

Anca Seaton

From: [REDACTED]
Sent: 08 October 2023 17:37
To: Planning Policy
Subject: Borough plan review representation documents from Exhall Hall Scheduled Ancient Monument.
Attachments: Exhall Hall Representation_Form_A__Personal_details__Electronic_.docx; Flood Risk Exhall Hall Representation_Form_B__Your_representation_s__Electronic_.docx; Transport assessment Representation_Form_B__Your_representation_s__Electronic_.docx; Exhall Hall Moat Representation_Form_B__Your_representation_s__Electronic_.docx

Dear Sir / Madam

I have attached my representations regarding the borough plan review.


I have attached 3 main representations:

- The Impact on the Scheduled Ancient Monument of Exhall Hall Moat and the errors and ecological obligations that were not considered in the previous iteration of the borough plan.
- The Flood Risk representation, which in my opinion, does not foresee some issues with the designation of commercial land at the School Lane /Bowling Green Lane SEA6 area of the River Sowe.
- And the representations on the Strategic Traffic Assessments and the issues and dangers with the traffic currently and projected traffic for School Lane CV7.

If you require any clarification, or wish to arrange to view the river sluice into the moat (Scheduled Ancient Monument) for your records, please do not hesitate to contact me.

Kind Regards

[REDACTED]

| | | |
|---|---|--|
|  <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> |
|---|---|--|

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

| | 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 | [Redacted] | |
| First name | [Redacted] | |
| Last name | [Redacted] | |
| Job title (where relevant) | | |
| Organisation (where relevant) | | |
| House no. and street | [Redacted] | |
| Town | [Redacted] | |
| Postcode | [Redacted] | |
| Telephone number | [Redacted] | |
| Email address (where relevant) | [Redacted] | |

Part B – Please use a separate sheet for each representation.

Name or Organisation:

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

| | |
|--------------|---|
| Paragraph | 'There are 12 designated heritage assets located within the study area. They comprise one scheduled monument, Exhall Hall (1034979), one Grade II* listed building, and 10 Grade II listed building, the closest of which is located c 450m south-east of the site. As all designated assets are located at some distance from the site, it is considered that the proposed development is unlikely to affect any of the assets.' |
| Policy | Heritage Site Assessments (2022) HEA – 2 P54 |
| Policies Map |  |

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

| | |
|-----|-------------------------------------|
| Yes | <input type="checkbox"/> |
| No | <input checked="" 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 checked="" 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.

This policy has made a broad statement of plans to commercialise land next to an ancient monument (Exhall Hall Moat) as “unlikely to affect it.” This is fundamentally wrong. We have submitted multiple legal and material objections to commercial development of this land to the planning department. I have listed some of these below. They should all be considered seriously in the designation of adjoining land.

YOU SHOULD BE MADE AWARE THAT THE RIVER SOWE RUNS THROUGH THE MOAT AND BACK INTO THE RIVER AS A RUNNING WATER COURSE, THEREFORE ALL POLLUTION IN THE RIVER SOWE FROM THE COMMERCIAL DESIGNATION AND POLLUTION RUN OFF FROM PROPOSED COMMERCIAL 6000 SQ FOOT FULFILLMENT CENTRE SITE AT BOWLING GREEN LANE (site 114B008 PA 039611 and 039592) RUNS THROUGH THE MOAT. MY LEGAL PROPERTY. DESIGNATION OF THE ADJOINING LAND AT BOWLING GREEN LANE AS COMMERCIAL CREATES A RISK FOR DEVELOPMENTS THEREIN TO POLLUTE THE MONUMENT. IT IS EASILY FORSEEABLE BY THE BOROUGH COUNCIL THAT THIS COMMERCIAL SITE AND THE PROJECTED TRAFFIC WILL BE POLLUTATIVE TO MY LAND WHICH IS A SCHEDULED ANCIENT MONUMENT AND IS PROTECTED BY LAW.

THE SCHEDULED ANCIENT MONUMENT LISTING FOR THE MOAT INCLUDES THE MOAT ISLAND, THE WATERFILLED MOAT, AND ALL OF ITS ECOLOGICAL CONTENTS.

