

Anca Seaton

From: Keith Kondakor [REDACTED]
Sent: 16 October 2023 18:49
To: Planning Policy
Subject: Fwd: Borough Plan KK other responses
Attachments: kk_reply to 7p23.pdf; kk_reply to 9p8.pdf; kk_reply to be2.pdf; kk_reply to ds1.pdf; kk_reply to ds3.pdf; kk_reply to ds4.pdf; kk_reply to ds4_emp.pdf; kk_reply to ds5.pdf; kk_reply to h2.pdf; kk_reply to ne4.pdf; kk_reply to ne5.pdf; kk_reply to sea-6.pdf; kk_reply to sha-1.pdf; kk_reply to sha-2.pdf; kk_reply to sha-3.pdf; kk_reply to sha-4.pdf; kk_reply to sha-5.pdf

Follow Up Flag: Follow up
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Categories: Processed

please submit my past responses from 2022 as background evidence

Keith

----- Forwarded Message -----

Subject:Borough Plan KK other responses

Date:Fri, 22 Jul 2022 19:56:58 +0100

From:Keith Kondakor [REDACTED]

To:Planning Policy [REDACTED]

CC:KONDAKOR Keith [REDACTED]

[REDACTED]
Ashley [REDACTED]

BALDWIN

Dear planners,

Here are the other comments


Keith

On 22/07/2022 16:46, Keith Kondakor wrote:

The borough plan 2024 to to 2039 target should be 350PA.

See attached cross cutting response to HEDNA

Keith

 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Review Preferred Options consultation draft Response Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Nuneaton News (website)	
Twitter/Facebook	
Other – please specify: councillor	

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	7.23
Policy	
Evidence base documentation (if applicable)	KK reply on HEDNA

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

Need changing requirement to 298 per year with uplift to 350.


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

6. Please set out what modification(s) you consider necessary. 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.

Change to reflect my model of HEDNA

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

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Date	22 July 2022

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Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	9.8
Policy	
Evidence base documentation (if applicable)	HEDNA and KK model

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Update table with my estimates.

	2021	2039	change	percentage
16-19	223	257	34	15.3%
20-24	1,440	1,547	108	7.5%
25-29	3,141	3,387	246	7.8%
30-34	4,665	4,374	-291	-6.2%
35-39	4,939	4,893	-46	-0.9%
40-44	4,822	5,767	944	19.6%
45-49	5,244	6,237	993	18.9%
50-54	5,931	6,105	174	2.9%
55-59	5,580	5,195	-385	-6.9%
60-64	4,598	4,249	-349	-7.6%
65-69	3,818	4,438	619	16.2%
70-74	4,364	5,073	708	16.2%
75-79	3,786	4,581	795	21.0%
80-84	2,867	3,718	851	29.7%
85-89	1,760	2,519	759	43.1%
90+	937	1,445	508	54.2%

There over 85 population increase seems implausible


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

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As above

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

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4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	Also 15.37 onwards
Policy	Policy BE2
Evidence base documentation (if applicable)	

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This section is over a decade out of date and need total re-write.
Over the last 12 years solar and storage technology has become significantly cheaper and should be installed at every opportunity. The policy should be that roofs are fitted with solar wherever possible.
Ground and water source heat pumps should be supported.
The latest World Health Organisation pollution limits should be considered when bio-mass combustion is proposed and this should be avoided in the urban area.
Wind power should be supported where there is suitable wind resources outside the urban areas.
Hydro-power, compressed gas, gravity storage and aqueducts should be supported in suitable locations.

Passive solar design also needs to consider shading to prevent buildings over heating in summer.


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

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As above

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

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Other – please specify:	<input type="checkbox"/>

Part B - Please use a separate sheet for each representation

Name or Organisation:

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Paragraph	
Policy	
Evidence base documentation (if applicable)	

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6. Please set out what modification(s) you consider necessary. 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.

You need to insert policies on Net zero development like the ones in the Warwick Plans.

eg

Policy NZC1: Achieving Net Zero Carbon Development

New development of one or more new dwellings (C3 or C4 use class) and/or 1,000sqm or more of new non-residential floorspace, hotels (C1 use class) or residential institutions (C2 use class) should achieve net zero operational regulated carbon emissions by implementing the energy hierarchy.

Proposals should demonstrate application of the energy hierarchy through submission of an energy statement which identifies:

- i. For new dwellings, a minimum 63% reduction in carbon emissions is achieved by on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2).
- ii. In non-residential buildings, hotels and residential institutions at least a 35% reduction in carbon emissions through on-site measures compared to the rate set by Building Regulations 2013 (or equivalent percentage reduction on Building Regulations 2021).
- iii. Compliance with the energy efficiency and renewable energy provisions set by policies policy NZC2(A) & (B) and by presenting the carbon savings achieved across each step of the energy hierarchy (demand reduction, efficient supply, renewable and other low-carbon technology).
- iv. Any residual operational regulated carbon emissions (over the course of 30 years) will be calculated and offset to zero in accordance with policy NZC2(C). Offsetting will only be considered an acceptable solution to net zero carbon requirements if it can be demonstrated that carbon reductions achieved via on-site measures (and near-site renewables) are demonstrably unfeasible or unviable.


Where full compliance is not feasible or viable, proposals must demonstrate through the energy statement that carbon reductions to the greatest extent feasible have been considered and incorporated through applying the energy hierarchy. In applying the energy hierarchy, proposals are expected to implement fabric energy efficiency and low carbon heating before incorporating renewable electricity generation and then offsetting.

A condition will be applied to planning permissions requiring as built SAP or SBEM calculations to be submitted prior to occupation and demonstrating that the finished building meets the standard set in Policy NZC1.

Alternatively, applications may demonstrate the requirements of Policy NZC1 are met through the Passivhaus standard with accompanying PHPP calculations submitted within the energy statement (without the use of fossil fuels on site including gas). A condition will be applied requiring Passivhaus certification prior to occupation.

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

Signature	
Date	

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Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	DS3
Policy	
Evidence base documentation (if applicable)	Warwick net zero needs adding

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

Need policy reworking to include proper net zero plan like Warwick

Policy NZC1: Achieving Net Zero Carbon Development

New development of one or more new dwellings (C3 or C4 use class) and/or 1,000sqm or more of new non-residential floorspace, hotels (C1 use class) or residential institutions (C2 use class) should achieve net zero operational regulated carbon emissions by implementing the energy hierarchy.

