

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
1.1	CJ	Avison Young on behalf of National Grid.		SEA-2 Wilsons Lane and SHA-4 Hospital Lane	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.</p> <p>Details of the sites affecting National Grid assets are provided below.</p> <p>Electricity Transmission Development Plan Document Site Reference Asset Description Policy SEA-2– Wilsons Lane GIS: 275Kv Overhead Transmission Line route: GIS Policy SHA-4 – Hospital Lane 4ZWW ROUTE TWR (001 - 059): 400Kv Overhead Transmission Line route: COVENTRY - NEHELLS</p> <p>A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.</p> <p>Without appropriate acknowledgement of the National Grid assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of National Grid infrastructure. We propose that the following site allocations and/or associated policies include wording to the following effect:</p> <p>Allocation SEA-2 & SHA-4 "A strategy for responding to the National Grid gas transmission pipelines present within the site is required which demonstrates the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the asset has been reduced through good design." Please</p>	Allocation SEA-2 & SHA-4 "A strategy for responding to the National Grid gas transmission pipelines present within the site is required which demonstrates the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the asset has been reduced through good design."	Add to SEA-2 and SHA-4

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					<p>see attached information outlining further guidance on development close to National Grid assets.</p> <p>Electricity assets</p> <p>Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. National Grid’s ‘Guidelines for Development near pylons and high voltage overhead power lines’ promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid’s statutory safety clearances are detailed in their ‘Guidelines when working near National Grid Electricity Transmission assets’</p> <p>Gas assets</p> <p>High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid’s approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines. National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid’s 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement. National Grid’s ‘Guidelines when working near National Grid Gas assets’ can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets</p>		

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1.2	C J	Avison Young on behalf of National Grid.		BE3	<p>Utilities Design Guidance</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.</p> <p>National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.</p> <p>Therefore, to ensure that Policy BE3 – Sustainable design and construction is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p>“x. Development will take a comprehensive and co-ordinated approach including respecting existing site constraints including utilities situated within sites.”</p>	Add to BE3: “x. Development will take a comprehensive and co-ordinated approach including respecting existing site constraints including utilities situated within sites.”	Add to BE3
2.1	ID	Canal & River Trust,		SHA3 and DS5	<p>Site SHA3 is described as ‘Judkins’ in Policy DS5 but is referred to as ‘Tuttle Hill’ in Policy SHA3. We recommend that for clarity this site is referred to by a single name. Site SHA3 incorporates land identified in the adopted Local Plan as Site HSG11 and additional land to the west of the Coventry Canal that together reflects the site identified in current planning application 035595 which proposes residential development of up to 400 dwellings. The site flanks the canal for around 460m where the canal sits in a principal cutting (Cutting 5 and 6) and is at a significantly lower level than the land adjacent to it. The canal is currently crossed by two bailey bridge structures associated with the quarry operation (bridges 23A and 23B) in this location. The Key Development Principles and Form of Development both recognise the value and importance of the Coventry Canal and the need for development to protect and enhance the canal. We consider that it is important to consider the role of the canal as an ecological corridor and to ensure that new built development does not result in significant loss of vegetation from either side of the canal corridor. Any development should aim to enhance the biodiversity value of the canal as a wildlife habitat.</p> <p>We note that it is proposed that a new bridge crossing the canal will be delivered as part of the development. Any new bridge crossing will require the prior consent of the Canal and River Trust in the form of a commercial agreement and any bridge would have to satisfy all of our requirements in terms of design, construction etc. Our Estates Team can advise in more detail on the process for seeking Trust consent. Any works on, over or affecting Trust land will require our consent and should comply with our current Code of Practice for Works Affecting the Canal & River Trust.</p> <p>No reference is made to the existing bridge crossings here and we would wish to have a clear understanding of what is proposed for each of the bridge crossings and whether the intention is to retain or remove them. If they are no longer required for use in association with the quarry, we suggest that any development of Site SHA3, should also make provision for removal of the bridges. Again, no works to remove the bridges should take place without the prior consent of the Trust.</p> <p>We will need to be satisfied that all works associated with the construction of the new bridge (and any removal of existing bridges) do not adversely affect the stability of the canal cutting slopes or otherwise risk damage to the canal or towpath. Although the detailed design and appearance of the new bridge is more likely to be a matter that can be secured via planning conditions, as could a detailed construction methodology, sufficient information should still be provided with any planning application to demonstrate that constructing the bridge is feasible and to show how works are likely to affect the cuttings slopes (possibly including slopes ability assessments and consideration of the extent of vegetation removal necessary to facilitate the works) as quite</p>	<p>Ensure the site name is consistent between Policy DS5 and Policy SHA3.</p> <p>Provide clarity over the existing two bailey structures associated with the quarry operation (bridges 23A and 23B) which cross the canal in this location and whether they are to be retained or removed.</p> <p>Under Form of Development, point 18 should be amended to read: 'A detailed construction management plan should be implemented to reduce the effects of the Coventry Canal; this should include sufficient evidence to demonstrate that the stability of the existing canal cutting slopes will not be adversely affected by the development either during or after construction work'.</p>	<p>In terms of point 1; Amend Key Development Principle 5 on SHA3 to advise: " Replacement bridge or bridges across the canal will be required at the Developers expense; therefore the Applicant should have early discussions with the Canal and River Trust (any works will require the express consent of the Trust) to ensure the works will not affect the canal structure. Provision will need to be made by the Developer to provide pedestrian and cycle access to the tow path from the site." Add to Key Development Principles: that "financial contributions will be required to upgrade the towpath surface in the area." In terms of point 2 this</p>