In the borough plan the site has been also listed as “largely lost” this is wrong. The moat remains intact and waterfilled on ALL sides. The land is protected and undisturbed.

Similar heritage assets, including the historic core of Exhall (HWA5142), located 450m north-west of the site; and the post-medieval extent of Exhall Hall Garden (MWA12598), 200m north of the site, denotes a once highly developed medieval and post-medieval landscape which has been largely lost – as such, these heritage assets are of medium significance.

The document repeats this over and over and is completely incorrect. The site is protected by law and does not have any lesser legal protection because of its appearance or lack of visible historical architectural footings. They are present under the lawn. The moat is still 100% present, visible, and functional with the river.

LAW 1:

•Section 61 (9) of the Ancient Monuments Act 1979.

Section 61 (9)

For the purposes of this Act, the site of a monument includes not only the land in or on which it is situated but also any land comprising or adjoining it which appears to the Secretary of State [F29or the Commission] or a local authority, in the exercise in relation to that monument of any of their functions under this Act, to be essential for the monument's support and preservation.

We believe the Secretary of State for culture must be notified that the adjacent land will impact the scheduled ancient monument because:

Heritage Category: Scheduled Monument

List Entry Number: 1019141

Date first listed: 16-Dec-1999

States that the biome of the moat is also protected, and this proposed development and its associated stated pollution and PM2.5 particles and noise pollution from lorry traffic volume will irrevocably harm the protected site and its protected endangered ecosystem.

Multiple protected species have now been logged with Warwickshire biological records centre to be breeding at the moat and adjoining river- including (with photos):

- Nesting Kingfishers

LAW 2:

'Schedule 1 Protection'

Standing Advice states that a bird survey should be carried out if the development is likely to affect Birds protected under Schedule 1.

This will require a full bird survey. I would raise the material objection that the kingfisher nests in the ground and the proposed site will contaminate the ground water runoff into the river and potentially increase flood water risk and water run off levels due to rainwater drainage from the new site and destroy nests.

- White clawed crayfish

LAW 3:

'Protected under Wildlife & Countryside Act 1981'

The grid reference (SP343852) also has a report of White Clawed Crayfish in the river Sowe very close to Exhall Hall Moat in Neals Green. (Record 6497

- <https://records.nbnatlas.org/occurrences/4127a411-ca27-4a81-88f4-7e09d08a3a2a>)

- Area is also listed as a Medium Priority Country Stewardship Water Quality Area

- Bats

LAW 4:

'Schedule 5, Wildlife & Countryside Act 1981'

A recent bat survey shows 8 different species of bat living in the trees surrounding the moat and the Bowling green lane commercially designated site.

These animals are listed as highly susceptible to pollution.

There are many more species to consider. A full summer and winter bird survey should be completed.

The stated pollution from the estimated 100-200 lorries per hour at peak times would destroy the habitat of these creatures as the CONNECTED river Sowe, which feeds the moat, would become polluted from the ambient traffic emissions and run off.

LAW 5:

- I would like to also have the proposed site recognised as a “zone of influence” over the protected moat and river ecosystem as per ‘Natural England’s “standing advice”’

LAW 6:

- The borough plan was modelled on previous traffic data. Traffic has greatly increased in the area and so further development adjoining the Scheduled Ancient Monument and its ecosystem could push the PM2.5 particle emissions over what the UK law allows. •” (the EU “legal limit”) for PM2.5 is 25 µg m⁻³. This limit has been transposed into UK law”.

Current ‘Environment Act 2021’

This will have a direct effect on the ecosystem of the monument.

LAW 7:

and the pollutants would definitely be above upper limits set out in the new ‘Environment Act 2021’ 2040 limit of just 10 micrograms per M3 in the ambient air. This is due to the cumulative effect of the M6 junction and also existing developments due to be completed in the area compounded with the proposed development traffic increase figures and the realistic new figures which will be higher than those misrepresented in the submitted data.

Material objection: Conflicts with Planning Policies.

