

Appendix 1

Responses received on the Issues and Options document and officers' draft responses.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
1	Miss	JB	Ainscough Strategic Land	1	Larger sites/ new settlements suggested plan period of 30 years, with smaller sites brought forward more quickly.	The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.
				2	Use the new standard method for calculating housing Additional sites for housing to meet need and a new SHLAA should be produced.	Noted.
				7	Option 1 – all sustainable and deliverable sites should be considered prior to amending GB boundaries.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				9	Development focus within Nuneaton and Bedworth as the two most sustainable settlements.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				10	Should be reviewed as part of the local plan process to potentially seek more additional deliverable sites to meet housing needs.	The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new housing development within the Borough Plan review.
				11	Option 3 and option 2. Option 1 is considered as unrealistic.	Noted.
				12	Sites outside of the Green Belt, adjacent to Nuneaton and Bedworth settlement boundaries.	Depending on the Council's chosen Option, the Green Belt sites will be considered in light of sites that are submitted to the Council through the 'call for sites' process.
				13	Developments should then seek to provide it but in some instances it may not be possible due to technical constraints or viability.	Comment noted.
				14	Aspiration rather than a requirement.	Comment noted.
				15	Large-scale is defined as a quantum or area size to reduce confusion in planning applications. Viability should also be a factor.	Comment noted.
				16	The Council should seek to create a policy that reflects paragraph 131 of the NPPF.	Comment noted.
				20	Yes, the policies should be amended to a focus for new development to ensure sustainability.	Comment noted.
				21	It should be addressed in the Local Plan.	Comment noted.
				22	They will need to be reviewed with a particular focus on climate change.	Comment noted.
				2	Mrs	JB
2	Yes, the existing evidence base is outdated (some over 10 years old). Needs to consider cross boundary issues. Need to ensure evidence is robust.	Comments noted.				
23	Policies should reflect the anticipated Environment Bill and also consider using the Local Plan process to find sites that could potentially be used to provide offsetting.	This comment has been noted and will be considered at the next stage of the Borough Plan review.				
				24	Yes, design codes should be dealt with as a separate SPD.	Comment noted.
				25	Agreed.	Comment noted.

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				3	The following evidence base studies are all five or more years old: Climate change; biodiversity; employment; flood risk and water cycle; green belt; landscape; housing; transport. Studies need to consider cross boundary issues.	Comments noted and will feed into the evidence based studies review.
				4	A combination of Option 1 and 2 is favoured over Option 3. Where sites use existing road networks, cumulative impact should be considered.	Comments noted and any future development surrounding the M6 J3 will be subject to a suite of transport assessments which will consider cumulative impact.
				5	If there was a new junction on the M6 to the west of Coventry for employment sites, this would alleviate pressure off the M6 J3.	Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				6	A combination of option 2 and 3 is favoured.	Comment noted.
				7	Option 3 is favoured, sustainability should be prioritised. All residents should have access to open space and we should be preparing for the impacts of climate change. Disagrees to EMP2 (Wilson's Lane) allocation for this reason.	Comments noted.
				8	Option C however this must consider all aspects of sustainability.	Noted.
				9	Sites should be mapped and allocated for the most beneficial land use for the area e.g for a new health centre/primary school. Where there are gaps in provision, neighbourhood plans should be produced for those areas.	Comment noted.
				10	Agreed.	Noted.
				11	All sustainable options should be considered (and all aspects of sustainability).	Sustainability is at the heart of the NPPF and all spatial options will be considered in terms of their sustainability.
				12	Capacity of existing infrastructure needs to be considered and new infrastructure needs to be planned for.	Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				13	Yes targets should be set and developments should provide tree-lined streets. References NPPF Paragraph 131.	Noted and agree that all developments should take into account NPPF paragraph 131.
				14	Yes but would need to be managed in the long term potentially through planning condition.	Comment noted.
				15	Tree planting requirements should be relative (on a sliding scale) to the development size rather than having a threshold. Small sites could provide off-setting contribution.	Comment noted.
				16	No, targets should be treated as a minimum requirement.	Comment noted.
				17	Use Class E, A4 and A5 (as was) and F1 should all be acceptable uses. Better to keep shops in active use. C3 could be acceptable but needs to be located carefully.	Comments noted and will be taken forward for consideration at the next stage of the Plan review.
				19	Option B – The impacts of Covid-19 have changed the nature of town centres. Likely to become focus for social/leisure/meeting facilities. The overall experience will be more important.	Comments noted and will be taken forward for consideration at the next stage of the Plan review. New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				20	Yes – there should be greater emphasis to the importance of cycling and walking connections/infrastructure.	Comment noted.
				21	Yes - all new developments should be required to install vehicle charging points.	Comment noted.
				22	No these policies should be updated to reflect the changes we need to make to address the climate emergency and to improve air quality.	Comments note. and will be taken forward for consideration at the next stage of the Plan review.

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				23	Yes – a minimum of 10% should be set. Higher targets should be set for allocations to address specific issues within the locality.	Comment noted.
				24	Yes design codes are best dealt with as SPDs as they can be reviewed and updated as necessary. Concerns around policies and SPDs not been taken into account effectively in decision making processes.	Comment noted.
				25	No, only some of the issues have been identified. Other issues include neighbourhood plans; cross-boundary issues and cumulative impact; M6 J3; use classes (over-reliance on B8), guidance for the design of employment and mixed use sites, air quality, access to open space, climate change, flood risk and flood storage, biodiversity recovery and allocation of EMP2 Wilson's Lane.	This comment has been noted and issues raised will be considered at the next stage of the Borough Plan review.
				26	Neighbourhood Plans; cross-boundary issues and cumulative impact (such as M6 J3); over reliance of Use Class B8 in the area; further guidance on design of mixed use sites; air quality; open space; climate change; biodiversity recovery; allocation of EMP2 (disagrees with allocation).	Comments noted and will be taken forward for consideration at the next stage of the Plan review.
				28	Table 3, Appendix B, Option 3 – Provide new employment in close proximity to junction 3 of the M6. Concern mistakes regarding cross-boundary issues will be repeated. All aspects of sustainability to be considered.	Comment noted.
3	Mrs	IJ	Ash Green Residents Association 2018	1	Most comments from members related to them feeling like there was not enough advertising of the consultation dates and venues.	The Council undertook comprehensive consultation for the document including exhibitions throughout the Borough.
4	Mr	RM	Bedworth & District Horticultural Council	1	Agreed.	Comment noted.
				3	Allotment Strategy 2012 – 2022 is flawed and 90% of the planned activities never happened.	The Allotment Strategy forms part of a wider evidence base of documents. The Allotment Strategy is intended to be reviewed as part of the Parks and Greenspaces Strategy which is being progressed.
				4	Option 1.	Noted.
				7	Option 1.	Noted.
				8	Option 1.	Noted.
				9	Everything should be reviewed again in light of the impacts of Covid-19.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				10	There is no justification for all the houses proposed.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				13	The planting of more trees is essential. Existing trees also need to be properly managed.	Noted.
				14	Orchards are generally enclosed land and would need to be managed – queries who would manage this?	This point is noted, and responsibility would need to be agreed upon during the planning process to ensure the areas are managed appropriately.
				26	Allotments have received little support in the Borough Plan. The Pandemic has seen a massive increase in those seeking to have their own allotments.	Comments noted and allotment occupancy rates will continue to be monitored.
5	Mrs	LG		1	Agreed.	Noted.

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			The Bedworth Society	2	The evidence base needs to be updated given the age of the Borough Plan.	A new evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				3	The Coventry population figure increase needs to be updated.	Understand this is being dealt with separately through the ONS and will be addressed at the next stage of the Plan review.
				4	Option 1 - A lot of existing employment estates are close to major routes in any case, and have easy access to them, unlike the proposed development at EMP6.	The Concept Plans for Strategic Allocations: HSG6 and EMP6, School Lane and Longford Road, Bedworth Supplementary Planning Document (2020) provides guidance on access at Section 2.6 and 3.3.
				5	Industrial based employment should be located where workers can access them using public transport or with cycles lanes. Office based employment should be dealt with separately and may have a reduced need as a result of Covid.	Sustainable access is one of the factors considered with every development proposal. New evidence base will be commissioned as part of the later stages of the Borough Plan review process to assess the impact of Covid.
				6	Option 4 would allow the most control. It is better to keep non-employment areas separate from employment.	Noted.
				7	Option 1 – smaller, brownfield sites could mean local developers have a chance to develop them using local labour. Green Belt should be used for housing as an extreme last resort.	Noted.
				8	Option A providing brownfield sites have already been considered.	Comments noted.
				9	Environmental aspects should be considered firstly, followed by infrastructure for, and the necessity of the new development.	Comments noted and will be fed into the next stage of the Borough Plan review.
				10	Yes – there are currently too many sites allocated.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Housing need in Bedworth should be recalculated before any more sites commence.	Careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review.
				13	No – better to adapt what is already available in terms of green spaces on developments as who will maintain any trees which are planted?	The intention is that the maintenance of trees will be set out within the planning process and conditioned to any decision, but the comments are noted.
				14	Yes but it would need managing.	Again, this is something that the Council would look to confirm during the planning process of a proposal to ensure any future orchard would be maintained.
				15	A large scale development is one that would impact on a locality's facilities (shops, health etc.), require additional major road alterations for access, requires additional power (gas and electricity) substations and covers an area larger than one acre.	Comment noted and will be considered with other responses to this question when taken forward to the next stage of the plan review.
				16	No, the Plan should set out that trees should be planted wherever possible. It is more important that the trees that are planted are maintained and inspected annually.	Comment noted.
				17	The former Classes A4 and A5 should be unacceptable uses to promote healthier lifestyles. Independent shops selling more environmentally friendly products would be preferred.	This response is largely in agreement with option 2 and the request for more independent shops is noted. The Council supports independent businesses and will take this comment forward to the next stage of the review.
				18	Independent small shops especially those which offer environmental skills such as repairs.	As above.

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				19	Option C.	Noted.
				20	Yes – to encourage a healthier, fitter population.	Comments noted.
				21	This is a commercial issue and will be driven by need. Property developers will incorporate them into plans when it increases their revenue.	The comment does not explicitly say so, but it is indicated from their response that there is no need to incorporate EV charging points into policy as once the need is there it will be beneficial for developers to put them in themselves.
				23	The new plan should require any new development to make a biodiversity gain. The actual percentage should be defined after consultation with experts in the field.	Comment noted.
				24	Yes – The Bedworth Society are a member of Civic Voice who are inputting into better design in building development.	Comment noted.
				25	Yes to a greater or lesser degree.	Comment noted.
				26	Concerns regarding local infrastructure such as: changes at Bayton Road crossroads; impact on health centres; retention of older buildings rather than demolition to keep buildings with history and character.	These comments are noted and will be taken through to the next stage of the review. An updated Strategic Transport Assessment will be undertaken to further understand highway capacity issues, although the Bayton Road/School Lane/Coventry Rd junction was identified as in need of improvement in the 2016 STA. The updated STA will inform an updated Infrastructure Delivery Plan/Schedule, which will also consider infrastructure needs including health facilities. NBBC have a non-designated heritage asset list which records buildings which are considered to have local heritage merit to prevent demolition of these buildings.
				27	The Bedworth Society have commented on each iteration of the Borough Plan and endeavour to look after Bedworth Past, Present and Future.	Comment noted.
6	Mr	MH	FCC (submitted by Axis on behalf of FCC)	1	The plan period is in line with NPPF Paragraph 22. Should the timetable for the preparation of the plan slip then it may be prudent to extend the play period to 2040. Paragraph 22 also sets out policies for larger scale developments should be set within a vision that looks further ahead (at least 30 years).	Comments noted and it will be necessary to review the Plan period should there be a delay to the Plan review.
				2	Yes, existing evidence should be updated or replaced to ensure the plan is prepared in accordance with legal and procedural requirements. Most current evidence-based documents are around 5 years old or older. The Council should publish a list of evidence base they are producing and make it clear to stakeholders when this will be published and invite comments on its publication.	Comments noted and the Council will endeavour to provide a list of evidence-based documents which will be updated in due course.
				3	A comprehensive list of the evidence base documentation which is proposed to be produced should be published to enable everyone to understand activities that are being undertaken in the preparation of the plan in accordance with NPPF Paragraph 35.	As above.
				7	Option 1 as it provides a clear logical approach to locating new development. The only amendment suggest is that brownfield land should be prioritised over greenfield land in the urban areas.	Comments noted.
				9	Prioritisation of brownfield land over greenfield land.	Comment noted.

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				10	Yes agreed. Until the duty to co-operate is revoked the Council are obliged to co-operate with other planning authorities on strategic housing matters. This includes accommodating some of the 35% uplift applied to Coventry. Update existing allocations (given they have been in place over two years) as deliverability should be a key focus. Site HSG11 is deliverable and when reviewing sites, consideration should be given to opportunities for the expansion of allocated sites, such as HSG11.	Comments noted.
				11	Spatial Option 1 is supported. Residential development in existing settlement boundaries should be maximised before the open countryside and as a last resort, Green Belt.	Comments noted and agreed.
				12	Opportunities to maximise land adjacent to the existing strategic site allocations within settlement boundaries should be considered, based on up-to-date evidence.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				13	No – it should be encouraged but other factors such as open space, creation of other habitats etc also need to be considered. The current case-by-case approach does not preclude the achievement of higher levels of tree planting should the opportunity arise. 'Large scale developments' should be defined.	Comments noted and will be taken forward into the next stage of the Borough Plan review.
				14	No - for the same reasons as above.	As above.
				15	The NPPF provides a definition for 'major development' within Annex 2: Glossary. It is considered that this is the most appropriate definition.	Comment noted.
				16	Please see response to question 13.	Comments noted.
				20	Emphasising the importance of walking and cycling is supported. The provision of infrastructure is dependent on viability, and this should be recognised on a site-by-site basis and for example should be a justifiable reason to fall short of parking standards in more sustainable locations.	The comments relating to the support for walking and cycling are noted.
				21	It is considered that all new dwellings should include an electric vehicle charging point which complies with the relevant standards that are applicable at the time. For commercial uses, one or two charging points per ten spaces would be appropriate initially with a requirement to have the necessary infrastructure in place to provide charging points on all parking spaces in the future.	The comments supporting Policy HS2 are noted, as are the suggested requirements for other uses.
				23	Are the Council intending to use the Warwickshire Biodiversity Impact Assessment Tool or the DEFRA Biodiversity metric 3.0? It is assumed the Metric 3.0 would be adopted. At this stage the 10% proposed in the Environmental Bill has not received royal assent and until such a time as it does, opportunities for net-gain should be pursued but specifying a percentage should be avoided. Local Wildlife Sites should be reviewed and their protection should be based on up-to-date ecological information.	No decision has been made at this point as to how biodiversity will be measured. The comments relating to the Council's Local Wildlife sites are noted.
				24	Agreed.	Noted.
7	Mr	PB		1	Disagree – entire review required.	Comment noted.

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				2	Agreed given impacts of the pandemic and evidence which may have been based on the 2011 census which is now outdated.	Comments noted. A new evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				3	Yes, any research based on the 2011 census will need updating.	As above.
				4	None of the options. Vacant units in existing industrial estates should be allocated to potential clients. If these aren't suitable they should be rebuilt to accommodate their needs.	Comments noted.
				5	Extend Bayton Road by building on the Hawksbury Golf Course.	Comment noted.
				6	Option 1.	Noted.
				7	Option 1 – brownfield land such as Public House on Bulkington Road (Bedworth) which is an eyesore.	Noted.
				8	None of the options. Plenty of brownfield sites that need looking at.	Comment noted.
				10	Yes. Disagrees NBBC should be taking 4,000 homes off Coventry when they have green spaces and Student Accommodation available.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	There will not be many locations to build in the future.	Please see comment above.
				13	Feels that there is no point.	Comment noted.
				14	Unlikely to be implemented when developers could maximise profits.	If the Borough Plan were to require an orchard, then developers would need to adhere to policy or provide justification for not providing it.
				16	Yes as they have to maintained and currently this is not done very well.	Comment noted.
				18	No other uses suggested – Bulkington is a good shopping area.	The reference to Bulkington as a good shopping centre is noted.
				20	Suggests a traffic survey is undertaken as currently very few cyclists.	As part of the review of the Borough Plan requirements will be reassessed which includes current road network capacities.
				21	Agreed.	Comment noted.
				25	The review feels rushed and should be reviewed in full.	Comment noted.
				26	Requests new bungalows for elderly or disabled which are currently not provided for.	This comment has been noted. and will be considered at the next stage of the Borough Plan review when considering the type of housing required in the Borough, based on available evidence.
8	Dr	AS	Bedworth Eagles JFC	1	No.	Comments noted.
				10	Agreed. There is a lack of traffic infrastructure to make many of these areas sustainable and a loss of green space will result in urban sprawl.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				25	Disagree. Too few designated green spaces. Community infrastructure needs (education/health/poverty) have not been addressed which is an urgent need.	This comment has been noted. and will be considered at the next stage of the Borough Plan review.
				26	Town Plan NUN356 (Elizabeth Centre) – traffic, amenity and social consequences have not been considered sufficiently and will result in the severe loss of community amenity. Puts the future of Bedworth Eagles JFC into doubt. Insufficient mitigation measures for replacing the current community amenities and parking. Request the Elizabeth Centre site is withdrawn from the housing plan.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.

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				27	Objectives 5, 6 and 7 are not met through NUN365 and other plans due to the lack of consideration of material attributes (pages 1 & 2). Disagree that health and welfare has been taken into account with NUN365.	Comments in relation to concerns for NUN365 have been taken into account.
9	Mr	DB		1	Agreed, the 15 year period is appropriate, provided the evidence base is updated regularly and reviews take place as scheduled.	Comment noted.
				2	Agreed, it's essential that the evidence base is updated and previous data, that is out of date or based on flawed methodology is dismissed.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				3	Considers any base studies relating to projected housing should be ignored and dismissed as invalid as based on flawed ONS figures.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				4	Options 1 and 2 are preferable to option 3. Makes sense to focus development in the North of Nuneaton where A5 improvements are scheduled/new housing developments are located.	Comment noted.
				5	Adopt an infrastructure first approach so that either the infrastructure already exists that can accommodate the additional traffic that will be generated or the infrastructure is delivered in advance of any development taking place so that direct links to major arterial roads and motorways are in existence prior to development.	Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				6	Option 5 is preferable as this allows the Council to react quickly to changes in the employment market and decide upon changes to land use as and when necessary without being bound to structures and policies that may be overly restrictive and no longer representative of the employment market.	Comment noted.
				7	Option 1 as it gives the most protection to green belt land. Green belt around Ash Green and Bulkington must be protected in order to maintain village character.	Comment noted.
				8	Option A is preferable since this gives the most protection to existing greenbelt land.	Comment noted.
				10	Yes, as the evidence based has proven to be flawed. Considers a moratorium should be placed on all undeveloped sites in the current Borough Plan where planning permission hasn't already been granted to allow the review to take place and be completed.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				12	Consideration needs to be given to how people living in the Borough access the adjacent countryside for exercise and relaxation. New developments should not restrict access to green space.	Noted.
				13	Yes, this should be based on the number of houses within the development.	Comment noted.
				15	Yes, any development of 100 homes or more should be classified as large scale with associated s106 contributions payable by developers.	Comment noted.
				16	No. The Borough Plan should set targets for tree planting. The Council has passed motions relating climate change and	Comment noted.



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					working toward reducing carbon emissions. Tree planting is fundamental to this.	
				17	Option 1 is preferred as this allows the town centre use to react rapidly to changes in customer habits.	Comment noted.
				21	Yes, makes sense to amend in line with legislative requirements. A minimum of 1 off-street charging point plus an additional charging point for every two bedrooms of a property should be required.	Noted and will be considered at the next phase of the Plan review.
				22	No.	Noted.
				23	Yes, as this will place Council policy in line with upcoming Government legislation.	Comment noted.
				24	Yes, if this is the way to have better quality design and layout of new developments. It would be good to see increased use of local design style and materials in new build developments.	Noted.
10			Bulkington Residents Voice	1	The review should not look beyond 2038 as we do not know what changes COVID-19 will bring and the next National Census is in 2031.	The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.
				2	Yes – evidence bases concerning projected population/ housing need; state and capacity of existing infrastructure and traffic modelling are considered weak and need to be updated/ replaced.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				4	It hasn't yet been demonstrated that there is a capacity shortfall, or how any shortfall might relate to projected population.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				5	Occupancy levels, and unused capacity at existing locations need to be determined before locating new employment areas.	Comment noted.
				6	Option 1 with a need to examine existing policies that are causing these businesses to locate on employment sites.	Comment noted.
				7	Option 1, prioritise the existing urban areas of the Borough as further development is at expense of residents quality of life/ the environment.	Comment noted.
				8	Should be option to 'do nothing' as borough cannot sustain indefinite growth.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				9	A hierarchy which considers what residents really want as no attention is given to this important aspect.	Comment noted.
				10	Yes, as population projections are unreliable & land has unjustifiably been removed from green belt.	Comment noted.
				13	Tree planting is important but maintenance must be factored in.	Comment noted.
				14	Maintenance must be factored in.	Comment noted.
				15	Plant trees at peripheries where maintenance may not be required often.	Comment noted.
				17	For Bulkington, use class is not a main priority – main street needs maintenance.	Comment noted.
				20	Walking and cycling essential but for Bulkington residents has to be disregarded due to limited public transport/ distances to travel to other town centres.	Comment noted with reference to Bulkington taken into account.

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				21	Yes.	Comment noted.
				23	By dealing with the housing figures and putting greenbelt back into greenbelt status biodiversity will be at least to a degree restored.	Noted.
11		C&AD		1	No, plan should be in 5-year blocks.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				4	Options 2 & 3 are preferred. Vacant industrial sites should be used before green belt sites.	Comment noted.
				5	Vacant industrial sites should be used before green belt sites.	Comment noted.
				7	Green belt should be protected at all costs.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				8	Green belt should be protected at all costs.	As above.
				9	Development should be based on existing amenities (i.e. access to green space).	Comment noted.
				10	Yes – does not agree with original estimate of needs.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				11	Use of vacant sites in town centres.	Comment noted.
				12	Use of vacant sites in town centres.	Comment noted.
				13	Tree planting should be part of new developments but preserving current hedges and mature trees should be considered more of a priority.	Comment noted.
				14	No – not essential for recreational purposes.	Comment noted.
				15	Large scale development considered inappropriate.	Comment noted.
				16	Tree planting should be part of new developments but preserving current hedges and mature trees should be considered more of a priority.	Comment noted.
				20	Cycling and walking important as high traffic levels in area. No new roads in plan.	Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				21	Every house should have a charging point.	Comment noted.
				22	Borough plan should be re-evaluated to consider actual requirements over a 5 year period.	Noted.
				25	Do not agree. Considered consultation to be unhelpful.	The Council undertook comprehensive consultation for the document including exhibitions throughout the Borough.
				26	Consultation 'poorly advertised, badly displayed and misleading'.	As above.
					Consultee responder found many questions difficult to understand/ complete and considers form is not suitable for general public.	As above.
12	Mr	PW		1	Yes.	Comment noted.
				7	Option 1.	Comment noted.
				8	Option A.	Comment noted.
				13	Yes.	Comment noted.

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				14	Yes.	Comment noted.
				16	Yes.	Comment noted.
				25	No – traffic issues should be looked at cumulatively rather than in isolation.	Development proposals are required to take into account existing development and other proposals in the locality prior to their determination.
				26	Allocation EMP2 in relation to the point above as well as playing fields, flood prevention, preserving rights of way and landscaping.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
13	Mrs	WB	The British Horse Society	7	Option 1 – to protect access to the countryside.	Comment noted.
				8	None of the above. Option 1 from Q7 is preferable but failing that Option A.	Comment noted.
				11	Option 1 or 2 to avoid negative impacts on rights of way and access to the countryside whilst also using development opportunities to extend the PROW network.	Comment noted.
				20	The off-road network should be prioritised and should be inclusive of all vulnerable road users, including horse-riders.	Comments given in relation to the question are noted which confirms that the Active Travel definitions includes horse riders as a vulnerable road user.
				26	Creating and sustaining rights of way and shared NMU routes has resource implications which need to be reviewed in light of the increased use of rights of way since the pandemic.	A new evidence base will be commissioned as part of the later stages of the Borough Plan review process in relation to the impact of Covid.
14	Mr	ID	Canal and River Trust	20	Revised wording for Policies SA1 and HS2 could highlight the potential of walking and cycling infrastructure, including canal towpaths which are an important traffic free route for both leisure and utility. Towpaths should be considered an integral element of the infrastructure needed to encourage greater connectivity.	The comments given in relation to incorporating the canal network as an asset into the wording of Policies SA1 and HS2 is noted and will be considered at the next stage of the plan review.
				26	The canal network is a multifunctional resource that has the potential to contribute positively towards the delivery of objectives in the Plan. The review should aim to incorporate references to the roles that the canal network can play in particular: canal's role in placemaking; sustainable walking and cycling routes; an important historic feature; health and wellbeing benefits; visitor attraction.	The Council acknowledge the wealth of benefits our canals provide for the local community and will seek to incorporate their benefits into policies and on a site-by-site basis at the next stage of the plan review.
15	Mr	IT	Cerda (submitted on behalf of Vistry Group)	7	Option 2 - with regards to the use of either greenfield or Green Belt land, this needs to be led by the needs that are being met through the release of land. NBBC have accepted a responsibility to accommodate some of Coventry's unmet need (now increased by 35%). Some of the most appropriate locations are likely to be within the Green Belt. These sites will inevitably be closer to Coventry and will more likely result in sustainable travel patterns.	Comments noted and will be considered at the next stage of the local plan review.
				9	Further consideration should be given to increasing the proposed density of development on existing allocated sites, facilitated by increasing either the net or gross dwellings per hectare. This would result in greater utilisation of any Green Belt land released.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				8	Vistry Group would not support a review of the allocated sites. Vistry Group currently have an option of a parcel of	Careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					land north of Coventry Road, Bulkington, which forms part of allocation HSG8: West of Bulkington. Considering reviewing the delivery of allocations only two years after the Plan has been adopted is premature. Given the process of the Concept Plan (for HSG8) was not adopted until July 2020 created an inability for developers to submit planning applications until last year. It is considered that a review of the appropriateness of the housing allocations would be unjustified, as there are not notable or unjustified delays with the progression of sites.	
				11	Option 2 – refer to comments for Q7.	Comments noted.
16			The Coal Authority		No specific comments to make on the questions asked but consider that the potential risks posed to development proposals by past coal mining activity, including land instability and public safety issues, should be addressed as part of the Borough Plan review. Recommend the inclusion, in any new Local Plan, of a policy to address issues of ground instability and should direct applicants to the information required to support any planning application.	The Council will continue to work with The Coal Authority at the next stage of the Borough Plan review to ensure the comments provided are carried forward to Regulation 19.
17			Coventry City Council		The majority of matters relate to local choices to be made by NBBC. CCC wish to stress the importance of effective joint working, especially around the shared borders. Expect to engage in detail prior to the next formal stage of consultation. CCC is disappointed to see that NBBC will be withdrawing from the current Memorandum of Understanding and based on available evidence this is considered premature and without a basis in evidence. Recommend plan period aligns with the HEDNA (up to 2043).	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet housing need.
18	Miss	KC	Ash Green Residents	1	The plan has been going on too long and was passed in 2018/19.	This review seeks to update and review the plan adopted in 2019. The review of the local plan is a long process which requires reviewing evidence bases and several Regulation stages and so The Council has begun preparing the next local plan even though the current plan was adopted in 2019.
				2	Housing figures have been overestimated and need reassessing.	The sites allocated and housing figures in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				4	Option 1 – more focus away from M6 J3 which is already gridlocked.	Option preference noted and comments regarding the M6 J3 capacity will be considered at the next stage of the plan review.
				5	Considers new employment areas should be away from M6.	Preference noted.
				6	It depends if the previous industrial uses have left contaminated land/toxic materials.	Any land previously used for industrial uses will have to undertake ground studies to establish the extent of any land contamination. If toxic materials are found then they would either need to be remediated prior to any future development or the potential land uses of that area would be restricted to ensure the safety of any future occupier.

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				7	Excess of housing not needed.	As part of the review of the Borough Plan requirements for future housing will be reassessed.
				8	No justification for building on Green Belt.	Any development in the Green Belt will be subject to meeting exceptional circumstances as set out in national planning policy. More information can be found in The Joint Green Belt Study (2015) published by NBBC in conjunction with other Local Planning Authorities in the local area.
				10	Overdevelopment will have an adverse impact on residents' health and wellbeing.	Comment noted.
				11	Considers that housing numbers should be lowered in all areas by refusing outside requests.	The Council have a Duty to Cooperate with nearby local authorities at set out in national planning policy framework and as such NBBC will have to take on some of Coventry City Council's unmet need.
				12	Disagrees.	Comment noted.
				13	Trees have many benefits and should be supported.	Comment noted.
				14	Supports natural growth.	Comment noted.
				16	The higher the target for trees, the better.	Comment noted.
				20	Yes - Walking and cycling important for health and wellbeing.	This comment is noted and agreed.
				21	Considers electric vehicles to be problematic.	Comment noted.
				23	Biodiversity as a very important issue.	Noted and agreed.
				25	No, residents unhappy about volume of green space being used for development.	This comment has been noted and will be reviewed at the next stage of the plan review when focusing on existing green spaces.
19			CPRE Warwickshire Branch	1	Yes although in general Local Plan periods are too long – 10 years would be appropriate.	Comment noted.
				2	Agrees it should be updated. Coventry housing projection are unsound and assumes the Memorandum of Understanding between LPAs.	As part of the review of the Borough Plan requirements will be reassessed including housing requirements of adjacent Local Authorities.
				3	The Joint Green Belt Study of 2015 is flawed and should be replaced with a new review covering the whole West Midlands which has been subject to full and fair public consultation.	Comment noted and as part of the Borough Plan review all evidence-based documents will be reviewed and updated where necessary.
				4	Option 1 – existing employment is underused, and recent trends reduces the land needed for employment. Option 2 and 3 should be withdrawn.	Comments noted in relation to avoiding additional development close to M6 J3 and preference for Option 1.
				5	Current provision of employment land (107ha) should be re-examined) as it is not justified.	As part of the review of the Borough Plan requirements will be reassessed.
				6	Option 1 is preferable in most instances.	Comment noted.
				7	Green Belt should not be used for any residential development. Land that should be Green Belt and meets the criteria for inclusion should be proposed for inclusion in the Green Belt (specifically Bedworth Woodlands).	Noted that none of the options set out were deemed preferable.
				8	Green Belt should not be used for any new employment uses. (There are some employment sites in the Green Belt now.)	Comment noted.
				10	Agreed - There should be a full review of existing allocated housing sites in the 2017 Plan where no outline or full permission has been granted. Many sites have no justification and are based on flawed housing projections (e.g HSG4 Bedworth Woodlands/ HSG2 East of Arbury Hall).	As part of the review of the Borough Plan requirements will be reassessed including housing requirements.
				11	Option 1.	Comment noted.