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Add NZC1 onwards
Must have no gas boilers or gas supply.
Mandate solar on all suitable roof spaces up to the maximum electrical load of the building

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

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Date	22 July 2022

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Paragraph	DC4
Policy	
Evidence base documentation (if applicable)	HEDNA

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The HEDNA is wrong, we need 298 homes per year plus some catch-up – see note Below

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

- 5,250 homes based on 350 dwellings per annum

Note on HENDA and Housing Target

This is my initial response to the May 2022 Nuneaton & Bedworth Housing & Economic Development Needs Assessment. I have asked NBBC for the data which supports the assessment but the council has failed to provide the data behind the age profile and headship calculation. The NBBC HEDNA report therefore should be given no weight until this information is available.

It is also essential to recognise that a housing need assessment for our borough needs to understand what has happen in the housing market area since 2011 and the economic imbalance between the North and South of the Coventry and Warwickshire sub-region. Nuneaton and Bedworth has suffered primarily from low household incomes and lower opportunities. Most of the population growth has come from inward internal migration.

Detailed comments (by HEDNA section number)

1.4 The functional Housing Market Area (HMA) and Functional Economic Market Area (FEMA) for Nuneaton and Bedworth should include Hinckley, Coventry and North Warwickshire but exclude Stratford-on-Avon. There is a massive interaction between growth in Hinckley and Nuneaton.

2.19 “The earnings of those working in the Borough fall 23% below the sub-regional average”, The rest of the report ignores this.

4.2 “house prices in Nuneaton and Bedworth are around one third lower than the wider HMA”. This is key detail. High quality house building will focus on areas with higher house prices. Plans for higher targets are only viable if some of the infrastructure and affordable housing can be funded properly externally.

5 Demographic trends.

The 2021 early release shows that the population of Coventry has been significantly over estimated by around 40,000 people. There has been a smaller over-estimate of populations in Warwickshire of around 8,600. For the Coventry and Warwickshire Housing market area the Mid-year population estimate will have been around 31,000 too high by 2021.

It was clear as far back as 2013 that the population forecasts were deeply flawed as they did not take account of the growth of student numbers around Coventry and displacement of people into Warwickshire. I have made this case in all the consultations and hearings for both our borough plan

and that in Coventry. More recently we have had a vast array of diverse data showing the significant error in the Population of Coventry in the 25-34 year age range such as birth rates and vaccination take-up. My research was key in challenging the ONS mid year estimates for Coventry and the review of their work by the statistics regulator in 2021.

5.3 Age profile.

The census shows we have 19.0% of borough population under 16 years old and 19.1% over 64.

5.4 ONS Mid-Year Estimates (were wrong)

The change in population between census in the borough has been approximately 8,791 people which is a 7.0% increase. I estimate there have been around 15,611 births and 12,456 deaths in the 10 years implying a net natural change of around 3,155 and in implied net migration into the borough of 5,636 people. The population change in Coventry was 8.9% and overall Warwickshire change was 9.4% lead by Rugby which rose by 14.4%. (note all these estimates will be improved when census data is released without rounding to nearest 100 and birth/death data releases aligned with timing of census)

5.5 Accuracy of Population Estimates and Relationship with Coventry

I have attached my slide pack for my Statistics Authority presentation. I and other campaigners have been demonstrated to be correct by the new census data. Remarkably a population estimate based on facebook users was more accurate than ONS MYE.

5.8 Migration within region.

The big growth area was Rugby which had more affordable housing and better rail services to London.

5.10 growth in housing.

The borough population grew 7.0% between censuses while number of households grew by 7.3%. The number of dwellings increased by 8%. The accelerated rate of housebuilding is reducing the number of suppressed households but increasing the number of empty homes since 2006.

Projected Population Growth

Over the decade 2011-2021 the population of the Borough grew by around 8,791 people (7%). Over that period we have increased the number of households by 7.3% and number of dwellings by 8% (just under 4000).

I have created a crude black box model of the borough's male and female population to enable the population changes from 2011-2021 to be rolled forward to 2031 and beyond. The input data for changes over the decade clearly have considerable limitations due to the rounding of totals (to 100s) and the lack of single year age totals. It is also obvious that 2021 was not a typical year due to impact of the pandemic both suppressing birth rate and reducing the number of students physically being at university addresses.

My model takes the 2021 census population in 5 year age bands by sex and produces an estimated single year age band population aligned with single year age profile in Nuneaton and Bedworth PCN GP registrations. The model uses real birth and mortality data plus a modelled migration rate per age

to roll forward the 2011 census profile to a modelled 2021 population for each sex. The modelling of deaths is also only a crude approximation as data is mostly available in 5 year bands. We have the added issue of 2011 census having a 85+ age band to roll forward into 95+ band in 2021. I based death rates in model on 2016-20 mortality data in the 5 year age bands which includes around 9 months of the pandemic in the 10 year trend. The Microsoft excel solver function is then used to fine tune the migration coefficients to produce the minimum square error. This crude model cannot produce a perfect single year match. In real world the migration rate varies between years for each age and some of the inputs are in 5 year age bands or maligned by 3-9 months. However it is good enough to drive a model of birth rates and household headship numbers. In rolling the model forward from 2021 census year to 2041 the single year migration coefficients are fixed, birth rates are fixed at average birth rate in 5 year band for 2013-2019 and the fixed death rate. Figures 4 & 5 shows the modelled and census populations at 2021 in very good agreement. Figures 6 & 7 shows the 2021 census populations rolled forward to 2031.

When we get single year data from the full census release we can better represent populations in the under than one year and 95+ bands. That will have only tiny impact on housing requirements for 2021 to 2031.

The model forecasts a population increase of 6,611 people between 2021 and 2031. Between 2031 and 2041 the increase is predicted to be 4,818 as the number of people sadly dying increases as post war population ages.

