

Anca Seaton

From: Mark Sullivan [REDACTED]
Sent: 16 October 2023 20:34
To: Planning Policy
Subject: Nuneaton and Bedworth Borough Plan Review - Reg 19
Attachments: N+B Representation_Form_A - Name and details for CPRE Warwickshire.docx; N+B Local Plan Review DS2 Rep by CPRE.docx; N+B Local Plan Review DS3 Rep by CPRE.docx; N+B Local Plan Review DS4 Rep by CPRE.docx; N+B Local Plan Review DS5 Rep by CPRE.docx; N+B Local Plan Review DS6 Rep by CPRE.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Processed

16 October 2023
From: CPRE Warwickshire [REDACTED]

Nuneaton and Bedworth Borough Plan Review - Reg 19

Please find attached one Form A and 5 Form Bs. These are CPRE Warwickshire's Objections and Representations on the Local Plan Review. A second tranche of response forms about some individual site policies will follow.

Thank you.

M A Sullivan
BA MRTPI
for CPRE Warwickshire

Anca Seaton

From: Mark Sullivan [REDACTED]
Sent: 16 October 2023 23:58
To: Planning Policy
Subject: Nuneaton and Bedworth Borough Plan Review - Reg 19
Attachments: N+B Local Plan Review SHA1 Rep by CPRE.docx; N+B Local Plan Review SHA2 Rep by CPRE.docx; N+B Local Plan Review SHA4 Hospital Lane.docx

Follow Up Flag: Follow up
Flag Status: Completed

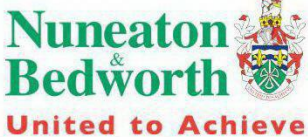
Categories: Processed

16 October 2023
From: CPRE Warwickshire [REDACTED]

Nuneaton and Bedworth Borough Plan Review - Reg 19

Please find attached 3 more Form Bs. These are to be included in CPRE Warwickshire's Objections and Representations on the Local Plan Review.

M A Sullivan
BA MRTPI
for CPRE Warwickshire

 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Review Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

Borough Plan Review Publication Stage

Please return to Nuneaton and Bedworth Borough Council by 16th October 2023 via:

Email: planning.policy@nuneatonandbedworth.gov.uk

Post: Planning Policy, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, NUNEATON, CV11 5AA

This form has two parts –

Part A – Personal details.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	<p>1. Personal details* * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</p>	<p>2. Agent's details (if applicable)</p>
Title		Mr
First name		Mark
Last name	CPRE Warwickshire	Sullivan
Job title (where relevant)		
Organisation (where relevant)		
House no. and street		
Town		
Postcode		
Telephone number		
Email address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	Policy DS2 Settlement Hierarchy and Roles
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

<p>Policy DS2 is the policy that sets the Settlement hierarchy and roles. Its title does not indicate that it sets policy for the rural areas of the Borough. However the fifth</p>

paragraph of the Policy states:

“New unallocated development outside the settlement boundaries, as shown on the policies map, is limited to agriculture, forestry, leisure and other uses that can be demonstrated as appropriate, to require a location outside of the settlement boundaries.”

This is a general statement without containing any detailed policy. Yet it is relied on by the Council in arguing against returning to the Green Belt land which was allocated for housing in the adopted Local Plan but is not allocated in the new Plan. Green Belt policy includes detailed development control principles which this policy does not – yet it is to control development on land which was Green Belt or had been Proposed Green Belt, and which will be under pressure from developers if left as unallocated land ('white land').

If the Local Plan is going to be adopted with these areas of countryside not returned to the Green Belt, a full and detailed separate policy is needed to make the Plan sound. (See areas shown as 'rural area' (light green) on the District Diagram), Section 5.0 p13.

CPRE Warwickshire objects to Policy DS2 on these grounds.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Expand the Policy to include definition' of the 'rural area' would make it complex and take it beyond its scope as defined by its title.

A new, additional policy is needed to define development control criteria for the rural land areas which are not in the Green Belt. Alternatively expand Policy DS6 (Green Belt) to include policy for the 'rural areas' which are not Green Belt. The policy should be essentially the same as for Green Belt.