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				12	Reduce the number of housing and employment allocations by removing some of those in the 2017 Local Plan.	Noted.
				17	All traditional town centre uses should be acceptable. Redevelopment out of town centre supermarket sites for housing/industrial.	Comment noted.
				20	Yes.	Noted.
				21	Unlikely to be a long term requirement.	Noted.
				23	Yes but a larger biodiversity gain of 20-25% should be aimed for.	Comment noted.
				24	Agreed but must be made part of the Plan.	Comment noted and agreed
				25	Disagree. Take out any provision for meeting an invalid claimed 'unmet housing need' from Coventry.	As part of the review of the Borough Plan requirements will be reassessed including housing requirements.
20	Mr	GC		4	Option 2 but existing infrastructure requires upgrading first prior to buildings.	Comments noted regarding current infrastructure around the A5 needed upgrading first.
				5	Area adjacent to Bermuda Park Industrial Estate / A444. Could join the Arbury housing development and through road from Heath End Road.	Noted and will be considered at the next stage of the borough Plan review.
				7	Option 1 – planning departments should act responsibly.	Option preference noted.
				10	Agreed. All sites should commit to upgrade or add to surrounding infrastructure e.g existing road networks.	Planning permissions for larger sites include planning obligations which can include for improvement to local road network and other provisions either directly or via financial contribution.
				13	Tree planting should always be encouraged.	Comment noted and agreed.
				14	Should be encouraged where space is available.	Comment noted.
				16	Realistic targets should be encouraged.	Comment noted.
21	Councillor	LC	Bulkington Ward Councillor	1	Agreed – with a minimum of 2038.	Comment noted.
				2	Agreed – current evidence is outdated.	Comment noted.
				3	The Memorandum of Understanding based on ONS data needs to be reviewed.	Comment noted and understand that this is being dealt with concurrently with the Borough Plan review.
				4	Option 1 will keep development contained and prevent sprawl.	Comment noted.
				7	Option 1 – Land should not be taken from the Green Belt.	Preferred option noted.
				8	None of the options – brownfield should be used.	Comment noted.
				10	Agreed as current sites propose building on Green Belt. Will cause overdevelopment of Bulkington and Hawkesbury.	Comment noted.
				11	Option 3 – Bulkington is surrounded by Green Belt and brownfield land should be used as development on Green Belt impacts village's identity and destroys Grade 2 farmland.	Comments noted.
				13	Yes and trees on new developments will help soften the impact on existing residents.	Comments noted and agreed.
				14	Great idea but not at the cost of destroying Green Belt to plant orchards elsewhere. Queries how they will be maintained.	Comments noted and maintenance of orchards will be considered at the next stage of the review.
				15	Development which will have a clear and obvious disruptive effect on the community, beyond what it can absorb or naturally mitigate against. Requires additional infrastructure.	Definition noted.
				16	Exceptionally challenging figures should be set to offset the additional CO2 created through new developments.	Comment noted.

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				23	Feels biodiversity should be left in the first place and not destroy Green Belt.	Comment is noted but where retention of areas is not possible the Council is seeking to provide biodiversity gain elsewhere.
				26	The ONS for Coventry. Need to consider in relation to neighbouring authorities and their impact on NBBC.	Comments noted.
22			Joint submission on behalf of CWLEP Growth Hub	1	Yes – updating it will cause it to run out of line with other plan making in the region such as the Coventry and Warwickshire HEDNA which will project growth needs until 2050.	Noted.
				2	Agree – there have been a number of employment and economic studies since the Borough Plan was adopted	Comments noted and agreed.
				3	The NBBC Employment Land Studies should be updated to examine the need for strategic sites and help the borough recover from the pandemic.	Comments noted.
				4	Each of the options has their own positive and negatives. Logistics is a key part of Nuneaton & Bedworth, however there should be allocations and employment land which is located to aid businesses that do not require strategic links to thrive. The Plan review needs to address long term deficit in job deficit in the area.	Comments noted.
				5	Allocations and employment should plan for adequate supplies of different use classes and include planning for a range of sizes and potential sectors. Repurposing employment uses in town centres should be promoted and employment uses in employment areas should be protected. Areas with constraints (urban areas around Nuneaton in particular) should be looked at.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning repurposing employment uses in town centres are noted.
				6	Needs to be a balance to ensure traditional employment uses remain the dominant space within industrial estates. CWLEP does not support Option 5.	Comment noted.
				8	Enabling growth and presenting sites which are easily accessible and within proximity to other employment uses or strategic locations is preferred.	The options selected for future employment sites are based on their proximity to the existing strategic highway network within the Borough or locations adjacent to established employment sites.
				13	Tree planting alone will make a very small dent in progress to Net Zero – this should be expanded to tackle congestion, vehicle use, energy efficient.	Comment noted.
				17	Policies which seek to compliment the daytime and night-time economies will be key to the regeneration of area. Greater sustainable employment growth should be encouraged.	Comment noted.
				20	Policies should move away from traditional modes of travel and consider more ambitious future mobility options e.g EV charging/last mile delivery/e-scooters/e-bikes.	The Borough Plan review seeks to ensure that more sustainable modes of travel are accessible and development is located in the appropriate places to reduce the need to travel.
				26	CWLEP believes that strategic and sub-regional planning ought to be mentioned within the document. The HEDNA will provide the basis for joint working and initiatives within Coventry & Warwickshire for enhancing economic growth.	Comment noted.
				27	The early review of the Local Plan lacks a strategic context. Future housing and employment requirements need to be considered in the context of subregional not just within NBBC.	The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.

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					Urges Council to cover the period up to 2050 to align with HEDNA. Recommend next stage of the review is held until the direction of travel by central government is established following the 2020 Housing White Paper.	
23	Mrs	KD			Respondent feels there are too many developments in the area causing traffic issues and loss of wildlife habitats/trees. Agreed the plan needs to be updated and existing allocated sites should be reviewed.	Comments noted.
24	Mr	RD		4	Prefer existing employment centres to be extended, better if sites are around public transport networks, M6 J3 would cause more traffic.	Comment noted.
				5	Land around Tuttle Hill Quarry next to railway for example where it less attractive to residential, maybe more mixed developments.	Noted.
				6	Option 2.	Comments noted.
				7	Option 1.	Comments noted.
				8	Option A.	Comments noted.
				10	Agreed.	Comments noted.
				11/12	Make use of existing spare sites, reuse of existing buildings, looking at higher density options particularly town centre and to the edge of, for e.g high rise development up 10 storeys. This would create more business for existing shops for example. Make use of brownfield sites on edge or suburban sites. Building around existing public transport, e.g a denser housing community around Bermuda Park station.	Comments noted and will be taken forward to the next stage of the review.
				13	Yes.	Comments noted.
				14	Depends if suitable for development.	Comments noted.
				16	Targets should be set.	Comments noted.
				17	Option 1 (Use Classes E/A4/A5).	Comments noted.
				18	No.	Comments noted.
				19	Option A.	Comments noted.
				20	Yes more emphasis on cycling and walking as long as it is backed by improvements.	Comments noted.
				21	Yes.	Noted.
				22	No.	Noted.
23	Yes.	Noted.				
24	Yes.	Noted.				
25	Yes.	Noted.				
26	An upgraded public transport (buses in particular) is required for example bus lanes or bus only lanes in new developments.	Comments noted.				
25	Mr	RD		N/A	Poor review meeting held at Goodyers End Primary School. The meeting was badly advertised meaning most locals who may have an opinion on the proposals were completely unaware it was happening.  Too much housing and not enough infrastructure to cope. The council needs to be prioritising traffic issues.	The Council undertook comprehensive consultation for the document including exhibitions throughout the Borough.  The Planning System is only able to consider the implications of future development and ensure that highways are able to appropriately deal with predicted traffic, relying on the highways authority (WCC) for this information and an updated evidence base in relation to transport.



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					EMP7 is in a completely inappropriate location. It is a valuable green space and appreciated farm land buffer. Also have grave concerns on the size of the Hospital Lane housing development for much of the same reasons.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
26	Mr	AD	Apus Projects Limited	1	Yes the plan period is appropriate.	Noted.
				4	Option 3.	Noted.
				5	No.	Noted.
				6	Option 2.	Noted.
				8	Option C, poorly performing and deliverable greenbelt sites in sustainable locations should be considered.	Noted.
27	Mr	WD		1	Agree.	Noted.
				2	Yes, it's out of date. Cannot keep building houses indefinitely and it is not sustainable to keep expanding the population in this way.	Noted.
				4	Option 1- more houses built means more employment facilities are needed.	Noted.
				7	Green belt should not be used for housing development under any circumstances, green spaces are already getting smaller and we should leave these areas for our leisure and wildlife.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential housing development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				8	Green belt should not be used for new employment developments under any circumstances, green spaces are already getting smaller and we should leave these areas for our leisure and wildlife. The more houses we build the more employment opportunities will be required and even more space will be taken up construction new employment buildings.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				10	Should be a review. There are already large house building sites around the borough. currently 200 houses being constructed in Bulkington equating to possibly 300 or more extra cars in the village, Bulkington it is a village not a town.	Noted.
				11	Any housing development plan which does not take into account the local infrastructure or the needs of the local people is a bad plan wherever it is situated.	Noted.
				13	Should be a plan for tree planting.	Noted.
				20	Yes.	Noted.
				23	Any development should replace an equivalent area to the one they have destroyed.	Noted.
26	There needs to be more consideration to the infrastructure when building houses, there appears to have been no such consideration to this in Bulkington.	Infrastructure will be addressed as part of the plan making process before any new development is proposed.				
28	Cllr	KE	Cabinet Member for Public Services, Nuneaton &	1	In part yes.	Noted.
				2	Yes, the current evidence base needs to be updated and replaced. Some of the evidence used to create the current Borough Plan is 10-15 years out of date. As well as this, our housing numbers are based upon flawed ONS data.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.

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			Bedworth Borough Council	3	As referenced above, the ONS housing data needs to be updated. I would also support the request of the Woodlands Action Group to have new ecology surveys done on the HSG4 allocation.	Noted, as per Q2 response. The Council would require updated technical surveys to be prepared on existing allocated sites as part of the planning application process.
				7	Clearly, the sites that are most deliverable. In the case of HSG4, this is not deliverable and will not help the Council meet its 5 year housing land supply.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				10	Yes. This is something the Planning Inspector supported at the end of the hearings. HSG4 needs to be treated as a priority for a review because the site is not deliverable. Therefore, it makes sense to completely remove this strategic allocation from the plan.	Noted. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	We desperately need to get more housing within Town Centres.	Noted. Options 1 and 2 prioritise the location of new residential uses within existing urban areas, which includes town centres.
				12	As per Q.11- town centres.	Noted.
				13	Trees can become expensive for the council to maintain. So any future tree planting needs to be done right.	Noted.
				14	Wouldn't have anything against this.	Noted.
				20	Noting against this.	Noted.
				21	Yes, should be looked at.	Noted.
				25	It needs to be about the deliverability of sites, and I think there needs to be potentially a sub review within the review to look at this.	Noted. As part of the review of the Borough Plan requirements will be reassessed. The Council's Authority Monitoring Report sets out the progress being made towards delivering its objectives in the Plan.
29	Mr	BF		1	15 years is certainly a good period providing that associated infrastructure is also considered.	Noted.
				4	Option 2. Whilst the Borough has good transport links and is at the heart of the motorway network, the actual road infrastructure through Bedworth and Nuneaton is already at capacity.	Noted. The Planning System is only able to consider the implications of future development and ensure that highways can appropriately deal with predicted traffic, relying on the highways authority (WCC) for this information and an updated evidence base in relation to transport.
				6	Option 4.	Noted.
				7	Option 1- preserve Green Belt as best we can.	Noted. A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy.
				8	Option A- preserve Green Belt as best we can.	Noted. A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy.
				9	Urban areas, countryside, Green Belt.	Noted.
				10	Yes- especially when you are trying to overcompensate for Coventry.	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				11	Option 2- focus of key transport infrastructure.	Noted.
				13	Yes targets per year should be set.	Noted.
				14	Yes, but who would be responsible for maintenance.	Noted.
				17	Difficult to answer- in Bedworth All Saints Square is dead after 5pm.	Noted.

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				18	Hybrid plan with mixed use including residential to sustain City Centres.	Noted.
				19	Option C.	Noted.
				20	Yes, there should be more emphasis on Cycling and Walking, in an attempt to improve people's well-being.	Noted.
				21	Yes, some form of provision for vehicle charging should be provided.	Noted.
				22	No, there needs to be an emphasis on Cycling and Walking, this will also support your Making the journey to school safer and improved walking routes to schools.	The Borough Plan review seeks to ensure that more sustainable modes of travel are accessible and development is located in the appropriate places to reduce the need to travel.
				23	Yes bigger focus on biodiversity.	Noted.
				24	Yes design codes should be addressed by SPDs.	Noted.
				25	Key issues have been identified but not addressed. There needs to be an emphasis on Cycling and Walking, this will also support making the journey to school safer and improved walking routes to schools.	Noted. I&O is the first consultation stage of the Borough Plan review with more details considered at the Publication Stage. Section 10 and Local Community Section of Broad Issues within I&O notes requirements to improve walking and cycling routes.
				26	There needs to be an emphasis on Cycling and Walking, this will also support your Making the journey to school safer and improved walking routes to schools.  The proposed improvements / transport mitigation for "South Bedworth" fall very short of the mark and do not consider / include the proposed cycle route in any of the plans.	Noted. I&O is the first consultation stage of the Borough Plan review with more details considered at the Publication Stage. Section 10 and Local Community Section of Broad Issues within I&O notes requirements to improve walking and cycling routes.
30	Miss	JT	Framptons (on behalf of AR Cartwright Ltd)		Signed form no questions answered.	Response noted.
31	Mr	AG		1	Because of the speed of change in requirements from Brexit, government policy etc I would suggest 10 years is more appropriate. Just look at the Coventry overspill debacle.	Noted. The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				2	Clearly there is an issue with the Coventry overspill figures which increased NBBC housing need by 38%!! ONS/OBC seem to have differing views and even West Midlands Mayor says they are wrong.	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				3	Clearly housing v employment v transport.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				4	Options 1 and 3 seem best. Regarding Option 3 there seems little land in NBBC territory near A5 not already being covered by housing. Also A5 and Long Shoot already notorious traffic black spots.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				5	No. However important to consider traffic and employee travel.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				6	There is no one size fits all approach here. For example, sticking houses in the middle of Bermuda Park or Attleborough Fields makes no sense but putting some on the edge of a new development eg, Faultlands could make sense. Equally leisure can be integrated into employment eg cinema, bowling, go kart track.	This comment has been note. and will be considered at the next stage of the Borough Plan review.

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				7	Option 1. Green Belt should be protected but seems protection status means nothing.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				8	Option A.	Noted.
				9	To protect green belt and agricultural land development should be targeted at brownfield or derelict/unproductive land. Employment should be near existing trunk transport links.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				10	Yes – sadly too late for some where planning agreed under a flawed plan. Sites should fit need for NBBC and not Coventry.	Comments noted. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				11	Option 1 followed by Option 2 (no further explanation).	Noted.
				12	No.	Noted.
				13	Yes.	Noted.
				14	No. No one will care for them.	Noted.
				15	No. All developments should comply.	Noted.
				16	Yes. To absorb carbon, improve environment and block view of unsightly developments.	Noted.
				17	Mix of uses best option.	Noted.
				18	Not really.	Noted.
				19	Keep frontages looking attractive.	Noted.
				20	I live near HSG9 which emphasises cycling etc but then says it is far from schools, shops, employment making car use essential.	Noted.
				21	Every home should have at least 1 EV charging point where parking is on site. For designated parking 1 point per 5 spaces to cater for residents and visitors.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				22	More need to take into account the cumulative effect of traffic rather than each development in isolation.	The Planning System is only able to consider the implications of future development and ensure that highways can appropriately deal with predicted traffic, relying on the highways authority (WCC) for this information and an updated evidence base in relation to transport.
				23	Fail to see how development improves biodiversity over agricultural fields.	Noted.
				24	Housing and other developments must fit/blend in, understood NBBC does not have a natural architecture like a Cotswold town but developments should fit in.	This comment has been noted and will be considered at the next stage of the Borough Plan review
				25	Traffic is a key issue, it is getting worse.	The Planning System is only able to consider the implications of future development and ensure that highways can appropriately deal with predicted traffic, relying on the highways authority (WCC) for this information and an updated evidence base in relation to transport.
				26	Traffic- no mention of increasing congestion in the Plan.	The Planning System is only able to consider the implications of future development and ensure that highways can appropriately

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						deal with predicted traffic, relying on the highways authority (WCC) for this information and an updated evidence base in relation to transport.
32	Mr	AC	Gladman	1	The plan period of 2023-2038 is therefore appropriate given that the Council are not planning for significant growth in new settlements.	Noted.
				2	For the vision to be achieved, it is imperative that the entirety of the evidence base that will be employed to underpin the Borough Plan Review is updated and reflects the most up to date evidence for the Borough.	Noted.
				7	A hybrid of option 1 and option 3 would be the most suitable for the location of new residential growth.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				9	A hybrid approach to the location of new residential growth will be required. Settlements with the greatest range of services and facilities, with key transport links and access to local employment opportunities should receive the greatest levels of growth. The Council should fully explore non-Green Belt areas adjacent to Nuneaton as not only are they less constrained in planning policy terms than Green Belt sites. Important to acknowledge that brownfield sites can suffer from low land values and insurmountable constraints.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				10	Agree there should be a review of the existing allocated sites as this will ensure future development in the borough is genuinely plan-led. Non-delivery on allocated strategic sites can have a significant impact on the Council's ability to demonstrate a five-year housing land supply as required by national policy.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	A hybrid of option 2 and option 3. There are sustainable locations next to key transport infrastructure and not constrained by Green Belt designation. Concerns with the content of paragraph 7.22 which infers that, should the Duty to Cooperate legal obligation be abolished in the future, the Council would only need to plan for a housing target based on the standard method figure of 429dpa. Utilising a higher figure could also enable the delivery of greater levels of affordable housing and make a significant contribution to the unmet need expected to arise from Coventry City.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period. In addition, the Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				13	Tree planting is better suited to local design codes rather than overly prescriptive policy wording.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				20	It is important to acknowledge that strategic sites are capable of delivering other non-car mode solutions to travel including public transport solutions such as click-bus and light rapid transit systems.	Noted. I&O is the first consultation stage of the Borough Plan review with more details considered at the Publication Stage.
				21	It is important to consider the capacity of infrastructure providers (particularly electricity) to cope with the demand. Detailed design issues such as this, should be left for the Building Regulation process.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
23	Would support a development management policy which aligns with the Governments proposals within the Environment Bill 2019-2021, which imposes a mandatory	This comment has been noted and will be considered at the next stage of the Borough Plan review.				

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					requirement for development to achieve a 10% net gain in biodiversity. The Council should not look to set a requirement over and above the 10% biodiversity net gain that the Government is seeking to legislate.	
				24	Agree that design codes are best dealt with as a supplementary planning document. When considering design, the Borough Plan Review should be mindful of the outcomes of the Building Better, Building Beautiful review and the changes recently implemented to the National Planning Policy Framework. Design should be considered at detailed application stage.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				26	Yes. The next stage of the Borough Plan Review must consider in detail the extent of unmet need arising from Coventry City.	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including potential unmet need from Coventry.
33	Mrs	AG		1	The current plan only takes us up to 2023 which would not be deliverable in the time frame. A longer time frame would also allow more time before the consideration of the next plan to consider revised allocations.	Noted. The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.
				2	Much of the evidence base is now 10 plus years old , transport , environment , air quality, ons figures regarding growth have all changed and need to be reviewed . The infrastructure and amenities within the village have changed and need to be relooked at and updated.	Agree, the Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points raised are noted.
				3	ONS data on which Coventry growth has been calculated. These have led to NBBC accepting 4,000 houses from Coventry. The Mou should be looked at and the Coventry 4,000 houses rejected.	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet housing need.
				4	Option 1 – No focus on particular areas / employment has changed since COVID towards more home working.	Noted. A new evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				6	Option 2 – revisit sites to determine the type of employment.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				7	Option 1 – Land should not be taken out of the green belt when brownfield sites are available .	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				8	Option A- caveat that new employment uses should come from brownfield sites.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for employment development within the Borough Plan review.
				9	The outskirts of towns and town centre regeneration offer the best opportunities for housing and in turn will attract infrastructure and amenities.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				10	Yes existing sites should be reviewed as a matter of urgency before greenbelt land is gone forever. The current plan is based on over inflated ONS housing projections.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Option 3 Locating new residential development in non - green belt land.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites

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						against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				12	Recent land changed from Greenbelt to brownfield originally farmland.	Noted.
				13	Tree planting would be welcomed though it would have to be carefully managed.	Noted.
				14	A clear strategy is required , if left unmanaged this again can attract anti social behaviour.	Noted.
				15	Large scale developments which have clear and obvious disruptive effects on the local community, this is above and beyond what it can absorb or naturally mitigate against requiring additional infrastructure and amenities to cope.	Comments noted.
				16	Tree planting should be given a target (no explanation).	Noted.
				17	Bulkington is a Village.	Noted.
				18	Bulkington is a Village.	Noted.
				19	Bulkington is a Village.	Noted.
				20	Yes- policies SA1 and HS2 be amended to give greater emphasis to the importance of cycling and walking connections/infrastructure being provided.	Noted.
				21	Yes the new Borough Plan be amended from that set out in policy HS2 to require new developments to install vehicle charging points.	Noted.
				22	No.	Noted.
				23	Yes.	Noted.
				25	The borough plan is currently destroying a substantial proposition of our biodiversity by building on green built [belt] land. Offering 10% of this back is hardly fair compensation, especially when poor site selection has been used without a proper methodology. Further environmental studies should be carried out by NBBC.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
34	Mr	PC	Godfrey Payton on behalf of Nicholas Chamberlain School Foundation	10	Para 7.13 states that 'as part of the Borough Plan Review, it is proposed to undertake a review of allocated sites to reassess their suitability for allocation.' The question posed is unclear whether the review is specific to the suitability of the allocated site or would deal with the question of speed of achievability. It is considered inappropriate to review the suitability of allocated sites given the fact that this has been tested at Examination relatively recently (2 years). The allocated sites inclusion within an adopted Local Plan, which has been tested and found sound by the Planning Inspector, does by its very nature indicate that the allocated sites are suitable. A change in the housing requirement, as outlined in the Issues and Options paper, does not change the test of suitability of the allocated sites. What it would seemingly do is change the pressure for speed of housing delivery across the allocated sites rather than entertain a notion of de-	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period as part of the Borough Plan review.

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					allocating sites. It would be considered counterproductive for the LPA to create uncertainty by reviewing the allocated sites as part of the Borough Plan review. The landowner of HSG4 and HSG5 is progressing these sites to ensure delivery as required within the existing adopted Borough Plan.	
35	Mr	GP	Godfrey Payton on behalf of Coventry Diocesan Board of Finance Ltd	7	Sustainability should be at the core of the assessment for the location of land for residential uses. The redevelopment of brownfield urban land is likely to be in a location that is sustainable. The green belt boundary is drawn tightly around parts of the Borough's urban areas but not others. There are parcels of land which were identified in the 2015 Joint Greenbelt Study as being 'low-performing green belt parcels' but were not allocated for residential use in the Borough Plan. Coventry Diocesan Board of Finance Ltd own 14.13 acres of land the north of Marston Lane, Bedworth. The land is considered to be urban back land which is prone to misuse and anti-social behaviour. It is considered most suited for development for residential use. Whilst this land is within the green belt it is, by its nature, urban as identified within the Joint Green Belt Study 2015. Option 3 is therefore favoured.	Noted re Option 3. A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations
				12	There are parcels of land which have been identified as being low performing in terms of green belt within the Joint Green Belt study and are in a sustainable location, such as parcel BE1, which is considered, by its nature, to be urban then it is considered reasonable that these parcels should be assessed favourably as part of the spatial options rather than being dismissed simply because they are included within the green belt.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
36	Mr	AJ	Heaton Planning Ltd on behalf of Tarmac Trading Ltd	10	Development will commence at strategic housing allocation HSG7 – East of Bulkington within the first 5 years of adoption of the Borough Plan, as per the relevant policy aims. Significant progress has been made up to date, with a planning application due to be submitted before the end of 2021.	Noted. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period as part of the Borough Plan review.
37	Mrs	CH		N/A	The form does not allow me to raise the concerns that I wish to raise. The proposed allocation of several new industrial areas in the Ash Green and surrounding areas is extremely worrying. Ash Green, Exhall and Keresley Village are small communities located in the M6 Junction 3 area. An area which appears to be favoured for a number of new industrial areas on our greenbelt land. You are not providing these sites to meet existing demand and it would also appear as to attract such companies away from Coventry and surrounding areas. Suggests investigating the use of land either side of the A444 on the Nuneaton and Bedworth corridor which is currently home to existing Industrial areas and has easier access to the M6.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for employment development within the Borough Plan review. The proposed options selected for future employment sites are based on their proximity to the existing strategic highway network within the Borough or locations adjacent to established employment sites.



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38	Mr	BS	Highways England	3	<p>Consideration needs to be made for meeting the Housing Need for the Borough and wider Warwickshire County, and therefore a review of the Strategic Housing Land Availability Assessment needs to be reviewed. As under the adopted Borough Plan, it is anticipated that further growth will need to be accommodated from Coventry.</p> <p>The Transport Evidence Base will be critical in understanding how the development proposals and aspirations emerging will be accommodated on the SRN [strategic road network] and local transport infrastructure. It is therefore critical that early discussions and engagement takes place with key transport and infrastructure stakeholders. We therefore recommend the formation of a Transport Working Group to aid the development of the Transport Evidence Base.</p>	<p>Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet needs.</p> <p>The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the Transport Evidence Base are noted.</p> <p>Consideration will be had to forming a Transport Working Group to inform the Transport Evidence Base.</p>
				4	<p>Highways England has concerns about all options notably option 2 and 3 due to the impact these would have upon the safe and efficient operation of the SRN</p> <p>On option 2 - In addition, further development and allocations are located to the north of the A5 within Hinkley and Bosworth which will impact on the operation of the A5 Corridor. It should be noted. that the A5 / A47 'The Longshoot' Signalised Junction and A5 / A47 / B4666 'Dodwells' Roundabout Junction are operationally constrained, and any development greater than within the adopted Local Plans cannot be accommodated.</p> <p>On option 3- It has been identified that the cumulative impact of the allocated growth from the adopted Coventry Local Plan and Borough Local Plan impacted upon the operational capacity of the junction. As a result, a mitigation scheme has been identified by Warwickshire County Council which will accommodate the growth as identified within the Local Plans, and does not undermine the safe and efficient operation of the M6 Corridor.</p> <p>However, any further development or allocations in this area cannot be accommodated by this improvement, and therefore would result in operational impacts on the M6 Corridor which would undermine its safety.</p>	<p>The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for employment development within the Borough Plan review.</p> <p>The options selected for future employment sites are based on their proximity to the existing strategic highway network within the Borough or locations adjacent to established employment sites.</p> <p>Highways England comments are noted and the Council will consider their position as part of the exploration of potential options and the updating of the evidence base informing the Borough Plan review.</p>
				11	<p>We have considered the spatial options, and we have no clear preference to the proposals in terms its location, as all options will result in interaction with the SRN, and will require infrastructure improvements based on the outcomes of the transport evidence base.</p> <p>We consider that that option 2 should include bus corridors as both provide a viable alternative to car based journeys in</p>	<p>Comments noted. Infrastructure will be addressed as part of the plan making process before any new development is proposed, with Highways England a crucial consultee as part of the Local Plan review.</p>

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					<p>a sustainable manner such as cycle routes and rail corridors.</p> <p>Nonetheless, we know that large development sites located in proximity to SRN junctions are likely to impact on the capacity of our network. This in-turn, can create potential congestion and safety issues.</p>	
				20	Support..	Noted.
				21	Support	Noted.
39	Mrs	EB	Historic England	27, 25	<p>Vision- Historic England raises concerns that the conservation and enhancement of the historic environment is not included within the vision set out for Nuneaton and Bedworth in this document.</p> <p>Objectives- Whilst Historic England welcomes that the historic environment is now included within one of the nine Strategic Objectives of the Plan, we suggest an amendment to the wording of Objective 7 to "sustains and enhances" to better reflect the wording of the NPPF.</p> <p>Broad Issues- Under the Local Environment section on p.7 Historic England welcomes the acknowledgement that there are many buildings within the Borough which are important to local history, but which are not listed. We also note reference to the fact that some built heritage has suffered from poor quality modification and a lack of maintenance and repair. It is imperative that these issues are reflected in the "Important Considerations for Development" in relation to certain proposed development sites. Reference to 'English Heritage's' Building's at Risk Register, should be amended to 'Historic England's' Building's at Risk Register.</p>	<p>Consideration given to incorporating suitable wording relating to the historic environment within the vision as part of the development of the Borough Plan review.</p> <p>Agree point on Objective 7 in relation to wording. Seek to review and consider.</p> <p>Noted and will be considered at the next stage of the Borough Plan review.</p>
				2, 3, 4, 5, 7, 8, 11, 12, 26,	<p>In terms of growth options for new employment and housing allocations, Historic England recommends that the Council undertake the process of the 'Site Selection Methodology', as set out in HEAN3, referenced above, and we reiterate that we also recommend that detailed Heritage Impact Assessments (HIAs) are prepared for individual sites. We also note that one of the potential options for the location of future employment areas is to provide employment in close proximity to the A5. The A5 corridor is potentially sensitive to development with regard to non-designated heritage assets and there is therefore the need to ensure a robust evidence base, working in conjunction with your specialist archaeological adviser to inform the evidence for any site allocations in this area.</p>	<p>The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the A5 corridor and site-by-site Heritage Impact Assessments are noted.</p>
				13	<p>Historic England notes that this section of the Issues and Options document focuses on potential policy proposals to increase tree planting in the Borough and that other</p>	<p>Comments noted. Advice Note to be considered as part of the evidence base for the Borough Plan review in relation to the historic environment.</p>

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					climate change related matters are left either to national policy or fall back on policies of the adopted Local Plan. This is a rapidly evolving subject and Historic England has published new guidance in relation to the historic environment and climate change and also on commercial renewable energy. We refer you to the following: Historic England Statement on Climate Change and Sustainability: Historic England Advice Note 15 (February 2021):	
				17	Whilst Historic England supports the diversification of town centres, any regeneration proposals within Nuneaton and Bedworth town centres should be fully evidenced and take account of the desirability of sustaining and enhancing the significance of heritage assets.	Comments noted.
				24	Historic England is supportive of Design Codes being produced as Supplementary Planning Documents (SPDs), to ensure that they carry weight in the decision-making process.	Noted.
				28	<p>Sustainability Appraisal (SA)</p> <p>Overall Historic England is pleased to see that some of our comments made in relation to the SA scoping Report have been taken on board. With regard to Chapter 2, which identifies relevant Policies, Plans &amp; Programmes, we welcome the inclusion of the Ancient Monuments &amp; Archaeological Areas Act, UK Government, 1979, but suggest that this should also be included in Appendix A. Historic England welcomes the amended wording of SA Objective 5, "To conserve and enhance the historic environment", as this aligns the objective with a key environmental objective of the planning system, as set out in the NPPF at paragraph 8c.</p> <p>We note that the commentary on p.30 para.6.3 of the SA in Chapter 6.0 'Assessing the Issues and Options', refers to the assessment in Table 9 as showing that none of the Borough Plan objectives meet SA objective 6, to conserve and enhance the historic environment. However, this is listed as Objective 5 in Table 6 (p.27) of the SA document.</p> <p>Clarification of which objective is referred to should therefore be provided. It is further noted. that the SA recommends that "to improve the assessment the Borough Plan objective 7 could be amended to include historic as well as natural environments. This has been done". Although the latest version of the Borough Plan now also includes the historic environment within Objective 7, Historic England suggests undertaking again the exercise set out in Table 9 of the SA (Testing of the Borough Plan's vision &amp; objectives against the SA objectives), so that the historic environment is taken into account.</p>	Comments noted and will be considered at the next stage of the Borough Plan review. Advice notes for SA will be reviewed and addressed.