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					<p>extensive work may be necessary to ensure that these slopes remain stable during and after these works. Similarly, any new buildings proposed near to the crest of the cutting slopes will also have to demonstrate that they can be safely constructed without risking creation of land instability. We suggest that these requirements could be included in the Key Development Principles. We consider it appropriate for the development to provide new accesses onto the canal towpath in order to encourage greater use of the canal as a recreational resource and a sustainable travelling route for walkers and cyclists. As the development is therefore likely to result in increased footfall, along with the improved access, the towpath itself will require upgrading and will need a more durable surface to both facilitate year-round use. We consider it appropriate to include this as a requirement within Policy SHA3 as these works will also be necessary to reduce increased future maintenance liabilities which would otherwise have to be borne by the Trust.</p>		<p>is already described in Key Development Principle 14. 3. Amend Key Development Principle 18 to read: 18. New housing should address the canal. A detailed light contour map of proposed lighting will be required to ensure no light spill to the canal wildlife corridor and a construction management plan will be required and need to be implemented to reduce the effects of the development on the Coventry Canal. This is include sufficient evidence that the stability of the canal infrastructure including the cutting will not be affected during or after construction.</p>
2.2	ID	Canal & River Trust		DS5	Ensure the site name is consistent between Policy DS5 and Policy SHA3.	Ensure the site name is consistent between Policy DS5 and Policy SHA-3	Amend name in DS5 for the title of SHA-3 to Tuttle Hill