The most straightforward solution is to include these areas of rural land in the Green Belt by changing the Green Belt boundaries. That will bring them under Policy DS6 as written.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	x

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To fully explain why the policy/text is not sound, to respond to the Inspector's matters and questions, to reply to the local planning authority's case, and if necessary to address or comment on the Examination statements of other parties.

Please note the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	M A Sullivan BA MRTPI
Date:	16.10.2023

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	DS3
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Strategic Policy DS3 – Overall development needs states:

“By 2039, as a minimum, the following levels of housing and employment development will be planned for and provided within Nuneaton and

Bedworth

Borough:

- 9,810 homes based on 545 dwellings per annum.
- 66.45ha of employment land for local industrial and distribution/warehousing development (including 5.35ha for replacement provision).
- 2ha of employment land for office space.
- 19.4ha of employment land for strategic B8 warehousing and distribution development (indicative)."

These amounts of development are in excess of actual need and are too high. The text supporting the policy states (at 6.14 et seq) that using the actual 'standard methodology' calculation produces an annual housing requirement of 442 dw/yr, not 545 dw/yr. The most recent HEDNA work finds that the annual requirement is 424 on a trend basis. And then at para 6.18 it is stated that

"The sub-regional HEDNA modelled the new demographic projections and assessed how the population is expected to change over time and applied these alternative projections, through the framework provided, to the standard method to deduce a figure of 409 dwellings per annum."

The figure in Policy DS3 of a 'minimum' of 545 houses per year which the Plan should deliver is significantly too high. On the assessment done in 2023, the need is in the range 400-425 per year, or 20% less (strictly, 409-424 from the tables in the Plan).

Para 6.26 states that the housing supply (land available) in the new Plan will be 12,100 houses - 2,300 houses higher than even the Plan's projection of a requirement of 9,810 dwellings 2021-2039. The now-calculated real requirement of 409-424 dw/yr means that there are allocations in the Plan which are not necessary and should be deleted. SHA2 (Arbury) is the most obviously unnecessary allocation to delete, in addition to the deleted allocations HSG4 and HSG7 which have already been removed in the new Plan.

There is no need or justification to accept any housing requirement from Coventry. Coventry City Council's expected objections to the Plan, in which it seeks to argue for housing land to be supplied in N&B's area to meet Coventry's needs, are unjustified. The City's population and household projections have yet to be reviewed and scrutinised. Responses to the City Council's Issues & Options stage of its Local Plan Review make clear that the City Council's projections of future population and household numbers, indicated in the I&O consultation paper, are too high and should be reduced .

The Employment land requirement set out in Policy DS3 is well in excess of the actual need. The calculated need for 82.5 ha of employment land is actually for 73.5 ha of B8 Use Class warehousing, 7.1 ha of B2 industrial use, and only 2 ha for offices. Warehousing provides few jobs per hectare and is an inefficient use of land. At 6.46 it is explained that the warehousing 'need' is covered by the 'Faultlands' location (SEA1) on the south side of Nuneaton which already has planning permission. Table 6 at p25 shows that there is a surplus of 19ha because of the availability of industrial land now.

CPRE Warwickshire objects to Policy DS3 on these grounds.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy DS3 needs to be amended to reduce the housing requirement for 545 dw/yr to 409-424 dw/year, and the total for the Plan period 2021-2039 from 9,810 to 7,500-7,600 houses.

Policy DS3 should be rewritten to make clear there is a surplus of employment land; and should state that there is no requirement for any new allocation of employment land in the Plan period. The employment land requirement can be met by using existing land in employment or related uses.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	x

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	M A Sullivan BA MRTPI
Date:	16.10.2023

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	Policy DS4 Allocations for housing
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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Policy DS4 lists as housing allocations strategic sites which will be allocated for residential development and associated infrastructure uses, as shown on the proposals map. These are mostly greenfield and some were Green Belt until the

2018 Local Plan was adopted. The table in Policy DS4 lists sites for 4,769 houses in 2021-39.

CPRE Warwickshire's objection made to Policy DS3 shows that the housing requirement is actually some 20% less than the Plan proposes, and also notes that the supply of sites is well in excess of even the inflated annual requirement of 545 dw/yr. Some of the sites listed in the Table should be deleted:

- The parts of SHA1 (Top Farm) which do not have planning permission.
- SHA2 (Arbury) which is a damaging and unjustified allocation, has poor access which will require costly spending, requires complex legal agreements and which is not required to meet the real housing requirement of the Plan.
- SHA4 (Hospital Lane) which has a resolution to grant permission but no S106 Agreement or outline permission
- SEA6 (Bowling Green Lane – housing element) where there are outline planning applications but no permissions; this location has poor highway access and is close to the M6 and A444 so would be affected by noise.