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					<p>With regard to the scoring of the effects of the options set out in the Borough Plan Issues &amp; Options document Historic England notes that for Question 4 Option 2 (Provide new employment in close proximity to the A5) of the SA this has been scored as all question marks in relation to Objective 5 (i.e. the impact between the option and SA objective is uncertain). Appraisal comments of "There is no obvious link between this option and this objective" (p.125 SA document) are also noted.. However, as mentioned above, Historic England raises concerns that the A5 corridor is potentially sensitive to development with regard to non-designated heritage assets and this may be an option which would result in negative effects for the historic environment/Objective 5 of the SA. We also note that in scoring the various Options for the location of new residential development, negative scores have been given for Options which would locate housing development within the Borough's urban areas, and generally positive scores awarded for Options which would locate development outside of the urban areas. This is on the basis that most of the Borough's statutory historic assets and Conservation Areas are located within the urban areas. Whilst this is the case, Historic England notes that very broad options have been identified at this stage, and there is the potential for harm to the historic environment, dependent upon the location of development sites. As the Plan is progressed to the stage where specific allocations are being considered Historic England strongly advises that the 5-step site selection methodology set out in HEAN 3 is utilised (as advised above) and that this methodology and its findings are set out in a Heritage topic paper, as part of the evidence base for the Borough Plan Review.</p> <p>In addition, Historic England notes that the Baseline for the SA (Appendix B) also includes 'Buildings at risk' (p.83). In our comments on the SA Scoping Report we raised the issue of identifying opportunities to conserve and enhance heritage at risk through additional indicators in the SA and we are disappointed that this has not been actioned, as heritage at risk has been identified as a 'Broad Issue' for the Borough in the emerging Plan.</p> <p>To assist with your preparation of the SA in relation to the assessment of effect upon the historic environment we refer you to Historic England's Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, 2016 (HEAN8): Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment</p>	
40	Mrs	EB	Historic England		Duplicate submission made at 16.08 05/08/21 which included additional appendix for Town Centres Area Action Plan Consultation (not as part of this consultation).	See previous response with regard to Historic England comments.

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41			Longford Community Action for our Neighbourhood	-	Response relates to a petition (33 signatures) to update the EMP2 Wilson's Lane Policy and Supplementary Planning Document to include: a landscaped buffer zone; 10m building height restriction near residential properties; green space; play area; playing pitches; protection of PROW; to allocate land to support environmental objectives. Also request Sowe Meadows is given Local Green Space designation and the Council maintain their 'Your Green Track' infrastructure.	Comments are noted.
42	Mrs	SG	Home Builders Federation	1	Agree that a fifteen-year timeframe for the plan period is appropriate.	Comment noted.
				2	Agreed. All policies should be underpinned by up-to-date evidence. In particular refer to proposed changes to Parts L, F, M, R and S of the Building Regulations. The Council's Viability Assessment should test individual developments and plan policies.	Comments noted and will be considered at the next stage of the Borough Plan Review.
				3	The BPR should as a minimum meet their own Local Housing Needs of 429 dwellings per annum and accommodated unmet need for neighbouring areas. The Council should prepare and maintain one of more Statements of Common ground to include meeting housing needs across the C&WHMA.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				7	Boundaries can be altered in exceptional circumstances (NPPF para 140/141). The Council should make as much use as possible of suitable brownfield sites, optimising density and discussions with C&WHMA. Should avoid 'town cramming'. A blanket approach to density is inappropriate. Density standards should be in accordance with NPPF para 125. Promote sustainable patterns of development by considering urban areas inside the Green Belt boundary, in towns and villages inset within the Green Belt or in locations beyond the outer Green Belt boundary (NPPF para 142).	Comments are noted and will be fed into the next stage of the Plan review.
				10	The Council should undertake an accurate assessment of availability, suitability, deliverability, developability and viability of all existing and proposed site allocations.	Comments noted.
				11	Disadvantages of pursuing any one option in isolation. Preferred Spatial Option is a combination of: <ul style="list-style-type: none"> <li>Option 1 – locating new residential development within existing settlement boundaries;</li> <li>Option 2 - small scale, sustainable urban extensions focused on key transport infrastructure (the M6, A roads, railway stations, cycle routes);</li> <li>Option 3 - locating new residential development in non-Green Belt areas; and</li> <li>the release of land from the Green Belt (see HBF's answer to Question 7 above).</li> </ul> The preferred spatial option should ensure the sufficiency of housing land supply and achieve the Housing Delivery Test.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				13	No (see HBF's answer to Question 16 below).	Noted.

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				14	No (see HBF's answer to Question 16 below).	Noted.
				15	No (see HBF's answer to Question 16 below).	Noted.
				16	Planning policies and decisions should ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments (such as community orchards). The Council should be encouraging the inclusion of more trees in development rather than imposing arbitrary targets for tree planting.	Comments confirming trees should be encouraged rather than enforced through policy are noted. It is agreed that it is important to ensure the right trees are planted in the right places.
				20	The importance of cycling / walking should be emphasised.	Comment noted.
				21	It is unnecessary for the Council to amend Policy HS2 because of the Government's proposals under Part S of the Building Regulations.	Comment noted.
				22	See answer above.	Noted.
				23	Policy should align with Government's proposals as set out in the Environmental Bill which set out 10% strikes the right balance.	Comment noted and will be followed as the Government guidance is released in due course.
				24	The Council's policy approach on design should accord with the 2021 NPPF, the latest NPPG, the National Design Guide and National Model Design Code. SPDs should not convey development plan status onto a document, which has not been subject to the same process of preparation, consultation and examination, contrary to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations).	Comment noted.
				25	The Council should also identify the individual policies to be reviewed, e.g the Council's affordable housing tenure mix should accord with the 2021 NPPF expectation that at least 10% of homes will be available for affordable home ownership (para 65) and the 24 May 2021 Written Ministerial Statement requirement for 25% of affordable housing to be First Homes.	Comments noted.
43	Mr	JH	Howkins & Harrison	1	Agreed.	Noted.
				2	Yes due to time period since previous evidences were prepared.	Comment noted.
				3	No.	Noted.
				4	Preference for Option 3 but "with access to" not "close" as this lacks definition. Option 2 is possible but the North Warwickshire Plan is based on development along the A5 corridor and NBBC have opportunity to avoid adding congestion.	Preference for Option 3 noted.
				5	No.	Noted.
				6	Policy should not be too prescriptive and allow flexibility though market led changes.	Noted.
				7	Option 3 should be chosen with more flexibility to choose sustainable locations. Green Belt is an outdated interference.	Comment noted.
				8	Option C preferred with sustainability being the driving force. Green Belt is outdated.	Comment noted.
				9	Sustainability should be considered from the view-point of the District as a whole including all of the villages, and not	Comments for a preference for adding to existing villages as a sustainable option noted.

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					on a location by location basis. Consideration should be given to the fact that you can bring sustainability to a village by adding people. The move towards electric cars means future growth of a village can be sustainable. Policy should be compulsory for villages to take a small amount of growth each year.	
				10	Yes.	Comment noted.
				11	All three options should be considered as they are not mutually exclusive.	Comment for blended approach noted.
				12	No.	Noted.
				13	Yes but further evidence required by tree experts regarding number/type of tree.	Noted.
				14	No. Could be subject to vandalism.	Noted.
				15	No.	Noted.
				16	Further evidence required but could be appropriate.	Noted.
				17	Should not refer back to old use classes.	Noted.
				18	All uses should be allowed in order to provide flexibility.	Comment noted.
				19	Frontages change over time and policy should reflect this.	Comment noted.
				20	Yes.	Noted.
				21	Yes in principle but refrain from overprovision due to burden on electricity capacity.	If this policy is taken forward, then new developments will have to demonstrate they can provide the necessary infrastructure and capacity to support such a requirement.
				22	Yes.	Noted.
				23	Yes – should follow national planning policy.	Noted.
				24	Yes.	Noted.
				25	Yes.	Noted.
				26	No.	Noted.
44	Mr	PS	Inlands Waterways Association	1	Yes.	Noted.
				2	Yes.	Noted.
				3	Conservation Areas: The Coventry Canal and the Ashby Canal warrant designation as Conservation Areas.	Comment noted.
				4	Option 3.	Noted.
				7	Option 1.	Noted.
				8	Option A.	Noted.
				9	Intensification of density by redeveloping old housing and industrial estates.	Comment noted.
				10	Yes - any Green Belt sites not yet fully developed should be reviewed and terminated if non-GB alternatives now exist.	Comment noted.
				11	No allocate Green Belt development and minimise greenfield development.	Comment noted.
				12	Intensification of density by redeveloping old housing estates.	Comment noted.
				26	The Coventry Canal and the Ashby Canal within the Borough are major heritage, amenity and recreational assets warranting Conservation Area status.	Comment noted.
45	Mrs	IS		1	Disagrees. Guidelines keep changing to detriment of the public.	Comment noted.
				2	Yes because guidelines are not adhered to.	Comment noted.

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				3	The Statement of Community Involvement needs updating and made more clear.	Comments noted and will be taken forward for consideration at the next stage of the Plan review. New evidence base which may include the SCI will be commissioned as part of the later stages of the Borough Plan review process.
				4	Options 1 and 2 only. Option 3 has already lost all it's Green Belt.	Preference for Options 1 and 2 noted.
				5	No extra options needed if present sites are not at capacity.	Comment noted.
				6	Option 1 is preferred providing it is not being land banked – in that case a time limit should be set.	Comment noted.
				7	None – infrastructure should be costed first prior to any application. Option 2 would therefore be the only option for those communities who lost their Green Belt in the last Local Plan.	Comment noted and will be considered at the next stage of the Plan review.
				8	Option C provided consultation is undertaken which is in a way the public understand.	Comment noted.
				9	Early engagement should be undertaken with any strategy taken.	The Council endeavour to engage with the public at each stage of the consultation process and undertake comprehensive consultation including exhibitions throughout the Borough.
				10	No, too time consuming.	Comment noted.
				11	Options which consider communities and not just houses – associated infrastructure and supportive of inclusive growth. Those that include Sustainable Community Strategies and Local Area Agreement.	Comments noted.
				12	Yes any in accordance with the NPPF.	Noted.
				13	Yes – should be tree requirement per metre in any size development. Mature trees should not be replaced by saplings they should be replaced by similar species/sizes.	Noted.
				14	Yes if suitable to the area and if it is maintained appropriately.	The Council would look to confirm during the planning process of a proposal to ensure any future orchard would be maintained.
				15	Unsure.	Noted.
				16	Option 3.	Noted.
				17	Should be approached on a best quality and best fit basis.	Comment noted.
				19	The best outcome should be chosen to showcase Nuneaton and Bedworth in the future.	NBBC will endeavour to present the best options to promote the town centres.
				20	Yes provided NPPF supports and future road infrastructure in considered.	Comment noted.
				21	Yes.	Noted.
				22	No see above.	Noted.
				23	Yes if in accordance for Government policy.	Comment noted.
				24	No best to keep as dealt with previously.	Noted.
				25	Difficult to assess.	Noted.
				26	Statement of Community Involvement needs to be addressed and updated. Need to be easier for the public to understand.	Comments noted and will be taken on board for future consultations.
46	Mr	IJ		1	Yes.	Noted.
				2	A lot of work put into evidence base but local needs have taken a back seat compared to Government's high housing targets.	Comment noted.



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				7	Option 1 – Green Belt is an important restraint against sprawl.	Preference noted.
				8	None of the options, we should not prioritise land in the countryside for employment uses.	Comment noted.
				9	Make a 'heat map' with higher end of the scale showing more employment uses where higher priority for additional areas should be given. Housing nearer to higher employment density may reduce commuting traffic.	Suggestion has been noted and will be considered at the next stage of the Borough Plan review.
				10	Yes – some of the sites should be removed from the plan. For example, Bulkington has already had planning approved for 200 houses and HSG7 and HSG8 should be removed and kept as Green Belt for a number of reasons including traffic, loss of privacy, wildlife issues, flooding, parking.	Comments noted and The Council are aware of the petition given to the House of Commons with regards to these sites.
				11	Non Green Belt although it is sensible to locate new housing near to employment sites and train stations to reduce traffic.	Comment noted.
				12	Make a 'heat map' with higher end of the scale showing more employment uses where higher priority for additional areas should be given. Housing nearer to higher employment density may reduce commuting traffic.	Comment noted.
				13	Yes although not building houses is a better way to reduce carbon emission. Feels the Council have been cutting down mature trees in recent years, need to ensure the trees are a permanent feature.	Preference noted.
				20	Yes.	Comment noted.
				21	Yes both houses and flats should have private parking with charge points.	Comment noted.
				23	Yes.	Noted.
				26	Yes – infrastructure improvements should be made within a close distance to large development sites. E.g previous plan proposed 25% population increase in Bulkington but not a 25% increase in local provision of infrastructure. Ensure a buffer between mature trees and new development to protect the tree.	Comments noted.
				27	Questions whether Bulkington Residents Voice has been in contact.	Please refer to response from Bulkington Residents Voice (reference 10).
47	Coun cillor	KK		1	Yes.	Noted.
				2	Evidence on population and transport need updating.	Noted and agreed.
				3	As above plus employment and education for a post Brexit, post Covid low carbon world.	Comment noted.
				4	Option 1 preferred – it should be noted. in future majority of people will work from home/have flexible arrangements.	Comments noted and will be taken forward for consideration at the next stage of the Plan review. New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				5	Need to better use areas around railway station.	Comment noted.
				6	Option 5 – New age with more technology changing where we work.	Comment noted.
				7	NBBC has the least countryside of any Warwickshire District. Disagrees with absorbing Coventry's need as we have already over allocated sites for housing up to 2038.	The Council have a Duty to Cooperate with nearby local authorities at set out in national planning policy and as such NBBC are required to take on some of Coventry City Council's unmet need.

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				8	No more large scale employment sites in the Borough required.	Employment need is based on evidence-based assessments which will be commissioned as part of the later stages of the Borough Plan review process to establish if there is need.
				10	Agreed. Existing allocations are based on out of date evidence. Requests Top Farm, Bedworth Woodlands, Arbury amongst others are de-allocated. Queries ONS data for Coventry.	Comments noted and the ONS are looking at the discrepancy with Coventry's population separately. This will be considered further in the Housing and Economic Development Needs Assessment (HEDNA).
				11	Already have too much land allocated.	Noted.
				12	Town centre focused option needed.	Comment noted.
				13	Need to focus on reducing loss of existing mature trees. Metric should be based on tonnes of CO2 absorbed.	Comments noted.
				14	Yes where suitable.	Noted.
				16	Requests targets for net gain in tree biomass not just numbers.	Noted.
				17	If more residential uses in town centres then businesses with late night operation should be restricted.	Comment noted.
				19	Reduce retail areas and increase open spaces.	Comment noted.
				20	Agreed – must include direct walking/cycling routes through developments.	Comment noted and agreed.
				21	No requirement for car-free homes which have good public transport options.	Noted.
				22	No.	Noted.
				23	Baseline should be taken from maximum biodiversity point in the last ten years note date of application.	Comment noted.
				24	If undertaken quickly.	Comment noted.
				25	Issue of not being part of the West Midlands for Public transport and being over car dependant We need planning for health.	Comment noted.
				26	Require an education policy to tie housing to where school places are available Transport policy to get the new railways at Stockingford and Hawkesbury built.	Comments noted.
				27	Objective to retain young people Economic objective should be amended to be a sustainable and stable economy.	Comments noted.
				28	Need to focus on air pollution and stop urban sprawl.	Noted.
48	Mrs	MK		1	Agreed.	Noted.
				2	Agreed – lots of changes over last few years.	Comments noted and new evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				3	Population studies in particular (especially Coventry).	Comments noted and understand the ONS for Coventry is an ongoing issue being dealt with separately.
				4	Preference for Option 1 but sites must be accessible by modes other than cars. Option 3 has some merits but only if public transport is linked directly to the employment sites.	Preference for Option 1 noted and reasons for Option 3 noted.
				6	Option 1.	Comment noted.
				7	Option 1 but most stop at a certain point. Already densest part of Warwickshire. If required, housing should be spread across the country.	Comments noted.

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				8	Probably Option 3 provided sustainable is actually sustainable in every sense. Green corridors must be retained.	Preference for Option 3 noted.
				9	Preference for more bespoke building as the need arises (especially employment).	Comments noted regarding employment land lying empty if it's not to a company's specification.
				10	Yes and overall whether additional sites are required at all. Infrastructure should be in place first (e.g school places) Concerned demand will dry up and sites will be left half built.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Start in the town centres and work outwards prioritising vacant sites. Preference for denser smaller properties.	Comments noted.
				12	Distance from various infrastructure or amenity.	Comments noted.
				13	Yes but not just to new developments. Considers climate change should be at the heart of all planning decisions.	Comments noted although how implementation of such a policy could be done retrospectively would be challenging.
				14	Disagrees with definition of an orchard (5 trees). Likes the idea of a proper orchard but would need community ownership.	Comments noted regarding ownership/maintenance.
				15	Above 15 dwellings as it has greater implications on surroundings.	Noted.
				16	Disagrees, - there should be minimum numbers.	Comment noted.
				17	Considers sensible uses and residential allowed but asks for limits on betting shops/vaping shops and other unhealthy shops.	Depending on their Use Class, the Council can to an extent limit the number of betting shops for example, as planning permission is required. However, in the case of a vaping shop, as it would fall within Use Class E, provided the unit was already a shop there is no control over the type of retail use that replaces it under The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended 2020).
				19	Allow more residential on outskirts of town centre.	Comments noted.
				20	Agrees.	Noted.
				21	Yes, EVCP per dedicated parking space. Non allocated should have 1 CP per 5 vehicles.	Noted.
				22	No.	Noted.
				23	Agrees and should be on site.	Noted.
				24	Should be in the Plan.	Noted.
				25	Housing numbers and anything to assist with combating climate change.	Noted.
				26	Housing requirement.	Noted.
				28	Tables which score red should be eliminated.	Summary tables which score red are discounted sites.
49	Mr & Mrs	JL & JS		7	Option 1 except HSG4 which was promised to be returned to Green Belt.	Preference and comment noted.
				10	Agreed – the housing numbers are excessive and linked to Coventry's need.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				13	Agreed.	Noted.
50		BL		1	Disagreed.	Noted.
				4	No thought on transport. Need to encourage educated people to settle in the area.	Comments noted.
				5	Future changes need to be considered e.g working from home.	Comments noted and will be taken forward for consideration at the next stage of the Plan review. New evidence base will be

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						commissioned as part of the later stages of the Borough Plan review process.
				7	No Green Belt development. Homes should be affordable for local salaries and of an appropriate size.	Comments noted.
				8	No Green Belt, only build employment if truly needed.	Comments noted.
				9	Brownfield and accessible sites by public transport.	Noted.
				10	Agreed.	Noted.
				11	Public transport accessible.	Noted.
				13	Yes.	Noted.
				14	Yes.	Noted.
				20	Yes, need to reduce car reliance.	Noted.
				21	Agreed to encourage users.	Noted.
				23	Should be higher.	Comment noted and will be fed into next stage of the review.
				24	Disagrees.	Noted.
				26	Ash Green traffic already congested, avoid development in the area.	Comments noted.
51		RB	St Philips (written by Lichfields on their behalf)	1	Agree minimum 15 year period, recommend circa 30 years.	Noted.
				2	Agreed, extent will be impacted by outcome of HEDNA and extent of the review.	Comments noted.
				3	Green Belt Review. Other documents will be linked to the findings of the HEDNA.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				7	Option 3 is preferred. Review of Green Belt required as the Council does not have sufficient land to meet needs on brownfield land. Unmet need constitutes exceptional circumstances.	Noted.
				9	No, refer to Option 3 above as the preferred option.	Noted.
				10	Agree. NPPF Para 74 requires annual update of deliverable sites. The Council's 5YHLS figure is ambitious.	Noted.
				11	Favours Option 2 as this would most align with the sustainability aspirations in the NPPF.	Noted.
				12	The housing need figure to come out the HEDNA is a minimum figure. Until the implications of the HEDNA have been considered, considered premature to finalise a preferred growth option.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				13	Supportive of the encouragement for increased tree planting in large-scale developments but should be on a site-by-site basis.	Comment noted.
				14	Supportive but as above, should not undermine deliverability of the Plan.	Noted.
				16	Supportive but should have regard to the economic viability of the Plan.	Comment noted.
				23	Supportive of principle but Plan should be cautious in advance of Environmental Bill passing in law. Suggest a comprehensive package of strategically located habitat banks in order to support developments which require off-site mitigation.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				25	Refers to answer to Q12 – housing requirement to be established first.	Noted.

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				26	Recommends Call for Sites undertaken as soon as possible.	Call for sites ongoing.
52	Ms	SG	L & Q Estates (submitted by Pegasus Group on their behalf)	1	<p>Plan should be amended to allow for a 30 year plan period. The I&amp;Os Document states at Paragraph 4.3 that the result of a longer timeframe risks the evidence upon which it is based being unreliable over this period..." – this reasoning is disputed. NPPF confirms larger scale developments should be set within a vision which looks at least 30 years ahead.</p> <p>L&amp;Q Estates believe there are a number of benefits to planning for a greater time period than 15 years minimum required by NPPF. Greater certainty to the public and wider development industry and ensures development and infrastructure can be appropriately planned for.</p> <p>No reason why a longer plan period should accelerate the datedness of the evidence base which underpins it. NPPF Paragraph 140 – Green Belt boundaries should 'ensure beyond the plan period' – planning for an extended period allows for a more strategic consideration of Green Belt boundaries and whether they still serve their intended purpose, as well as whether Green Belt release is required to meet needs.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities. The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.
				2	<p>Yes, they are almost entirely out of date and trends have changed significantly. Latest evidence concerning Green Belt and employment requirements in particular are out of date. This document as a whole, but particularly the individual assessments of land parcels contained therein, is now fundamentally and substantively out of date as a result of development allocations (including land now released from the Green Belt). These factors have fundamentally altered the context of land parcels contained within the Study, not only in respect of the five purposes of the Green Belt but also in landscape and visual terms.</p> <p>Particularly the case in respect of Site allocation EMP2 – a site of this scale has significant influence on the land around it, which currently remains in the Green Belt.</p> <p>Fundamental need to NBBC to update evidence in respect of the overall quantum of employment land. In particular it does not capture the increased demand for Class B2/B8 employment sites resulting from the increased prevalence of online shopping/impact of Covid.</p>	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				3	<p>The following need updating: Employment Land Study (2016); - acknowledged that the overwhelming demand for employment land in the Borough was in the distribution sector and that there had been a historic constrained supply of employment land which was particularly relevant for this sector. In view of this there is an urgent need for new evidence to support the delivery of employment development in the emerging Local Plan.</p>	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the referenced documents are noted.

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					<p>Infrastructure Delivery Plan; - Significant changes are likely to have occurred to the infrastructure requirements within the Borough taking into account new development within Nuneaton and Bedworth's administrative area but also within Coventry City Council's administrative area.</p> <p>Housing Needs Assessment (2010); SHLAA (2016).</p>	
				4	<p>Support for Option 3 as it continues the strategy begun through the existing plan. More up to date evidence still suggests this represents the most appropriate strategy.</p> <p>Option 1 is highly unlikely to meet current needs. In terms of option 2 (the A5 corridor) this would not bring forward sites on the motorway network nor would it locate sites immediately next to the conurbation.</p> <p>The I&amp;O document sets out the adopted Plan identifies at least 107.8 hectares of employment land to be provided between 2011 and 2031 and the plan allocates 86.3 hectares of land to meet this requirement. Of the 6 sites identified, two have not been the subject of any planning application. L&amp;Q queries the assertion subsequently made at paragraph 5.2. The Coventry &amp; Warwickshire Sub-regional Employment Market Signals Study identifies at Figure 5.2 that NBBC are only able to demonstrate a supply of between 1.42 and 1.35 years supply of employment land. Whilst there is no policy requirement for this supply to be maintained above five years, it is alarming to see there is such a limited supply of employment space in the short term across the whole region. The most obvious way to rectify this would be to allocate a greater number of employment sites though the plan review.</p>	<p>The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the Coventry and Warwickshire Study employment land supply are noted.</p>
				5	<p>L&amp;Q Estates consider the most important element of the strategy of delivering employment growth in the borough is captured within option 3.</p>	<p>Comments noted.</p>
				7	<p>Option 3 has to be the most appropriate strategy for the delivery of housing development. The designation of Green Belt or the open countryside does not in themselves consider the wide-ranging sustainability factors which must underpin new residential allocations. With regards to Green Belt, it is largely a historic designation which does not involve many of the factors that feed into the delivery of sustainable development.</p>	<p>A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.</p>
				8	<p>Given that the quantum of employment land required during the plan period is not known (indeed, the duration of the plan period is also not known) then it</p>	<p>The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for employment development within the Borough Plan review.</p>

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					<p>cannot be categorically confirmed whether or not green belt release is required to meet employment needs at this stage of the plan making process.</p> <p>Nevertheless, there is a clear distinction to be made between housing and employment land requirements and the appropriateness or otherwise of locating such developments within the green belt.</p> <p>L&amp;Q Estates supports Option C; Large scale employment uses, such as Class B2/B8 uses, are most appropriately located on the strategic road network, in order to facilitate the requirements of the businesses that occupy such uses but also to minimise conflict with residential dwellings and also minimise their impact upon the wider local road network.</p> <p>This invariably leads to the consideration of sites within the green belt given the relationship with the green belt with the edge of settlements and the strategic road network such as the M6. Such locations are often the most sustainable and also results in the co-location of employment uses as existing employment sites are commonly found in these locations.</p> <p>Regard should nevertheless be had to the requirements of the NPPF for green belt boundaries to endure beyond the plan period, which, as set out previously should be a longer plan period.</p>	
				9	<p>L&amp;Q estates confirm that the approach toward employment land should follow Option C as set out in Q8 above. Such an approach is also appropriate for the hierarchy for identifying housing land.</p> <p>Option 2 consisting of small scale, sustainable urban extensions focused on key transport infrastructure (e.g. the M6, A roads, railway stations, cycle routes etc) represents the most sustainable option being unconstrained by existing policy designations such as Green Belt and reflecting the key nodes on the transport network which are generally the most sustainable locations.</p>	Comments noted and preference for option C.
				10	No comment.	Noted.
				11	<p>The 3 options identified include small scale sustainable urban extensions focused on key transport infrastructure which includes the M6 and A roads.</p> <p>With the pressure on the Borough Council to deliver housing both to meet its own needs, reflect economic factors and potentially persist in meeting Coventry's requirement for additional housing, land west of the A444 provides an opportunity to deliver a small scale sustainable urban extension falling within Option 2. This would also ensure that meeting the need for housing in Coventry was located close to where that need was generated.</p>	Comments noted.

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					The other options are unlikely to deliver enough housing to meet needs.	
				13	L&Q Estates recognises the importance, but has concerns with regards to setting targets for tree planting in large scale developments. A target-based approach could result in inappropriately designed developments simply to fulfil targets. Tress should be included on a site-by-site basis. The NPPF does not require or support tree planting targets.	Comments are noted.
				14	As above, should be provided where appropriate and not on a blanket basis.	Noted.
				15	In planning terms 'major development'.	Noted.
				16	See Q13.	Noted.
				20	It is considered that it is not necessary to update Policy SA1 to provide a greater emphasis on the importance of walking and cycling infrastructure in general terms, assuming that site specific policies for individual strategic sites will continue be formulated for new allocations identified through the Local Plan Review. Site specific policies are clearer than an overarching policy which provides vague and general support,	Position and explanation noted.
				21	As the out in the I&O document, despite not required by policy HS2, electric vehicle charging points are required through the adopted Air Quality SPD and emerging Transport Demand Management Matters – Parking Standards SPD. L&Q Estates is therefore of the view that policy HS2 should accordingly be updated to reflect the latest requirements of the council's SPDs.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				22	See responses to questions 20 and 21 above.	Noted.
				23	NPPF does not stipulate a percentage gain required. Whilst L&Q Estates is aware of the Environment Bill which is currently making its way through Parliament, this bill has not been enacted and therefore does not constitute a legal requirement at this time. indeed, if this was the case, the July 2021 NPPF would reflect this, but it does not.  It is therefore considered that it is not appropriate at this stage for the new Borough plan to require a 10% biodiversity net gain. However, should the Environment Bill progress to a point where it becomes statute and a point of law during the formulation of the local plan then this position should be revisited.	Comments noted.
				24	Delaying the production of design codes to beyond the plan-making stage does not provide certainty for those responsible for delivering the developments to which the design codes relate.	This comment has been noted and will be considered at the next stage of the Borough Plan review.



