

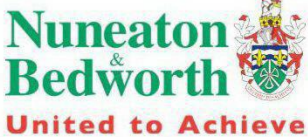
Anca Seaton

From: [REDACTED]
Sent: 16 October 2023 22:23
To: Planning Policy
Subject: Borough Plan consultation
Attachments: BoroughPlan RepresentationFormA.doc; BoroughPlanRepresentationFormB.doc;
BoroughPlanRviewOct2023Comments.doc

Follow Up Flag: Follow up
Flag Status: Completed

Please find my comments attached.



 <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		
First name		
Last name		
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:

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

Paragraph	
Policy	SA1, HS1, HS2, TC3, BE2
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 checked="" 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.

See attached document.

(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.

(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 expand on my comments.

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)

[Redacted Signature]

Date:

16/10/2023

Borough Plan comments

My biggest concern of the Borough Plan is that the policies are not being applied to all applications rigorously enough and we are getting sub-standard developments. The mechanisms for monitoring outcomes appear rather weak, with no means of rectifying the issues if policy is not effective e.g. TC2f -Target – increase the number of national retailers present in the town centres. Surely this is just down to market forces and none of the policies can make that happen?

Another example is the supermarket that has been given permission to build on the Crow's Nest pub car park. Even though I believe this failed the test for District centres and put this clearly in my objection, it was still allowed. This was my objection. 'In section TC3 of the adopted Borough Plan, it says that development within district or local centres will be considered acceptable in principle, subject to the following

1. The function, vitality and viability is maintained or improved.
2. Contributes positively to the range of services on offer
3. Does not harm the amenities of local residents

I believe that this proposal fails on those grounds. It risks the viability of the existing convenience store, why would such a small district centre need 2 convenience stores?

It does not contribute positively to the range of services on offer. All the services are already provided by the existing convenience store and the butchers.'

The monitoring at TC3c has the target, as below but nothing can be done if the local centre doesn't remain healthy.

District and local centres remain healthy in terms of their function, viability, and vitality.

HS1

Whilst the words of the HS1 policy are OK, they are very vague and non-specific.

There should be mention of linking the railway station, bus station and Town centre in Nuneaton and the train station and town centre/bus stops in Bedworth. Only by having specific policies to encourage this can we possibly get people out of their cars and onto public transport and walking and cycling and achieve the 15% modal shift that the Plan requires. If these things are not in the Borough Plan, getting money from developers towards their cost will not be possible and we have no hope of getting 15% modal shift.

There should be specific mention of an entrance on the Weddington side of the existing Nuneaton station and Stockingford station (which has had a feasibility study already carried out by WCC). There does not appear to be any mention of this study in the Plan evidence base, therefore it is not sound.

HS2 – once again I am concerned about the monitoring. What are the penalties for not conforming to the various policies and SPD? There appear to be none.

E.g. The Crow's Nest supermarket does not conform to the SPD, regarding the cycle parking but there are no consequences except a poor development that the residents will be stuck with for many years.

SA1

13.

New proposals will need to ensure that the development includes fundamental mitigation for climate change, carbon reduction leading to neutral carbon emissions by 2050 and for a nature recovery strategy. For example, new developments should be built in line with water resource efficient design standards (110 litres/person/day).

And yet the Plan is missing key points in section BE2 that would make this happen. This is not sound.

BE2 – nothing to say that new homes/developments should have solar panels, ground or air source heat pumps etc.

In the current climate, this is not sound. Any claims that a development will be carbon neutral is not possible unless these things are mandated for new developments.

13.18 The figures are not ambitious enough. Things like solar panels need to be mandatory not an optional extra. I do not believe that the Plan is sound for achieving carbon neutrality by 2050.