Deleting these large sites is all the more justified as the second part of Policy DS3 (Non-Strategic Residential Allocations - table p34 and following detailed descriptions) lists a significant number of small housing sites in the urban areas which would comply with the national policy to maximise use of brownfield land. These add up to a capacity of 689 houses.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy DS4 should be amended by deletion of the Sites SHA1 (Top Farm), SHA2 (Arbury), SHA4 (Hospital Lane) and the housing site at SEA6 (Bowling Green Lane). The allocated major sites table (p33) should be amended to omit these sites, totalling 3,700 houses. The table would then show a total supply from these greenfield sites reduced to 1,100 houses (from 4,769 in the table in the Published Local Plan).

Policy DS4's Non-Strategic Residential Allocations (table p34) shows that 689 houses can be delivered on small urban and previously-developed sites. Priority should be given to development of these sites.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	x

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To fully explain why the policy/text is not sound, to respond to the Inspector's matters and questions, to reply to the local planning authority's case, and if necessary to address or comment on the Examination statements of other parties.

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Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	M A Sullivan BA MRTPI
Date:	16.10.2023

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	DS5 Employment Land allocations
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

See objection to Policy DS3. There is a surplus in land supply for employment uses. There is no need for new employment land at locations on green field sites.

The Employment land requirement set out in Policy DS3 is well in excess of the actual need. The calculated need for 82.5 ha of employment land is actually for 73.5 ha of B8 Use Class warehousing, 7.1 ha of B2 industrial use, and only 2 ha for offices. Warehousing provides few jobs per hectare and is an inefficient use of land. At 6.46 it is explained that the warehousing 'need' is covered by the 'Faultlands' location (SEA1) on the south side of Nuneaton which already has planning permission. Table 6 at p25 shows that there is a surplus of 19ha because of the availability of industrial land now.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete the table in Policy DS5.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	x

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	M A Sullivan BA MRTPI
Date:	16.10.2023

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	DS6 Green Belt
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Policy DS6, Green Belt, states (first para) that “To ensure the Green Belt across the Borough continues to serve its fundamental aim and purpose, and maintains its essential characteristics, it

will be protected by restricting development to only that which is considered by national planning policy as not inappropriate Green Belt development, except where very special circumstances can be demonstrated.”

The Policy does not mention alterations to the Green Belt boundary, but this is covered in a subsection (paras 6.68-6.71). There it is explained that a ‘New Green Belt Technical Report’ has examined whether land removed from the Green Belt in the 2018 Local Plan can justifiably be returned to Green Belt status in the Review. The report (by Arup, March 2023) has not been subject to public consultation and there was no opportunity to respond to it or to make representations to the Council about its content.

The work undertaken on this important subject only examines two housing locations in the adopted Plan, HSG4 Bedworth Woodlands and HSG7 Bulkington. Appendix A to the Plan p206-208, lists policies in the current Local Plan which are to be superceded by the Plan Review. Similar appraisal should be given to the School Lane / Longford location, which had been land in the Green Belt until the adoption of the present plan and for which Policies HSG6 / EMP6 are not being continued. Additionally, Policy HSG2, Arbury, now Policy SHA2, Arbury, should have been examined for removal of allocation and return to the Green Belt.

The assessment of HSG4, Woodlands, is particularly defective. The work by Arup assumes that the rest of the old Bedworth Woodlands allocation land, north and west of HSG4, which was allocated for housing in the Local Plan of the 1990s, would stay land outside the Green Belt. The whole of the Woodlands ‘white island’ that resulted from abandonment of the larger allocation after an Appeal decision by the Secretary of State in 2001 should have been assessed for inclusion in the Green Belt. It was all in the Proposed Green Belt until about 1975.