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2.3	ID	Canal & River Trust		SHA6	<p>Site SHA6 is located adjacent to the offside (non-towpath side) bank of the Coventry Canal and is currently allocated for development in the adopted Local Plan (site HSG12).</p> <p>The Key Development Principles identify a need to provide accessible cycle routes and footpaths to neighbouring facilities and paragraph 8.76 expands on this, seeking "an upgrade and completion of the National Cycle Network Route 52 will be provided through the site, with connections to the wider cycle network".</p> <p>National Cycle Network Route 52 (NCN52) runs along the Coventry Canal towpath north from the Coventry Basin on the edge of Coventry city centre to Hawkesbury Junction, just south of the application site. This route passes by the Coventry (Ricoh) Arena and there is access from the arena to the canal towpath. The Trust has recently undertaken improvements to the canal towpath from Coventry Basin to Hawkesbury Junction, which will help facilitate more widespread use of this sustainable travelling route.</p> <p>There is a gap in NCN52 between Hawkesbury Junction and Bedworth, with the route starting again by Bedworth Train Station. A continuation of NCN52 north of Hawksbury Junction and through site SHA6 towards Bedworth would help to provide a sustainable link for future residents of this development to both Coventry and Bedworth as well as offering a leisure and recreational resource to encourage healthier and more active lifestyles.</p> <p>However, at present the only means of accessing the site SHA6 from NCN52 from the south is via a pedestrian bridge crossing the Coventry Canal by the Grade II Listed Hawkesbury Junction Engine House. This bridge is not DDA compliant- it has a narrow deck and steep narrow steps only and is certainly not well-suited to act as a crossing for cyclists, who would be obliged to dismount and carry their bikes over it. Neither the adopted Local Plan nor the recently adopted Concept Plan SPD explicitly acknowledge this fundamental point.</p> <p>To achieve an effective connection between site SHA6 and NCN52 to the south, the Trust considers that improved access over the canal will be necessary and should be acknowledged within the Key Development Principles. The present access is not adequate to cater for any significant increase in usage by pedestrians or cyclists and the proximity of the listed Engine House creates a significant pinch-point on the north side of the canal where access and visibility is restricted close to the existing pedestrian bridge.</p> <p>Upgrading the existing footbridge by the Engine House may be problematic given the limited space available and the sensitivity of the location which is both within the Hawkesbury Junction conservation area and adjacent to a Grade II listed building. Ensuring that any new or improved bridge here was appropriate in design and heritage terms is likely to be difficult and will inevitably increase costs.</p> <p>We therefore suggest that it would be appropriate to include a requirement to identify a suitable location to provide a new cycle/footbridge crossing the canal to the north of Hawkesbury Junction to link site SHA6 to the canal towpath and to provide a more suitable connection to NCN52, which could be extended along the canal towpath between Hawkesbury Junction and the new bridge. We further consider that a necessary element of securing an appropriate connection between the site and NCN52 at Hawkebsury Junction would also be the inclusion of improvement to the canal towpath to ensure it can operate effectively as a route for both pedestrians and cyclists.</p>	<p>Include in the Key Development Principles a requirement to provide a new cycle/footbridge bridge crossing the canal north of Hawkesbury Junction to facilitate extension of NCN52 along the canal towpath and then into Site SHA6, together with a requirement to improve the towpath between Hawkesbury Junction and the bridge to a standard appropriate to encourage greater use by cyclists.</p>	<p>Outline application 037807 (which is subject to approval subject to the signing of a Legal Agreement and includes conditions for the provision of a foot/cycle bridge over the Coventry Canal linking the application site and towpath and which includes provision of its long-term management and maintenance. A condition has also been included to include a towpath to the northern boundary of the application site and its long term maintenance and also an upgrade of the towpath along Coventry Canal to a pedestrian/cycle path between Hawkesbury Junction and the towpath alongside the north boundary of the application site. The conditions also states that the proposal will refurbish the boating facilities building to include toilet, shower and washing up facilities. It is therefore considered that these be included as Key Development Principles.</p>

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2.4	ID	Canal & River Trust		NSHA-4 and DS5	Site NSHA-4 is located adjacent to the offside (non-towpath side)bank of the Coventry Canal. Any development of this site should consider the relationship created with the canal and have regard to its role as a green corridor and wildlife habitat. Provision of landscape planting and/or public open space should be considered alongside the canal and development should take advantage of views over the canal and not turns its back on it.	No modifications have been provided.	The non-strategic sites do not have their own Policies or Concept Plans. However, DS5 does refer to the canal for all the sites. As all sites adjacent to canals would be expected to make use of the canal and retain and enhance its wildlife corridor benefits, then it is considered reasonable to add this to DS5.
2.5	ID	Canal & River Trust		SEA-1 and DS6	Policy SEA1 identifies an appropriate approach to development of this site in the Key Development Principles and Form of Development. Any new bridge over the Coventry Canal, or any works to (or use of) the existing Turnover Bridge will require the prior consent of the Canal & River Trust.	No modifications have been provided. The wording suggests the Canal & River Trust are in agreement with this Policy but just request that the following is added "Requires Policy to include consent required for any works to the canal bridge."	Key Development Principle 4 on SEA-1 refers to crossing the canal and it is considered reasonable to include "any works to the Coventry canal infrastructure including bridges will require the express consent of the Canal & River Trust
2.6	ID	Canal & River Trust	Para. 8.108	SEA-4 and DS6	Para. 8.108 suggests that development of Site SEA4 offers an opportunity to re-establish the canal branch through the site and link it to the remaining portion to the east. Whilst this would still remain separate from the existing navigable canal network, the Trust nonetheless considers that it provides an opportunity to restore part of the industrial heritage of the locality as well as creating a wildlife habitat.	No modifications have been provided. The wording suggests the Canal & River Trust are in agreement with this paragraph but just request that the wording is enhanced so that the canal bridge is restored in order to restore part of the industrial heritage of the locality as well as creating a wildlife habitat.	Amend paragraph bullet point to state: <ul style="list-style-type: none"> • Re-establishing the canal branch through the site and linking to the remaining portion to the east, <i>in order to restore part of the industrial heritage of the locality as well as creating a continuous wildlife corridor habitat.</i>
2.7	ID	Canal & River Trust		CEM-1	A small section of the site adjoins the Coventry Canal and we note that the Key Development Principles include a requirement for provision of a suitable stand-off zone/buffer from the canal, which we consider is an appropriate approach to protecting the canal. We suggest that any buffer should be at least 5/10m in depth and comprise native species to help support the role of the canal as a wildlife corridor.	No modifications have been provided. The wording suggests the Canal & River Trust are in agreement with this Policy but that the wording is amended to include the amount of stand-off and that this buffer be enhanced native planting to this wildlife corridor	Key Development Principle 2 already requires standoff so amend to read: 2. Provision of a suitable stand-off of at least 5-10m buffer from the Coventry Canal. This buffer is to be planted with native species in order to enhance the