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					<p>From experience on a national basis that development plans are adopted with a promise for further details to be provided through an SPD which then isn't forthcoming.</p> <p>Design codes should be provided at the plan making stage wherever possible.</p>	
				25	<p>L&amp;Q Estates considered that the broad options available to provide a strategy for new development within the borough have been identified in the issues and options document. However, it is necessary through production of the evidence base and engagement with key stakeholders including developers and landowners that the options are defined to provide the most sustainable future for the borough. This should be the principle objective of the local plan strategy and it should not, as a principle, be unduly fettered by introducing principles such as not considering green belt release, which could undermine the fundamental objective of delivering new development in locations that will provide the most sustainable pattern of growth.</p>	<p>This comment has been noted and will be considered at the next stage of the Borough Plan review.</p>
				26	<p>The fundamental issue for the local plan is to provide for sufficient housing to meet a growth in population and deliver the jobs necessary not only for the Borough but contribute towards the prosperity of the whole region. The emerging plan should acknowledge the key locational advantage NBBC has through providing suitable sites to meet need.</p>	<p>Comments noted.</p>
				28	<p>Question 4 Option 3 – L&amp;Q Estates dispute the scoring in several aspects Question 8 – broadly supportive.</p>	<p>Comments noted.</p>
53			Longford Community Action for our Neighbourhood		<p>Duplicate response</p>	
54	Mr	SM		N/A	<p>Attached response not attached</p> <p>Lack of consideration of District Centres Objects to HSG10 but if it goes forward, needs to have GP, shops, school and facilities.</p>	<p>Noted.</p>
55	Mr	GS	Bellway Homes (written by Marrons Planning on their behalf)	1	<p>The start date for the Local Plan should be based on the anticipated timescales for Publication of the Plan, rather than the adoption date of the Plan as suggested in the consultation document. This would suggest the start year should be 2021 given that the Plan is published in January 2022, which means the housing supply data will likely be taken from the 1st April 2021. In so doing, the housing requirement (calculated using the standard method) would take account of the latest</p>	<p>The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.</p>

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					<p>household growth projections and housing affordability data, which takes account of past delivery.</p> <p>In terms of an end date for the Local Plan, the NPPF states that strategic policies should look ahead over a <u>minimum</u> of 15 years.</p> <p>Preparing a plan for a longer time period will allow for flexibility should plan making slip due to unforeseen events. Therefore, it is suggested that the Plan period should be up to 2041. This would provide flexibility and a long term approach to the delivery of growth, which could support the allocation of strategic sites should these form part of the spatial strategy.</p> <p>NPPF Para 22 sets policies should set a longer term vision (at least 30 years) for significant extension to towns and villages. The Plan period should therefore be 2021 to 2041.</p>	
				2	<p>The Framework is clear, evidence should be up to date, adequate and relevant to the policies in the Plan, taking into account market signals (para 31). On this basis, all of the Council's evidence base should be reviewed, to consider whether it needs updating.</p>	Comments noted and will be considered at the next stage of the local plan review.
				3	<p>HEDNA</p> <p>SHLAA will need updating. Bellway Homes have submitted a new site at Plough Hill Road, Nuneaton for consideration. The Council is encouraged to take account of, and rely upon, robust evidence put forward by promoters for Site's which would lessen the evidential burden of the preparation of the Plan.</p> <p>The Local Plan will need to promote sustainable patterns of development and therefore be informed by an up-to-date evidence base that has assessed the locations which have the greatest opportunity to promote walking, cycling and public transport to employment, shopping, leisure, education and other activities (paragraph 104 of the Framework). All emerging policies will need to be tested for viability purposes to ensure they do not undermine the deliverability of the Plan. The evidence base will need to be updated.</p>	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the referenced documents are noted.
				4	No comment.	Noted.
				5	No comment.	Noted.
				6	No comment.	Noted.
				7	National policy on changing Green Belt boundaries (para 141) is clear in that before changes can be justified, the	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites

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					<p>Council must demonstrate it has examined fully all other reasonable options for meeting its identified need for development. In preparing this Plan, the Council must therefore prioritise meeting its need in the existing urban areas.</p> <p>followed by land in the countryside that is not Green Belt (Option 1). The option is also the most sustainable having regard to the SA.</p> <p>The need to promote sustainable patterns of development must be taken into account, but non Green Belt locations should still be fully examined first of all.</p> <p>The comments are noted. around the potential capacity of the existing urban areas which need to be clearly evidenced in order to inform the preparation of the Plan.</p>	<p>against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.</p>
				8	No comment.	Noted.
				9	The settlement hierarchy of the adopted Plan is still relevant and appropriate to guide future development. Nuneaton should remain at the top of any settlement hierarchy.	Comments noted.
				10	Agreed - It would be appropriate to review the status of existing allocated sites, and consider removing the allocation if the site is no longer deliverable or developable.	Comments noted.
				11	<p>Option 1 – not a realistic option without evidence to support the assertion that no further allocations on greenfield land will be necessary on the basis that the Council's housing requirement would simply be its local housing need figure calculated using the standard method (429dpa), and that there are sufficient commitments and brownfield regeneration sites coming forward to support this.</p> <p>The consultation document refers to a greater assumption going forward about windfall provision. Caution is urged should a forensic urban capacity assessment be undertaken, as this could result in double counting if windfalls are then to be relied upon going forward.</p> <p>However, caution is particularly advised at using the standard method figure solely prior to completion of the revised HEDNA.</p> <p>Assumptions are also made about the likelihood of the Duty to Co-Operate (DtC) being abolished which means that the Council will not have to take account of any housing needs that can't be met by neighbouring authorities.</p>	<p>Preference for Option 2 is noted.</p>

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					<p>Option 2 which allows for small scale sustainable urban extensions focussed on key transport infrastructure (presumably in addition to locating development within the urban boundary) is therefore favoured in order to provide greater flexibility in ensuring the housing requirement is met. Bellway Homes controls land to the East of Plough Hill Road, Nuneaton, which is capable of delivering circa 170 homes. The land would be a suitable allocation in accordance with Option 2 for several reasons.</p> <p>Should a combination of Option 1 and 2 not be sufficient to meet housing requirements, allocations in sustainable non Green Belt areas should be considered as suggested in Option 3.</p>	
				12	No comment.	Noted.
				13	<p>The encouragement of tree planting in new developments is welcome, provided that the amount, type, and location of trees is carefully considered. Any target in terms of area or number of trees will need to be consistent with the quantum of development required to ensure both can satisfactorily be accommodated (alongside other Requirements.</p> <p>One of the barriers to planting of trees in new development is the burden of commuted sums towards their maintenance, and a flexible approach to long term management is encouraged.</p>	Comments noted.
				14	<p>Orchards of a scale commensurate with the development would be an appropriate typology for open space provided that this takes the place (wholly or in part) of other open space typology requirements expected on development already. If not, a consequence may be reduced capacity on allocated sites and the requirement to allocate additional land. The Council may therefore wish to consider offsetting the requirement for orchards on new developments to land which it controls elsewhere.</p>	Comments noted.
				15	It is suggested that tree planting should be encouraged within all developments in accordance with the Framework irrespective of scale.	Noted.
				16	No comment.	Noted.
				17	No comment.	Noted.
				18	No comment.	Noted.
				19	No comment.	Noted.
				20	Greater emphasis on cycling and walking connections in determining the location of new development is welcomed, in accordance with the requirement in Chapter 9 of the Framework.	Support is noted.
				21	As the consultation document points out, building regulations are likely to be amended	Noted.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					by 2023 at the latest to require vehicle charging points. Given that the local plan will be adopted in 2023, it is not necessary to duplicate regulation.	
				22	No comment.	Noted.
				23	The Framework provides for biodiversity net gains as a minimum. The Environment Bill is likely to require new development to meet 10% biodiversity net gain as a minimum. Again, the Borough plan should be cautious about duplicating regulation.	Noted.
				24	Whether a design code is an SPD depends upon the purpose of the design code, whether it is Council or Developer lead or prepared jointly. Design codes should be informed by the National Model Design Code and in accordance with the requirements of the Framework.	Comment noted and will be fed into next stage of the review of the Plan.
				25	The issues identified are broadly correct, however the Plan should be alive to revising these as evidence is prepared and published, e.g. the revised HEDNA.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				28	Table 11 Q11 In the absence of any evidence, it is not possible to conclude the existing settlements will generate sufficient new housing within their boundaries to provide decent housing for all. Therefore Option 1 is unlikely to result in a positive significant effect on housing as set out in Table 11 – Question 11. There is more likely to be a significant negative effect if unmet housing needs persist in the Borough. It is also unclear why Option 2 would have a negative effect on waste generation, whereas Option 1 would have a positive effect.	Noted.
56	Mr	KM	Woodlands Action Group	1	Agreed with housing targets for local need (minus MOU).	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				2	Suggests review of most of the existing evidence.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				3	Independent ecology reports should be undertaken on sites such as HSG4.	Noted.
				4	Option 1 given some are not already occupied, with scope for extension.	Comment noted.
				5	Near developments already being built. Jobs should be put ahead of housing without infrastructure.	Comment noted.
				6	Option 1 (except town centres).	Comment noted.
				7	The current plan damages the Green Belt and countryside. HSG4 should be looked at again.	Comment noted.
				8	Seek extension to existing employment sites as stated in question 4.	Comment noted.
				9	See Q5.	Noted.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
				10	Yes. HSG4 is unsustainable and an ecological disaster only in plan due to MOU.	Noted. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Option 2 but with care and consideration for existing residents.	Comment noted.
				12	Town centres.	Noted.
				13	Yes and existing roads should be checked for high levels of pollution.	Noted.
				16	Targets should be set.	Noted.
				17	C3 should be added to town centres.	Noted.
				20	Yes.	Noted.
				21	With petrol and diesel cars being phased out it's a must.	Comment noted.
				22	They should be updated to provide more EVCP for the future.	Noted.
				23	Maybe an independent biodiversity expert should review sites.	Noted.
				25	The MOU needs sending back to Coventry.	Noted. Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				26	Sites currently in the plan should be put on hold from planning consent until the MOU situation is assessed.	Noted.
				27	The Woodlands Action Group gained 10144 signatures in 1997 to return Bedworth Woodlands to the Green Belt, which was and hope will again be Council policy.	Noted.
57		M&PM		N/A	Objection to School Lane/Bowling Green Lane being used for industrial use. Two schools nearby. Existing industrial estate in Bayton Road with empty units. Green fields are necessary for the health of the nation.	Comments noted.
58	Mr	RM		2	Yes. More appraisal required on the MOU with Coventry.	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				3	Yes we need a biodiversity appraisal.	Noted.
				4	Option 1 where space is available and Option 3 if schools or existing housing is unaffected.	Comments noted.
				7	Option 3 as the Green Belt is unlikely to be a sustainable place.	Any Green Belt sites will be considered in light of sites that are submitted to the Council through the 'call for sites' process and dependent on the Council's chosen Option.
				8	Option 3.	Noted.
				9	Commuting to the workplace/schools/retail needs to be factored into the selection of land for development. This should include access to main routes.	Noted.
				10	Yes. Don't believe the MOU with Coventry has been fully appraised, and we are now potentially building 4k more houses than we need.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				11	Those with the ability to create much needed green spaces in our already over-subscribed population.	Comment noted.
				13	No, we need a balanced Eco system and a balanced biodiversity plan. Meadows sequester carbon into the ground. Reed beds supply important habitat and water improvement. Plant trees in in right places Not at the demise	Comments noted.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					of other habitats. Remember trees store carbon during their life cycle and release it if cut or dying.	
				14	Why not (no further comment given).	Noted.
				15	1.5 acres for sport or retail/industrial development. Would consider 400 social housing to be large scale as a proportion percentage of our borough size.	Noted.
				16	Yes but see above.	Noted.
				17	Set out that use classes E and C3 are acceptable.	Noted.
				23	Yes we have a density index of 1.65 per Sq kilometre and are ranked 175 in population density.	Noted.
				24	Yes they are a key mechanism to deliver high quality sustainable places, in combination with other documents. We have the lowest number of nature reserves in the whole of the county. An issue ignored by the planning department. See Sustainability Report.	Noted.
				25	Questions Coventry's estimates especially including students in the population growth.	Noted.
				28	Paragraph D6.1 Nuneaton and Bedworth have the lowest number of nature reserves in the county. The lowest accessibility to woodlands. We are the only area of Warwickshire which does not contain a WWT site.	Comments noted.
59	Miss	SM		1	As it is the minimum yes.	Noted.
				2	I would think it needs to be updated to adapt to changes brought about by the pandemic and Brexit. I personally have little faith in some of the evidence and figures presented to justify the borough plan when it was originally conceived.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process.
				3	I would like to see Employment, Transport, Housing, Health updated, as these were inadequate during the first consultation. Too much housing and industrial development with insufficient Health, Transport and Education build into the plan.	Comments noted.
				4	None of these options. Would like to see significantly less new employment areas but improvement and regeneration of existing sites with much improved transport links.	Noted.
				5	As far as I'm aware the Bayton Road industrial estate is half empty. So if it is not fit for purpose, regenerate it, rather than destroying greenbelt land and further destroying our ecosystem and biodiversity. To build on the land in Bowling Green Lane, a pretty little area, with history and serving as a division between Ash Green/Exhall and Bedworth and a vital area for wildlife and nature, is criminal.	Comments noted.
				6	Option 3 (no explanation given).	Noted.
				7	Option 1.	Noted.
				8	Option A.	Noted.
				9	The impact on the people that live there.	Noted.
				10	Yes, I think all allocated sites should be reviewed because the figures the plans were based upon were inaccurate and did not take into account current birth rates, rates of people	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					moving into the area, now we are post pandemic and early Brexit, those figures will have changed, I suspect dramatically.	
				11	Option 3.	Noted.
				13	Yes.	Noted.
				14	Yes.	Noted.
				15	Any development which removes established trees or destroys countryside or greenbelt should be planting trees and including meadows for insects.	Noted.
				16	Considers a tree planting target the least NBBC can do.	Noted.
				17	Option 3.	Noted.
				19	Option B.	Noted.
				20	Probably.	Noted.
				21	As above.	Noted.
				22	Only opinion on transport is on buses. The bus services need improving.	The Borough Plan review seeks to ensure that more sustainable modes of travel are accessible, and development is located in the appropriate places to reduce the need to travel.
				23	More biodiversity. Wildlife in local area declining. Climate and biodiversity should be a priority in the Council's development plans.	Noted.
				24	Yes great idea to have codes, the borough need more beauty.	Comment noted.
				25	Probably.	Noted.
				26	Open spaces and parks, currently the existing ones outside of the town centres are horribly neglected and out of date. They are so important but I do not think the existing one meet the diverse needs of residents. Perhaps a separate consultation on improving existing and future open spaces would be of use.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
60		AH	Coventry and Warwickshire Clinical Commissioning Group (CCG)	1	The plan period of 15 years is in line with the minimum specified under the National Planning Policy Framework and therefore is acceptable to the CCG because the anticipated growth is not such that new settlements will be created.	Comments noted.
				2	The CCG recognises that it is appropriate to undertake an immediate review of the adopted Borough Plan following the publication of the updated National Planning Policy Framework (NPPF) to provide assurance that the adopted plan is in line with the latest updated NPPF guidance.	Comments noted.
				3	The CCG requests that the associated health and wellbeing strategy and associated evidence base is considered. In addition the NHS Long Term Plan has set a clear future direction of travel for the NHS in England and building on the national strategic aims outlined within Five Year Forward View and General Practice Forward View places strong emphasis on the need to expand and strengthen primary and wider out-of hospital care. Development (including community and health infrastructure) that supports innovations in patient care, increased use of technology and integration of health, wellbeing and wider community services to develop community wellbeing and cohesion is	Comments are noted and a new evidence base will be commissioned as part of the later stages of the Borough Plan review process.



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					key to delivering the vision detailed in the Local Plan issues and options document.	
				4	The CCG does not favour a specific option but requests that the assessment of all employment location options needs to consider the proximity of the residential areas for the employment.	Comments noted.
				6	The CCG does not have a view for dealing with non-employment uses on existing industrial estates. The CCG is aware that healthcare delivery is in some areas increasingly provided from converted retail and industrial units and where need and funding is identified would support this use, following the standard NHS England health delivery site planning processes.	No option selected but comments made are noted.
				7	The CCG has a duty to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106/Community Infrastructure Levy framework and that funding of future health provision and access is not compromised through housing development and population growth. Location of new residential areas need to consider; wider health service infrastructure; strong partnerships better community services; good public transportation; air pollution and availability of green spaces.	No preferred option selected but comments regarding the factors which need to be considered for the location of new housing is noted and will be considered at the next stage of the review.
				8	Please refer to response above. No specific option favoured but requests that the assessment of all employment location options needs to consider the proximity of the residential areas for the employment.	Noted.
				9	No comment.	Noted.
				10	The CCG has undertaken planning working closely with the Borough Council. Any review of allocated sites, where there is a major change in the allocated sites position may result in significant rework of planning already undertaken by the CCG. There are a number of key health and care messages that need to be considered for any review of allocated sites: Wider health service infrastructure accessibility Models that are concentrated in geographical areas Strong partnerships between community services Community wellbeing Good transportation links Mindful of air pollution and availability of green spaces.	Comments noted and will be considered at the next stage of the review.
				11	Please see Q10.	Noted.
				12	See above.	Noted.
				13	The CCG is mindful that broader issues affecting population health and wellbeing, including air pollution/quality and the availability of green spaces, are priorities. Recognising this, the CCG would strongly endorse the direction of net zero carbon and associated sustainability plans.	Comments noted.
				14	See response above to Q13	Noted.
				15	See response above to Q13	Noted.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
				16	See response above to Q13	Noted.
				17	The CCG is aware that healthcare delivery is in some areas increasingly provided from converted retail and industrial units and where need and funding is identified would support this use, following the standard NHS England health delivery site planning processes.	Comments noted.
				18	See Q17.	
				19	See Q17.	
				20	The CCG is supportive of any plan which promotes physical activity and accessibility; both are key determinants of health and wellbeing.	Support is noted.
				21	The CCG is supportive of plans which improve accessibility and the use of greener fuel for transport.	Support is noted.
				23	The CCG recognises that through biodiversity health and wellbeing factors are enhanced, creating improvement in health and wellbeing and is therefore supportive of plans to meet biodiversity gain targets.	Support is noted.
				24	The CCG is supportive of design codes being dealt with through supplementary planning documents.	Noted.
				25	See Q26.	
				26	The CCG would ask the Borough Council to share as much information as possible with it at the earliest stage as regards the likely profile of the population arising from any planned housing development. This will assist the CCG's wider planning process by enabling it to understand the likely health needs of the population, as well as the preferred channels of communication of sub-groups within the population, which in turn, allows for more effective service development, delivery, and population engagement. This in particular includes any change from the current housing allocation sites, noting the planned schemes in place responding to housing and population growth.	Comments are noted and taken on board.
61			North Warwickshire Borough Council	N/A	<p>The Council is in general support of the Nuneaton and Bedworth Borough Plan Review, Issues and Options consultation 2021. Although disappointing that NBBC state they are withdrawing from the current MOU, at this time this is not seen as a major issue. Due to the age of the MoU and the commissioning of further evidence such as the HEDNA, when this is drafted in the autumn this will pave the way for discussions on a future MoU.</p> <p>There are some significant concerns regarding the approach to the provision of housing and the strategic approach that is necessary to address wider housing needs and pressures North Warwickshire Borough notes the concerns raised by the issues and options document but would urge Nuneaton &amp; Bedworth Borough to acknowledge the need to potentially address wider than local housing need and reflect that in the assessment of housing requirement in the Plan and the relationships with and cross-boundary co-</p>	The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.

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					operation with adjoining Local Authorities and the wider sub-region, there may be the necessity and need to address cross border issues such as housing need through joint working partnerships.	
62	Miss	HP		1	A Plan period of 15 years is too long. There will be a need to take account changes in Climate Change, Climate Change legislation, possible changes in Central Government. If the Plan was reviewed every 5 years, then changes in legislation could be incorporated into the Plan.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				2	The existing evidence base needs to be updated to take into account future developments in Climate Change, as well as existing problems which are being caused by Climate Change.	New evidence base will be commissioned as part of the later stages of the Borough Plan review process
				3	The amount of housing needs to be updated. Who are the new homes being built for? Is the secondary school on top farm only for those in the north of Nuneaton or from other areas as well?	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				4	Option 3 - The A5 is already heavily congested at peak times. Surrounding roads unable to cope.	Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				5	The M6 has better links to the motorway network, so new employment areas should be in this area. More investment into Town Centre would increase employment.	Comments noted.
				6	Option 1. Companies need the option to be able to expand.	Comments noted.
				7	Option 1 - The land on Top Farm is the 'Green Lung' for the North of Nuneaton. This will be lost as a result of the proposed new housing development and secondary school. This land needs to be protected. The proposed new housing and secondary school will have an impact on the congestion of local roads, and levels of pollution. Traffic concerns and wildlife concerns.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				8	Option A. But prioritise land closer to the M6, and/or the M6/M69 junction.	Preference is noted.
				9	Selecting land for development will need to consider Climate Change and Climate Change legislation.	Comment noted.
				10	Agreed. Opposed to housing on Top Farm and need to expand school places in local area.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Look at increasing the housing on land closer to the M6/M69 junction. This would provide better access to the motorway network, than the A5.	Comment noted.
				12	Consider the area around Ansty, Shilton for more housing. It is closer to Coventry. Also provides easy access to Leicestershire, via the M6/M69 junction.	Comment noted.
				13	The targets should be based on the number of trees. Top Farm is an ideal candidate for this. It is suitable for increasing the number of trees, which would offset the polluting effects of the Leicester Road gyratory, and the	Noted.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					increase in traffic on Higham Lane, Weddington Road and the A5.	
				14	Yes. It will provide food for local residents and wildlife. The trees would provide wildlife with nesting sites and shelter.	Noted.
				15	Developments that have already been built in Weddington, Higham Lane and the Long Shoot, are all suitable for orchards. They would qualify for an orchard each.	Any policy included in the Plan review would be applicable to new developments. It is unable to request retrospective requirements from extant/built out planning permissions.
				16	We need a lot of new trees, as a lot have been lost, as a result of development, disease. There should be no upper limit for tree planting. The same principle should also apply to hedgerows.	Noted.
				17	Both Options 3 and 4 would be acceptable. People who need Council housing and affordable housing, need to have these homes closer to the Town Centre. This would avoid the need to pay for bus fares and/or taxi fares. They would also be closer to amenities such as the library, railway station, shops.	Comments are noted.
				18	The present library is important architecturally. The old St. Nicolas Parish Hall, holds a lot of memories for the older citizens of Nuneaton. As it has parking facilities, it could be re-used by local Arts' groups.	Noted.
				19	Option B - This would allow important existing features of the Town Centre to be retained. It would also give the option of putting housing above the shops. There are too many takeaways.	Comments noted.
				20	This would not work in Higham Lane as it cannot be widened any more. Reliant on public transport or taxis.	It is noted that this would not be a 'one size first all' approach but if the Council does amend the policies it would support the importance of cycling and walking more generally.
				21	Agreed – every new home/business.	Noted.
				22	Ideally option 3.	Noted.
				23	Yes. Also the removal of hedgerows/healthy trees to be banned. Even dead trees can provide important shelter for wildlife.	Support and comment noted.
				24	No - new building designs incorporate nesting holes for swifts/bats.	Noted.
				25	Mostly.	Noted.
				26	The development of Top Farm needs to be considered from an environmental and ecological/bio diversity aspect for several reasons (wildlife corridor/congestion/flooding and drainage.	Noted.
				28	Page 15 Table 3 - Any increase in Public transport, private car use, and truck use will automatically increase both pollution and negative impacts on Air quality. I can't see how this will change. It is more likely to get worse when you build more houses, in already highly-congested areas. The road layouts of Higham Lane, Hinckley Road and Old Hinckley Road, would make improvements for cycling and walking difficult, - if not impossible.	Noted.

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63	Mr	DP		1	Yes. The evidence changes too quickly to allow a longer period.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				2	Yes. For example the requirement to help address Coventry's housing need has been called into question by the Office Of Statistics Regulation report of May 2021, which queries the city's future population growth forecast.	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
				3	Yes - the Joint Green Belt Study 2015 which was relied on as evidence at the Borough Plan inquiry is a deeply-flawed document. Especially true with parcel BE5.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the Green Belt Study (2015) are noted.
				4	Option 1 - It would be inadvisable to adopt Option 3 to provide more employment near to junction 3 of the M6. This junction is already inadequate for the amount of traffic it carries, and the resulting congestion causes traffic to divert on to the local road network, affecting residential areas.	Comments and preference for option 1 is noted.
				5	Requirement for 107.8 hectares should be re-examined – likely to be too high.	Noted.
				6	Option 5 – treat on a site but site basis.	Noted.
				7	Option 1 – Building in the Green Belt should always be a last resort. Objects to allocation EMP2. The presumption should always be against development in the Green Belt unless there are truly exceptional circumstances.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				8	Option A for reasons set out above.	Comments noted.
				10	Agreed. Coventry's statistics need updating so housing numbers likely to be reduced in reality plus decline in retail use.	Comments noted. Careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review
				11	Option 1 – In order to help improve the environment within existing settlements.	Noted.
				13	Yes, Should be based on a combination of area and both number and type of trees.	Comment noted.
				14	Yes.	Noted.
				16	No, option 3 is unacceptable.	Noted.
				17	All classes E, A4, A5, F1 and C3 should be acceptable, to help revitalise town centres.	Comments noted and will be considered at the next stage of the Plan review.
				20	Yes.	Noted.
				21	No – EV not going to be used long term. Should invest in hydrogen re-fuelling infrastructure.	Comments noted.
				22	No (no further explanation given).	Noted.
				23	Should be 20%.	Comment noted.
				24	Yes but only if SPDs are given legal weight otherwise it's a waste of resources.	Comment noted.
				25	No – Open space and heritage protection should be included.	Comments noted and will be fed into the next stage of the Borough Plan review.
				26	Site EMP7 should be re-examined. The traffic infrastructure is inadequate.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					EMP2 should also be re-examined – it's removal from the Green Belt was illogical and unjustified.	
64	Mr	PR	Greenlight Developments Limited (written by PDR Planning on their behalf)	1	The Council assumes the new Borough Plan will be adopted in February 2023, hence the period of 2023 – 2038, however, this does not factor in any time for slippage. A more appropriate period, consistent with the current Borough Plan (2011- 2031) would be over 20 years, (2023 – 2043) to allow for any slippage in programme.	The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.
				2	The Green Belt Review has methodological flaws. Greenlight Developments has concerns over the approach, notably; Excessive size of land parcels - In the case of Greenlight's land interest, although the site it is located within parcel NG5, it only occupies 12% of its total area. As a result, no realistic conclusions can be drawn from the Study because the site itself has not been properly assessed against the purposes of Green Belt and thus its impacts have been overstated as if the site represented the whole Green Belt parcel as opposed to just a modest strip (bounded by existing hedgerows) on the edge of an existing urban area. Many of the higher scores to the whole parcel could not, legitimately, apply just to the Greenlight site. Methodological concerns about how the criteria for assessing purposes have been applied with respect to specific parcels; and A failure to apply the tests in Paragraphs 84 and 85 of the NPPF to the review of Green Belt boundaries in the Plan.  In addition, the SHLAA and SA needs up-dating. We note the HEDNA is to be produced by late 2021.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				3	See above response.	Noted.
				4	No comments.	
				5	No comments.	
				6	No comment.	
				7	Option 3 - Within the current Plan, 15 sites were removed from the Green Belt and allocated for housing; it has already been established the release of Green Belt land in the most sustainable locations (consistent with the settlement hierarchy) is required to meet the Council's housing needs.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				8	No comment.	
				9	The settlement hierarchy established under Policy DS2 of the current Plan, provides a reasonable hierarchy for selecting land for development. Within the current Plan, Nuneaton has seen considerable development directed to it; within the new Plan, this growth could be redirected to the Borough's other settlements, which includes the 'Northern fringe' of Coventry. Paragraph 6.8 of the supporting text to Policy DS2 states, "The main spatial areas of Nuneaton, Bedworth, Bulkington and the northern Coventry fringe are the most sustainable	Comments noted.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					<i>locations for growth.</i> " Any options for locating new residential development in the new Plan should build upon this established hierarchy.	
				10	The response sets out in turn an assessment of each of the Council's strategic sites: HSG1/HSG2/HSG3/HSG7/HSG10 concluding that a number of the strategic sites are not delivering as envisaged by the Council, therefore, it is imperative as part of the Plan review that, these sites are reviewed to reassess the suitability for allocation, or at the very least, a re-evaluation of the delivery rates over the Plan period.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				11	<p>At present, the Council cannot meet the requirements of NPPF Paragraph 65. Greenlight fails to recognise how the Council can formulate and consult upon credible spatial options for the future delivery of housing, if it does not know the level that needs to be delivered; the approach being undertaken is premature in this regard.</p> <p>Paragraph 7.10 of the Issues &amp; Options Consultation Draft places an increased reliance from the Council on windfalls in urban areas (urban capacity is going to solve the housing supply issues).</p> <p>Regard is had to Paragraph 70 of the NPPF</p> <p>Paragraph 170 of the IR on the Examination of the Nuneaton and Bedworth Borough Plan (9th April 2019), confirms that a forecast contribution of 247 dwellings from windfall sources over the last ten years of the plan period is soundly based; supporting the adopted Borough Plan's windfall allowance of 22 dwellings per year.</p> <p>This windfall allowance of 22 dwellings per year is used in the Council's five year housing land supply calculation as of 1st April 2020 (dated, 15th July 2020).</p> <p>The Council has not provided any compelling evidence to justify any significant increase in its windfall allowance; simply relying upon a generalist approach based on assumption.</p>	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				12	Growth needs to be supported in the Borough in the plan period to assist with the need to provide housing for the Coventry and Warwickshire and the Greater Birmingham housing market areas. As such, in this context, the Council should commit to the approach in the adopted Plan, to deliver Coventry's unmet need; the same approach North Warwickshire has taken in its current Local Plan review.	Comments noted.
				25	Broadly yes- However, the Council needs to formulate a development strategy, albeit it is recognised that, this cannot be formulated until the level of housing that needs to be delivered is known; at present it is not.	Comments noted, response as per Q11.