I then convert the population back into 5 year age bands and use ONS 2018 based headship rates to calculate expected number of households for each year. For 2021 that calculation gives 58,116 households compared to the census which gives 56,600. Part of the 1,516 difference will be due to around 900 people (source ONS: Care homes and estimating the self-funding population, England: 2021 to 2022) being in institutional settings who should not be included in headship calculation and the rest could be additional suppressed households given low incomes. Applying ONS 2018 based headship rate for 2031 gives us 61,615 households which is an increase of 3,499 extra households over 10 years. Rolling onto 2041 we get another 2,650 households as rate of population growth reduces. Over the proposed period of the plan 2024-39 the number of households increases by 4,467 which is 298 per year. We are currently building around 600 homes a year which will slow down as the backlog of buildings and help to buy is cleared. I would propose the base level of long term housing demand is set at 298 a year with addition small provision made to reduce suppressed household creation. A rough borough plan target proposal assuming we build 600 a year 2022-2024 is to have 400 target for 2024-29, 350 for 2029-2034 and 300 target 2034-39 giving 1,800 homes before plan starts and then 5,250 over 15 years (see figure 9). That would over provide by 1,500 to assist with suppressed household formation.

Cllr Keith Kondakor

22nd July 2022

Area name	All persons	MYE 2019	MYE2020	extrap	error
Hinckley and Bosworth	113,600	113,136	113,666	114,064	-464
West Midlands	5,950,800	5,934,037	5,961,929	5,982,848	-32,048
Warwickshire	596,800	577,933	583,786	588,176	8,624
North Warwickshire	65,000	65,264	65,452	65,593	-593
Nuneaton and Bedworth	134,200	129,883	130,373	130,741	3,460
Rugby	114,400	108,935	110,650	111,936	2,464
Stratford-on-Avon	134,700	130,098	132,402	134,130	570
Warwick	148,500	143,753	144,909	145,776	2,724
West Midlands (Met County)	2,919,600	2,928,592	2,939,927	2,948,428	-28,828
Coventry	345,300	371,521	379,387	385,287	-39,987

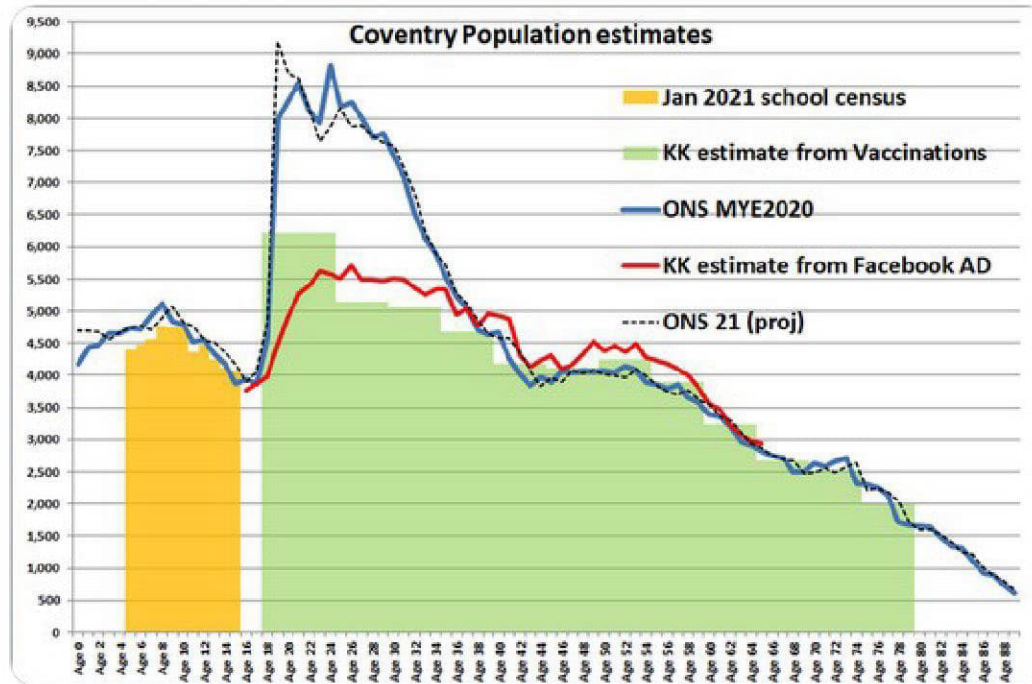
Figure 1 – 2021 census, Mid year estimates for 2019,2020, (source ONS) MYE extrapolation to March 2021 and error at March 2021



Keith Kondaker

...

I estimate the standard 2021 mid-year population of Coventry is around 345,000 people (CI 330,000-370,000). Official @ONS 2020 MYE was 379,387 & their projected 2021 population was 383,820. The city now has 38000 less than projected. @BBCWR @CPRE @live_coventry @covobservernews



2:39 PM · Aug 19, 2021 · Twitter Web App

Figure 2 – My April 2021 estimate of Coventry population which was only out by 300 from 2021 census.