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							benefits of the canal as a wildlife corridor.
2.8	ID	Canal & River Trust		NE1	Policy NE1 identifies the importance of protecting and enhancing green/blue infrastructure assets and improving links both to them and between them. The Policy identifies potential opportunities for strengthening the role of the Coventry Canal in this respect and assisting in encouraging people to make use of the canal towpath as a sustainable walking and cycling route and recreational resource as well as enhancing its role as a valuable wildlife habitat.	No alternative wording has been requested.	The wording suggests the Canal & River Trust are in agreement with this Policy and that it does not require any amendments.
2.9	ID	Canal & River Trust		BE1	<p>Policy BE1 is appropriate insofar as it refers to the risks associated with the development located on or adjacent to land which may have been subject to contamination and/or land instability, but it should also consider the risks that new development can present in terms of creating land instability which could adversely affect adjacent land or infrastructure, such as canals and associated structures such as embankment or cutting slopes.</p> <p>New developments involving construction operations taking place in close proximity to the Trusts canals and associated structures presents a risk that these operations, including any excavations required for foundation construction, may create land instability or otherwise adversely affect the stability for structural integrity of the canal.</p> <p>Canals are not water-tight and retain their water through a combination of waterway wall construction, clay lining and earth pressure. Vibrations (for example, from piling operations, ground compaction or plant/vehicle movement) and excavation of the ground in the vicinity of the canal can create land instability and lead to leaks or even, in extreme cases, breaches of the canal which in turn results in flooding of adjacent land.</p> <p>We appreciate that the issue of land instability can be complex and often also involves other regimes such as Building Regulations and legislation such as the Party Wall Act 1996. However, the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability.</p> <p>In particular, paragraph 184 of the NPPF is clear that where a site is affected by land instability issues, responsibility for securing a safe development rests with the developer and/or land owner.</p>	<p>Policy BE1 should be amended: Development proposals located on or adjacent to land which may have been subject to contamination and / or land instability or are likely to risk creating land instability that could adversely affect nearby land and / or infrastructure will need to demonstrate the following:</p> <ol style="list-style-type: none"> 1. That the site is suitable for its proposed use and that measures can be taken to mitigate effectively the impacts arising from land contamination and instability on public health, environmental quality, the build environment and general amenity. 2. That the development site is or will be made suitable for the proposed final use and will need to provide, as a minimum, the following documents with the planning application <ol style="list-style-type: none"> a. Detailed site history identifying contaminative uses and land instability. b. The nature and agent of the contamination, land instability and the hazards and risk posed 3. That any risks of creating land instability likely to adversely affect nearby land o infrastructure can 	The suggested modifications are considered reasonable and in line with the NPPF and Policy BE1 will be amended accordingly.

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						be adequately mitigated. Development proposals should also demonstrate consideration of pollution prevention measures during construction.	
3.1	ML	The Coal Authority		BE1	The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.	No alternative wording has been requested.	The wording suggests the Canal & River Trust are in agreement with this Policy and that it does not require any amendments.
4.1	DB	Coventry City Council		General - Duty to Co-operate	The Plan as drafted has yet to comply with the requirements of the Duty to Cooperate and therefore could not be considered sound. Put simply, without having established the Housing Need for the Housing Market Area, and resolved any subsequent issues, then there can be no certainty regarding the Borough's Housing Need or whether the allocations proposed are sufficient. Given that there was previously a Memorandum of Understanding signed by all authorities in the HMA, to progress without due reference to this or preparing alternative agreements is disappointing. We look forward to preparing a suitable Statement of Common Ground once we can robustly calculate Housing Need. The impact of this may be that elements of the Borough's draft Plan may need to be rewritten, and will need further consultation.	No suggested wording but parts may need to be rewritten once HEDNA is published and robust housing needs are considered.	The Council recognises that the housing need may need to be readdressed once the HEDNA is completed.