- This designation and development Bowling green lane as a 6000sq foot fulfilment centre completely goes against Sections 15 and 16 of national planning policy framework: Section 15 - conserving and Enhancing the Natural Environment. Section 16 - Conserving and Enhancing the Historic Environment.

Borough Plan Review - Regulation 19 consultation

Consultation period: Monday, 4 September to Monday, 16 October 2023.

What is the Borough Plan Review?

The Borough Plan Review sets out where new homes, workplaces and other developments should be built to meet the needs of the borough, while conserving the area's most valuable environmental assets for the plan period 2021 - 2039. The Borough Plan Review provides policies and guidance on how planning applications are determined.

The purpose of this plan states that conserving the areas most valuable environmental assets is one of the main policies. Please adhere to this.

Contribution of the site to the significance and setting of known heritage assets:

The site is considered to make a low positive contribution to the setting of designated heritage assets within the immediate vicinity. There is limited intervisibility between the site and the cluster of designated assets to the south-east of the site. However, it is likely that the site formed a part of the agricultural environs associated with the Exhall Hall, many aspects of which survive including standing buildings, historical records, and archaeological remnants. The site is considered to have a historic relationship with the surrounding agricultural land which is preserved in the survival of these fields.

Impact Assessment:

The proposed development may have several indirect impacts upon the setting of the designated heritage assets at Exhall Hall. These may include but are not limited to increased local traffic and associated noise, particularly relating to proposed additional junction at the existing Bowling Green Lane/School Lane junction directly adjacent to Exhall Hall. It may also include effects arising from increased lighting and noise directly associated with the development, particularly the development of the employment land, depending upon the nature and size of new constructions. The proposed development also constitutes a fundamental change to the landscape character of the site. The agricultural fields likely have an historical association with Exhall Hall and an alteration to the character of the planned enclosure may negatively affect the setting of all assets associated with the hall.

Your plan HEA - 2 then goes on to foresee damage to my property from the designation as commercial. You are directly in control of whether this damage can take place. Under Section 61 (9) of the Ancient Monuments Act 1979, The secretary of state should, by law, then be notified of the intended foreseen damage to the Scheduled ancient Monument.

(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 Bowling green Lane site mapped as SEA06 block in purple designated as commercial land should be re-designated as residential, Agricultural, or Conservation land. Any developer should be made to leave a large buffer zone for the ecological preservation of the Scheduled Ancient Monument.

The borough plan should also include remedial plans for the growing pollution from lorry traffic in the area due to other sites designated locally as commercial. These should not simply allow developers to make payments to DEFRA which doesn't help the pollution and impact locally but make a serious tangible enforceable plan to reduce impact on local wildlife and monuments such as M6 and A444 sound and pollution barriers, Banning of lorry traffic through residential areas such as School Lane. School lane is not a lorry route. It is a residential street. Putting a Commercial done at a residential end of this street is not appropriate. The commercial zone is the Bayton road end, not the bowling green lane end. See any

local map.

We may be next to a motorway which seems to have been argument enough to not place homes next to the motorway on the site at bowling green lane, and instead commercial land use was designated. Just put up a sound barrier. Do not bring commercial traffic through residential areas. Do not wilfully damage a Scheduled Ancient Monument and its unique ecosystem. Please re-designate this land as Residential. Agricultural, or Conservation.

(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:

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.

