtube.com/watch?v=VfD-XWr_MnY
- 47.2 As part of this process, the potential for restoration of the former Mancetter Quarry site for Biodiversity Net Gain (BNG) purposes, and as a linked extension to the current Hartshill Hayes Country Park (55 hectares), has been under discussion with the owners Tarmac, Mancetter Parish Council and Warwickshire County Council. In addition, part of the adjoining former Golf Course at Ridge Lane (also owned and controlled by Tarmac), may have potential for incorporation into the quarry area to enable and enhance access along existing public rights of way and link into/combine both sites with the Country Park. This former golf course (which has substantially re-naturalised) also has potential for BNG purposes, carbon capture and renewable energy opportunities (solar panels, wind etc), subject to further investigation.
- 47.3 The Parish Council is keen to promote this proposal and link it to local industrial and cultural heritage interests and also to use the site for educational and leisure purposes, promoting and enabling community access to the countryside to support health and wellbeing in the community. The potential for creating a major hillside Country Park facility, of an approximate 170 hectares in size, close to two major urban areas at Atherstone/Mancetter and Hartshill/Nuneaton, comparable to other major country parks in the Warwickshire and Leicestershire sub-regions, would be a major boost to the area.
- 47.4 One of the main issues will be access to the site. The current quarry access off Quarry Road has potential and is a good standard within the site. However, Quarry Road itself, with restricted access over the Coventry Canal bridge (18th Century brick arched bridge and a potential local heritage asset) and through to Mancetter Road/Nuneaton Road B4111 junction, is unlikely to be a suitable option except for local traffic and walking/cycling. An alternative option may be via Ridge Lane and

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Purley Chase Lane, the latter currently used by commercial lorry traffic serving the quarry (with ‘access only’ available beyond that point suggested as an option).

47.5 Prioritising this route would serve vehicular access from the Nuneaton, Hartshill and Galley Common/Ansley Common direction and encourage access from Atherstone and Mancetter by more sustainable means via walking and cycling. This access route may also open the opportunity of using the former golf course buildings (now derelict), as servicing buildings for any renewable energy facility, or even a new visitors centre / redeveloped site facilities for any enhanced Country Park – along the lines of similar facilities and country parks at Pooley Park, Polesworth and Kingsbury Water Park, Kingsbury. Both of those sites have generated significant visitor trips and acted as economic boosts and opportunities for their areas, as well as contributing to the health and wellbeing of the Borough and surrounding areas.

47.6 A map indicating the areas referred to above is attached as Map 5 in Appendix A.

Options for Mancetter Quarry	
Option 1	Mancetter Quarry restoration be for public access, environmental enhancement via BNG, and renewable energy opportunities.
Option 2	Expand the proposal to ensure a link to the Hartshill Hayes Country Park.

Questions on Mancetter Quarry	
MQ / 1a	Which Options do you agree with?
MQ / 1	Should the Mancetter Quarry restoration be directed towards re-use for public access, environmental enhancement via BNG and renewable energy opportunities? Yes or No - please explain.
MQ / 2	Should there be a policy to support the opportunity of creating a new, expanded Country Park, combining the Quarry with Harsthill Hayes and parts of the former Purley Chase Golf Course? Yes or No - please explain.
MQ / 3	Are there any other uses which this proposal should include? Yes or No - please explain.

New Policy – River Anker Access and Nature Project

48.1 Atherstone Town Council has developed the “River Anker Access and Nature” project. This follows an initial ‘River Anker Access and Nature Study’, that investigated the potential for improved access along the River Anker, links with the surrounding area and the potential for improving the meadows alongside the river for nature. A proposal based on the Study, should be considered for supporting the potential for a footpath/cycle route enabling access to the Anker River corridor, facilitated by routes delivered through adopted and future housing allocations to the north of Atherstone. The area is shown on Map 6 in Appendix A.