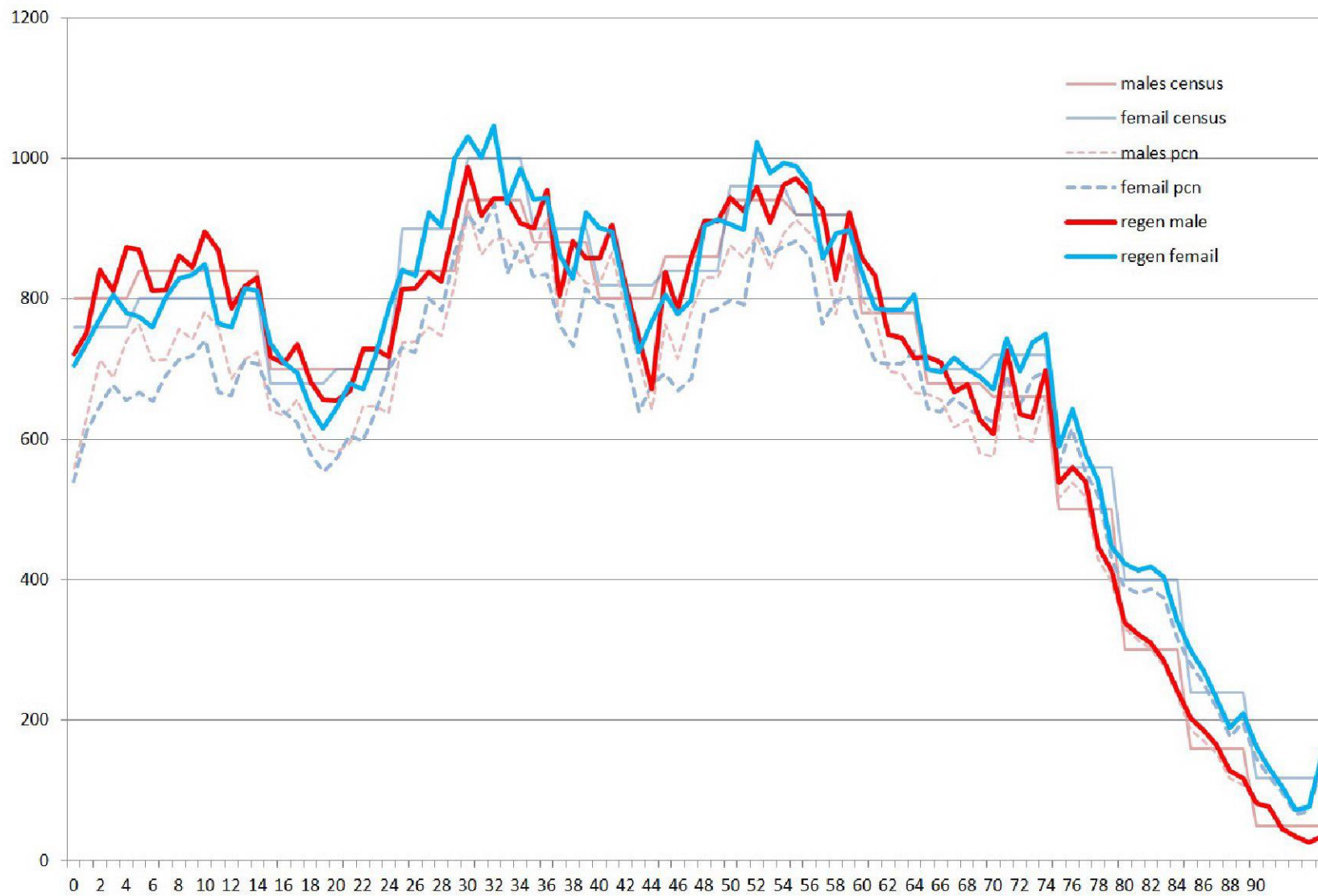


Figure 3 generating single year 2021 population from 5 year band census data and PCN GP registrations.

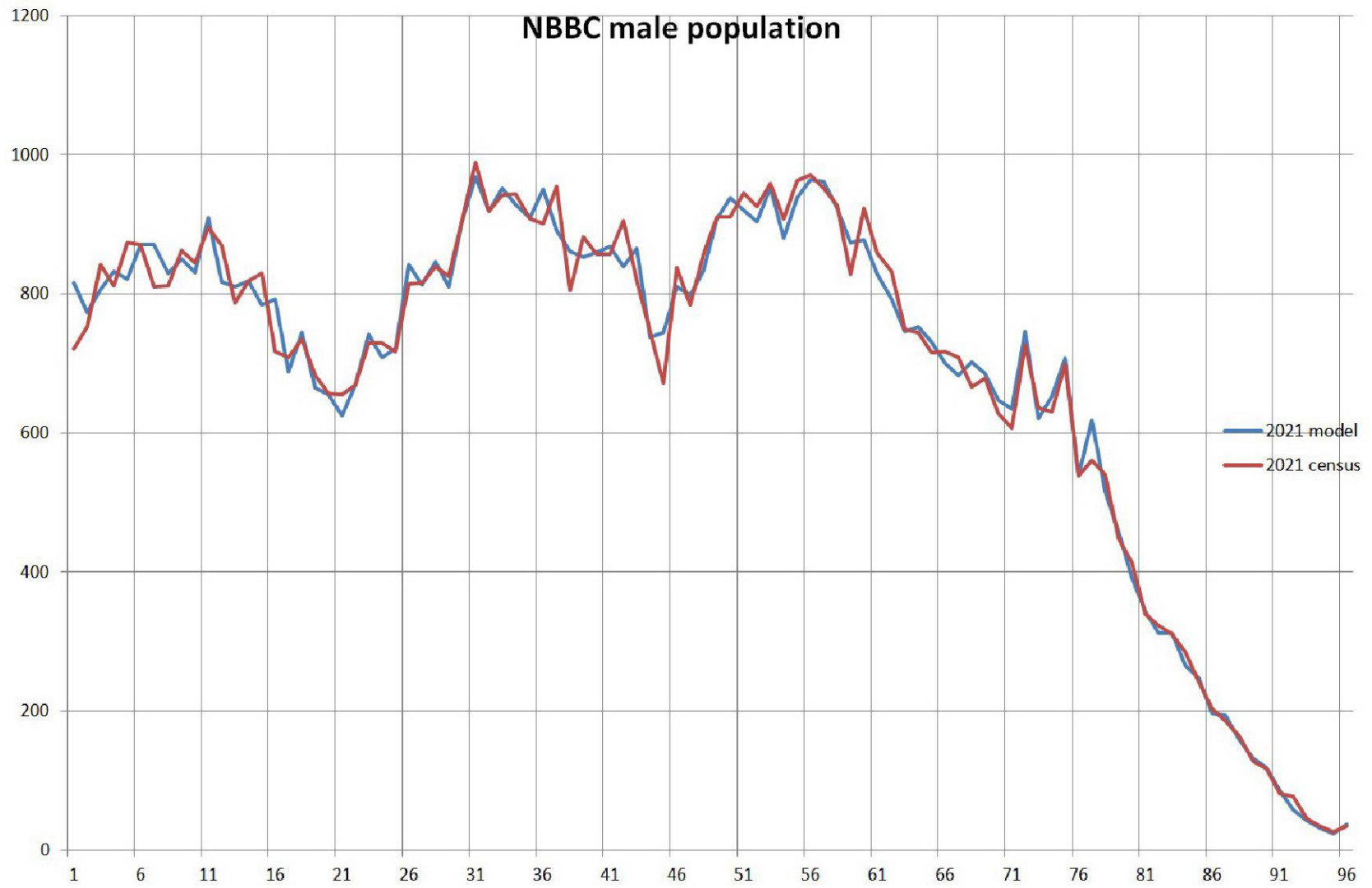


Figure 4 - Model output of 2021 male population and single year population created from 2021 census data.