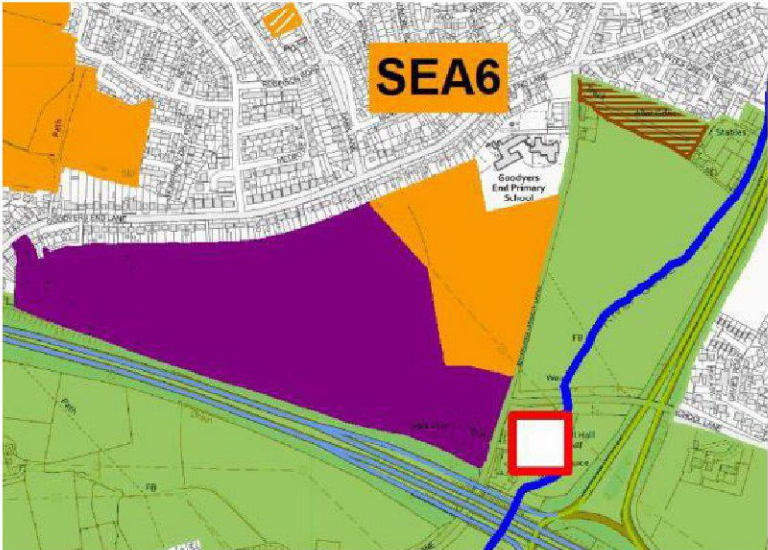
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| | |
|---|------------|
| Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank) | |
| Date: | 08/10/2023 |

Part B – Please use a separate sheet for each representation.

Name or Organisation:

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

| | |
|--------------|---|
| Paragraph | Page 5 |
| Policy | Level 1 Strategic Flood Risk Assessment (2023) |
| Policies Map | <p>Summary of flood risk in the Nuneaton and Bedworth Borough</p> <p>Parts of the Nuneaton and Bedworth Borough are at risk of flooding from the following sources: fluvial, surface water, groundwater, sewers, reservoir inundation and canal overtopping/breaches. This study has shown that the most significant sources of flood risk in the Nuneaton and Bedworth Borough are fluvial and surface water.</p> <ul style="list-style-type: none"> • <i>Fluvial flooding:</i> The primary fluvial flood risk is along the River Anker and its tributaries, including Wem Brook and Bar Pool Brook, which present fluvial flood risk to rural communities as well as to the main urban centres of Nuneaton and Bedworth. The River Sowe also presents a flood risk in the southwest of Bedworth. The floodplains of the watercourses are fairly well confined in the majority of the Borough, with wider extents along the River Anker due to lower lying, flat topography, notably through Nuneaton. • <i>Surface water:</i> The Risk of Flooding from Surface Water map shows a number of prominent overland flow routes; these predominantly follow topographical flow paths of existing watercourses or dry valleys with some isolated ponding located in low lying areas. There are also considerable flow routes following the roads through the main urban areas of Nuneaton and Bedworth which alongside isolated areas of ponding affect many properties across these settlements.  |

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

| | |
|-----|-------------------------------------|
| Yes | <input checked="" 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 | x |
| No | |

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.

The flooding in the river Sowe has been noted to be increasing in recent years. It almost flooded all homes at the junction of bowling green lane and School Lane in February 2020. Global Climate change has been scientifically proven to increase the risk of flooding and the proposed commercial designation of land at bowling green lane/ school lane junction mapped as SEA6 puts nearby properties and the SCHEDULED ANCIENT MONUMENT: Exhall Hall Moat at risk of further flooding. This flood risk will damage the wildlife, standing structures, and also risk damage to the structure and earthworks of the monument itself.

The river Sowe runs through the moat. Not beside it. The sluice brings flow of the river through and around the monument before depositing it back through the outgoing sluice. There are no feasible ways to adequately defend against flooding as residents and therefore town policy will dictate flood destruction due to developments increasing run off into the river. Particularly the commercial site proposed. The huge amount of covered land for lorry parking would cause massive amounts of run off during storms as groundwater absorption of a vast area will be covered. Even if drainage is put into local drain systems these could easily overflow into the river causing damage and pollution,

(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.

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Re-designate land at the junction of bowling green lane and School Lane CV7 as residential, agricultural, or conservation. Not commercial.

(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:

It's important for witness accounts of recent near misses i.e., Storm Dennis 16/02/2020 with the river to be put on record for consideration.

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.