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				28	As per Greenlight's response to Question 11 (above), Greenlight fails to recognise how the Council can formulate and consult upon credible spatial options for the future delivery of housing, if it does not know the level that needs to be delivered; the approach being undertaken is premature in this regard (this equally applies to the SA).	Comments noted.
65	Mrs/ Mr	J&MR		N/A	<p>We would like to voice our objection to the proposed planning permission for 398 houses on Hospital Lane. This land regularly floods, and the Government has issued a statement declaring land liable to flooding should not be used for housing.</p> <p>There are other areas on brown sites which could be used for small amounts of housing without this greenbelt land being used. There is already no capacity at the local schools and GP surgeries and Bedworth's infrastructure is not suitable for such a huge planning project.</p>	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
66	Mr	LW	Phoenix Projects Ltd	1	<p>No. The current Borough Plan allocates a number of large sites for housing development at the edges of existing towns and villages. The consultation paper acknowledges that a number of these sites have not come forward in terms of the submission of any planning applications (HSG2 Arbury; HSG4 Woodlands; HSG5 Hospital Lane; HSG7 East of Bulkington for a total of 2,808 dwellings) despite the fact that the Plan was adopted in 2019.</p> <p>Given the potential number of additional dwellings which need to be provided in the Borough in addition to the current allocations it is inevitable that there will be proposals for large scale extensions to some of the existing towns and villages. Accordingly it is considered that a longer timescale than 2023 – 2038. It is suggested that a twenty year timeframe should be adopted i.e. 2023 to 2043.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities. The Council is not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.
				2	Yes. The existing evidence base will need to be updated to reflect the findings of the 2021 census and the requirements to meet some of the needs of neighbouring authorities which cannot meet their needs within their administrative boundaries.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				7	<p>We support option 3 to accommodate additional development needed to meet the longer term needs of the Borough, namely to prioritise the most sustainable locations regardless of whether it is designated urban area, green belt or countryside.</p> <p>In considering potential sites for housing or other development a difficult balancing exercise needs to be undertaken and therefore all potential sites for development should be considered irrespective of their planning designations e.g. green belt.</p>	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.



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				10	Yes. We agree that there should be a review of existing allocated sites given that a number of large sites are not yet the subject of planning applications. This accounts to more than 20% of the total requirement over the current Local Plan period. Sites should only be allocated for development where they can be delivered within the plan period.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	We support spatial option 3 at Q7, namely to prioritise the most sustainable locations regardless of whether it is designated urban area, green belt or countryside. Sustainability is the key principle behind the planning system and once land has been developed for housing it will continue to be used for that purpose in perpetuity. Accordingly it is imperative that the most sustainable sites are brought forward for development in order to meet this objective.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new housing development within the Borough Plan review.
				12	As well as some large scale allocations to meet the longer term housing needs of the Borough it will be important to allocate small sites at the edges of sustainable settlements. The business community has identified a need for executive or aspirational homes and sites should be considered for these, as well as for affordable and other types of housing. The allocation of some smaller sites will help smaller local builders who cannot afford to purchase large sites.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
67	Mr	MO	Pinnacle Planning on behalf of Richborough Estates	1	Updated census information will be made available in March 2022, which is around the time that the consultation on the Publication Version will be coming to a close, based on the current timetable. In light of this, Richborough is of the view that it is unlikely that the Borough Plan will be adopted prior to the end of 2023, which means that the strategic policies will only look ahead 14 years from adoption. The strategic policies, including the vision, should therefore be amended to look ahead to 2039 at the earliest, which would mean planning for additional dwellings.	This comment re timings has been noted and will be considered at the next stage of the Borough Plan review.
				2	Richborough supports the preparation of the HEDNA and the aim to obtain the most up to date information on housing need and typologies. Once the HEDNA has been published, and the figures have been adjusted for the census outputs, the Regulation 18 consultation should be repeated. Only at that point can informed decisions of a strategic nature be made. Much of the evidence base will require a full update.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the HEDNA and SHMA are noted, as are the comments on an additional Regulation consultation which will be considered as part of the Council's Local Development Scheme.
				7	Richborough supports 'Option 1', as proposed within Question 7, which prioritises the existing urban areas of the Borough followed by land in the countryside that is not Green Belt, and then Green Belt land. This is on the basis that the land outside of the Green Belt is considered to be sustainable and deliverable as well as being capable of meeting needs in full as part of a sustainable strategy for development. Prior to the publication of the HEDNA and the assessment of non-Green Belt options, the required	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.

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					Exceptional Circumstances for Green Belt realignment have not been demonstrated.	
				10	<p>Richborough support the preparation of a the HEDNA and is of the view that the standard method figure of 429 dwellings for N&amp;BBC represents only the 'starting point'. In accordance with paragraph 61 of the NPPF, as well as the 2015 SHMA, there are likely to be exceptional circumstance which justify an uplift including a requirement to take the needs of neighbouring areas into account.</p> <p>Richborough supports the proposed review of allocated sites in order to reassess their suitability for allocation with a view to understanding why they have under-delivered. However, Richborough are also of the view that this work should be expanded in order to review the sites which have delivered to gain a better understanding of the characteristics. This will assist the Borough Plan Review in identifying deliverable sites and avoiding the failures of the Borough Plan.</p>	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				27	<p>Vision- Richborough is of the view that the 'vision' should be altered to acknowledge the need to meet the development needs in full, including for housing.</p> <p>Objectives- Richborough is of the view that Objective 4 is not fit for purpose and the equivalent objective in the Borough Plan should be revisited and amended to acknowledge the need to ensure need are met and housing is delivered.</p>	Comments have been noted and will be considered at the next stage of the Borough Plan review.
68	Mr	BW	Rosconn Strategic Lane	7	Urban areas and countryside should generally be prioritised over Green Belt to meet development needs unless there are good reasons for not doing so, such as conflict with wider sustainability considerations or risk of non-delivery. As the Council will be aware the adopted Borough Plan has already seen the removal of land from the Green Belt to meet development needs, such as around Bulkington. Part of the exceptional circumstances case for doing so was the sustainable location of these sites and this was expressly acknowledged by the Borough Plan Inspector. Now they have been released for development and removed from the Green Belt, retention of these strategic sites should clearly take precedence over releasing further Green Belt land. The question of urban capacity was already examined a relatively short while ago as part of the Borough Plan and was found to be limited, requiring the aforementioned release of Green Belt.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				10	It is clear from the Issues and Options Consultation Document that the Council's principal concern in respect of existing allocated sites is that planning applications have yet to be submitted on several. As the Council will be aware, this does not apply to HSG8 given that part of the allocation benefits	Comments noted. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.

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					<p>from full planning permission for 188 units which forms part of the Council's deliverable five year supply for housing.</p> <p>Having regard to the housing trajectory presented by the Council as part for the 2019 Main Modifications Consultation on the Borough Plan, HSG8 was expected to commence delivery towards the end of the 2020 / 2021 monitoring year. Full planning permission was granted for part of the allocation in October 2020 and development commenced shortly thereafter with plots having already been released for sale. As such, it is clear that HSG8 commenced delivery broadly when it was expected to.</p> <p>As the Council will be aware, Policy HSG8 requires that the allocation be brought forward in accordance with a Concept Plan which was adopted as a Supplementary Planning Document (SPD) in mid-2020, about a year after adoption of the Borough Plan. The full application for 188 units pending consideration at the time was initially deferred at planning committee to allow for the SPD to be adopted first. Thus the requirement for a Concept Plan has no doubt elongated the lead-in time for the allocation coming forward. Now this is in place, developers and promoters have more certainty about how the allocation is expected to come forward and will no doubt facilitate HSG8's ongoing delivery.</p> <p>Taking the above factors together, we do not consider that progress towards bringing HSG8 forward to have been unreasonably slow, and indeed it is coming forward at about the pace originally anticipated. As such, there is no need to review the allocation so soon after the adoption of the Borough Plan.</p>	
				11	<p>RSL does not have any observations in respect of the spatial options at this stage. The best performing option requires assessment alongside the overall scale of housing need. Assuming the Borough's base Local Housing Need (LHN) figure of 429 dwellings per annum (dpa), paragraph 7.22 of the Consultation Document states further sites may not be required beyond existing settlement boundaries and Borough Plan allocations. If that is correct, then Option 1 of locating new residential development within existing settlement boundaries (including Borough Plan allocations) could be feasible. Due to the need for the Borough to accommodate some unmet need from Coventry, however, it is doubtful the minimum LHN figure will be sound basis for the Borough Plan Review's housing requirement.</p> <p>The Council intends to produce an updated Housing and Economic Development Needs Assessment (HEDNA). The HEDNA is not a subject of this consultation, but broadly</p>	<p>Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet housing need.</p>

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					speaking the Consultation Document cites concerns about the demographic projections for Coventry overestimating the city's population growth.	
69	Mr	JB	RPS on behalf of Taylor Wimpey	10	Yes, RPS agree that there should be a review of the existing allocated sites. RPS recommends that HSG7 should be one of sites that the Council does reassess as a matter of priority, not only for its suitability but for also for its likely deliverability. RPS would wish to see the Council use this as an opportunity to identify alternative site allocations, as replacements for any sites that are removed. This would include consideration given to 'Land South of Bulkington' being promoted by Taylor Wimpey as an obvious alternative site at Bulkington.	Comments noted. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	<p>RPS cannot find any supporting information to justify why these spatial options are considered to be 'reasonable alternatives', or if these represent the only reasonable alternatives available to the Council. In fact, there is very little commentary in the IO of any description to underpin the three options presented at this stage. It is therefore very difficult to understand why only three options have been presented as part of the IO consultation.</p> <p>There also appears to be a significant amount of overlap between the spatial options presented here, and the options set out under question 7 which also relate to options for locating future residential development but have been presented in the context of Green Belt land release. This is because both the housing and Green Belt options in the IO include multiple options that reference locating development in urban areas. However, the interaction and relationship between these two sets of options is not explained in the IO. This is significant because, as highlighted in responses to question 7 later on, the options that do not differentiate between countryside that is non-GB and GB. There is a very significant risk, unless this is re-considered if this approach is not reviewed and rectified, the Sustainability Appraisal will not meet the legal tests for considering all Reasonable Alternatives well founded in Case Law.</p> <p>In relation to the specific options presented, under option 1, there is always likely to be a finite limit to the reliance that can be placed on urban sites to deliver the future housing growth requirements of an area. It is clear that additional sites are going to be required, and that this is likely to include sites outside built-up areas which would inevitably lead to some sites within Green Belt locations.</p> <p>In terms of option 2, it is not clearly defined what 'small-scale sustainable urban extensions' actually means, nor it is clear</p>	<p>This comment has been noted and will be considered at the next stage of the Borough Plan review in relation to reasonable alternatives considered and the interrelationship between the options set out in Q7 and Q11.</p> <p>A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations. Careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review.</p>

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					<p>why a 'larger' urban extension option has been deliberately excluded as a reasonable alternatives at this stage.</p> <p>In relation to option 3, RPS notes (at para 6.6 of the IO) that non-Green Belt land areas are relatively limited, located to the north-west of Bedworth and to the north of Nuneaton, and therefore are unlikely to have the capacity or suitability to deliver the quantum of housing required to meet future needs.</p>	
				12	<p>RPS considers that the spatial options considered in the NBLP review should have a greater focus on locational issues. This includes the distribution of development towards specific settlements, in this case, Bulkington. RPS contend that a greater level of growth should be directed to Bulkington as it is the 3<sup>rd</sup> largest settlement in the Borough; whilst Bulkington now benefits from two housing allocations nether have delivered any housing to date; and, only one site is identified in the Council's current housing trajectory.</p> <p>Additional reasonable alternative spatial option that should be considered as part of the options appraisal, namely one on 'larger scale, sustainable urban extensions'. Furthermore, RPS would suggest that another option, 'locating new residential development in GB areas' would also be a reasonable alternative, as a counterpoint to option 3.</p>	<p>Comments noted re Bulkington's locational factors. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.</p>
				7	<p>As highlighted in response to questions 11 and 12, it is clear that there is risk that overreliance on sites within urban areas (mainly SHLAA sites) is unlikely to generate sufficient land to meet local and wider-HMA needs, whilst there are clearly limited opportunities for further growth on land within existing settlements due to tightly drawn Green Belt boundary.</p> <p>RPS broadly supports an approach that treats sites 'on their merits' which recognise their intrinsic qualities as well as the potential benefits that development can bring for local communities, regardless of existing designations.</p> <p>RPS would therefore prefer option 3 is taken forward as a basis for the assessment and selection of growth locations at the next stage of the plan review.</p>	<p>Noted preference for Option 3.</p>
				28	<p>RPS has identified problems with the IOSA, in particular with respect to the 'spatial bias' that has been in-built into the SA Framework, through the inclusion of a specific sustainability objective that supports growth within urban areas (SAO2). RPS contend that SAO2 is not, in fact, a sustainability objective but is a plan objective that has been inserted into the SA Framework to reflect and augment the Council's preference for development within urban areas as the 'first choice' ahead of all other potential options.</p>	<p>Comments re the soundness of the Sustainability Appraisal will be considered and addressed as part of the development of the Borough Plan review and a reassessed evidence base.</p>

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					These representations identify a number of additional reasonable alternatives, primarily relating to the spatial housing options, that have not yet been appraised as part the SA process. Accordingly, the appraisal of these additional options should be incorporated into the next iteration of the SA.	
				1	No, RPS do not agree that a Plan period of 2023 – 2038 is appropriate. National policy (NPPF 2021, paragraph 22) is clear that the 15 year timeframe for plans are a 'minimum' and not a 'ceiling'. A plan period that looks further forward can then help to ensure that future policy can endure over the longer term without the need for small, incremental changes at regular intervals, for example involving modifications to the Green Belt boundaries. RPS recommends that the emerging Local Plan looks ahead over at least a 30 year period from the adoption date (2023).	Noted. The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities. The Council is currently not considering a new settlement as part of its options and therefore does not consider that the Plan period should extend beyond 2038.
				13, 14, 16	Developers and house builders already make provision for existing and new trees as part of development schemes. These are usually informed by appropriate ecological assessments undertaken as part of the planning application process.  RPS does not consider it appropriate (or necessary) for the new Local Plan to include specific targets for the number or area of trees to be provided as part of large-scale developments in the Borough.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				21	No. There is currently no national policy requirement for the provision of EVCPs as part of new development. The Council makes reference to potential for a new Building Regulations which could see the introduction of proposals for the installation of chargepoints. The proposal to introduce the new building regulations has not been taken forward and therefore remains a policy aspiration. Nonetheless, if and when the new regulations do come forward, there would not be a need of a local plan policy in any case as this would duplicate the new requirement.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				23	The emerging legislation set out in the Environment Bill clearly states that the biodiversity value percentage attributed to development is '10%', and not 'at least 10%' as suggested by the Council. The Council has therefore mis-interpreted the intentions in the draft Bill. No reference to the potential use of biodiversity credits as a means to secure the 10% BNG as part of new development proposals.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				24	No. Design codes and other specifications are not legally required to be included in local plans or supplementary planning documents, and that applicants are free to promote their own design guidance and codes as part of the planning application process.	This comment has been noted and will be considered at the next stage of the Borough Plan review.

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70	Mr	CA-F	RPS on behalf of Barratt Developments, Redrow Homes, Taylor Wimpey and William Davis Homes known as the South Warwickshire Developers Forum 'SWDF'	N/A	<p>The principal interests lie in the Stratford on Avon/Warwick area. There are however relevant cross boundary matters introduced in this emerging Plan that are relevant for the SWDF to comment on.</p> <p>The purpose of this response is to respond directly to matters of strategy concerning the emerging housing requirement for the wider Coventry and Warwickshire Housing Market Area ("C&amp;W HMA") and as such is not concerned with matters such as the strategy for distribution or specific allocations.</p> <p>From 2018, the Government has required that Authorities define their Local Housing Need ("LHN") using the 'Standard Method'. This process presents a much more streamlined and clearer way of calculating need, which relies on uplifts to the 2014 Sub-National Household Projections, to account for affordability pressures and, in the context of the 20 largest cities, an urban uplift.</p> <p>The uplift represents a new last step in the method, applying a 35% uplift to each of the 20 largest cities or conurbations in the Country. The motivation behind this is clear – to boost significantly levels of housing in the largest and most sustainable centres.</p> <p>On the matter of Coventry, the Council has indicated that it will be withdrawing from the arrangement noted. above, following the publication of the May 2021 document titled 'Review of Population Estimates and Projections' from the Office of Statistics Regulation ("OSR"). The OSR report took a particular interest in the accuracy of past population projections (which themselves inform the household projections) and point to a potential discrepancy in the way the student population has been accounted for. It is worth noting that the findings of the OSR are not conclusive and point towards further work to be undertaken. The Council has indicated that this will be included within the future Housing and Economic Needs Assessment ("HEDNA"), though have rescinded from the agreed position in the MoU in the meantime. This, RPS considers, is short sighted move given the fact that no detailed findings on Coventry's projections have been published.</p> <p>To meet the urban uplift, the PPG advises that this should be met within the administrative boundary unless this conflicts with wider national policy, and it is advised that this should look to brownfield and other under-utilised land. Although the position may change, RPS cannot help but look to the position back at the 2017 Plan, where a chronic shortage of</p>	Comments noted and will be considered at the next stage of the Borough Plan review. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet housing need. This may or may not, depending on the Council's updated evidence base, consider the unmet need for settlements within the wider West Midlands Conurbation.

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					<p>housing land was identified. It would appear that history will repeat in this regard, and the Council will be forced to ask its neighbours to assist in meeting their housing need. If this does indeed turn to the requirement for significant extensions or new settlements, related close to Coventry, it is likely that a 15-year plan period is not going to be sufficient in order to allow adequate timeframes for delivery.</p> <p>The 2017 Birmingham Local Plan was adopted with a considerable shortfall, 37,900 dwellings in fact. One of the main reasons this was considered acceptable and found sound by the Inspector was that there was a commitment in the plan to ensure that the shortfall was met by the adjoining authorities through their own plans. The deadline for this to be achieved was in January 2020, a date which has long passed without any real progress in resolving the matter.</p> <p>North Warwickshire has become one of only two Authorities with a sound plan that includes a contingent of growth to meet Birmingham's unmet need. The Council has committed to 10% of Birmingham's unmet need, equating to 3,790 dwellings. In terms of Birmingham now, the City's need is likely to increase further. As part of the 2021 LHN calculation, the City would need to deliver 4,829dpa, an increase from the figure of 3,577dpa in the 2017 Local Plan. Like Coventry, Birmingham is regarded as one of the top 20 urban centres in the Country and is subject to a 35% uplift.</p> <p>Whilst perhaps less spatially related to C&amp;W than Birmingham, the position with the Black Country is similarly not something that the C&amp;W Authorities can ignore.</p> <p>RPS is concerned that Nuneaton and Bedworth are taking a retroactive step in the withdrawal from the MoU with C&amp;W Authorities. Whilst we do not know what will take the place of the Duty to Cooperate, we can be assured that we will not be left with a void, and there will be a continued need to engage with neighbouring areas and come to a collaborative view on how the need will be met locally.</p>	
71	Dr	AS		1	No. In this case, the borough plan is being enacted currently, and many of the elements of the plan that people will respond to are already being enacted. Extra housing and the problems being highlighted by residents (transport infrastructure, wildlife damage etc) will already be in development.	Noted.
				2	Yes. The need for an increase in the size of the Borough are overstated and the demand for 14,000 houses against the current (2011 census) of 52,711. That's an increase of 26% in	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.



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					housing and slightly less in population, versus the 2001-2011 increase of 7.6% housing and a 13% expectation of population increase 2011-2037 (Warwickshire Observatory). There are already concerns about the inadequate population assessments made by the Office of National Statistics – the additional numbers of students expected to take up residence in the borough are strongly overstated as agreed by the Office for Statistics Regulation (OSR). The average regional growth is expected to be 14% between 2011 and 2031. The housing strategy states that more young people are staying with parents and hopes to provide cheap housing to allow independent living. Should cheaper housing be developed (not bourne out by the type of housing development seen in borough developments) there is more likely to be an influx of people outside of the borough, including commuters from conurbations. In addition, the Baby Boomer generation (born 1946–1964), representing a major population section, will be much smaller by the end of the plan, leaving a large stock of existing housing for reuse.	
				3	The assessment of green spaces in the Bedworth area is very poor and only recognises a proportion of the green spaces and ignores the smaller areas that provide green refuges for wildlife and community amenities. This makes areas such as the Elizabeth Centre and Johnson road recreation area prone to have housing development without adequate protection of existing wildlife and green space.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning green spaces in and around Bedworth are noted.
				4	Possibly options 1 and 2. Current A5 housing development adds no adequate transport infrastructure for people to cross the Nuneaton railway line, meaning that delays and pollution will exacerbate the existing Weddington to town centre traffic problems. I also disagree with taking up greenbelt land for this purpose.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				5	Employment areas should be set out where employers wish to locate, with adequate thinking on lowering environmental damage and provision of low carbon transport infrastructure. For example, the Giga factory in Coventry could be a major local employer. Town centres are becoming empty of shops due to on-line purchasing. As much employment starts to have a strong on-line element, surely NBBC needs to creatively adjust its straight-line projection plans. The Netherlands ensures that employment locations are based along and at the ends of passenger travel routes – we should take such existing policy measures from other crowded countries into account.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				6	Option 4.	Noted.
				7	Option 1.	Noted.
				8	A.	Noted.

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				9	Please consider employment in towns first, mainly where the employment does not entail excessive noise or pollution. The town centres should be thought of increasingly as areas of balanced living, employment and leisure space. Linked employment and housing would be acceptable to reduce the waste in commuting – eg hospitals and linked housing. Similarly with industrial estates.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				10	Yes. There is a lack of traffic infrastructure to make many of these areas sustainable, and the loss of green space makes the current plan seem like a recipe for urban sprawl without regard to the character of the towns, their infrastructure to support, appropriate employment and preserving green spaces.	Noted. It is acknowledged that transport and other key infrastructure will be needed, this will be incorporated into the Plan where appropriate.
				11	Option 2 - small scale, sustainable urban extensions focused on key transport infrastructure (e.g. the M6, A roads, railway stations, cycle routes etc).	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				13	Agree with Option 1, but this must be done bearing conservation science in mind, and be strictly rewilded with independent oversight. No building standards beyond building regulations exist for the necessary movement to zero/low carbon, and housing plans should be delayed until a view of future standards is available and can be set. Please note that 'trees' alone are not the answer on CO2 take-up and are an oversimplistic solution. The opportunity must be taken to combine tree additions with rewilding and green corridors which are missing in parts of the borough.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				14	Rewilding to improve wildlife habitats is acceptable, orchards are not specifically expected unless these can be part of a commercial or sustainable venture.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				15	The town as an ecosystem – please see detailed guidelines for 'new urbanism', including the '5 minute walk' concept, varied housing, greenspace in urban areas. This is not currently incorporated into NBBC housing schemes, and developers are known to bypass strategic concepts and produce the usual housing estates.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				16	NO – targets must be set, but more comprehensive and in consultation with Warwickshire Wildlife Trust.	Noted.
				17	Set out that use class E and C3 (residential) uses are acceptable.	Noted.
				19	Option B.	Noted.
				20	Yes. Nuneaton and Bedworth are blighted by traffic infrastructure and congestion problems. Fixing new developments along existing walking, cycling or public transport routes (including new schemes) must be prioritised.	Noted. The Borough Plan review seeks to ensure that more sustainable modes of travel are accessible and development is located in the appropriate places to reduce the need to travel.
				21	3 phase charging to be made easy and inexpensive to implement as required by houses by having infrastructure in place. It is not necessary to have large numbers of charging	Noted.

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					points initially, but to have relatively inexpensive options to install in future.	
				22	No.	Noted.
				23	Agree with at least 10% biodiversity gain in the borough, as in my answers above.	Noted.
				24	Yes, but they should carry weight and not be discretionary once a development has started.	Noted.
				25	No. There are too few designated green spaces and, critically, the building of social structures to address low educational, health and poverty have not been addressed as an item upon which housing has an integral impact. The NBBC plan considers mostly houses and not communities and urgently needs to recognise address its very poor record in this area.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				26	The Borough Plan Review will report in 2023. This is too late to review and act on plots of land in the Borough Plan that will be potentially sold and built on prior to the review. There is one case in point that is raised here and must be reviewed and acted on to remove it from the Borough Plan before it is lost. Town Plan NUN365 is a non-strategic part of the plan. This is touched on in the Borough Plan, but the individual case has not been properly considered before decision. The material and social consequences of the plan have not considered, and once sold cannot be remedied. Town plan NUN356 aims to sell for housing the Johnson Road Bedworth Elizabeth Centre area that holds over 50 cars at peak times often bringing up to a 100 children a day, seven days a week for football training and matches at the leased and reinstated Johnson Road recreation ground. In addition there is a wildlife habitat and basketball court that will disappear if housing goes ahead. There is virtually no non-residential parking on Johnson Road or the Tewkesbury Drive estate, a cul-de-sac, and current plans to provide only a replacement 18 places in an unsafe and unsuitable position, will cause severe traffic problems, endanger child safety, and put in doubt the future of Bedworth Eagles JFC football charity. This plan has taken no account of the loss of a community amenity and the resulting loss of plans for further development of a joint JFC and scouts/community clubhouse on part of the site. This is seen by the charity and residents as a major loss in this relatively deprived area of the town, and will lead to loss of amenity for the community in general and specifically welfare for the children in the area. The pitch and recreation area at Johnson Road is currently operating well because there are sufficient parking spaces for volunteers and participants. An expansion of the Bedworth Leisure Centre would not provide this benefit, there is no community improvement benefit other than providing amenity.	Noted. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed. This includes NUN365.

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				27	<p>I disagree that the Borough Plan fulfils its vision, particularly the Borough will see improved job prospects and safe and healthy communities. The plan merely provides amenities and has not taken into account the support of community welfare activity. This is seen in non-strategic plan NUN365, where the junior football club, and in future a scouting group and community activities. This will certainly damage life and health prospects in the Bedworth area.</p> <p>Objectives 5, 6 and 7 are not met through NUN365 and other plans due to the lack of consideration of material attributes including the reduction of open space, degradation of road safety and traffic conditions, also not considering the functioning of communities and supporting the structures that positively socialise children into becoming capable and well-performing citizens.</p> <p>I have strong doubts that the Borough Plan has taken the health and welfare of communities or the traffic infrastructure into account with NUN365. As this is the case, there are likely many other aspects of the Borough Plan that are damaging to the community.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				28	<p>The Sustainability Appraisal is difficult to find on the website and very inaccessible for the layman due to its length and complicated nature. The use of Pugh's Concept Selection (its SA tables) is not sufficiently developed by the authors (I'm qualified in this area), and is unable to sensibly evaluate many of the important criteria. There are no alternative concepts discussed here, and are presumed unreasonable due to the inability to meet the set criteria, which are 1. Amount and distribution of growth, 2. Strategic site options for housing; 3.Strategic site options for employment; and 4. Alternative Policy options. There is only effectively one plan being assessed at a high level, without taking into account community, crime and health/ welfare matters.</p> <p>The assessment overall therefore is high level and flawed when it comes to improving communities. I would propose that the plan has had insufficient study and development, and that the current Review process mechanism, because its broad scope and lack of accessibility to the public, needs to be improved. The sustainability assessment takes no account of the non-strategic plans such as NUN365 and its impact. This should be the subject of a review by local elected and unelected delegated people.</p>	Comments re the soundness of the Sustainability Appraisal will be considered and addressed as part of the development of the Borough Plan review and a reassessed evidence base.
72		SS		1	Yes. Any longer becomes sheer guesswork.	Noted.
				3	Numbers of people requiring housing over the next few years, as provided by the ONS, now found to be inaccurate by its own review body. This needs to be addressed immediately, as housing without accompanying infrastructure is being thrown up all around the borough.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.

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				13	Yes, there should be planting on large scale developments, whilst also recognising that tree planting is not the be all and end all of biodiversity. Other types of planting – scrub, meadow etc. are just as relevant, especially when planned to allow green corridors for wildlife through urban areas.	Noted.
				20	Yes. There should be more 'complete' cycle ways – i.e. ones that don't suddenly stop and expect cyclists to navigate heavy traffic, or major junctions. They should also take into account other potential single person modes of transport – electric bikes and scooters for example, and more thought should be given to the increasing number of electric 'disability' scooters being used even by people who are not disabled, as a cheap and easy way of getting into the local town.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				21	Yes. In times of wet and cold weather, most people will revert to using their electric car instead of other individual modes of transport. Families will have to use a car to travel around together. Public transport costs are prohibitive for family travel.	Noted.
				23	10% should be the minimum biodiversity gain, and should be increased on a site-by-site basis to allow green corridors across built up areas, ideally linked to nearby public footpaths, to allow for a free flow of small wild animals and insects etc.	Noted.
				24	Not qualified to say – but there also needs to be some sort of quality code for the new build estates, as well as design requirements. Some of these estates, often built by nationally known building companies, can only be described as shoddy, and there seems to be no check on whether they actually meet national build standards or environmental requirements. Why are there no local post purchase surveys of how much snagging is identified on different sites? Builders whose build quality necessitates weeks, or even months, of remedial work on their sold houses should not be allowed to build until they can prove their work practices have been revised to ensure high quality builds. National firms have no local skin in the game, and therefore have no local pride in their work. They need better supervision or checking.	Noted. Construction/snagging issues are covered by separate legislation under Building Regulations and, where appropriate, the NHBC guarantee.
				25	No. One outstanding omission is around infrastructure. Hundreds of houses are being built in the north of Nuneaton, for example, when traffic flow towards Coventry already causes gridlock across Nuneaton on a daily basis. To suggest that they could use the A5 is a joke – the A5 is overloaded in the same way, and slowing down with the extra traffic, generated by these new houses, attempting to join the flow. Surely planning permission could have been granted subject to the infrastructure being put in place first? That includes surgeries, schools, local convenience stores, etc. Local rules do state that new developments should take	The Planning System is only able to consider the implications of future development and ensure that highways can appropriately deal with predicted traffic, relying on the highways authority (WCC) for this information and an updated evidence base in relation to transport. Any infrastructure requirements will be addressed as part of the plan making process before any new development is proposed.