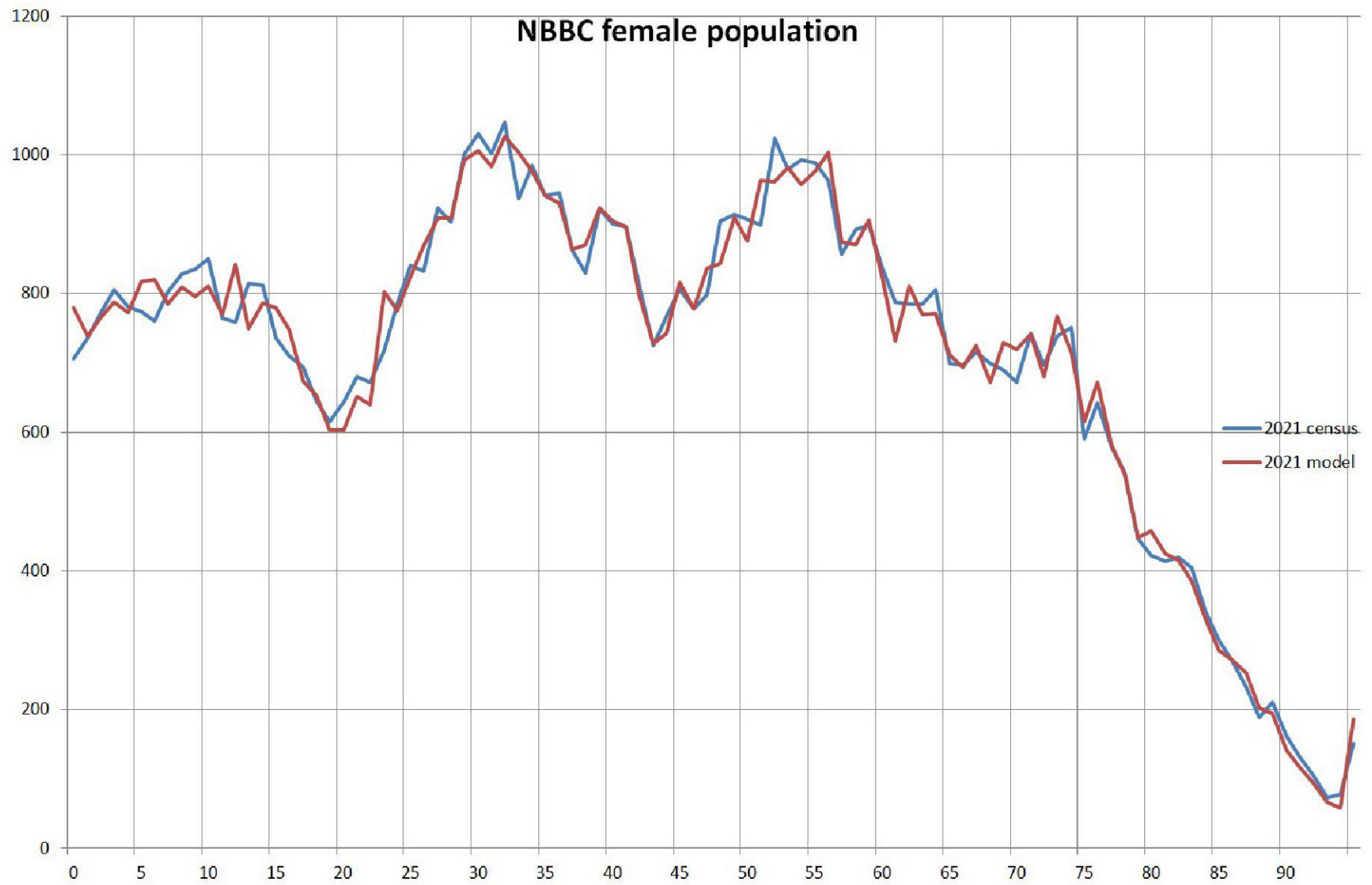


Figure 5 - Model output of 2021 female population and single year population created from 2021 census data