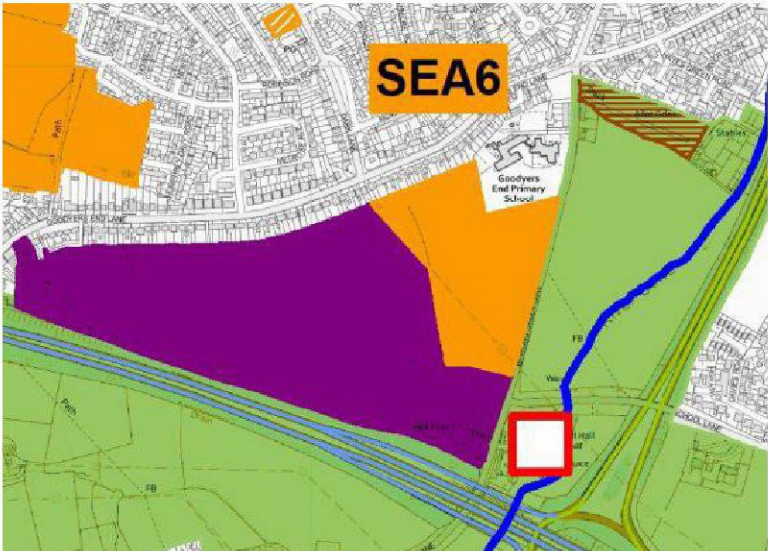
9.

| | |
|---|------------|
| 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) | |
| Date: | 08.10.2023 |

Part B – Please use a separate sheet for each representation.

Name or Organisation:

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

| | |
|--------------|--|
| Paragraph | 7.23 7.23 Queuing on the School Lane eastbound approach to the School Lane/B4113 Coventry Road/Bayton Road junction is the cause of the ‘severe’ classification, this is likely due to the Borough Plan sites in close proximity to the junction, i.e. Bowling Green Lane (SEA-6) and Prologis Extension (SEA-3).’ |
| Policy | Strategic Transport Assessment - 2023.pdf |
| Policies Map | <p>SEA6</p>  |

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

| | |
|-----|-------------------------------------|
| Yes | <input type="checkbox"/> |
| No | <input checked="" 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 checked="" 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.

The Commercial designation and proposed commercial development of the site at junction SEA6 is cause for severe traffic concern. It is already listed as such in paragraph 7.23 yet the designation of this land for further commercial use in a residential area will compound an issue that is already listed in the borough plan documents as SEVERE. This is unsound. The junction cannot tolerate any further traffic at peak times and there is a flood of schoolchildren walking through this junction at school closing time. The proposed site is now for a 6000 square foot fulfilment centre with hundreds of lorries coming through each day due to this commercial designation. The increase in traffic of HGVs through a residential road to a single commercially designated field is ridiculous.

YOU SHOULD BE MADE AWARE THAT THE RIVER SOWE AT THIS JUNCTION RUNS THROUGH THE SCHEDULED ANCIENT MONUMENT AT EXHALL HALL MOAT AND BACK INTO THE RIVER AS A RUNNING WATER COURSE, THEREFORE, ALL TRAFFIC POLLUTION IN THE RIVER SOWE FROM THE COMMERCIAL DESIGNATION AND POLLUTION RUN OFF FROM PROPOSED COMMERCIAL 6000 SQ FOOT FULFILLMENT CENTRE SITE AT BOWLING GREEN LANE (site 114B008 PA 039611 and 039592) RUNS THROUGH THE MOAT. MY LEGAL PROPERTY. DESIGNATION OF THE ADJOINING LAND AT BOWLING GREEN LANE site 114B008 AS COMMERCIAL CREATES A RISK FOR DEVELOPMENTS THEREIN TO POLLUTE THE MONUMENT. IT IS EASILY FORSEEABLE BY THE BOROUGH COUNCIL THAT THIS COMMERCIAL SITE AND THE PROJECTED TRAFFIC WILL BE POLLUTATIVE TO MY LAND WHICH IS A SCHEDULED ANCIENT MONUMENT AND IS PROTECTED BY LAW.