48.2 In addition, the potential for improvements to existing public rights of way (PROW’s) should also be included, possibly by directing contributions from developments within the town and immediate area to facilitate the delivery of a circular town route, utilising the existing canal towpath and the existing PROW network to and from the canal, the Carlyon Industrial estate, and within the residential estates of the town.

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- 48.3 The Study and proposal also provides the opportunity for enhancing the natural environment, supporting and helping to deliver the Riverside Local Nature Reserve (LNR) proposed in the adopted Local Plan alongside the River Anker), and directing BNG funding towards achieving the ecological and environmental improvements within the LNR or similar locations within the Anker River Study area.

Options for the River Anker Access and Nature Project	
Option 1	Include a policy in support of, and to help implement, the River Anker Access and Nature Study.
Option 2	Do not include a policy supporting the Study and retain current access to the river as it is, using PROW's where these exist.

Questions on the River Anker Access and Nature Project	
RA / 1a	Which Option do you prefer?
RA / 1	Should access to the River Anker from central core and residential areas of the town be encouraged/facilitated? Yes / No.
RA / 2	If access is supported, what are the benefits this may provide to residents/businesses in Atherstone?

New Policy – Wild Packington

- 49.1 It is suggested that the Local Plan Review includes an enabling policy for the Wild Packington Project, which aims to kick start natural processes and allow nature to lead the way on a third of the Packington estate. The Project is also part of the Tame Valley Wetland Trust River Blythe Restoration programme. The site comprises approximately 344 hectares (850 acres) of the River Blythe SSSI (Site of Special Scientific Interest) corridor from the nature reserve south of the A45 up to the M6 and has been submitted to the local plan process for consideration. The site area is shown on Map 7 in Appendix A. The remaining land comprises the historic deer park and an area of regenerative agriculture and nature-friendly farming, creating a mosaic of land uses for wildlife.
- 49.2 The Project ambition is to develop new nature-based enterprises to build on those already supported. This will include camping, glamping and wildlife safaris. Education, health and wellbeing programmes will also be developed. Meat sales will continue on site and will enable visitors to buy meat from the rewilding area.
- 49.3 Natural processes will be restored in the project area through a change in grazing from sheep to low numbers of mixed grazers including cattle and horses. Natural regeneration will also be encouraged, with some supplementary tree planting undertaken to restore a mixed native seed source. Internal fencing will be removed to allow grazing animals to freely roam across the site. Some habitat restoration will be undertaken on site, including wetland creation and river restoration. The aim is to restore hydrological processes on the site as well as natural water levels. Plans for the Project also include consideration of the reintroduction of key species, including beavers and water voles.

Options for Wild Packington	
Option 1	Support the Wild Packington Project through a new local plan policy.
Option 2	Do not have a new policy on this specific project but support it through other existing policies.

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Questions on Wild Packington	
WP / 1a	Which Option do you prefer?
WP / 1	Should the Council be supporting re-wilding of the Borough's rural and agricultural areas, or seeking to maintain current uses?
WP / 2	Please explain the reasoning for your answer.

New Policy – Coleshill Manor Site

- 50.1 Planning permission was originally granted in 1991 (OAP/1991/0130) for conversion and new office accommodation at the former Coleshill Hospital, known as Coleshill Manor on some 16.3 hectares (gross) of land within the Green Belt. The permission allowed for the construction of up to 10,033 sq.m. (107,994 sq.ft) of offices in a parkland setting. The indicative masterplan from a later (1999) planning permission showed 7 buildings in addition to the conversion of the manor house, which had previously been used as a hospital.
- 50.2 Some parts of the original permission have been implemented; therefore, extant planning permission remains for the site. However, since 2010 the site has been under threat by the construction of the Birmingham section of HS2 as part of the delta junction.
- 50.3 The adopted Local Plan recognised this issue and indicated that the Borough Council would consider favourably applications for replacement buildings if they were to be demolished due to HS2. This occurred in early 2025, when a relatively new office block was demolished to make way for HS2.
- 50.4 In addition, some of the other proposed office blocks shown on the indicative masterplan for the site will also be impacted by the route of HS2. It is considered important for the Borough Council to signal that although HS2 has carved through part of the site, alternative solutions for the site should be explored.
- 50.5 The current consent is for delivery of offices in a parkland setting. The site is located in the Green Belt and within a sensitive gap between Coleshill and Castle Bromwich/Solihull. If a new policy is to be supported, it is not proposed to encourage logistics, warehousing or major employment uses, as these would adversely affect and impact upon this sensitive location. Any development of the site should reflect the parkland setting. Therefore offices, hospitality or, research and development uses that complement a 'campus' style setting may be appropriate. This will very much depend on the proposal being acceptable and having a minimal impact on the area.
- 50.6 A map identifying the site and the area referred to above is attached as Map 8 in Appendix A.