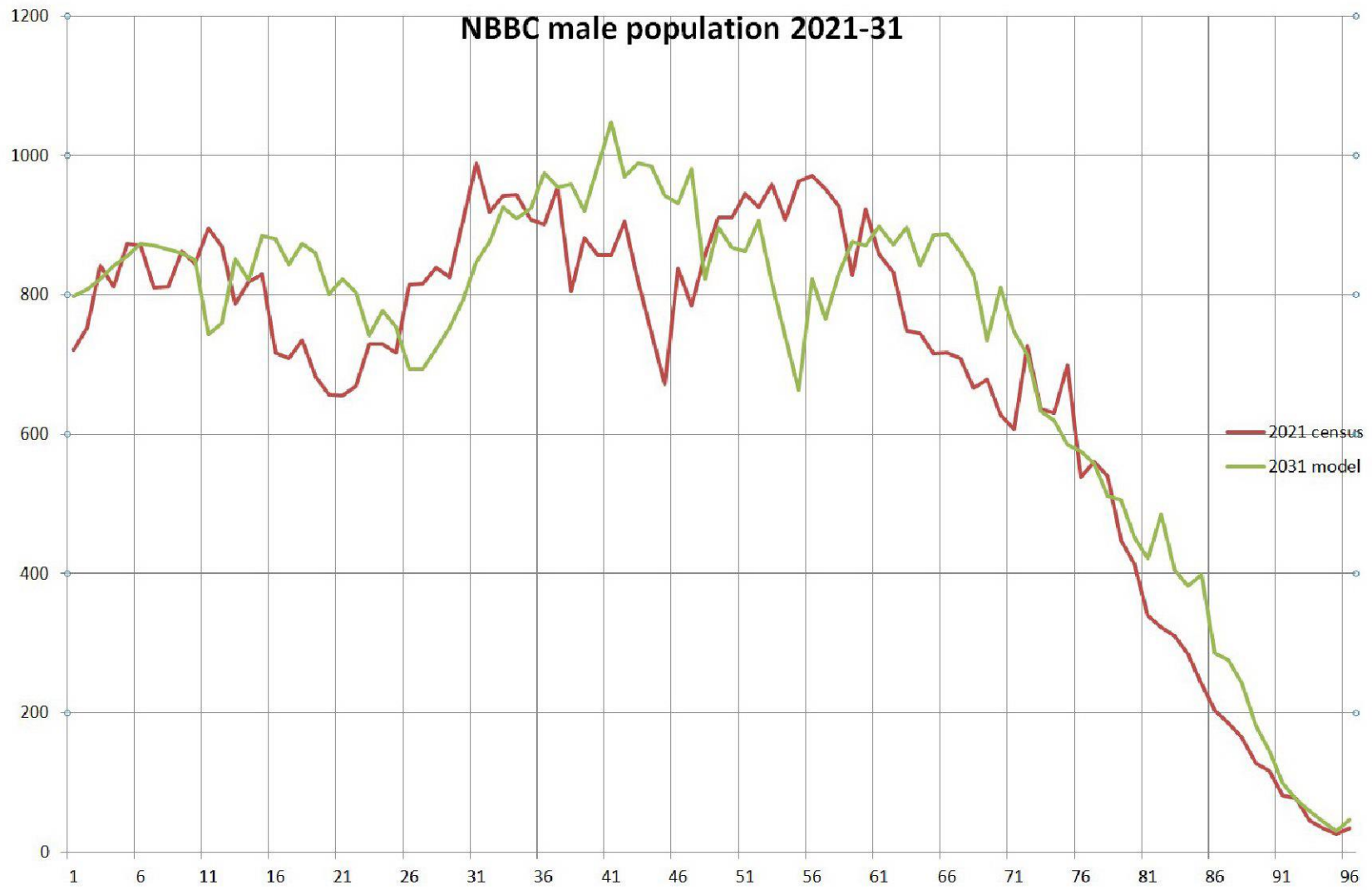


Figure 6 - Model output of 2031 male population and single year population created from 2021 census data

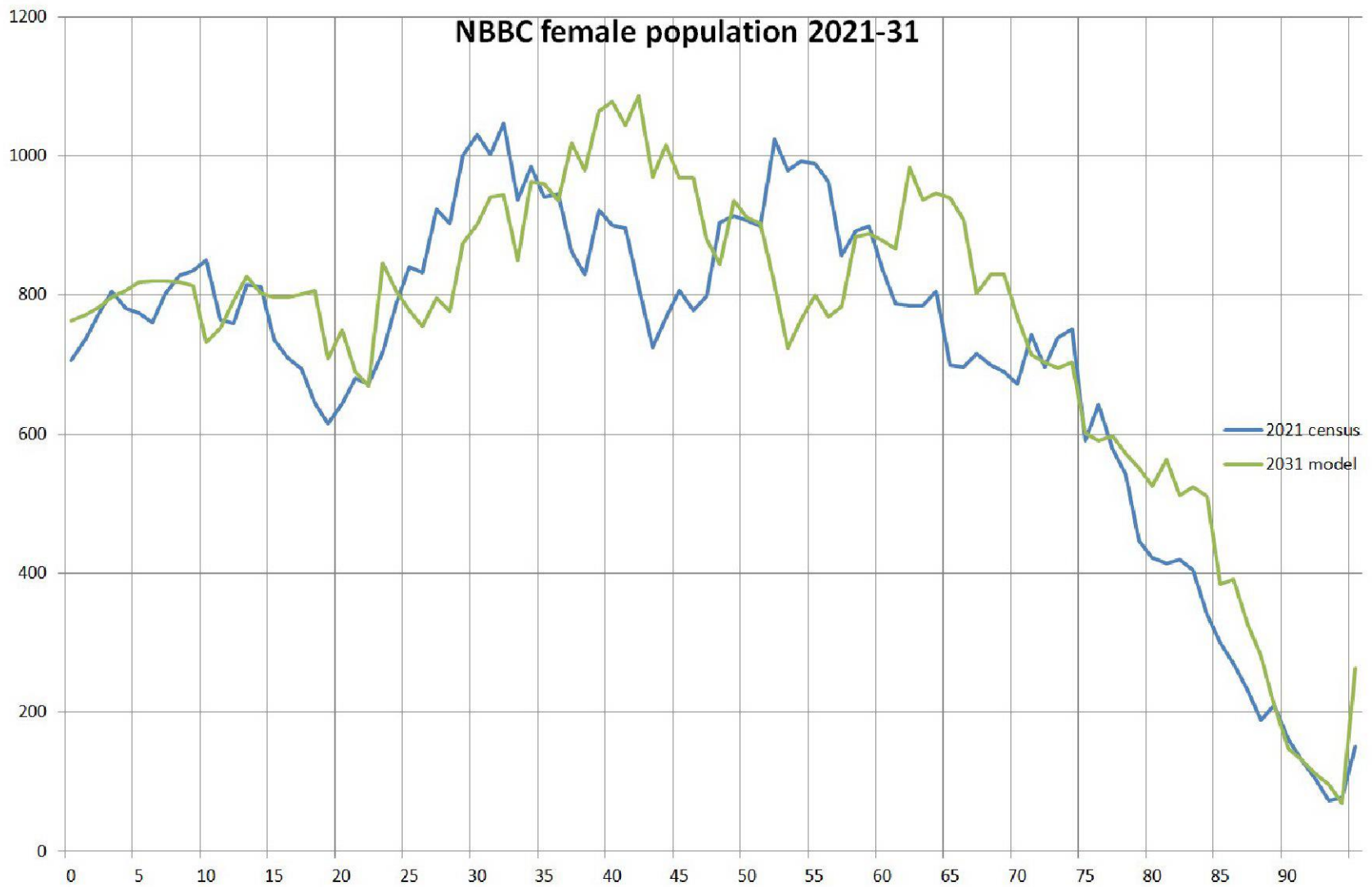


Figure 7 - Model output of 2031 female population and single year population created from 2021 census data