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4.2	DB	Coventry City Council		DS3	Coventry City Council supports the design principles as set out in Policy DS3. However, there is concern with the last paragraph of the policy. This element of the policy is highly restrictive as it simply states that 'New unallocated development outside the settlement boundaries, as shown on the proposals map, is limited to agriculture, forestry, leisure, and other uses that can be demonstrated to require a location outside of the settlement boundaries. Defining the limits of development so finally on a proposals map at a point in the process where the development needs of NBBC and its partners across the wider sub region are not known is premature and far too inflexible. The policy needs revising to build in flexibility so that the plan is able to respond to accommodating any implications of the jointly commissioned HEDNA.	No suggested amended wording but wording needs to be amended to allow flexibility for sub regionally housing need.	The Council recognises that the housing need may need to be readdressed once the HEDNA is completed. The settlement boundary would potentially be amended at that time once the full implications of the HEDNA are ascertained.
4.3	DB	Coventry City Council		DS4	<p>Strategic Policy DS4 – Overall Development Needs</p> <p>Welcome the acknowledgement that the figure for the number of homes and amount of employment will be reviewed once the joint Coventry and Warwickshire HEDNA is published later in 2022 (once the Census figures are factored in). Furthermore, Coventry City Council welcomes the statement in para 7.24 that Nuneaton and Bedworth Borough Council (NBBC) will co-operate in continuing to assist with any unmet need from neighbouring areas where there is clear evidence to justify this.</p> <p>It is noted that, in advance of the full sub regional HEDNA, NBBC's interim HEDNA, focusing exclusively on the borough administrative area, has been commissioned to provide an initial steer. Coventry City Council does not wish to draw any conclusions at this stage as the final sub regional HEDNA will be completed once the consultants (Iceni) have had the opportunity to consider the Census figures. This preferred options consultation closes on 22nd July 2022 which will be prior to the HEDNA being finalised. Therefore, any implications for the plan and the current Memorandums of Understanding (housing and employment) will need to be addressed under the statutory Duty To Co-operate and through the production of Statements of Common Ground. Because of the current uncertainty over the numbers this has implications for other policies too, particularly DS3 (Development Principles).</p>	No suggested amended wording as overall needs uncertain until HEDNA is published and sub regional housing need is finalised.	The Council recognises that the housing need may need to be readdressed once the HEDNA is completed and once the full implications of the HEDNA are ascertained.
4.4	DB	Coventry City Council		DS5	The allocations are noted. Those adjacent to the City boundary need further work in order to understand the impact on, for example, cross-boundary highways or biodiversity issues. This work has not been undertaken and we are therefore unable to comment further at this stage. However, as in our response to Policy DS3 and DS4 the situation needs reviewing once the HEDNA figures are known as there may be a requirement to make further allocations to meet need.	No suggested wording provided but requires cross boundary work for sites in proximity to Coventry City Council once needs are finalised.	Once sites are finalised, discussions can be had with Coventry City Council, before the publication version to ensure the Policies meet both needs such as for highways and biodiversity.