Options for Coleshill Manor Site	
Option 1	Have a proactive new policy seeking the delivery of the site.
Option 2	Do not have a new policy on this specific site but use existing national and other local policies to support its delivery.

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Questions on Coleshill Manor Site	
CM / 1a	Which Option do you prefer?
CM / 1	Should there be a policy to encourage the full implementation of the planning permission?
CM / 2	<p>If yes, do you agree with the following wording?</p> <p>Coleshill Manor</p> <p>The Borough Council will look favorably on proposals at Coleshill Manor to replace buildings demolished, including those that have permission but are not able to be developed due to the construction of HS2. In particular the Council would encourage offices, hospitality or, research and development uses that complement a 'campus' parkland style setting. Logistics/Warehousing (B8) uses will not be permitted.</p> <p>Any development should respect its Green Belt status and parkland setting, as well as the listed building on the site. Buildings should be no taller than a 2-storey house.</p> <p>Lighting should be kept to a minimum with footpaths, parking and access roads lit at a low level.</p> <p>Any signage should be no higher than a single-storey house and externally illuminated to reduce its impact on the surrounding area.</p>
CM / 3	If no, what do you suggest should be done to encourage the site to be brought forward/developed?

New Policy – Extension to Indurent Park, Kingsbury Road, Dordon

- 51.1 An existing employment park, Indurent Park (formerly known as St Modwen's Tamworth Park), located southeast of Junction 10 on the M42, east of Kingsbury Road is proposed for protection/identification as an Employment Area to be included in the adopted Policy LP12 (see LP12 above). In addition to designating the site as an 'Employment Area' under policy LP12, it is proposed to extend the site to the east and south-east by some 39 hectares as a new employment allocation within the Local Plan Review (following its inclusion in the Draft Employment DPD in July 2025).
- 51.2 There is a high-pressured gas pipeline that runs through the site operated by Cadent. The Health and Safety Executive (HSE) is the primary body responsible for regulating the safety of high-pressure gas pipelines in the United Kingdom. The site can be developed with the pipeline in situ. An alternative option may be to relocate the pipeline to the east, but this may impact on the delivery of employment site allocation E2 and its extension (as noted in the options for Policy LP39 above). Any movement of the pipeline will need to consider carefully the implications and ensure the delivery of both the proposed and existing allocations. Both Cadent and the HSE would need to be involved in any changes to its route, as it has implications on the number of employees who can be present on site. Any restrictions in terms of number of employees would be outside the planning consent regime. It is not seen that this will be overly restrictive in terms of those who can occupy the site.

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- 51.3 Different unit sizes could be provided on site and these could range from around 2,000 sq. M. (21,500 sq.ft) to around 18,000 sq.m. (194,000 sq.ft) in size.
- 51.4 A map identifying the site and the area referred to above is attached as Map 9 in Appendix A.