census	2011	61,441	63,811	125,252
model from 2011	2012	61,995	64,227	126,222
model from 2011	2013	62,533	64,631	127,164
model from 2011	2014	63,013	65,078	128,091
model from 2011	2015	63,500	65,571	129,071
model from 2011	2016	63,972	66,059	130,031
model from 2011	2017	64,391	66,502	130,892
model from 2011	2018	64,811	66,958	131,768
model from 2011	2019	65,212	67,380	132,592
model from 2011	2020	65,583	67,776	133,359
model from 2011	2021	66,004	68,203	134,207
census	2021	66,000	68,200	134,200
model from 2021	2022	66,403	68,631	135,035
model from 2021	2023	66,798	69,043	135,841
model from 2021	2024	67,183	69,436	136,619
model from 2021	2025	67,537	69,806	137,343
model from 2021	2026	67,864	70,141	138,005
model from 2021	2027	68,172	70,470	138,642
model from 2021	2028	68,456	70,775	139,231
model from 2021	2029	68,716	71,067	139,784
model from 2021	2030	68,960	71,347	140,307
model from 2021	2031	69,188	71,623	140,811
model from 2021	2032	69,421	71,890	141,311
model from 2021	2033	69,657	72,155	141,812
model from 2021	2034	69,881	72,427	142,308
model from 2021	2035	70,101	72,679	142,780
model from 2021	2036	70,326	72,935	143,261
model from 2021	2037	70,543	73,173	143,716
model from 2021	2038	70,776	73,417	144,193
model from 2021	2039	71,017	73,664	144,681
model from 2021	2040	71,251	73,908	145,159
model from 2021	2041	71,480	74,149	145,629

Figure 8 Keith's crude population model 2012-21 and 2022-41 plus 2011 & 2021 census

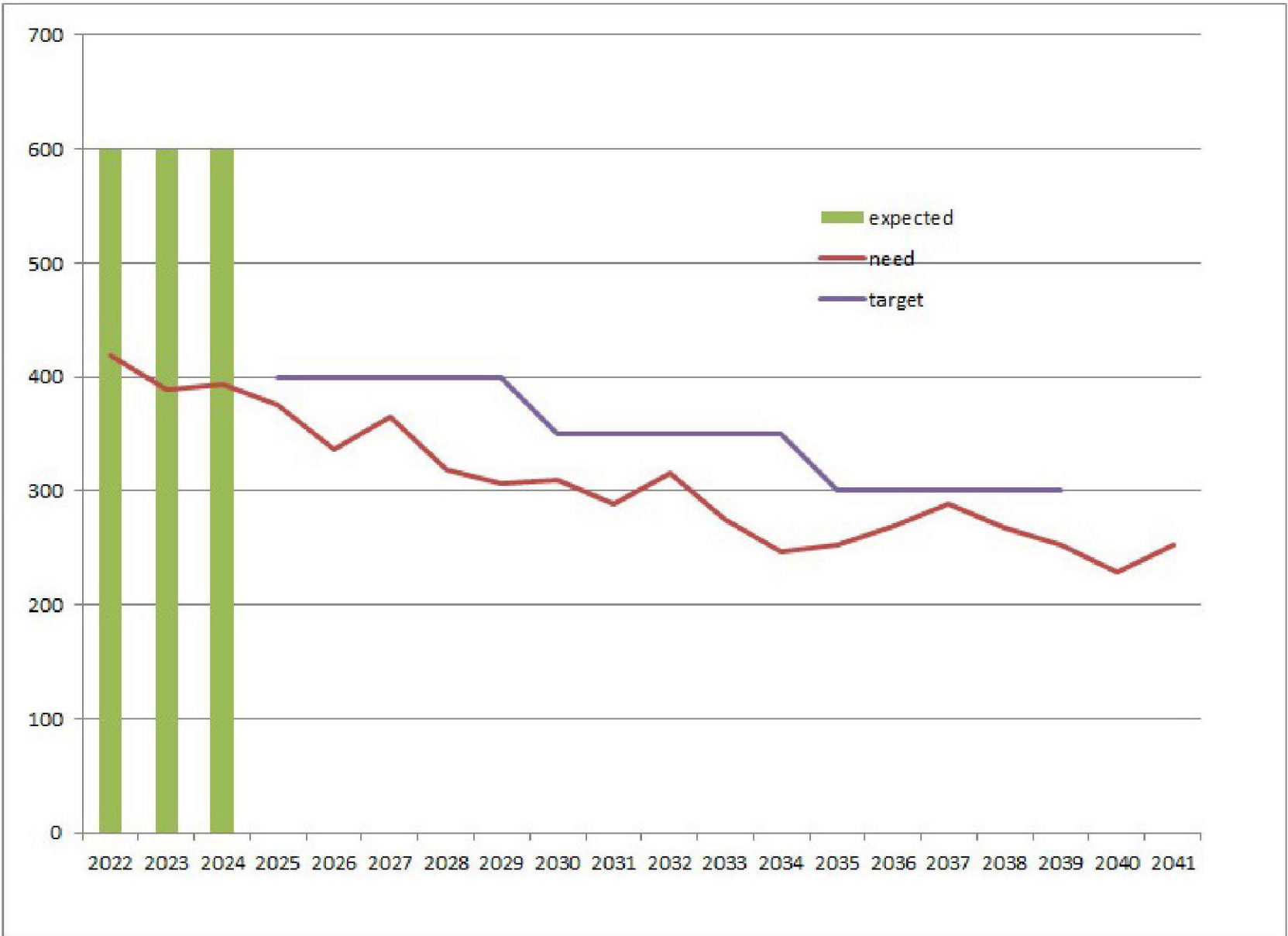



Figure 9 – Future additional households based on ONS 2018 headship rates plus possible housing target.

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Organisation (where relevant)		
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Post code		
Telephone number		
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Twitter/Facebook	
Other – please specify: councillor	

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	7.29
Policy	Ds4
Evidence base documentation (if applicable)	KK reply on HEDNA

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

The employment land takes no account of how tight the boundary of NBBC is and developments off A5 by MIRA and Dodwells which may provide employment actually on the boundary of the borough. Need to take of MIRA south and A5 near Dodwells from requirement.

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


6. Please set out what modification(s) you consider necessary. 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 employment land takes no account of how tight the boundary of NBBC is and developments off A5 by MIRA and Dodwells which may provide employment actually on the boundary of the borough. Need to take of MIRA south and A5 near Dodwells from requirement.

Lower employment land by developments on boundary.