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					into account local amenities and transport structure before development is allowed.	
73	Mr	MD	Savills on behalf of FCC Environment	1	<p>We consider that the proposed plan period is acceptable as it meets the minimum 15 year period required by paragraph 22 of the National Planning Policy Framework (2021) (NPPF).</p> <p>All are sites are of a strategic scale that Inspectors have accepted will continue to be developed outside of the plan period. The Council should look to accommodate this level of flexibility within plan time periods taking account of the revised paragraph 22 of the NPPF.</p>	Noted.
				2	<p>We agree that the existing evidence base needs to be updated or replaced. We have reviewed the date of publication of evidence base documents and found that for the most part they are produced in 2016 or before. Some of the evidence base is over 15 years old, such as a Landscape Character Assessment from 2004.</p> <p>The Council should publish a list of evidence base they are producing and make it clear to stakeholders when this will be published and invite comments on its publication. This will ensure that the Plan is justified as per the tests described in paragraph 35 of the NPPF.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				3	<p>Please see response to question 2. A full scale review of evidence base is required to ensure it is up to date and reflective of the existing adopted plan. In line with Planning Practice Guidance, proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies when undertaking a review. This should be a key consideration as we understand NBBC propose to review selected policies.</p>	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				4	<p>From the options proposed, we consider that option 1 is the best approach of the 3 proposed. We are supportive of its emphasis of no focus on a particular area of the Borough at this stage. However we consider that it is too premature to determine a suitable option to pursue for employment development due to the lack of up to date evidence. A fourth option based on the outcome of up to date evidence base should be pursued.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				5	<p>The focus for employment development should be based on updated evidence base. As discussed in answer to question 2 &amp; 3, the evidence base is out of date. Employment evidence base needs to be updated to ensure that it is reflective of the current demand for employment land in the Borough and surrounding area. Key evidence base such as the Employment Land Study (2016) requires updating.</p> <p>A fourth option based on the outcome of up to date evidence base should be pursued. Results of an updated Employment Land Study and Economic Development Needs</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review. The options selected for future employment sites are based on their proximity to the existing strategic highway network within the Borough or locations adjacent to established employment sites. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review, this includes evidence regarding provision for employment development.

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					<p>Assessment should be considered in determining the location and scale of employment for the Borough.</p> <p>The Council should provide evidence as to why only locations in close proximity to the A5 or junction 3 of M6 are being proposed as options. There is a need to consider what businesses' requirements for employment land are before coming to those conclusions.</p> <p>A key piece of evidence that should inform the Borough Plan review is the West Midlands Industrial Strategy (2019). Coventry and Warwickshire is highlighted as an area which lacks incubation space and space that can support agile and mobile economies. However it is identified that across the region, there is a significant gap in good quality employment land.</p> <p>The West Midlands Strategic Employment Study (2019) was commissioned by three midlands Local Enterprise partnerships, including Coventry and Warwickshire. The report focuses on strategic employment sites, which it defines as being 25ha or more in size. The report highlights market identified sites and motorway junctions which are considered to be suitable for development nearby. Their methodology for the selection of certain junctions over others is not clear.</p>	
				7	Of the options proposed we favour option 3 as a suitable strategy for the location of residential uses. Please see response to question 9 for an explanation of our proposed amendments to this approach and justification for our proposed approach.	Noted.
				8	<p>We request clarification from the Council of why a different spatial strategy is proposed for residential and employment sites. It is unclear why the options proposed for employment exclude reference to use of suitable brownfield sites. Such land should be prioritised before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, as per paragraph 141 of the NPPF.</p> <p>Of the options proposed we favour option C. As a starting point this option reviews all land equally, taking account of the most sustainable locations. This approach is supported by paragraph 142 of the NPPF which states that the need to promote sustainable development should be taken into account when reviewing Green Belt Boundaries.</p>	<p>This comment has been noted and will be considered at the next stage of the Borough Plan review.</p> <p>The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.</p>
				9	We disagree with the sequential approach proposed in table 2 of the consultation document. The sequential approach should be amended to read as follows: Allocated sites / Existing Urban Areas / Countryside / Green Belt	Noted. A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development

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					<p>There is a need to demonstrate exceptional circumstances for development in the Green Belt (see NPPF paragraph 140). We consider that a fourth option, similar to option 3 of question 7 and option C of question 8 should be pursued in which the most sustainable locations based on a wide ranging criteria are considered for development.</p> <p>Land at Judkins is one of the largest brownfield sites in the Borough, and is next to a large portion of non-Green Belt countryside.</p>	<p>locations will be suggested in the plan that consider more than Green Belt considerations.</p>
				10	<p>It is important that the review takes into account emerging evidence base. There is a danger that the early review runs ahead of evidence base available, especially in respect of cross boundary cooperation that is required with Coventry. There is an ongoing need for Nuneaton and Bedworth to engage constructively, actively and on an ongoing basis with Coventry and vice versa.</p> <p>The plan is being reviewed against the backdrop of Coventry's standard methodology figure being increased by 35% to 2,325 dwellings per annum. Considering that Coventry's average annualised total was 2,120 dwellings as identified by the 2015 Strategic Housing Market Assessment, Coventry's baseline housing requirement has increased by 205 dwellings per annum. In its currently adopted Local Plan, Coventry was only able to accommodate an average total dwellings of 1,230 dwellings per annum, as acknowledged through a Memorandum of Understanding.</p> <p>Further work is therefore required to establish Coventry's final housing need and how this feeds into NBBCs final requirement. It is not suitable for NBBC to consider its needs only. Their own standard method figure alone is not suitable for NBBC to base their housing requirement on. A recent Inspectors' report issued in respect of the Tonbridge and Malling Local Plan recommended non adoption of the Plan due to lack of evidence that Tonbridge &amp; Malling (T&amp;M) had engaged with neighbouring Sevenoaks Council regarding its housing shortfall.</p> <p>We would therefore suggest that NBBC engage with Coventry City Council and agree a Statement of Common Ground regarding Coventry's unmet housing need.</p> <p>FCC is landowner of residential allocation HSG11. We consider that Table 5 of the Borough Plan Review document should be updated to reflect the fact that the outline application (reference: 035995) was submitted in 2019, although it stalled in 2020, in part due to Covid-19, it is currently in the late stages of determination.</p>	<p>Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet housing need.</p> <p>The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.</p>



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				11	<p>We support option 1, as existing settlement boundaries contain existing allocations. Existing allocations have been tested through a recent Local Plan process, and can deliver housing on sites that have already been agreed to be suitable in principle.</p> <p>Where additional land is required, consideration should be given to the spatial options available. In the first instance non-green belt land should be favoured. However where these sites are not suitable or available, then the release of Green Belt should be considered.</p>	Noted.
				12	<p>Spatial options for development of the Borough are limited due its location within Green belt. Therefore the development of non-Green Belt sites should be reviewed. This requires an update of evidence base to ensure than up to date urban capacity report has been undertaken. Green Belt evidence base also requires updating. Both studies should reflect changing circumstances since its publication.</p>	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				13	<p>Blanket targets are not appropriate for all sites. These can be unduly onerous for some sites and too lenient for others. It is best to determine requirement to provide it on a case by case basis. For example, some sites may have a large number of existing trees and this needs to be considered when requirements for tree planting are set.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				14	<p>We disagree with this requirement for most of the same reasons set out in response to question 13. We question the Council's suggestion of incorporating orchards on all large scale development sites, without a definition of this.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				15	<p>We consider that the NPPF definition of major developments being defined as 10 or more homes is the most appropriate definition. The viability of this policy should be tested based on this criteria.</p>	Noted.
				16	<p>Tree planting targets could be set across the Borough if the Council desires. However it remains the case that detailed matters such as the number of trees required for a site should be determined on a site by site basis, following consultation with the Council at the time of a planning application.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				20	<p>We support the principle of greater emphasis being given to the importance of cycling and walking connections. However it must be considered at a site specific level firstly where these connections can be accommodated and also how they will impact viability. The delivery of such links would need to be included within an updated Infrastructure Delivery Plan.</p>	Noted. Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				21	<p>We invite the Council to provide further details of the type of infrastructure that is referenced.</p> <p>From a practical perspective it would also be useful to be provided with examples of where such technology has been</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.

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					<p>used and can be evidenced as a workable and viable solution.</p> <p>It is not for the planning system to deal with issues covered in the Building Regulations, furthermore it is not for Local Plans to pre-empt what may be or may not be required through future amendments to the building regulations.</p>	
				23	We note that reference is made to requirement for a "net gain" in biodiversity of at least 10% compared with the pre-development baseline. It is not clear whether the Council intend to bring a 10% requirement ahead of the Environment Bill being passed, this is potentially before the Plan's scheduled adoption in 2023.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				24	No, some design codes may suitably be dealt with as SPDs but in some cases the technical information needed at a concept stage may not be sufficiently detailed and therefore it would inappropriate to add weight to the design code without the appropriate evidence base.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				26	We request review of adopted policy NE3. There should be an opportunity to review the status of Local Wildlife Sites (LWSs) as time goes on. They should not be static designations and if new evidence comes to light which challenges the designation then this should be reviewed and considered by the Council. Applicants should be able to.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review. Points concerning the status of Local Wildlife Sites are noted.
				27	<p>Objectives – sets out objectives proposed in order to achieve the vision for the Borough Plan. This includes objective 4 which states that: "To provide a steady and adequate level of suitable housing for all." This appears to have been based on objective 4 of the currently adopted plan which states: "To provide the size, type and mix of housing that meets the specific needs of the Borough." We request clarification of why the wording has been changed to aim for a "steady" and "adequate" level of housing. This is not aspirational for the Borough. The Council shouldn't be aiming for "adequate" levels of housing, to ensure choice and flexibility NBBC needs to be aspirational in its planning for housing.</p> <p>We note that a new objective has been added as objective 9. We agree that the Council's objective should link to the Government's goal of net zero emissions. However the way in which this is done is something that needs to be set out specifically on a site by site basis.</p> <p>Para 3.2: Reference is made to rail connections that serve the Borough. Reference should be made to services to Crewe, Bermuda Park and Kenilworth which are not currently listed.</p>	All points noted and will be considered at the next stage of the Borough Plan review. Rail destinations/connections within the Borough will be referenced.
74	Mr	RB	Sport England	2	Sport England supports the authority's review of its Local Plan and welcome the updating of the relevant evidence base documents in particular the Playing Pitch Strategy to	Noted.

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					ensure playing pitches and sports facilities are planned appropriately to meet the demand generated from growth proposed as part of the Plan.	
				6	Sport England are supportive of an approach which would enable non employment uses on existing industrial estates. A flexible approach could help facilitate such uses as gyms and other indoor sports provisions such as gymnastics and climbing walls which require certain heights that are not normally attainable within town centre units. The provision of such sporting activities will enhance the options to undertake physical activities, improving the wellbeing of residents within the authority and also provide employment opportunities, which could be greater in numbers than those within the traditional employment use classes found on industrial estates.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				20	Sport England would support a policy which provides a greater importance of cycling and walking connections/infrastructure. Active travel should be prioritised over other modes of transport through safe, integrated walking and cycling routes, as this provides the greatest opportunity for people to be physically active in their day to day lives. Reference to Sport England's Active Design Guidance should be made within the revised policy with walkable communities and connected walking & cycling routes being two of ten principles to promote environments that offer individuals and communities the greatest potential to lead active and healthy lifestyles. Such an approach would help create an environment which could assist in addressing health issues within the authority.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
75	Mr	CS		1	The current plan only takes us up to 2032 which would not be deliverable in the time frame. A longer time frame would also allow more time before the consideration of the next plan.	Noted. The Borough Plan review seeks to extend the Plan period to 2038.
				2	Much of the evidence base is now 10 or more years old with regards to transport, environmental air quality, Office for National Statistics (ONS) figures regarding growth which will have all changed and need to be reviewed.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				3	ONS data on which Coventry growth has been calculated requires updating. These have led to NBBC accepting 4000 houses from Coventry. The Memorandum of Understanding should be reviewed and the Coventry 4000 houses rejected.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				7	Option 1 – Land should not be taken out of the green belt when brownfield sites are available. Destruction of green belt will lead to merging of areas such as Bulkington merging and becoming a suburb of Bedworth and or Nuneaton. This will lead to a distinct loss of character and community diversity.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				9	The outskirts of towns and town centre regeneration offer the best opportunities for housing and in turn will attract infrastructure and amenities. Closeness to the core is	Noted.

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					preferential to the periphery which in the 2010 review was discounted due to the lack of infrastructure and distance from employment sites.	
				10	Yes, there should be a review. The current plan is based on over inflated ONS housing projections linked to Coventry. Sites were not selected using a consistent methodology, rather any land that was for sale was offered up and existing brownfield land was ignored. Developments are far too large and unsympathetic particularly to smaller villages such as Bulkington, Hawkesbury, Woodlands and Ash Green. Infrastructure is under developed and we have not considered the impact of neighbouring authorities who are also building close to our boundaries and the implication of this on our transport network.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Option 3 (Locating new residential development in non-green belt land) Destruction of green belt will lead to communities such as Bulkington losing their identity as they are swallowed up by Nuneaton. Destruction of grade 2 and grade 3 farmland. Green belt provides land that is used for recreational purposes and is important for the well-being of residents.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				13	Tree planting would be welcomed though it should be carefully managed and a strategic plan would need to be produced by the Borough council. This needs to show how they would manage the spaces and stop them from becoming hot spots for anti-social behaviour or for fly tipping.	Noted.
				14	A clear strategy is required, if left unmanaged this can become an area that attracts anti-social behaviour and fly tipping and could become an eye-sore and a burden to local residents.	Noted.
				15	Large scale development is a development which will have clear and obvious disruptive effects on the local community. This is above and beyond what it can absorb or naturally mitigate against.	Noted.
				23	The Borough plan is currently destroying a substantial proportion of our biodiversity by building on green belt land. Offering 10% of this back is hardly fair compensation, especially when poor site selection has been used without a proper methodology. Further environment studies should be carried out by NBBC in a sympathetic manner unlike the studies carried out by developers which were biased towards their own development goals.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
76	Mrs	CS		1	The current plan only takes us up to 2032 which would not be deliverable in the time frame. A longer time frame would also allow more time before the consideration of the next plan.	Noted. The Borough Plan review seeks to extend the Plan period to 2038.
				2	Much of the evidence base is now 10 or more years old with regards to transport, environmental air quality, Office for	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.

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					National Statistics (ONS) figures regarding growth which will have all changed and need to be reviewed.	
				3	ONS data on which Coventry growth has been calculated requires updating. These have led to NBBC accepting 4000 houses from Coventry. The Memorandum of Understanding should be reviewed and the Coventry 4000 houses rejected.	Noted.. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				7	Option 1 – Land should not be taken out of the green belt when brownfield sites are available. Destruction of green belt will lead to merging of areas such as Bulkington merging and becoming a suburb of Bedworth and or Nuneaton. This will lead to a distinct loss of character and community diversity.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				9	The outskirts of towns and town centre regeneration offer the best opportunities for housing and in turn will attract infrastructure and amenities. Closeness to the core is preferential to the periphery which in the 2010 review was discounted due to the lack of infrastructure and distance from employment sites.	Noted.
				10	Yes, there should be a review. The current plan is based on over inflated ONS housing projections linked to Coventry. Sites were not selected using a consistent methodology, rather any land that was for sale was offered up and existing brownfield land was ignored. Developments are far too large and unsympathetic particularly to smaller villages such as Bulkington, Hawkesbury, Woodlands and Ash Green. Infrastructure is under developed and we have not considered the impact of neighbouring authorities who are also building close to our boundaries and the implication of this on our transport network.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Option 3 (Locating new residential development in non-green belt land) Destruction of green belt will lead to communities such as Bulkington losing their identity as they are swallowed up by Nuneaton. Destruction of grade 2 and grade 3 farmland. Green belt provides land that is used for recreational purposes and is important for the well-being of residents.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.
				13	Tree planting would be welcomed though it should be carefully managed and a strategic plan would need to be produced by the Borough council. This needs to show how they would manage the spaces and stop them from becoming hot spots for anti-social behaviour or for fly tipping.	Noted.
				14	A clear strategy is required, if left unmanaged this can become an area that attracts anti-social behaviour and fly tipping and could become an eye-sore and a burden to local residents.	Noted.
				15	Large scale development is a development which will have clear and obvious disruptive effects on the local community. This is above and beyond what it can absorb or naturally mitigate against.	Noted.

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				23	The Borough plan is currently destroying a substantial proportion of our biodiversity by building on green belt land. Offering 10% of this back is hardly fair compensation, especially when poor site selection has been used without a proper methodology. Further environment studies should be carried out by NBBC in a sympathetic manner unlike the studies carried out by developers which were biased towards their own development goals.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
77	Mr	PS		1	The current plan only takes us up to 2032 which would not be deliverable in the time frame. A longer time frame would also allow more time before the consideration of the next plan.	Noted. The Borough Plan review seeks to extend the Plan period to 2038.
				2	Much of the evidence base is now 10 or more years old with regards to transport, environmental air quality, Office for National Statistics (ONS) figures regarding growth which will have all changed and need to be reviewed.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				3	ONS data on which Coventry growth has been calculated requires updating. These have led to NBBC accepting 4000 houses from Coventry. The Memorandum of Understanding should be reviewed and the Coventry 4000 houses rejected.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				7	Option 1 – Land should not be taken out of the green belt when brownfield sites are available. Destruction of green belt will lead to merging of areas such as Bulkington merging and becoming a suburb of Bedworth and or Nuneaton. This will lead to a distinct loss of character and community diversity.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				9	The outskirts of towns and town centre regeneration offer the best opportunities for housing and in turn will attract infrastructure and amenities. Closeness to the core is preferential to the periphery which in the 2010 review was discounted due to the lack of infrastructure and distance from employment sites.	Noted.
				10	Yes, there should be a review. The current plan is based on over inflated ONS housing projections linked to Coventry. Sites were not selected using a consistent methodology, rather any land that was for sale was offered up and existing brownfield land was ignored. Developments are far too large and unsympathetic particularly to smaller villages such as Bulkington, Hawkesbury, Woodlands and Ash Green. Infrastructure is under developed and we have not considered the impact of neighbouring authorities who are also building close to our boundaries and the implication of this on our transport network.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Option 3 (Locating new residential development in non-green belt land) Destruction of green belt will lead to communities such as Bulkington losing their identity as they are swallowed up by Nuneaton. Destruction of grade 2 and grade 3 farmland. Green belt provides land that is used for recreational purposes and is important for the well-being of residents.	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
				13	Tree planting would be welcomed though it should be carefully managed and a strategic plan would need to be produced by the Borough council. This needs to show how they would manage the spaces and stop them from becoming hot spots for anti-social behaviour or for fly tipping.	Noted.
				14	A clear strategy is required, if left unmanaged this can become an area that attracts anti-social behaviour and fly tipping and could become an eye-sore and a burden to local residents.	Noted.
				15	Large scale development is a development which will have clear and obvious disruptive effects on the local community. This is above and beyond what it can absorb or naturally mitigate against.	Noted.
				23	The Borough plan is currently destroying a substantial proportion of our biodiversity by building on green belt land. Offering 10% of this back is hardly fair compensation, especially when poor site selection has been used without a proper methodology. Further environment studies should be carried out by NBBC in a sympathetic manner unlike the studies carried out by developers which were biased towards their own development goals.	Noted. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
78	Mr	JC	Stratford-on-Avon District Council	NA	<p>Nuneaton &amp; Bedworth Borough Council (NBBC) adopted its Borough (Local) Plan on 11<sup>th</sup> June 2019 and committed itself to an early review.</p> <p>As with all Local Plans across the Coventry and Warwickshire housing market area, the current NBBC Borough Plan is predicated on an agreed Memorandum of Understanding (MOU) in respect of the redistribution of Coventry's unmet housing needs.</p> <p>SDC expresses its extreme disappointment at the decision by NBBC to seek to withdraw from the signed Memorandum of Understanding.</p> <p>SDC is sympathetic with the concerns raised by the Issues and Options consultation document but respectfully urges NBBC to acknowledge the need to potentially address wider than local housing need and to realistically reflect this issue within the Borough Plan Review and in its relationships with partners across the sub-region.</p> <p>In any event, the standard method for calculating housing need is not considered significant to warrant withdrawal from the beneficial partnership and MOU, which would itself inevitably need revising as the other local authorities progress through their various local plan reviews and movements towards more joint planning approaches and documents, such as currently being proposed by SDC and WDC for South Warwickshire.</p>	Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet housing need.

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					Whilst SDC considers the withdrawal to be a political decision, it notes that given the current NBBC Borough Plan is not being withdrawn, there is no practical effect of this withdrawal. As with the other Local Plans across Coventry and Warwickshire, allocated sites in Nuneaton and Bedworth are coming forward for development and as such, housing needs continue to be met across the sub-region.	
79		WT		1	No. Delay it for as long as possible to allow for more appropriate sites for building to become available.	Noted. The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				4	Option 1. For instance, there is no point in building a new industrial estate on Bowling Green Lane when there are empty units/spare capacity at both Bermuda Park and Bayton Road.	Noted.
				5	Look at more brownfield sites that would not have such an impact on current housing and infrastructure.	Noted.
				6	More information needed before I can make a judgement. Why isn't this information provided in an easily accessible manner for residents? Saying it is available on the website is not acceptable. We shouldn't have to go searching for this. The whole planning process is designed to deter ordinary residents from engaging with it.	Noted. The Council have undertaken comprehensive consultation for the document including exhibitions throughout the Borough.
				7	Protect the Green Belt and countryside at all costs. Lockdown showed how valuable this space is to our physical and mental well-being.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				8	Make better use of brownfield sites and underused urban areas. Climate change needs to be prioritised. We should not be building new housing or employment areas on any Green Belt or countryside spaces.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				9	See Q7 & 8.	Noted.
				10	Yes. The world has changed post-Covid and post-Brexit. Who says we need so much more housing and the employment areas to go with them? We should be doing everything within our power to protect our existing green spaces.	The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.
				11	Underused urban areas. Town centres have become like ghost towns. Transform some of these spaces into housing and the result will be a demand for more retail and entertainment to go with them.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				12	See Q11.	Noted.
				13	Why chop down old, established trees and hedgerows for the sake of new developments as is the case with the	Noted.



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					current Borough Plan? The countryside needs protecting for future generations.	
				14	Avoid large scale developments in the first place, then there will be no need for orchards!	Noted.
				15	Keep developments small so there is limited impact on existing spaces.	Noted.
				16	We should be planting trees anyway to help slow down climate change but not for meeting some artificial quota.	Noted.
				17	Do not understand what the 'classes' are. Where is this information? Why is this process so difficult for ordinary residents to engage with? I attended one of the 'consultations' which had a few display boards with very limited information on them.	Noted. The Council have undertaken comprehensive consultation for the document including exhibitions throughout the Borough. The Use Classes Order is available to review on the national Planning Portal website.
				18	See answer to Q17.	Noted.
				20	Again, haven't been provided with enough information to make an informed response. However, the roads in Nuneaton and Bedworth are already struggling to cope with the amount of traffic from the current housing and industrial areas. Any future development must take this into account. This is also the case for schools, hospitals, doctors, dentists etc. When I have raised this issue in the past, I have been told that, 'new housing and employment areas come first and the infrastructure will follow.' This is unfair to residents of the borough who suffer in the meantime.	Noted. Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				21	See Q20.	Noted.
				22	See Q20.	Noted.
				23	We should be protecting the environment as a priority.	Noted.
				24	No idea! This is a nonsensical question for an ordinary resident.	Noted.
				25	Again, no idea.	Noted.
				26	The Borough Plan review/consultation has been very poor. Most residents had no idea that a review was even taking place. Putting information on social media is not fair to older residents who do not engage with that as a form of communication. Being told that the information was also advertised in local libraries is inadequate given that we have all been trying to stay at home as much as possible and avoiding public spaces due to the pandemic!	The Council undertook comprehensive consultation for the document including exhibitions throughout the Borough and has shared information on the consultation process via various media sources.
80		NA	Tetlow King on behalf of West Midlands Housing Association Planning Consortium		The HAPC supports the vision of the draft plan and would encourage the council to prepare policies which are in the best interest of the needs of all residents. As stakeholders in the community the HAPC is pleased to be involved in the preparation of the plan and for having the opportunity to share their views.	Noted.
				7	The HAPC support the option which will allow the greatest provision of affordable homes, in the most sustainable locations. Whilst the re-use of previously developed land in	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national

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					<p>urban areas is preferable, as set out in options 1 and 2, there are concerns that this could undermine the delivery of affordable housing as there are often viability implications for developing brownfield sites and therefore the HAPC would not support this as an option. Moreover NBBC do not have excessive brownfield land in which to develop. We welcome the publication of the HEDNA prior to any final decisions on strategy are made.</p> <p>The HAPC notes that land was previously released from the Green Belt in the current Borough Plan to provide for the employment and housing needs of the borough, the HAPC support this approach and understand the important role released green belt land can offer in ensuring sufficient sites are allocated for housing to maintain a constant supply. It would be preferred if brownfield sites, and non-green belt sites could be developed first. It is however acknowledged that there are limited amounts of non-green belt land outside of urban areas and as such limited infill urban development and development outside of the green belt is not likely to be sufficient in meeting the local housing need.</p>	<p>policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.</p>
				10	<p>The HAPC is wary of the suggestion that sites only allocated in recently adopted plan should already be reassessed for their suitability for development. The allocation sites were fully scrutinised by a Planning Inspector at a local plan examination. It is therefore not surprising, given only two years have passed since the plan was adopted, that some of the strategic allocation sites do not yet have planning permission. They are large strategic sites which will take time to deliver beyond the existing plan period. It is of course prudent to review the existing allocations as part of an overall review of sites in the Borough as a whole but the deletion of allocations could not be justified given the Borough's ever pressing housing needs.</p> <p>It is important to note that 429 dwellings per annum is the minimum housing requirement based on the government's standard method and as the PPG advises this is the starting point in determining the number of homes needed in an area. The standard method does not accommodate changing economic circumstances or other factors that might have on demographic behaviour and therefore the housing requirement needs to be above this. Therefore, the Council needs to undertake a thorough review of housing requirement substantiated by robust evidence and we note that a HEDNA is due.</p> <p>NBBC must continue to meet the unmet needs of Coventry under the duty to cooperate. As the standard method changed in December 2020, Coventry's housing requirement increased from 1,722 dwellings per annum to 2,325. It is inevitable Coventry will need the support of other Warwickshire authorities to help meet its needs.</p>	<p>Comments are noted.</p>

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					As of March 2021, 1,780 households were on the Council's up-to-date Housing Register/Waiting List. Therefore, the HAPC encourages the council to allocate and identify sites for up to 100% affordable housing as part of the Borough Plan review.	
				11	The HAPC's vision would be to see a spatial strategy which enables a sufficient supply of affordable homes. As such, they support the option will provide the highest levels of affordable housing across the authority area. The HAPC encourages the council to allocate and identify sites for up to 100% affordable housing. The HAPC members would welcome the opportunity to provide a range of tenures on the delivery of their sites to address a range of housing needs and a such would welcome the opportunity to work collaboratively with the Council. Once the HEDNA is completed, the HAPC urge the Council to assess this information and use this to inform the most suitable locations for future housing which is likely to include a combination of all three spatial options.	Careful consideration will need to be had to the appropriate housing requirement (including type/size/tenure) to be contained within the Borough Plan Review.
				12	It is vital that the borough plan allocates sufficient homes to deliver its housing requirement and the selection of the sites should be guided by a sustainability appraisal. Residential sites can be evenly distributed across the authority area. Existing Borough Plan Policy H2 requires that developments of over 15 dwellings provide 25% affordable housing. The HAPC support the provision of a 25% affordable housing contribution, however they would like to see the threshold for affordable housing reduced to 10 dwellings subject to viability. The HAPC believe a Local Plan should set a numerical target for affordable housing supply to ensure the Council and developers are working towards the same objectives and the delivery of homes can therefore be monitored. We are concerned that if the Council continues to with the 74% affordable/social rent and 26% intermediate housing that with the 25% First Homes requirement, there will be no scope for delivering shared ownership properties in the Borough.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period. Comments regarding existing Policy H2 are noted.
				23	The HAPC supports a minimum 10% net gain and do not believe this needs to be any higher due to the potential impacts on viability.	Comments noted and will be taken forward for consideration at the next stage of the Plan review.
				26	Within the consultation document no questions have been directly asked about the approach to affordable housing, this a hugely important issue to the Borough. We ask the Council to be wary of the ways in which such policies could impact development viability which may restrict the provision of affordable housing.	Comments noted and will be taken forward for consideration at the next stage of the Plan review.
81		RD	Tetlow King on behalf of	1	The adopted Borough Plan has a Plan period of 2011-2031 and therefore at time of adoption it had only 12 years remaining and not the 15 years required by the NPPF.	Noted that the NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.

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			Terra Strategic		<p>Nevertheless, the Inspector was satisfied with the Plan period as it aligned with other Warwickshire authorities in the same Housing Market Area (HMA) as it relied in the same evidence base.</p> <p>It is positive that NBBC has chosen a forward looking Plan period starting in 2023, instead of starting in 2021 or before, in the context of the adopted Borough Plan still having 10 years left to run it seems an appropriate start date for the Plan period. It is important that when the new Borough Plan is adopted that it has a minimum timeframe of at least 15 years to comply with the NPPF requirements so the proposed Plan period of 2023-2038 may need to be adjusted depending on the date of the Plan's adoption.</p>	
				2	<p>It is imperative that the new evidence base is commissioned, otherwise the Borough Plan review serves no purpose. The most critical evidence for any local plan review, partial or full, is a comprehensive assessment of the housing requirement. The evidence base effectively dictates the Plan period and currently the evidence base only supports the existing Plan period up to 2031.</p> <p>It is important to note that 429 dwellings per annum is the minimum housing requirement based on the Government's standard method and as the PPG advises this is the starting point in determining the number of homes needed in an area. The standard method does not accommodate changing economic circumstances or other factors that might have on demographic behaviour and therefore the housing requirement needs to be above this. Therefore, NBBC needs to undertake a thorough review of housing requirement substantiated by robust evidence. We note a HEDNA is due shortly.</p> <p>NBBC must continue to meet the unmet needs of Coventry under the duty to cooperate. As the standard method changed in December 2020, Coventry's housing requirement increased from 1,722 dwellings per annum to 2,325. It is inevitable Coventry will need the support of other Warwickshire authorities to help meet its needs</p> <p>The Issues and Options consultation should not be seen as an opportunity to disengage with the existing duty to cooperate arrangements with the other Warwickshire authorities, in particular Coventry. Although it was mooted in the White Paper that the duty to cooperate requirements could be abandoned, it was one of a multitude of potential changes to the planning system and the Government has yet to announce which policy changes will be taken forward in the forthcoming Planning Bill.</p>	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				3	<p>The Joint Green Belt Study (LUC 2015) - It is important that this document is updated as part of the review of NBBC's evidence, especially as several of the sites in the study are no longer in Green Belt and have been allocated for housing.</p>	Comments noted.