Options Extension to Indurent Park	
Option 1	<p>Seek delivery of the extension to Indurent Park as an employment allocation. The suggested policy wording is as follows:</p> <p>Some 39.43 gross hectares of land to the east and south of the existing Indurent Park, Kingsbury Road will be allocated as employment land within Use Classes B2/B8/Eg(iii) together with a minimum of a 200 metres buffer zone to the homes in the hamlet of Freasley.</p> <p>The allocation will provide approximately 70,000 sq.m / 750,000 sq.ft (gross internal area) and is expected to deliver at least one unit of at least 9,290 sq. m (100,000 sq. ft).</p> <p>A buffer zone will be required to be retained /provided of at least 200 metres to homes in the hamlet of Freasley. Impact on the hamlet should be minimised, particularly, in terms of the height of buildings, lighting and noise from the proposed development.</p> <p>The existing access from Kingsbury Road will be the primary access to the site. Development will be expected to contribute towards the cost of improvements to Junction 10 of the M42. Further highway improvements required as part of the development will be determined through a transport assessment.</p> <p>The allocation of this land will provide for access to the adjoining employment allocation site E2 (NWLP 2021). A corridor to allow a link road through the allocation will be provided.</p> <p>Active travel, particularly for cycling and walking, to the site will be required to be improved. The focus of any improvements will be to improve accessibility for existing and future Dordon and Polesworth residents.</p> <p>An Employment and Skills Plan will be required to ensure North Warwickshire residents can benefit directly from the construction and occupation phases of the development.</p>
Option 2	Do not have a policy in the local plan on this specific site.
Questions Extension to Indurent Park	
IP / 1	Please state if you prefer Option 1 or 2 and explain reasons for your preference.
IP / 2	If you agree with allocating the area as an extension to Indurent

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	Park for employment use, do you agree with the policy wording shown in Option 1 above? Yes / No. If no, please explain / suggest alternative wording.
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New Policy – Birch Coppice Spoil Heap

- 52.1 Birch Coppice Spoil Heap is the remains of the former Birch Coppice Colliery which closed in 1986. This is a major brownfield site located outside of the Geen Belt in the A5 corridor, directly adjacent to the Strategic Employment sites of Birch Coppice, Core 42 and Indurent Park. The spoil heap was originally envisaged to be a Country Park, however, as the slopes are steep and unstable and it is unclear whether the material is conducive or not to public access, this is now in doubt.
- 52.2 If the site could be reused it would potentially involve over 50,000 sq.m. of material within the spoil heap being removed. A suitable location would need to be found to relocate the material. Rail should be used as the preferred means of moving the material. This would need to be agreed with the local minerals planning authority (Warwickshire County Council).
- 52.3 The Draft Employment DPD considered proposing to allocate the site as a reserve employment site, recognising the challenges in bringing it forward but also setting out the Council's support to bring the site forward before the end of the Plan period. Following the merging of the Draft Employment DPD with the Local Plan Review, this proposal has been included for consideration as an Option below.
- 52.4 A map indicating the areas referred to above is attached as Map 10 in Appendix A.

Options for Birch Coppice Spoil Heap	
Option 1	Leave the site undeveloped to naturally re-wild.
Option 2	Seek delivery of the site as a Country Park.
Option 3	Seek delivery of the site for employment use.
Option 4	Do not have a policy in the Local Plan Review on this specific site but use existing national and other local policies.

Questions on Birch Coppice Spoil Heap	
BCSH / 1	Which Option do you prefer?
BCSH / 2	<p>If for employment use, do you agree with the suggested policy wording below?</p> <p>Birch Coppice Spoil Heap</p> <p>To assist in determining the viability of the delivery of the site an assessment will be required to be carried out to assess the feasibility of removing the spoil heap and the exact amount of land that can be provided as an extension to the regionally significant employment site of Birch Coppice.</p> <p>If the site proves to be viable and there is a suitable receptor site for the spoil, some 30 hectares of the former Birch Coppice Colliery</p>

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	<p>spoil heap (brownfield land) to the west of the existing Birch Coppice Site, will be allocated as a reserve employment site within Use Classes B2/B8/Eg(iii).</p> <p>Additional land may be considered to the southwest of the site subject to joint access arrangements and a buffer zone to Freasley. This can be investigated further and may help with viability of the site overall.</p>
BCSH / 3	If you do not agree to the suggested policy wording what changes would you like to see?