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

Signature	Keith Kondakor
Date	22 July 2022

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Notification directly from the Council's Planning Policy team	<input type="checkbox"/>
Nuneaton and Bedworth Borough Council website	<input type="checkbox"/>
Nuneaton News (paper)	<input type="checkbox"/>
Nuneaton News (website)	<input type="checkbox"/>
Twitter/Facebook	<input type="checkbox"/>
Other – please specify: councillor	<input type="checkbox"/>

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	
Policy	Ds5
Evidence base documentation (if applicable)	KK reply on HEDNA

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

We do not need or have infrasucture for all this development.
Remove SHA-1, SHA-4, NSHA-7 ,14 and 18 from DS5


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

6. Please set out what modification(s) you consider necessary. 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.

We do not need or have infrasucture for all this development.
Remove SHA-1, SHA-4, NSHA-7 ,14 and 18 from DS5

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

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Other – please specify: councillor	

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	H2
Policy	
Evidence base documentation (if applicable)	

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

Policy H2 is unsound as it prevents viable developments of 11-13 homes as they the requirement for 2 affordable homes kicks in above 10 market homes. To build 10 market homes a developer builds 10 homes, to build 11 market homes they need to build 13 homes. This abrupt step means opportunities are wasted. Recommend that policy is changed so that one affordable home is provided for the 10th market home and the second for the 12th market home.

Reference to First homes should be removed as this flawed project is unlikely to last until 2039.


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

6. Please set out what modification(s) you consider necessary. 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.

As above

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

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Date	22 July 2022

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Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	Policy NE4
Policy	
Evidence base documentation (if applicable)	

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We need to add to this policy something to reduce water course downstream of developments being silted up with runoff from the ground when they strip the surface of crops. This has been a problem in Change Brook by Clay Avenue and in the River Anker itself.


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

6. Please set out what modification(s) you consider necessary. 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.

Add paragraph on silt prevention and silt traps.

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

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Policy	
Evidence base documentation (if applicable)	

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Add protection for significant groups of mature trees. A good example is tree group G8 on to farm which can currently be seen from considerable distance but NBBC is refusing to protect with a TPO.


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

6. Please set out what modification(s) you consider necessary. 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.

As above

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Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	
Policy	Sea-6
Evidence base documentation (if applicable)	

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Delete allocation.

Failing that

- 1) Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path.
- 2) Require LTN1.20 cycle link to Bedworth and Coventry Arena stations


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

6. Please set out what modification(s) you consider necessary. 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.

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Do you wish to join the Planning Policy consultation database?

Yes

This form has two parts –

Part A – Personal details

Part B – Your response.

Part A

	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.	2. Agent's details (if applicable)
Title	Cllr	
First name	Keith	
Last name	Kondakor	
Job title (where relevant)		
Organisation (where relevant)		
House no. and street		
Town		
Post code		
Telephone number		
Email address		

3. How did you find out about this consultation? (please mark each box with an 'X' next to all answers that apply)

Community Forum notification	
Notification directly from the Council's Planning Policy team	
Nuneaton and Bedworth Borough Council website	
Nuneaton News (paper)	
Nuneaton News (website)	
Twitter/Facebook	
Other – please specify: councillor	

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	
Policy	Sha-1
Evidence base documentation (if applicable)	KK reply on HEDNA

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

We need this allocation removing.

If that does not happen then we need its scale reducing, trees at G8 and W1 protecting and proposed planning changed to insist that an entrance on Weddington side of Nuneaton station with bus interchange and drop-off parking,

There is no need for a primary school on the site as Lower Farm and Calender farm are two form entry

The sports funding need to stay local and exclude things in Bedworth. Need instead to support provision for onsite running and bus link to Pingles.

We need real modal shift for the whole of the North East of Nuneaton and not expand the general highway network capacity. What is needed is the northern spine road which must come with segregated cycle path and 20 MPH limit on all other estate roads.


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

6. Please set out what modification(s) you consider necessary. 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.

Remove allocation and policy.
Failing that modify as above,

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

Signature	Keith Kondakor
Date	22 July 2022

 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Review Preferred Options consultation draft Response Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Organisation (where relevant)		
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Town		
Post code		
Telephone number		
Email address		

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Community Forum notification	<input type="checkbox"/>
Notification directly from the Council's Planning Policy team	<input type="checkbox"/>
Nuneaton and Bedworth Borough Council website	<input type="checkbox"/>
Nuneaton News (paper)	<input type="checkbox"/>
Nuneaton News (website)	<input type="checkbox"/>
Twitter/Facebook	<input type="checkbox"/>
Other – please specify: councillor	<input type="checkbox"/>

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	
Policy	Sha-2
Evidence base documentation (if applicable)	

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path.
Provide funding for re-opening Stockingford Station and Bus connection to Bermuda park Station.


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

6. Please set out what modification(s) you consider necessary. 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.

Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path.
Provide funding for re-opening Stockingford Station and Bus connection to Bermuda park Station.

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

Signature	Keith Kondakor
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Other – please specify: councillor	

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	
Policy	Sha-3
Evidence base documentation (if applicable)	

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path.
Provide funding for re-opening Stockingford Station to reduce mitigate on Abbey Green AQMA.
Provide fully segregated LTN1/20 cycle path to proposed path crossing the green area off Corporation Street.

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

6. Please set out what modification(s) you consider necessary. 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.


Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path.

Provide funding for re-opening Stockingford Station to reduce mitigate on Abbey Green AQMA.

Provide fully segregated LTN1/20 cycle path to proposed path crossing the green area off Corporation Street.

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

Signature	Keith Kondakor
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Other – please specify: councillor	

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	
Policy	Sha-4
Evidence base documentation (if applicable)	

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

Delete allocation.

Failing that

- 1) Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path.
- 2) Provide 20% of the site as native woodland.
- 3) Provide an LTN1/20 standard cycle route to either Bedworth or Coventry Arena station.


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

6. Please set out what modification(s) you consider necessary. 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.

As above

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

Signature	Keith Kondakor
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Other – please specify: councillor	

Part B - Please use a separate sheet for each representation

Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	
Policy	Sha-5
Evidence base documentation (if applicable)	

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, which can be found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

Delete allocation.

Failing that

- 1) Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path.
- 2) Modify 12 to require cycle link to Bedworth to be fully funded and to LTN1/20 standard. Must be complete before occupation of 174th home

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

6. Please set out what modification(s) you consider necessary. 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.

As above

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

Signature	Keith Kondakor
Date	22 July 2022