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					<p>Accordingly, the urbanised context of these sites has changed which has implications for the purpose of Green Belt test.</p> <p>The Landscape Capacity Study (TEP 2017) was an important companion document to the Joint Green Belt Study which assessed the sensitivity of the landscape and its capacity to accommodate change without detrimental effects on its character.</p>	
				7	<p>Nuneaton and Bedworth Borough is heavily constrained by Green Belt. The adopted Borough Plan necessitated the need to release an extensive amount of Green Belt land in order to meet housing and economic needs. Indeed, nine out of 12 of the strategic allocations in the Borough Plan are sites which were formerly located in the Green Belt. The Inspector to the adopted Borough Plan recognised that exceptional circumstances existed to alter the Borough's Green Belt and that its release was necessary to secure the most sustainable pattern of development and it had a role in meeting Coventry's unmet needs.</p> <p>Nuneaton and Bedworth is not a Borough with a multitude of brownfield land available to develop. Therefore, alternative sites, greenfield or Green Belt need to be considered. In fact, non-Green Belt greenfield sites are in short supply, limited to a few locations north of Nuneaton, of which HSG1 forms a significant part and land to the west of Bedworth adjacent to HSG4 Woodlands. This point is acknowledged by NBBC in the Issues and Options paper at paragraph 6.6. Accordingly, option 1 is not a feasible strategy.</p> <p>We note the reference at paragraph 6.5 to windfall sites comprising 22 dwellings per annum. This is a very low figure and will not make much of an impact on fulfilling the housing requirement.</p> <p>Given it was inevitable that Green Belt sites were required to be released to meet the housing needs of the adopted Borough Plan; the release of further Green Belt sites are unavoidable to enable the Borough to meet its future housing needs. In the absence of the HEDNA it is difficult to predict what the land requirements will be, but the standard method of 429 dwellings per annum is a useful minimum starting point for establishing the housing requirement.</p> <p>As with the adopted Borough Plan, the focus needs to be on delivering new homes in the most sustainable locations and therefore the Sustainability Appraisal is a key tool in determining a revised spatial strategy. It is imperative that sites in the most sustainable locations are allocated for development and it is inevitable that some of these sites will be located in the Green Belt, given it restricts the Borough's growth so tightly. This is the same approach that was taken</p>	<p>A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.</p>

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					<p>to the adopted Borough Plan and it was endorsed as a sound spatial strategy by the Borough Plan Inspector.</p> <p>As outlined in our response to question 3, it is important that the Joint Green Belt Study and the Landscape Capacity Study are reviewed and updated. It is noteworthy that our client's land (HSG 12) was one of the lowest scoring sites in the Joint Green Belt Study and one of the few sites which was recommended for removal from the Green Belt (site BE4).</p>	
				10	<p>As the Borough Plan was only adopted two years ago, the existing allocated sites should be up to date and provide a realistic development strategy for the Borough for the coming years. TKP is wary of any suggestion that sites only allocated in the recently adopted Borough Plan should already be reassessed for their suitability for development. The Borough Plan identified 12 strategic sites for development and many of them required Green Belt release. The allocation sites were fully scrutinised by a Planning Inspector at the Borough Plan examination. It is therefore not surprising, that some of the strategic allocation sites do not yet have planning permission. They are large strategic sites which will take time to deliver beyond the existing Plan period. It is of course prudent to review the existing allocations as part of an overall review of sites in the Borough as a whole but the deletion of allocations could not be justified given the Borough's ever pressing housing needs. Terra Strategic is the landowner of the former Hawkesbury Golf Course (HSG12) and was prompt in submitting planning applications for the site. The overriding reason that HSG12 has been able to deliver new homes expeditiously is because the site is in single ownership. Other sites such as HSG1: North of Nuneaton are fragmented in multiple ownership and will take a long time to deliver which may not result in cohesive development. In order to make efficient use of land, Terra Strategic is seeking to maximise the capacity of the site and a development for 500 new has been masterplanned and supports the outline planning application.</p> <p>The provision of the additional 120 dwellings above the baseline minimum allocation of at least 380 dwellings will help NBBC to meet its housing needs, in the current Plan period and beyond. This is particularly important in the context of the unmet housing needs of Coventry and HSG12 is ideally located to accommodate these needs.</p> <p>It seems appropriate that housing allocations sites are reviewed in light of their capacity to delivery new homes (i.e. reviewing densities) but any suggestion that the allocation sites are not deliverable (NPPF definition) seems unwarranted given their recent scrutiny by a Planning</p>	<p>Comments noted. Careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review.</p>

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					Inspector. In relation specifically to policy HSG12, the requirement to include a canal marina should be deleted and the policy should be amended to provide up to 500 dwellings (instead of at least 380 dwellings).	
				11	Listed but no response.	
				12	<p>The three spatial options outlined on page 27, and cited below, do not seem to accord with the three options outlined in question 7 in relation to Green Belt.</p> <p>As outlined in our response to question 7, Nuneaton and Bedworth Borough is heavily constrained by Green Belt. The adopted Borough Plan necessitated the need to release an extensive amount of Green Belt land in order to meet housing and economic needs, valid spatial approach which was endorsed by the Borough Plan Inspector.</p> <p>Furthermore, Nuneaton and Bedworth is not a Borough with a multitude of brownfield land available to develop and therefore, alternative sites, greenfield or green belt need to be considered. Therefore options 1 and 3 are not feasible options. Option 2 may be feasible but only if there is further release of Green Belt land.</p> <p>As we have outlined previously, the focus needs to be on delivering new homes in the most sustainable locations and therefore the Sustainability Appraisal is crucial to determining the revised spatial strategy. It is vital that sites in the most sustainable locations are allocated for development and these may be Green Belt sites. This is the same approach that was taken to the adopted Borough Plan and it was endorsed as a sound spatial strategy by the Inspector.</p>	Comments regarding the focus needing to be on delivering new homes in the most sustainable locations are noted and agreed.
				20	HSG12 is the only mixed used allocation which will deliver a range of community benefits including extensive parkland, play space, pedestrian and cycle links, allotments and orchard, canal side improvements including a new bridge. The site is delivering more than just housing, it is offering open space, amenity and biodiversity improvements that will be of benefit to the wider community's health and wellbeing. The merits of the development scheme need to be recognised by NBBC which supports policies SA1 and HS2.	Support for SA1 and HS2 is noted.
				21	The full planning permission for HSG12 includes the require for electric vehicle charge points. This request was not exceptional and is needed to respond to climate change. Moreover, it has become a positive marketing strategy for new homes targeting environmentally conscious buyers.	Support for EVCP is noted.
				23	NBBC has already been seeking biodiversity net gain on development schemes on the basis of the Warwickshire Biodiversity impact assessment calculator. Albeit the requirement for 10% biodiversity net gain will not become a mandatory requirement until the Environment Bill is enacted potentially later this year.	Comments are noted.

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					<p>If the Council is looking to mandate biodiversity net gain through the Borough Plan Review, guidance must be provided (or signposted) on how to practically achieve a higher net gain in development. This would allow for net gain to be designed into processes at early stages and for any design issues to be detected and resolved without causing delay to development.</p> <p>We accept that 10% net gain is likely to become a mandatory requirement and we do not believe this needs to be any higher due to the potential impacts on viability.</p>	
82		RD	Tetlow King on behalf of Terra Strategic	1	<p>The adopted Borough Plan has a Plan period of 2011-2031 and therefore at time of adoption it had only 12 years remaining and not the 15 years required by the NPPF. Nevertheless, the Inspector was satisfied with the Plan period as it aligned with other Warwickshire authorities in the same Housing Market Area (HMA) as it relied in the same evidence base.</p> <p>It is positive that NBBC has chosen a forward looking Plan period starting in 2023, instead of starting in 2021 or before, in the context of the adopted Borough Plan still having 10 years left to run it seems an appropriate start date for the Plan period. It is important that when the new Borough Plan is adopted that it has a minimum timeframe of at least 15 years to comply with the NPPF requirements so the proposed Plan period of 2023-2038 may need to be adjusted depending on the date of the Plan's adoption.</p>	Noted that the NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				2	<p>It is imperative that the new evidence base is commissioned, otherwise the Borough Plan review serves no purpose. The most critical evidence for any local plan review, partial or full, is a comprehensive assessment of the housing requirement. The evidence base effectively dictates the Plan period and currently the evidence base only supports the existing Plan period up to 2031.</p> <p>It is important to note that 429 dwellings per annum is the minimum housing requirement based on the Government's standard method and as the PPG advises this is the starting point in determining the number of homes needed in an area. The standard method does not accommodate changing economic circumstances or other factors that might have on demographic behaviour and therefore the housing requirement needs to be above this. Therefore, NBBC needs to undertake a thorough review of housing requirement substantiated by robust evidence. We note a HEDNA is due shortly.</p> <p>NBBC must continue to meet the unmet needs of Coventry under the duty to cooperate. As the standard method changed in December 2020, Coventry's housing requirement increased from 1,722 dwellings per annum to 2,325. It is inevitable Coventry will need the support of other Warwickshire authorities to help meet its needs</p>	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.



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					The Issues and Options consultation should not be seen as an opportunity to disengage with the existing duty to cooperate arrangements with the other Warwickshire authorities, in particular Coventry. Although it was mooted in the White Paper that the duty to cooperate requirements could be abandoned, it was one of a multitude of potential changes to the planning system and the Government has yet to announce which policy changes will be taken forward in the forthcoming Planning Bill.	
				3	<p>The Joint Green Belt Study (LUC 2015) - It is important that this document is updated as part of the review of NBBC's evidence, especially as several of the sites in the study are no longer in Green Belt and have been allocated for housing. Accordingly, the urbanised context of these sites has changed which has implications for the purpose of Green Belt test.</p> <p>The Landscape Capacity Study (TEP 2017) was an important companion document to the Joint Green Belt Study which assessed the sensitivity of the landscape and its capacity to accommodate change without detrimental effects on its character.</p>	Comments noted.
				7	<p>Nuneaton and Bedworth Borough is heavily constrained by Green Belt. The adopted Borough Plan necessitated the need to release an extensive amount of Green Belt land in order to meet housing and economic needs. Indeed, nine out of 12 of the strategic allocations in the Borough Plan are sites which were formerly located in the Green Belt. The Inspector to the adopted Borough Plan recognised that exceptional circumstances existed to alter the Borough's Green Belt and that its release was necessary to secure the most sustainable pattern of development and it had a role in meeting Coventry's unmet needs.</p> <p>Nuneaton and Bedworth is not a Borough with a multitude of brownfield land available to develop. Therefore, alternative sites, greenfield or Green Belt need to be considered. In fact, non-Green Belt greenfield sites are in short supply, limited to a few locations north of Nuneaton, of which HSG1 forms a significant part and land to the west of Bedworth adjacent to HSG4 Woodlands. This point is acknowledged by NBBC in the Issues and Options paper at paragraph 6.6. Accordingly, option 1 is not a feasible strategy.</p> <p>We note the reference at paragraph 6.5 to windfall sites comprising 22 dwellings per annum. This is a very low figure and will not make much of an impact on fulfilling the housing requirement.</p> <p>Given it was inevitable that Green Belt sites were required to be released to meet the housing needs of the adopted Borough Plan; the release of further Green Belt sites are unavoidable to enable the Borough to meet its future</p>	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
					<p>housing needs. In the absence of the HEDNA it is difficult to predict what the land requirements will be, but the standard method of 429 dwellings per annum is a useful minimum starting point for establishing the housing requirement. As with the adopted Borough Plan, the focus needs to be on delivering new homes in the most sustainable locations and therefore the Sustainability Appraisal is a key tool in determining a revised spatial strategy. It is imperative that sites in the most sustainable locations are allocated for development and it is inevitable that some of these sites will be located in the Green Belt, given it restricts the Borough's growth so tightly. This is the same approach that was taken to the adopted Borough Plan and it was endorsed as a sound spatial strategy by the Borough Plan Inspector.</p> <p>As outlined in our response to question 3, it is important that the Joint Green Belt Study and the Landscape Capacity Study are reviewed and updated. It is noteworthy that our client's land (HSG 12) was one of the lowest scoring sites in the Joint Green Belt Study and one of the few sites which was recommended for removal from the Green Belt (site BE4).</p>	
				10	<p>As the Borough Plan was only adopted two years ago, the existing allocated sites should be up to date and provide a realistic development strategy for the Borough for the coming years. TKP is wary of any suggestion that sites only allocated in the recently adopted Borough Plan should already be reassessed for their suitability for development. The Borough Plan identified 12 strategic sites for development and many of them required Green Belt release. The allocation sites were fully scrutinised by a Planning Inspector at the Borough Plan examination. It is therefore not surprising, that some of the strategic allocation sites do not yet have planning permission. They are large strategic sites which will take time to deliver beyond the existing Plan period. It is of course prudent to review the existing allocations as part of an overall review of sites in the Borough as a whole but the deletion of allocations could not be justified given the Borough's ever pressing housing needs. Terra Strategic is the landowner of the former Hawkesbury Golf Course (HSG12) and was prompt in submitting planning applications for the site. The overriding reason that HSG12 has been able to deliver new homes expeditiously is because the site is in single ownership. Other sites such as HSG1: North of Nuneaton are fragmented in multiple ownership and will take a long time to deliver which may not result in cohesive development. More sites should be allocated to meet specialist housing needs such as the elderly.</p>	Comments noted. Careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review.
				11	Listed but no response.	

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
				12	<p>The three spatial options outlined on page 27, and cited below, do not seem to accord with the three options outlined in question 7 in relation to Green Belt.</p> <p>As outlined in our response to question 7, Nuneaton and Bedworth Borough is heavily constrained by Green Belt. The adopted Borough Plan necessitated the need to release an extensive amount of Green Belt land in order to meet housing and economic needs, valid spatial approach which was endorsed by the Borough Plan Inspector.</p> <p>Furthermore, Nuneaton and Bedworth is not a Borough with a multitude of brownfield land available to develop and therefore, alternative sites, greenfield or green belt need to be considered. Therefore options 1 and 3 are not feasible options. Option 2 may be feasible but only if there is further release of Green Belt land.</p> <p>The focus needs to be on delivering new homes in the most sustainable locations and therefore the Sustainability Appraisal is crucial to determining the revised spatial strategy. It is vital that sites in the most sustainable locations are allocated for development and these may be Green Belt sites. This is the same approach that was taken to the adopted Borough Plan and it was endorsed as a sound spatial strategy by the Inspector.</p>	Comments regarding the focus needing to be on delivering new homes in the most sustainable locations are noted.
				20	<p>HSG12 is the only mixed used allocation which will deliver a range of community benefits including extensive parkland, play space, pedestrian and cycle links, allotments and orchard, canal side improvements including a new bridge. The site is delivering more than just housing, it is offering open space, amenity and biodiversity improvements that will be of benefit to the wider community's health and wellbeing. The merits of the development scheme need to be recognised by NBBC which supports policies SA1 and HS2.</p>	Support for SA1 and HS2 is noted.
				21	<p>The full planning permission for HSG12 includes the require for electric vehicle charge points. This request was not exceptional and is needed to respond to climate change. Moreover, it has become a positive marketing strategy for new homes targeting environmentally conscious buyers.</p>	Support for EVCP is noted.
				23	<p>NBBC has already been seeking biodiversity net gain on development schemes on the basis of the Warwickshire Biodiversity impact assessment calculator. Albeit the requirement for 10% biodiversity net gain will not become a mandatory requirement until the Environment Bill is enacted potentially later this year.</p> <p>If the Council is looking to mandate biodiversity net gain through the Borough Plan Review, guidance must be provided (or signposted) on how to practically achieve a higher net gain in development. This would allow for net gain to be designed into processes at early stages and for</p>	Comments are noted.

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					any design issues to be detected and resolved without causing delay to development. We accept that 10% net gain is likely to become a mandatory requirement and we do not believe this needs to be any higher due to the potential impacts on viability.	
83		RD	Tetlow King on behalf of Living Space	1	The adopted Borough Plan has a Plan period of 2011-2031 and therefore at time of adoption it had only 12 years remaining and not the 15 years required by the NPPF. Nevertheless, the Inspector was satisfied with the Plan period as it aligned with other Warwickshire authorities in the same Housing Market Area (HMA) as it relied in the same evidence base. It is positive that NBBC has chosen a forward looking Plan period starting in 2023, instead of starting in 2021 or before, in the context of the adopted Borough Plan still having 10 years left to run it seems an appropriate start date for the Plan period. It is important that when the new Borough Plan is adopted that it has a minimum timeframe of at least 15 years to comply with the NPPF requirements so the proposed Plan period of 2023-2038 may need to be adjusted depending on the date of the Plan's adoption.	Noted that the NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				2	It is imperative that the new evidence base is commissioned, otherwise the Borough Plan review serves no purpose. The most critical evidence for any local plan review, partial or full, is a comprehensive assessment of the housing requirement. The evidence base effectively dictates the Plan period and currently the evidence base only supports the existing Plan period up to 2031. It is important to note that 429 dwellings per annum is the minimum housing requirement based on the Government's standard method and as the PPG advises this is the starting point in determining the number of homes needed in an area. The standard method does not accommodate changing economic circumstances or other factors that might have on demographic behaviour and therefore the housing requirement needs to be above this. Therefore, NBBC needs to undertake a thorough review of housing requirement substantiated by robust evidence. We note a HEDNA is due shortly. NBBC must continue to meet the unmet needs of Coventry under the duty to cooperate. As the standard method changed in December 2020, Coventry's housing requirement increased from 1,722 dwellings per annum to 2,325. It is inevitable Coventry will need the support of other Warwickshire authorities to help meet its needs The Issues and Options consultation should not be seen as an opportunity to disengage with the existing duty to cooperate arrangements with the other Warwickshire authorities, in particular Coventry. Although it was mooted in the White Paper that the duty to cooperate requirements	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.

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					could be abandoned, it was one of a multitude of potential changes to the planning system and the Government has yet to announce which policy changes will be taken forward in the forthcoming Planning Bill.	
				3	Both the Joint Green Belt Study (LUC 2015) and the Landscape Capacity Study (TEP 2017) formed an integral part of the evidence base to the Borough Plan. It is important that these documents are updated as part of the review of NBBC's evidence, especially as several of the sites in the study are no longer in Green Belt and have been allocated for housing.	Comments noted.
				7	<p>Nuneaton and Bedworth Borough is heavily constrained by Green Belt. The adopted Borough Plan necessitated the need to release an extensive amount of Green Belt land in order to meet housing and economic needs. Indeed, nine out of 12 of the strategic allocations in the Borough Plan are sites which were formerly located in the Green Belt. The Inspector to the adopted Borough Plan recognised that exceptional circumstances existed to alter the Borough's Green Belt and that its release was necessary to secure the most sustainable pattern of development and it had a role in meeting Coventry's unmet needs.</p> <p>Nuneaton and Bedworth is not a Borough with a multitude of brownfield land available to develop. Therefore, alternative sites, greenfield or Green Belt need to be considered. In fact, non-Green Belt greenfield sites are in short supply, limited to a few locations north of Nuneaton. This point is acknowledged by NBBC in the Issues and Options paper at paragraph 6.6. Accordingly, option 1 is not a feasible strategy.</p> <p>Our clients land interests at Plough Hill Lane provides another non green belt development opportunity. The site is situated in a sustainable location. there is a need for small site allocations (i.e. non strategic sites) to fulfil a role in ensuring a consistent five year housing land supply. Larger sites can take years to deliver but small sites such as our clients land at Plough Hill Lane can be delivered in the short term.</p> <p>It is imperative that sites in the most sustainable locations are allocated for development and it is inevitable that some of these sites will be located in the Green Belt, given it restricts the Borough's growth so tightly. This is the same approach that was taken to the adopted Borough Plan and it was endorsed as a sound spatial strategy by the Borough Plan Inspector.</p> <p>As outlined in our response to question 3, it is important that the Joint Green Belt Study and the Landscape Capacity</p>	A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.

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					Study are reviewed and updated. It is noteworthy that our client's land (HSG 12) was one of the lowest scoring sites in the Joint Green Belt Study and one of the few sites which was recommended for removal from the Green Belt (site BE4).	
				10	<p>As the Borough Plan was only adopted two years ago, the existing allocated sites should be up to date and provide a realistic development strategy for the Borough for the coming years. TKP is wary of any suggestion that sites only allocated in the recently adopted Borough Plan should already be reassessed for their suitability for development. The Borough Plan identified 12 strategic sites for development and many of them required Green Belt release. The allocation sites were fully scrutinised by a Planning Inspector at the Borough Plan examination. It is therefore not surprising, that some of the strategic allocation sites do not yet have planning permission. They are large strategic sites which will take time to deliver beyond the existing Plan period. It is of course prudent to review the existing allocations as part of an overall review of sites in the Borough as a whole but the deletion of allocations could not be justified given the Borough's ever pressing housing needs.</p> <p>The former Plough Hill Golf Centre and the adjacent Land at Hill Farm were not included as a site allocation in the adopted Borough Plan and planning applications for the site were approved in 2017 before the Borough Plan was adopted. Despite both sites having planning permission, the defined development boundary for Borough was not updated to accommodate the development. Accordingly, the proposals map needs to be updated so that the development boundary includes all land to the east of Plough Hill Lane as this now defines the urban edge of Nuneaton</p>	Comments noted. Careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review. The Council will consider the edge of the development boundary at the next stage of the Plan review.
				11	Listed but no response	
				12	<p>The three spatial options outlined on page 27, and cited below, do not seem to accord with the three options outlined in question 7 in relation to Green Belt.</p> <p>As outlined in our response to question 7, Nuneaton and Bedworth Borough is heavily constrained by Green Belt. The adopted Borough Plan necessitated the need to release an extensive amount of Green Belt land in order to meet housing and economic needs, valid spatial approach which was endorsed by the Borough Plan Inspector.</p> <p>Furthermore, Nuneaton and Bedworth is not a Borough with a multitude of brownfield land available to develop and therefore, alternative sites, greenfield or green belt need to be considered. Therefore options 1 and 3 are not feasible</p>	Comments regarding the focus needing to be on delivering new homes in the most sustainable locations are noted.

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					<p>options. Option 2 may be feasible but only if there is further release of Green Belt land.</p> <p>The focus needs to be on delivering new homes in the most sustainable locations and therefore the Sustainability Appraisal is crucial to determining the revised spatial strategy. It is vital that sites in the most sustainable locations are allocated for development and these may be Green Belt sites. This is the same approach that was taken to the adopted Borough Plan and it was endorsed as a sound spatial strategy by the Inspector.</p>	
				20	<p>Our client supports opportunities to maximise walking and cycling. The Plough Hill site has public footpaths running across it with new pedestrian and cycle links connecting into the wider network.</p>	Support for SA1 and HS2 is noted.
				23	<p>NBBC has already been seeking biodiversity net gain on development schemes on the basis of the Warwickshire Biodiversity impact assessment calculator. Albeit the requirement for 10% biodiversity net gain will not become a mandatory requirement until the Environment Bill is enacted potentially later this year.</p> <p>If the Council is looking to mandate biodiversity net gain through the Borough Plan Review, guidance must be provided (or signposted) on how to practically achieve a higher net gain in development. This would allow for net gain to be designed into processes at early stages and for any design issues to be detected and resolved without causing delay to development.</p> <p>We accept that 10% net gain is likely to become a mandatory requirement and we do not believe this needs to be any higher due to the potential impacts on viability.</p>	Comments are noted.
84		CT			Blank form submitted via email.	
85		CT	MP for North Warwickshire and Bedworth	N/A	<p>Several areas in Bedworth already have outline or full planning permission and comments focus of housing areas of Bedworth Woodlands (HSG4) and Hospital Lane (HSG5) as well as the employment land at Bowling Green Lane (EMP7).</p> <p>Bedworth Woodlands is a large area of green land used by the community as a recreational facility. The current administration should look at this area again and remove it from the Borough Plan as a Strategic Housing Site</p> <p>HSG 5- Hospital Lane. I object to this development due to its current state as greenbelt and would like to see the evidence that brown field sites have been assessed as not viable before this site was submitted.</p> <p>EMP7- I would also like to see the removal of EMP7 from the plan as this is in the greenbelt. There are other areas around the borough that are more suitable for employment land</p>	Noted. HSG5 and EMP7 are allocated sites within the current Borough Plan and have been removed from the Green Belt. The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed. Infrastructure will be addressed as part of the plan making process before any new development is proposed.

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					<p>and whilst these are still available for development, protected area should not be reclassified or developed.</p> <p>Pleased to see the review is asking for residents views on tree planting across the borough</p> <p>It is important that services and amenities will be built by the developer to ensure that, at the very least, existing service levels are maintained but ideally improved.</p>	
86	Mrs	CV		1	2038 is more or less acceptable as long as 5 year reviews are timely.	Comment noted.
				2	Evidence base is out of date – new ONS now available. Tight control of housing numbers must be recorded.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				3	Brownfield and windfall sites must be factored in.	Brownfield and windfall sites are included when calculating housing requirement and supply.
				4	All three options create additional infrastructure pressure. A step by step approach to using existing employment sites should be taken.	Comments noted.
				5	Careful management of industrial/work developments to avoid vacant sites.	Comments noted.
				6	Option 1 feels obvious, as do option 2/3/4. Option 5 is open to debate. Employment sites have potential to be noisy so would be far from suitable to suggest residential use. Nuneaton Town Centre has enough empty shops to create facilities in town.	Comments noted.
				7	Slight preference for Option 1 but non of the options can be selected without enormous consideration. Careful approach is required.	Comments noted.
				8	Too complex to simply select an option.	Noted.
				9	Queries which businesses want/need space. Need to focus on town centres and use vacant sites first.	Comments noted and will be taken to the next stage of the Plan review.
				10	Agreed – housing numbers proved to be inaccurate. Bulkington is surrounded by land earmarked for development.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				13	Yes but the Council need to maintain them.	Comment noted.
				14	As above.	Noted.
				15	No – trees are vital regardless of development size.	Noted.
				17	A more outward dynamic approach is needed in providing town centres for people but Council's should have input over the type of use a premises can change to.	Comment noted.
				18	Museums, libraries, art galleries, exhibition places.	Noted.
				20	EVCP in industrial areas. Work with existing infrastructure to best accommodate cycle lanes.	Noted.
				21	Yes – all new housing developments should have charging points.	Noted.



Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
				23	Sounds contradictory given we are building on Green Belt.	Noted.
				24	Yes.	Noted.
				26	Should develop the river around in Nuneaton town centre.	Noted.
87	Mr	MV		1	2038 is more or less acceptable as long as 5 year reviews are timely.	Comment noted.
				2	Evidence base is out of date – new ONS now available. Tight control of housing numbers must be recorded.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				3	Brownfield and windfall sites must be factored in.	Brownfield and windfall sites are included when calculating housing requirement and supply.
				4	All three options create additional infrastructure pressure. A step by step approach to using existing employment sites should be taken.	Comments noted.
				5	Careful management of industrial/work developments to avoid vacant sites.	Comments noted.
				6	Option 1 feels obvious, as do option 2/3/4. Option 5 is open to debate. Employment sites have potential to be noisy so would be far from suitable to suggest residential use. Nuneaton Town Centre has enough empty shops to create facilities in town.	Comments noted.
				7	Slight preference for Option 1 but non of the options can be selected without enormous consideration. Careful approach is required.	Comments noted.
				8	Too complex to simply select an option.	Noted.
				9	Queries which businesses want/need space. Need to focus on town centres and use vacant sites first.	Comments noted and will be taken to the next stage of the Plan review
				10	Agreed – housing numbers proved to be inaccurate. Bulkington is surrounded by land earmarked for development.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				11	Driving from town to town through Green Belt feels right and gives each place its own identity.	Noted.
				13	Yes but the Council need to maintain them.	Comment noted.
				14	As above.	Noted.
				16	Targets are vital.	Comment noted.
				20	EVCP in industrial areas. Work with existing infrastructure to best accommodate cycle lanes.	Comment noted.
				21	Yes – all new housing developments should have charging points.	Noted.
				23	Sounds contradictory given we are building on Green Belt.	Noted.
88			Wolvey Parish Council	N/A	a) There should be a distribution of gypsy and traveller sites across the whole borough, and not a concentration of sites in a small area; and (b) All parties should fully co-operate with one another to ensure that the objectives of neighbouring borough and district councils are considered.	Comments are noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.

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89			Warwick District Council	N/A	<p>Warwick District Council (WDC) expresses its extreme disappointment at the decision by NBBC to seek to withdraw from the signed Memorandum of Understanding.</p> <p>WDC is sympathetic with the concerns raised by the Issues and Options consultation document but respectfully urges NBBC to acknowledge the need to potentially address wider than local housing need and to realistically reflect this issue within the Borough Plan Review and in its relationships with partners across the sub-region.</p> <p>In any event, the standard method for calculating housing need is not considered significant to warrant withdrawal from the beneficial partnership and MOU, which would itself inevitably need revising as the other local authorities progress through their various local plan reviews and movements towards more joint planning approaches and documents, such as currently being proposed by WDC together with Stratford-on-Avon District Council for South Warwickshire.</p> <p>WDC notes that given the current NBBC Borough Plan is <i>not</i> being withdrawn, there is no practical effect of this withdrawal. As with the other Local Plans across Coventry and Warwickshire, allocated sites in Nuneaton and Bedworth are coming forward for development and as such, housing needs continue to be met across the sub-region.</p>	Comments noted and will be considered at the next stage of the Borough Plan review. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues.
90	Dr	IK	Public Health at Warwickshire County Council	1	Although in line with the NPPF for a 15 year period, Public Health support and recommend regular periodic reviews to address and incorporate any changes across the included topics. NBBC has the largest inequalities in Warwickshire, therefore Public Health would encourage opportunities to influence and shape needs during the plan period.	Comments noted.
				2	Public Health Warwickshire support the evidence base included. Public Health recommend including data from Joint Strategic Needs Assessment (JSNA) to support health and wellbeing content.	Noted.
				3	Public Health Warwickshire would support including the recent Coventry and Warwickshire Mental Health Needs Assessment which highlights the associations of physical activity, active travel, green space, with mental health.	Comments noted and will be taken forward to the next stage of the Plan review.
				4	Public Health recommend that the location of future employment areas are situated in a suitable location with access to public transport and opportunities for safe active travel.	Comments noted.
				7	Public Health favour the design of houses with eco-design and sustainable energy features and encourage considering sustainable construction and how climate change may impact a site e.g. flood risk, sustainable urban drainage etc. Public Health recommends considering local air quality and discourage over-development in air quality management areas (AQMA). Whichever locations are selected, consideration for appropriate access to primary and secondary care and local facilities are required.	No option selected, comment noted.