The process of appraisal of all these areas of land whose allocations are proposed for deletion in the new Plan needs to be carried out fully and with public participation.

CPRE Warwickshire objects to the detailed text supporting Policy DS6 for these reasons.

As stated in CPRE Warwickshire’s objections to Policy DS3, Settlement hierarchy and roles, the policy to protect these areas as ‘rural land’ (or white land’) is inadequate. Only Green Belt status will protect them from encroachment.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will

need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Policies/allocations in the adopted Plan which are to be deleted in the new Plan (Appendix A p206-208) are all supported for deletion: see list above.

The land of what was housing allocation HSG4 (Bedworth Woodlands) and the agricultural land to its north and west (which were proposed as housing allocation in the 1990s Local Plan) should be included in the Green Belt.

The land that was housing allocation HSG7 (North of Bulkington) should be included in the Green Belt.

The land which is current housing allocation SHA2 (Arbury) (HSG2 in the adopted Local Plan) should be de-allocated and included in the Green Belt.

The land that was housing allocation HSG7 (North of Bulkington) should be included in the Green Belt.

The revision of Green Belt boundaries that would bring about these changes and restore these areas of land to the Green Belt should be undertaken with public participation (which was not the case with the recent Arup 'New Green Belt Technical Report'.

As stated in CPRE Warwickshire's objections to Policy DS3, Settlement hierarchy and roles, the policy to protect these areas as 'rural land' (or white land') is inadequate. Only Green Belt status will protect them from encroachment.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
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Yes, I wish to participate at the oral examination	x
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8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	M A Sullivan BA MRTPI
Date:	16.10.2023

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	SHA1 (Top Farm)
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Policy SHA1 proposes 1,700 houses, District Centre and other facilities between Weddington and the A5. The houses proposed are not now required due to the lower annual housing requirement for N&B than is the basis of the adopted Local
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Plan. While there is an outline consent for most of the area of SHA1, the financial requirements of this, including a spine road, may mean that it is not delivered. The loss of countryside and farmland between Nuneaton and the A5 would be complete if SHA1 is allocated.

This Policy should be deleted from the Local Plan.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete Policy SHA1.

(Continue on a separate sheet / expand box if necessary)

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No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	x

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9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	M A Sullivan BA MRTPI
Date:	16.10.2023

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	SHA2 (Arbury)
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Policy SHA1 is for the allocation in the existing Local Plan HSG2 (Arbury). This is for 1,525 houses on land between Nuneaton and Arbury Park. The land is part of the setting of the Grade 1 Arbury Hall and the Grade II Registered Park and
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Garden. It was in the Green Belt until removed for allocation HSG2 in 2019.

This housing proposal is not necessary for the revised housing requirement. The policy has many requirements which are difficult to meet and has a serious cost requirement because its lack of road access. Significant new road construction is required and that if financed will not reduce, but rather increase, congestion on existing roads.

While there is a Concept Plan (SPD) adopted and there has been public consultation on it, there has been no planning application and there is no timescale when the whole plan could be implemented.

The lack of need for the housing, and the harm this proposed allocation will do to the environment, landscape, and setting of Arbury Hall justifies removing the allocation and returning the land to the Green Belt.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete the allocation SHA1 and return the land to the Green Belt.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	x

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To fully explain why the policy/text is not sound, to respond to the Inspector's matters and questions, to reply to the local planning authority's case, and if necessary to address or comment on the Examination statements of other parties.

Please note the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	M A Sullivan BA MRTPI
Date:	16.10.2023

Part B – Please use a separate sheet for each representation

Name or Organisation:

Campaign to Protect Rural England (CPRE), Warwickshire Branch

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	SHA4 (Hospital Lane, Bedworth Heath)
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

<p>This site is not required as the housing requirement in the Plan is much lower than assumed in the adopted Local Plan. While there is a resolution to grant permission, no S106 Agreement has been signed and it could be refused. The site</p>
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SHA4 should be deleted from the Local Plan.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete SHA4 from the Local Plan.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	x

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To fully explain why the policy/text is not sound, to respond to the Inspector's matters and questions, to reply to the local planning authority's case, and if

necessary to address or comment on the Examination statements of other parties.

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Date:	16.10.2023