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4.5	DB	Coventry City Council		DS6	The allocations are noted. However, as in our response to previous policies the situation needs reviewing once the joint HEDNA figures are known as there may be a requirement to make further allocations to meet need, as well as a requirement to address other cross-boundary issues.	See comments from DS5 above.	See comments from DS5 above.
4.6	DB	Coventry City Council		DS7	As in our response to previous policies the situation needs reviewing once the HEDNA figures are known in order to establish the Housing Need across the HMA.	See comments from DS5 above.	See comments from DS5 above.
4.7	DB	Coventry City Council		DS8	This policy builds in flexibility in the last paragraph: 'Where additional housing sites need to be brought forward, initial priority will be given to sustainable sites, including town centre redevelopment opportunities in Nuneaton and edge of settlement sites, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits'. This is welcomed. However, this conflicts with other policies especially DS3 and DS7 which are highly restrictive, defining the extent of development limits with no flexibility. The flexibility is essential in order for the plan to be able to respond to the final HEDNA for which the results are as yet not concluded.	See comments from DS3 above.	See comments from DS3 above.
4.8	DB	Coventry City Council		SHLAA	There are a number of questions regarding the conclusions of the site analysis of the SHLAA, especially in the absence of up-to-date evidence such as SFRA or Green Belt Review. Furthermore, sites appear to be dismissed without due consideration – for example ATT-2 is a non-designated heritage asset standing vacant and is not taken forward without consideration of non-intrusive conversion which would help deliver much needed dwellings for the Borough. Once the Borough's Housing Need is robustly established in the forthcoming HEDNA and subsequent Statements of Common Ground the SHLAA sites will need to be revisited with a much more thorough appraisal. At that point, site plans would be beneficial so that we can understand the spatial distribution and consider such points as where agglomeration of small sites might overcome issues of, for example, viability due to remediation or infrastructure requirements.	No suggested wording but requires sites readdressing once needs are finalised.	Sites will be readdressed once the HEDNA needs are finalised and all the outstanding evidence bases are completed.

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5.1	CL	CWLEP Growth Hub		All Policies - Housing	<p>Housing</p> <p>Provides the Borough's housing need for the 15-year plan period. Based on the latest information available, this indicates a need of 646 dwellings per annum (dpa), a total of 9,690 dwellings. This figure does not account for the Census 2021 information which is due to be released in the summer 2022. The housing figure may therefore change, but the 646 dwellings p/a figure is the best available figure at this point.</p> <p>CWLEP Response:</p> <p>The population and household results from the 2021 Census of Population are now available. We note that the Census results have produced figures that are higher than ONS estimates for population and households in the Borough in 2021, and more in line with the alternative estimates provided in the HEDNA. We would suggest these should be used as the baseline for future forecasts.</p> <p>Future housing development in the Borough should also be accompanied by adequate infrastructure provision, and that this is appropriate to meet the needs of the relevant scale of future growth in population and households, includes more sustainable accessibility, travel and living, and also reflects Net Zero ambitions in design, construction, and operation.</p>		Noted
5.2	CL	CWLEP Growth Hub		All Policies - Employment	<p>Employment</p> <p>Establishes the Borough's employment land needs. This is estimated to be 80.5 hectares of land for industrial and distribution/warehousing development, and 2 hectares of land for office development.</p> <ul style="list-style-type: none"> • Allocates strategic employment sites to meet the Borough's needs. <p>CWLEP Response:</p> <p>CWLEP recognises the progress that has been made in recent years in improving job density in the Borough – this will have helped to reduce unemployment amongst the Borough's resident workforce but also reduce the need for residents to commute out of Nuneaton & Bedworth to find work.</p> <p>Policies which encourage further increases in the numbers of good jobs in the Borough and lead to further positive performance in the job density ratio are welcomed. These will continue to improve Nuneaton & Bedworth's job density position relative to other areas of Coventry & Warwickshire, enable more residents to find work nearer to where they live, and help further build a more sustainable Borough.</p>		Noted

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5.3	CL	CWLEP Growth Hub		All Policies - Town Centres	<p>Employment</p> <p>Establishes the Borough's employment land needs. This is estimated to be 80.5 hectares of land for industrial and distribution/warehousing development, and 2 hectares of land for office development.</p> <ul style="list-style-type: none"> • Allocates strategic employment sites to meet the Borough's needs. <p>CWLEP Response:</p> <p>CWLEP recognises the progress that has been made in recent years in improving job density in the Borough – this will have helped to reduce unemployment amongst the Borough's resident workforce but also reduce the need for residents to commute out of Nuneaton & Bedworth to find work.</p> <p>Town Centres</p> <p>Includes planning policies that seek to deliver the Transforming Nuneaton and Transforming Bedworth regeneration initiatives and promote town centre uses to encourage more visitors and businesses.</p> <p>CWLEP Response:</p> <p>CWLEP recognises that all the town and city centres across Coventry & Warwickshire have changed drastically as a response to the Covid-19 pandemic, and in some cases have accelerated wider economic and social changes that were already underway. We recognise how vital the Transforming Nuneaton and Transforming Bedworth programmes will be in helping deliver these changes to the towns in the Borough.</p> <p>As part of the CWLEP Strategic Reset Framework Taskforce work on gathering evidence to help shape the Framework a range of emerging trends for town centres were collated by the group – these could also form part of the evidence base for the Borough Plan Town Centre Review, in particular:</p> <p>Changing role of town centres:</p> <ul style="list-style-type: none"> • For workers specifically, there is likely to be demand for connecting and collaborating in and beyond the workplace • For residents and visitors, a growth in festivals, events, cultural, large social gatherings seen as being a critical part of the success of town centres • Potential for connecting, experiencing and cultural consumption will come into greater focus • Scope for creating new, exciting, green, safe spaces in town centres 		<p>Purple Flag status would more appropriately be mentioned in our Town Centres Area Action Plan supplementary planning document. The scheme would also be something our Town Centres team can look into.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
					<ul style="list-style-type: none"> • Safe and vibrant night-time economy <p>Hospitality and retail:</p> <ul style="list-style-type: none"> • Hospitality – will be important in supporting town centres, especially if there is a diverse offer • Retail - increased desire for independent offerings, alongside experimental and experiential retail <p>Safety:</p> <p>Critical that safety for town centre visitors and residents remains, and formal recognition of this, through initiatives such as Purple Flag accreditation, will remain essential in helping to keep town centres safe, vibrant, and successful</p>		