Ref	Title	Respondent's Initials	Organisation	Question	Comments	Officer Response
				8	Whichever locations are selected for new employment, consideration for appropriate access to public transport and active travel (including new residential locations) are required.	Comment noted.
				10	Public Health agree there should be a review of the existing sites as some of the sites haven't yet progressed within the 5-year housing land supply. However, when reviewing sites, Public Health encourage considering how they're connected to local facilities including healthcare.	Noted. An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				11	Public Health recommend new residential development to have suitable infrastructure such as public transport and access to health services. Public Health encourage consulting with the community to understand priorities and develop in line with local health and wellbeing needs using the JSNA as evidence. Public Health recommend designing places with a good mix of housing to enable people to integrate into a community no matter what their living arrangements are	Noted.
				13	Setting targets for tree planting allows monitoring, evaluation and ability to assess impact in the long term.	Noted and agreed.
				14	Orchards have importance in terms of the sustainability of urban ecosystems. In addition to nutritional benefits, urban vegetation in orchard increases property values, improve privacy and provide many environmental benefits	Comments noted.
				17	Residential uses are acceptable as turning existing unused buildings into homes, creates new residential homes, but also recycles building stock and reduces the need to develop on green-belt land, thus helping preserve natural environments.	Comments noted.
				20	Public Health support emphasis on the importance of cycling and walking. Incorporating measured miles signage within development designs and ensuring that facilities and services are accessible by walking and cycling routes will support this. Prioritising walking and cycling routes encourages active travel and reduces car dependency.	The Borough Plan review seeks to ensure that more sustainable modes of travel are accessible and development is located in the appropriate places to reduce the need to travel.
				21	Public Health Warwickshire agree that the Plan should seek to improve infrastructure, such as charging points for electric vehicles and e-bikes. Encouraging uptake must also be undertaken through public incentives.	Comments noted.
				22	As reported in the Borough Plan Review: <ul style="list-style-type: none"> <li>Electric vehicle charging points are supported but not required by policy HS2: Making charging points available and highlighting locations to residents allows uptake of facilities</li> <li>The supporting text to policy SA1 refers to footpaths and cycleways and that opportunities for these should be pursued as part of the development of a strategic site. The policies that follow this policy on</li> </ul>	Comments noted.

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					<p>each strategic site then do set out requirements for footpaths and cycleways. However, the importance of this form of infrastructure is such that it should be set out in policy SA1, setting out the overarching requirements for strategic sites.</p> <p>Policy HS2 should make explicit that the sustainable transport options should be walking and cycling.</p>	
				23	Public Health support policy to be in line with the Environment Bill.	Noted.
				24	Public Health Warwickshire have been involved with NBBC on design codes which consider health and wellbeing in the environment and will continue to support this line of work.	Noted.
91	Ms	JJ	Warwickshire Wildlife Trust	2	<p>The Green Infrastructure studies from 2011 and 2013 should be regularly updated and look at where the most appropriate strategic areas are for nature recovery and tree planting etc. including smaller sites. Warwickshire Wildlife Trust is working on a Nature Recovery Network with Natural England which could help form part of this evidence base.</p> <p>Proposals maps should also include most up to date local wildlife sites and potential wildlife sites, nature reserves, SSSIs and Ancient Woodlands.</p>	Comments on updated evidence based required have been taken into account.
				3	<p>The Councils Green Infrastructure studies date back to 2011 and 2013 which are now 10 years out of date.</p> <p>A detailed and updated Green Infrastructure study could also look at areas for strategic habitat restoration, as well as tree planting to ensure large scale beneficial habitats are created and restored. . WWT Habitat Audit Team may be able to help with such work.</p>	Noted.
				6	This needs to be considered carefully as different uses classes such as leisure can encourage more traffic, noise and lighting which can impact on biodiversity and the environment particularly of nearby wildlife sites.	Noted.
				7	Option 1- WWT believe the focus should be on existing urban areas where the impact on the surrounding environment and landscape may be smaller. Though extending into the green belts should only be considered as a very last option to meet the areas own housing need, not that of neighbouring districts which would put pressure on the environment.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				8	Warwickshire Wildlife Trust strongly believes the development should be focused on land with the least biodiversity value and environment designations and detailed assessments (like those carried out in 2016) should form part of the process. Housing numbers should also be as low as possible to limit the impact on wildlife and only local need not neighbouring authorities need should be met in this local authority area.	Noted.

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				11	Housing needs to be located in those areas with the least environmental impact. Allocations should be supported by detailed ecological assessment such as those carried out in 2016 and well as green infrastructure studies looking at the best locations for strategic green corridors. To ensure that development doesn't affect wider habitat restoration.	Noted.
				13	<p>WWT agree in line with DEFRA's England Tree Strategy seeking 30,000 hectares per year by 2025 and the amendments to the NPPF (July 2021) seeking new streets to be tree-lined and trees incorporated into new developments.</p> <p>Native Trees can provide important habitat for many important and protected species, and if maintained and managed correctly and in the right locations can make a real difference for biodiversity.</p> <p>However in terms of the biggest biodiversity gains, large scale tree planting should ideally be based on identified green corridors.</p> <p>In line with the Council's Climate Emergency status and commitments, the Environment Bill, 25 year plan and the NPPF the Council should encourage Biodiversity offsetting on every site in line with the Biodiversity offsetting tool, and depending on the site, suitable habitats should be provided to offset any impacts to support and not conflict with the existing environment.</p>	Comments noted and will be considered at the next stage of the Plan review.
				14	<p>Yes this is supported by Warwickshire Wildlife Trust as orchards can provide a plethora of biodiversity and wildlife habitats. The fruit also provides food for other species and pollinators during the spring season.</p> <p>Long-term management, access and location will just need to be carefully considered to ensure that it doesn't conflict with the existing environment e.g. species rich grassland. The land should also be given a formal designation to protect its long term status.</p>	Comments and request for formal designation noted.
				16	Yes. Warwickshire Wildlife Trust supports the Council's ambition of more tree planting in line with the Council's Climate Change emergency, the Environment Bill, 25 year plan and amended NPPF. As long as they are the right native species in the right locations and as long as there is no conflict with the existing environment, important grasslands for example. Then having a target would certainly be very useful as a policy tool and to monitor delivery. It would also help to ensure a more strategic largescale habitat benefit, rather than ad hoc tree species.	Assumed response is supportive of target setting and 'Yes.' is a typo given the remainder of response.

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				20	Yes where carefully managed these can keep people off of important wildlife sites and onto set paths, and help with the climate change emergency.	Noted.
				21	Yes as above.	Noted.
				23	<p>Yes in line with the Environment Bill this should be included in the policy wording as a minimum. As Schedule 14 of the Environment Bill states that new development to be subject to a condition to secure that a biodiversity gain of 10% is met. This therefore needs to be included in the Local Plan policy wording as a minimum.</p> <p>Sites should all be assessed in terms of the BIA 'Biodiversity impact assessment' on a site by site basis to assess if there is a biodiversity loss in detail and on what type of habitat in order to consider in detail what net gain is appropriate on the site. This is necessary to ensure that legally protected species covered by the Wildlife and Countryside Act 1981 and the Councils NERC duties are legally fulfilled.</p>	Comments noted.
				27	<p>Warwickshire Wildlife Trust supports some of the general principles of the Plan, which could include a policy on 10% biodiversity net gain, more tree planting, climate change policies and protection of the green belt.</p> <p>Green infrastructure corridors and large scale tree planting could also be achieved through the plan, addressing climate change as well as providing biodiversity gain.</p> <p>We do however have a number of concerns in terms of large scale growth especially if additional growth is taken from neighbourhood areas not to meet local need and where this would take place and how far policies will go in terms of stopping development on and nearby important wildlife sites SSSIs and ancient woodland, as mitigation should only be as a last resort.</p> <p>In terms of evidence base, the plan will need detailed studies backing up green infrastructure policies in order to ensure meaningful corridors can be worked up that are achieving real gains on the ground. In terms of evidence base WWT is also working on a Nature Recovery Network, in line with the Nature Recovery Delivery Partnership prospectus, November 2020.</p> <p>The Nature Recovery Network will be a national network interlinking our existing spaces for nature with newly created, expanded, improved wildlife-rich places, across the length and breadth of England, bringing nature and its many benefits much closer to people.</p>	Comments in relation to the Nature Recovery Network are noted.
92			Warwickshire County Council	N/A	As part of the Local Plan Review I understand that sites allocated, such as Top Farm will also be reviewed. I would like to take this opportunity to stress that the County Council is	Comments noted.

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					<p>committed to the development of this site and has put in place mechanisms to ensure this site is delivered within the Local Plan timescale.</p> <p>We are keen to be fully involved in the Plan Review and update, and I trust you will engage with our relevant specialist teams at the earliest opportunities on much of this work which we recognise makes a significant contribution to the delivery of both our councils' strategic priorities. This is particularly important where County Council services, such as waste and social care will be impacted by the growth agenda and I ask that the County Council is consulted.</p>	
93	Mrs	CW		2	Unable to comment as no access to internet to see evidence based studies.	Noted.
				3	See above.	Noted.
				4	Option 1 preferred.	Noted.
				6	Option 1.	Noted.
				7	Option 1 – immoral to consider more Green Belt removal.	Noted. The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.
				8	Option A.	Noted.
				9	Clean up brownfield/vacant sites first.	Comment noted.
				10	Agreed. Need from Coventry not scrutinised. Student numbers not considered appropriately.	Noted, careful consideration will need to be had to the appropriate housing requirement to be contained within the Borough Plan Review.
				11	Option 3.	Noted.
				13	Yes, targets should have an extra 10% for non-survival and vandalism.	Noted.
				14	Yes.	Noted.
				15	175 or more properties.	Noted.
				16	No.	Noted.
				17	Option 4 – Town centres should allow more residential use and less fast food outlets.	Noted.
				19	Option B – To clarify matters following creation of Class E.	Noted.
				20	No – already places great emphasis on cycling and walking connections.	Comments noted.
				21	Yes – one charging point per residential property and a ratio for apartments based on parking allocations.	Comment noted and will be considered at the next stage of the Plan review.
				22	Yes for SA1 and SA2 but see Q21 for HS2.	Noted.
				23	Yes.	Noted.

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				24	Yes but more work needed than the exhibition held at the Bermuda Phoenix Centre on 30 <sup>th</sup> June.	Noted.
94	Mr	RW		1-24	Duplicate response to the above given by Mrs Carol Walsh.	
95 96	Ms	DW		1	Yes but with a review every 5 years.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities.
				4	Option 3 – ease of access to transport hubs.	Noted.
				5	Unused brownfield sites – the I&O states the borough has 100ha of derelict land.	Noted.
				7	Option 1.	Noted.
				8	Option A.	Noted.
				9	Use empty premises in town centres for housing.	Noted.
				10	Yes – what is the correct need for housing in the area without being used as a Coventry overspill.	An updated evidence base in line with a local housing need assessment in accordance with national policy and guidance will be prepared to deliver a sufficient supply of homes for the plan period.
				11	1 or 2.	Comment noted.
				12	Use retail to residential conversions.	Comment noted.
				13	Yes.	Comment noted.
				14	Yes.	Comment noted.
				16	Yes to improve air quality.	Comment noted.
				17	Option 4 – Class e and C3 are acceptable.	Comment noted.
				19	Option A most flexible.	Comment noted.
				20	Yes.	Comment noted.
				21	Yes as many as possible to attract people.	Comment noted.
				22	No.	Comment noted.
				23	Yes 10%.	Comment noted.
				24	Yes as complex.	Comment noted.
				25	Yes.	Comment noted.
				26	Crime.	Comment noted.
	Mr	MD	Savills on behalf of Arbury Estate	1	We consider that the proposed plan period is acceptable as it meets the minimum 15 year period required by paragraph 22 of the NPPF (2021). However paragraph 22 also states that where larger scale developments forms part of the strategy for the area, policies should be set within a vision that looks further afield (at least 30 years), to take into account the likely timescales for delivery. Nuneaton and Bedworth Borough Council (NBBC) should be open to considering a longer plan period if such sites are proposed within the Plan.	Noted.



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					Rather than opting for a "do minimum" approach of sticking to the 15 year period plan, NBBC should be actively seeking to extend the plan period where appropriate for such strategic sites. This does not mean that the whole plan period is required to be extended, rather the specific strategic allocation policy would acknowledge that an element of delivery would outside the plan period. This has been included as part of a sound plan at Langley SUE, Birmingham and Kings Hill, Warwick. Both sites are of a strategic scale that will be developed outside of the plan period. A larger timescale in respect of the allocations was accepted by Inspectors of both plans.	
				2	We agree that the existing evidence base needs to be updated or replaced. We have reviewed the date of publication of evidence base documents and found that for the most part they are produced from 2016 or before. Some of the evidence base is over 15 years old, such as the Landscape Character Assessment (2004). All evidence base should be updated to take account for changing circumstances since its publication. In particular the documents should be updated to reflect the currently adopted Borough Plan, the allocations within it and development that has been permitted and or developed since. The Council should publish a list of evidence base they are producing and make it clear to stakeholders when this will be published and invite comments on its publication. This will ensure that the Plan is justified as per the tests described in paragraph 35 of the NPPF.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				3	Please see response to question 2. A full scale review of evidence base is required to ensure it is up to date and reflective of the existing adopted plan. In line with Planning Practice Guidance, proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies when undertaking a review (paragraph 068, reference ID: 61-068-20190723). This should be a key consideration as NBBC propose to only review certain policies.	The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review.
				4	From the options proposed, we consider that option 1 is the best approach of the 3 proposed. This approach can be fulfilled through development of land in Arbury Estate ownership which is currently allocated and proposed through the call for sites process. The focus for employment development should be based on updated evidence base. As discussed in answer to question 2 & 3, the evidence base is out of date. The evidence base needs to be updated to ensure that it is reflective of the current demand for employment land in the Borough and surrounding area. Key evidence base such as the Employment Land Study (2016) require update, particularly in light of Covid-19 and	This comment has been noted and will be considered at the next stage of the Borough Plan review.

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					Brexit. Paragraph 31 of the NPPF states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. It also states that this should take into account relevant market signals. NBBC should therefore endeavour to do this during production of their evidence base.	
				5	<p>As set out above we consider that option 1 is the best approach of the 3 proposed. However we consider that it is too premature to determine a suitable option to pursue for employment development due to the lack of up to date evidence. A fourth option based on the outcome of up to date evidence base should be pursued.</p> <p>Results of an updated Employment Land Study and Economic Development Needs Assessment should be considered in determining the location and scale of employment for the Borough. The Council should provide evidence as to why only locations in close proximity to the A5 or junction 3 of M6 are being proposed as options. There is a need to consider what businesses' requirements for employment land are before coming to those conclusions. This would form the basis of a fourth evidence based option. A key piece of evidence that should inform the Borough Plan review is the West Midlands Industrial Strategy (2019). Coventry and Warwickshire is highlighted as area which lacks incubation space and space that can support agile and mobile economies. However it is identified that across the region, there is a significant gap in good quality employment land. The West Midlands Strategic Employment Study (2019) was commissioned by three midlands Local Enterprise partnerships, including Coventry and Warwickshire. The report focuses on strategic employment sites, which it defines as being 25ha or more in size.</p> <p>The report highlights market identified sites and motorway junctions which are considered to be suitable for development nearby. Their methodology for the selection of certain junctions over others is not clear. However a range of locations are highlighted in Nuneaton and Bedworth.</p> <p>Savills research has shown that nationally, there have been record breaking levels of take-up throughout 2020 (80% over the long term average). So far in 2021 this strong demand is continuing. This has impacted supply across the West Midlands, which has begun to fall from an already low level as a result of this significantly increased take- up. Nuneaton &amp; Bedworth sits within the Coventry &amp; Warwickshire sub-region and the wider West Midlands region and is within an area of consistently very high demand from both the logistics and manufacturing sectors. The sites proposed in the accompanying call for sites submissions benefit from a locational advantage of being close to the A444, which see particularly strong market demand.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review. The options selected for future employment sites are based on their proximity to the existing strategic highway network within the Borough or locations adjacent to established employment sites. The Council's evidence base will be reassessed and updated where necessary as part of the Borough Plan review, this includes evidence regarding provision for employment development.

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					<p>Part of NBBC's current evidence base includes an Employment Land Use Study (August 2016). This includes reference to an urgent need for additional supply of good quality and well located land in the Coventry travel to Work Area (including Nuneaton &amp; Bedworth), to accommodate short to medium term demand.</p> <p>Arbury Estate has been successful in bringing forward EMP1 Faultlands, with an outline permission granted in 2019 for 1 million sqm B2 &amp; B8 floorspace. The accompanying Socio-economic and Market Need Assessment to support the application estimates that the Site has the potential to deliver at least 1,500 jobs. This is in the context of the Borough experiencing significantly high levels of out-commuting.</p> <p>Arbury Estate also own the majority of land associated with EMP4 Coventry Road. Site survey work is currently being undertaken on this site and positive discussions are taking place with Warwickshire County Council (who are the land owner of the former Red Deeps Special School which also forms part of the allocation), with the aim of submitting a comprehensive application for the allocated land later in 2021. Table 5 of the Borough Plan review consultation document should be updated to reflect the status of both allocations.</p> <p>The progress seen at EMP1, EMP4 and other employment sites clearly demonstrates a demand for employment land in the Borough. The progress seen on these sites and the submission of further sites should provide the Council with a clear indication of the Estate's willingness to bring forward its land to assist the Borough with ensuring there is a satisfactory and robust level of employment land available.</p>	
				7	Of the options proposed we favour option 3 as a suitable strategy for the location of residential uses. Please see response to question 9 for an explanation of our proposed amendments to this approach and justification for our proposed approach.	Comment noted.
				8	<p>We request clarification from the Council of why a different spatial strategy is proposed for residential and employment sites. It is unclear why the options proposed for employment exclude reference to use of suitable brownfield sites. Such land should be prioritised before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, as per paragraph 141 of the NPPF.</p> <p>Of the options proposed we favour option C. As a starting point this option reviews all land equally, taking account of the most sustainable locations. This approach is supported by paragraph 142 of the NPPF which states that the need to promote sustainable development should be taken into account when reviewing Green Belt Boundaries. It states that the consequences of channelling development towards</p>	<p>This comment has been noted and will be considered at the next stage of the Borough Plan review.</p> <p>The Council is required in line with national policy and the presumption in favour of sustainable development to set out strategic policies for new development within the Borough Plan review. This includes consideration of Green Belt land where all other reasonable options for meeting identified needs for development have been fully examined.</p>

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					areas outside the Green Belt should be considered when reviewing Green Belt boundaries.	
				9	<p>We disagree with the sequential approach proposed in table 2 of the consultation document. The sequential approach should be amended to read as follows: Allocated sites / Existing Urban Areas ☐ Countryside ☐ Green Belt</p> <p>The Planning and Compulsory Purchase Act 2004 s38(6) directs that planning determinations should be made in accordance with the development plan unless material considerations indicate otherwise. Therefore already allocated sites carried over from the previous plan or new allocations should be amongst the first places development is directed towards.</p> <p>The NPPF requires previously developed land to be prioritised (see paragraph 119). Paragraph 141 of the NPPF requires that before concluding that exceptional circumstances exist to justify changes to Green Belt that as much use as possible has been made of suitable brownfield sites.</p> <p>We agree with para 6.6 which states: "In planning policy terms, the non-Green Belt status means that they are less constrained for development than Green Belt Sites. However, they may not always be the most sustainable location for new development in the round, given their location, character, constraints etc. and so would have to be viewed on a case-by-case basis".</p> <p>Although this may be the case, there is a need to demonstrate exceptional circumstances for development in the Green Belt (see NPPF paragraph 140). It is not enough to say as is stated in para 6.7 that: "The emphasis of protecting the Green Belt may be incompatible with other priorities."</p> <p>We support the development of land currently in the Green Belt if required. However this should come through release within a Local Plan, rather than requiring the demonstration of very special circumstances for development at the application stage.</p> <p>We consider that a fourth option, similar to option 3 of question 7 and option C of question 8 should be pursued in which the most sustainable locations based on a wide ranging criteria are considered for development. This should include safeguarding Green Belt land where appropriate, as per paragraph 143c of the NPPF.</p>	<p>Noted. A Green Belt Assessment will take place as part of an updated evidence base which will consider potential development sites against the relevant Green Belt purposes as set out in national policy. However, depending on the Option chosen, development locations will be suggested in the plan that consider more than Green Belt considerations.</p>
				10	<p>It is important that the review takes into account emerging evidence base. There is a danger that the early review runs ahead of evidence base available, especially in respect of cross boundary cooperation that is required with Coventry. Although at paragraph 7.6, the consultation document states that the Government's planning white paper suggests that the duty to cooperate may be abolished, it is still a requirement as it stands, so should be planned for.</p>	<p>Comments noted. The Council in preparing the Borough Plan review has a legal duty to co-operate with neighbouring authorities to address cross-boundary issues, including Coventry's potential unmet housing need.</p> <p>The sites allocated in the extant Borough Plan reflect the requirements set out within this document at that time. As part of the review of the Borough Plan requirements will be reassessed.</p>

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					<p>The plan is being reviewed against the backdrop of Coventry's standard methodology figure being increased by 35% to 2,325 dwellings per annum. Considering that Coventry's average annualised total was 2,120 dwellings as identified by the 2015 Strategic Housing Market Assessment, Coventry's baseline housing requirement has increased by 205 dwellings per annum. In its currently adopted Local Plan Coventry were only able to accommodate an average total dwellings of 1,230 dwellings per annum, as acknowledged through a Memorandum of Understanding. It is telling that this has increased.</p> <p>As set out in paragraph 7.3 of the consultation document and within the Planning Practice, the standard method "...identifies a minimum annual housing need figure. It does not produce a housing requirement figure." Further work is therefore required to establish Coventry's final housing requirement.</p> <p>The PPG requires a Statement of Common Ground to be prepared and maintained on an ongoing basis throughout the plan making process. As a minimum it should be published when the area it covers and the governance arrangements for the cooperation process have been defined, and substantive matters to be addressed have been determined (Planning Practice Guidance Paragraph: 020 Reference ID: 61-020-20190315). We would therefore suggest that NBBC engage with Coventry City Council and agree a Statement of Common Ground regarding Coventry's unmet housing need. This statement can then be updated and refined throughout the plan making process, as required by the PPG. As this information is known, it is not suitable for the Council to consider its needs only. Their own standard method figure alone is not suitable for Nuneaton and Bedworth to base their housing requirement on. A recent Inspectors' report issued in respect of the Tonbridge and Malling Local Plan recommended non adoption of the Plan due to lack of evidence that Tonbridge &amp; Malling (T&amp;M) had engaged with neighbouring Sevenoaks Council regarding its housing shortfall.</p> <p>T&amp;M's argument was that as Sevenoaks did not formally ask for help, therefore it wasn't for the Council to "make the running". The Inspector concluded that this is a circular argument with a risk that both parties defer the issue without any meaningful attempt to resolve it (see para 24). The Inspectors concluded that there was a requirement for T&amp;M to engage constructively, actively and on an ongoing basis, regardless of whether there was a precise figure or range, or indeed whether T&amp;M felt it may not be able to accommodate the unmet need in full or in part (see para 21). A key point made in the report was that account can only be taken of the engagement undertaken by authorities up to the point of</p>	

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					<p>submission of the plan, as the assessment of compliance with the DtC only relates to the preparation of the Plan (see para 34 &amp; 38). A copy of the Inspector's report is included with these representations.</p> <p>The Council should consider the outcome of this Inspectors report in their approach to engaging with Coventry regarding duty to cooperate. Although not finalised, it is clear that Coventry has a need it cannot meet and this is likely to increase. More work should be done to ensure cooperative working between the LPAs, including input to the emerging Housing Economic Development Needs Assessment which we understand is due to be published in November. The validity of results produced by this report are questionable if Coventry has not taken an active part in its production. Cooperation on such evidence base documents is important in avoiding a scenario as seen at Tonbridge and Marling.</p> <p>Arbury Estate is a landowner at residential allocations HSG2 Arbury and joint landowner of HSG4 Woodlands. Table 5 of the Local Plan Review consultation document should be updated to reflect the current status of both sites as follows:</p> <ul style="list-style-type: none"> <li>- HSG2 Arbury: Masterplanning review of the site is progressing, as the site is part of a National Model Design Code pilot funded by MHCLG and being delivered by PRP masterplanners in cooperation with NBBC.</li> <li>- HSG4 Woodlands: Joint working is currently progressing between Arbury Estate and Nicholas Chamberlaine's Schools Foundation. Initial ecology and highways access works have been undertaken to build up a technical baseline of the site. A planning application for the remaining land outside of the 9 dwelling application (reference: 037609) is due to be submitted in 2022.</li> </ul>	
				11	<p>We support option 1, as existing settlement boundaries contain existing allocations.</p> <p>Existing allocations have been tested through a recent Local Plan process, and can deliver housing on sites that have already been agreed to be suitable in principle.</p> <p>Where additional land is required, consideration should be given to the spatial options available. In the first instance non-green belt land should be favoured. However where these sites are not suitable or available, then the release of Green Belt should be considered.</p>	Noted.
				13	<p>Blanket targets are not appropriate for all sites. These can be unduly onerous for some sites and too lenient for others. It is best to determine a requirement to provide tree planting on a case by case basis.</p> <p>We request clarification of which schemes the proposed requirement would apply to as the NPPF definition of major development is 10 or more homes. Depending on the type of</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.

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					development, useable open space or protection of grassland or wetland for example may be more appropriate than the planting of trees. Ecological and biodiversity gains may not be best made through a blanket requirement for trees.	
				14	We disagree with this requirement for most of the same reasons set out in response to question 13. We disagree with the sweeping statement that this requirement would not create an extra burden as it can be incorporated into existing planting requirements. It is not clear how this conclusion can be drawn without knowing the size of development which is yet to be defined.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				15	We consider that the NPPF definition of major developments being defined as 10 or more homes is the most appropriate definition. The viability of this policy should be tested based on this criteria.	Noted.
				16	Tree planting targets could be set across the Borough if the Council desires. However it remains the case that detailed matters such as the number of trees required for a site should be determined on a site by site basis, following consultation with the Council at the time of a planning application. This is to ensure that it is a proportionate amount of trees on site without reducing the developable area of any sites.	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				20	We support the principle of greater emphasis being given to the importance of cycling and walking connections. However it must be considered at a site specific level firstly where these connections can be accommodated and also how they will impact viability. The delivery of such links would need to be included within an updated Infrastructure Delivery Plan.	Noted. Infrastructure will be addressed as part of the plan making process before any new development is proposed.
				21	We invite the Council to provide further details of the type of infrastructure that is referenced. This is to ensure that any policy requirement to ensure the installation of such infrastructure is evidence based and justified as required by NPPF paragraph 35. From a practical perspective it would also be useful to be provided with examples of where such technology has been used and can be evidenced as a workable and viable solution. Paragraph 10.7 of the consultation document references changes to the building regulations to ensure that all new developments provide electric vehicle charging points. We disagree that the outcome of consultation on changes to the building regulations should be disregarded in the Council making a decision on requirements for electric vehicle charging points. It is not for the planning system to deal with issues covered in the Building Regulations, furthermore it is not for Local Plans to pre-empt what may be or may not be required through future amendments to the building regulations. Consideration needs to be given to this type of policy as technology associated with electric cars changes and adapts and whether a charging point for every dwelling will be	This comment has been noted and will be considered at the next stage of the Borough Plan review.

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					required. Increasingly modern electric cars are chargeable from an existing socket in house. There should also be a consideration of whether a standard electric charging point is suitable for every electric car.	
				23	<p>We note that reference is made to requirement for a "net gain" in biodiversity of at least 10% compared with the pre-development baseline. It is not clear whether the Council intend to bring a 10% requirement ahead of the Environment Bill being passed, this is potentially before the Plan's scheduled adoption in 2022.</p> <p>We do not consider that the Council is justified in bringing this requirement forward ahead of the Bill being approved, unless it can demonstrate evidence of this requirement being evidence based.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				24	<p>No, some design codes may suitably be dealt with as SPDs but in some cases the technical information needed at a concept stage may not be sufficiently detailed and therefore it would inappropriate to add weight to the design code without the appropriate evidence base. We consider that unless the design code is supported with robust technical information / evidence, particularly in respect of site specific codes, then the design code should not be adopted as an SPD.</p> <p>The National Model Design Code defines a Design Code as: "A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area."</p> <p>Paragraph 11.4 of the Borough Plan Review consultation document states that: "...local design codes would provide a local framework for creating beautiful and distinctive places through a consistent and high quality of design."</p> <p>The National Model Design Code defines on page 36, framework plan as being: "A set of plans at local area or settlement level that detail spatial information, for example, street hierarchy, transport accessibility, open space, land use and patterns of built form".</p> <p>It is generally understood that a framework is less detailed than a masterplan, which is in turn less detailed than a code. We request clarification from the Council regarding the proposed approach to Design Codes, whether Borough wide, area wide or site specific.</p>	This comment has been noted and will be considered at the next stage of the Borough Plan review.
				27	<p>2.2 Objectives – sets out objectives proposed in order to achieve the vision for the Borough Plan. This includes objective 4 which states that: "To provide a steady and adequate level of suitable housing for all."</p> <p>This appears to have been based on objective 4 of the currently adopted plan which states: "To provide the size, type and mix of housing that meets the specific needs of the Borough."</p>	All points noted and will be considered at the next stage of the Borough Plan review. Rail destinations/connections within the Borough will be referenced.



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					<p>We request clarification of why the wording has been changed to aim for a “steady” and “adequate” level of housing. This is not aspirational for the Borough. The Council shouldn’t be aiming for “adequate” levels of housing, to ensure choice and flexibility NBBC needs to be aspirational in its planning for housing.</p> <p>We note that a new objective has been added as objective 9. We agree that the Council’s objective should link to the Government’s goal of net zero emissions. However the way in which this is done is something that needs to be set out specifically on a site by site basis.</p> <p>Para 3.2: Reference is made to rail connections that serve the Borough. Reference should be made to services to Crewe, Bermuda Park and Kenilworth which are not currently listed.</p> <p>Para 7.3 makes reference to National Planning Policy Guidance (NPPG). This should read Planning Practice Guidance (PPG).</p>	