New Policy – Houses in Multiple Occupation

- 53.1 The Borough Council has considered a Board report on the number of houses in multiple occupation (HMOs) and agreed to place an Article 4 Direction over the whole of the Borough. North Warwickshire has seen a continual gradual increase in HMO numbers, as has been the pattern nationally. There are more general reasons for this, such as the affordability of rented housing, forcing more into HMOs, housing benefit for single under 35's only being entitled to the lower shared HMO room rate and, more recently, SERCO acquiring them as part of national Asylum Seeker Accommodation Dispersal. Some of these properties were already HMOs prior to SERCO managing them. There are also more local factors as exhibited in Dordon, with Birch Coppice Business Park requiring more HMOs for its workforce.
- 53.2 The total number of HMOs within North Warwickshire is not large numerically but does constitute 0.1% of housing stock. There is an absence of some the key drivers of significant numbers of HMOs such as hospitals, universities or large population centres and so whilst there are pockets of HMOs, complaint data from Private Sector Housing and Environment Health teams of the Borough Council is low.
- 53.3 HMO licences have been issued since 2006 by the Private Sector Housing team of the Borough Council. Demand is the lowest in Warwickshire with just 29 HMOs currently having or requiring a licence which last for a period of five years. HMO standards are generally higher in licensed HMOs, however, where an unlicensed HMO becomes known it will also be inspected to ensure safe standards and suitable management.
- 53.4 Local planning authorities can withdraw the permitted development rights that allow the conversion of Class C3 dwellinghouses to Class C4 HMOs by issuing what is known as an Article 4 Direction under the Town and Country Planning General Permitted Development Order 2015. As with all Article 4 Directions, this does not mean that HMOs are automatically unacceptable but allows the local planning authority a measure of control over the number, concentration and location of them, and may allow the Council to include conditions on any permissions that serve a proper planning purpose.
- 53.5 The Council has taken the decision to introduce an Article 4 Direction on HMOs. This means that all HMOs will require planning permission. Over-concentration in any street/road is the main concern, as they can change the character of the locality and type of housing stock available. Some of the observed potential impacts on

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concentrations of HMOs include pressures on parking, noise, a loss of local character, changes to local retail provision and a decline in the more settled population of an area. To date there has been only minimal impact in the Borough but there are increasing numbers, so this is a new policy area under consideration.

Options for HMO's	
Option 1	Have no policy within the Local Plan Review on HMOs.
Option 2	Have a policy on the over-concentration of HMOs.

Questions on HMO's	
HMO / 1	Which Option do you prefer?
HMO / 2	<p>If you prefer Option 2, do you support the suggested policy wording below? Yes / No.</p> <p>Houses in Multiple Occupation (HMOs)</p> <p>Proposals for the conversion of existing dwellinghouses or the construction of new buildings to be used as Houses in Multiple Occupation (HMOs) should protect the residential amenity and character of the area and will be permitted where they:</p> <ol style="list-style-type: none"> i. Would not result in this type of accommodation forming over 10% of the number of residential properties with a 100 metre radius of the application a site (measured from the centre of the site). ii. Would not result in a C3 family dwellinghouse being sandwiched between two HMOs or other non-family residential uses. iii. Would not result in a continuous frontage of three or more HMO's or other non-family residential uses. iv. Would not give rise to unacceptable adverse cumulative impacts on the range of housing provision, amenity, character, highway safety and parking. v. The HMO would provide high quality accommodation with adequate living space.
HMO / 3	If you do not agree to the suggested policy wording what changes would you like to see?

53.6 Regarding clause (i) in the policy above, a working example of how the percentage of HMOs and other non-C3 family dwellings within 100m of an application site may be calculated is included at Appendix C.