•The borough plan was modelled on previous traffic data. Traffic has greatly increased in the area and so further development adjoining the Scheduled Ancient Monument and its ecosystem could push the PM2.5 particle emissions over what the UK law allows. •" (the EU "legal limit") for PM2. 5 is 25 µg m-3. This limit has been transposed into UK law". Current 'Environment Act 2021'
This will have a direct effect on the ecosystem of the monument.

and the pollutants would definitely be above upper limits set out in the new 'Environment Act 2021' 2040 limit of just 10 micrograms per M3 in the ambient air. This is due to the cumulative effect of the M6 junction and also existing developments due to be completed in the area compounded with the proposed development traffic increase figures and the realistic new figures which will be higher than those misrepresented in the submitted data.

The traffic data used to approve this original plan is out of date and new modelling should also take place. There have been multiple new developments in the area since this land was designated as commercial, and the traffic has already increased as a result. There are also multiple commercial developments in the area which are already part way through completion, their potential impact should be considered when looking at site **114B008 SEA6 and whether it is now viable**. New traffic modelling should be required.

Traffic Noise Pollution:

There is also a huge amount of **noise pollution** in the area from current traffic from the A444 and M6. The residents are at our limit for noise pollution, and this should not be compounded when it can be easily avoided.

The Lorry traffic using the site **114B008** will cause noise pollution at night and in the early hours of the morning to offload and onload their cargo will also cause a huge amount of noise pollution. This is an extremely noisy job, and a fulfilment centre should never be placed this close to any housing.

Duty to Cooperate:

Highways England should also be notified and brought into the conversation about all of these developments as they will be interested to see how they will possibly replan, or upkeep small residential roads (school lane and bowling green lane) with this HUGE amount of increase in traffic. I believe not doing so would be a failure in Duty to cooperate.

Duty to Cooperate

To ensure the local plan complies with the Duty to Cooperate, it should meet the following criteria:

- The Council has engaged and worked effectively with neighbouring authorities and statutory bodies.

CONGESTION ON SCHOOL LANE:

Parked traffic on school lane prevents even standard sized cars from going through quite often. The only commercial area on school lane is the red kangaroo development and since it was rebuilt after the fire it has been absolute chaos with many complaints about customers parked cars all along school lane. This problem already exists and so to compound this chaos with developing a commercial site at the opposite end of school lane through this narrow residential area, is just not physically viable. Lorries struggle to get through and take a long time to navigate the parked cars. The HUNDREDS of daily lorry Journeys planned for the development of a fulfilment centre at site SEA6 114B008 Planning Applications: 039611 and 039592 would leave school lane at almost permanent standstill. I am aware that this borough plan does not control planning applications but the designation of this single field in a residential area as commercial has caused this ridiculous planning application to be submitted. Widening the road will not solve any problems as the cars will still park, and the pollution and noise will still be increased.

SAFETY OF SCHOOL CHILDREN & Duty to Cooperate with schools.

I believe that there has been a total failure in duty to cooperate with local schools on the traffic due to be created at this site SEA6 114B008 zoned as commercial use (Planning Applications: 039611 and 039592). Hundreds of school children

cross this junction every day and will have nowhere safe to cross after this land is developed as a commercial fulfilment centre as designated and lorries are coming in and out constantly. A bridge for schoolchildren and railings would have to be installed to prevent injury and death at the very least. Lorries have poor visibility in blind spots and schoolchildren are prone to crossing the road at inopportune moments. It is only a matter of time before this junction becomes deadly if the proposed commercial land stays designated as such. Even if this planning application fails, another commercial application will be submitted and another, and another, as long as this is commercially zoned. The only way to prevent lorries causing injury to the children in this area is to try to keep them in separate zones. There is absolutely no need for this single field in a residential area with schoolchildren to be zoned as commercial.

(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.

Please re designate the land at SEA6 site 114B008 as Residential, Agricultural, or Conservation.

If you are concerned that the land then becomes useless – there is always a need for housing. Modern energy efficient housing with lots of green space buffer zones along bowling green lane and alongside the M6. Or it can be designated as agricultural only. It is currently used as such. With the cost of food- local farming is necessary. Please reconsider the designation of this land from commercial to something safer.

(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 | x |
| Yes , I wish to participate at the oral examination | |

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

To represent the interests of the monument and ecology due to the impact from traffic, pollution, and traffic noise pollution

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) | |
| Date: | |