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
5.4	CL	CWLEP Growth Hub	7.21	DS4	<p>80.5 ha of employment land for industrial and distribution/warehousing development and 2ha for office space.</p> <p>CWLEP Response: Logistics is a key part of Nuneaton & Bedworth's economy, as in other parts of Warwickshire, due to its central location, accessibility, and proximity to the strategic transport network. Whilst as a sector it is likely to continue growing in the future with associated demand for employment land, there should also be allocations and employment land located in the Borough to aid businesses that do not require a similar scale of strategic links to thrive and grow.</p> <p>There is also a recognition that new housing brings with it a requirement for additional warehousing/logistics infrastructure, and overall development need should link to policies on future housing need.</p> <p>Enabling long term and sustainable business growth and ensuring that there is an adequate supply of employment land available within Nuneaton & Bedworth is key. This includes all levels of the market, including an appropriate mix of small, medium, large, affordable, and high quality. The C&W Authorities Market Signals Report (2019), available at https://www.cwlep.com/sites/default/files/employment_market_signals_study_-_final_report_v6_clean_170719.pdf, emphasises the importance of small business units to enable SME's to establish and grow, and increase levels of economic growth for the Borough. A continuing shortage of affordable space hampers enterprise, opportunity, and sustainable growth.</p> <p>Allocations and employment land should adequately plan for a range of different use classes and include planning for a range of sizes and potential new and emerging, or a wider range of, sectors as the Borough's economy evolves.</p>		Noted
5.5	CL	CWLEP Growth Hub	7.44-7.47	DS6	<p>There is a need for new subregional strategic allocations to be brought forward (particularly above 25ha). These will be needed to attract significant inward investment into Nuneaton & Bedworth and ergo Coventry & Warwickshire.</p> <p>Evidence base does not factor in the C&W Authorities Market Signals Report (2019) Available at https://www.cwlep.com/sites/default/files/employment_market_signals_study_-_final_report_v6_clean_170719.pdf</p>	There is a need for new subregional strategic allocations to be brought forward (particularly above 25ha). These will be needed to attract significant inward investment into Nuneaton & Bedworth and ergo Coventry & Warwickshire.	Strategic employment allocation SEA-1 at Faultlands Farm is allocated for 26 ha, therefore this meets the need for a subregional strategic allocation.
5.6	CL	CWLEP Growth Hub	8.80-8.113	SEA-1, SEA-2, SEA-3, SEA-4, SEA-5, SEA-6	<p>Logistics is a key part of Nuneaton & Bedworth's economy, as in other parts of Warwickshire, due to its central location, accessibility, and proximity to the strategic transport network. Whilst as a sector it is likely to continue growing in the future with associated demand for employment land, there should also be allocations and employment land located in the Borough to aid businesses that do not require strategic links to thrive and grow.</p>	Each SEA site is allocated for E, B1, B2 and B8. It is likely that market forces will lean towards B8. It is recommended that Nuneaton & Bedworth Borough Council provide some sites which are solely business based, and not offer B8 across the board, to ensure that some allocations are brought forward to provide for non-logistics/distribution use	Requiring sites which exclude the provision of B8 uses was not a recommendation of the HEDNA (2022), therefore this cannot be justified from our evidence base.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
						across the Borough as the local economy evolves and grows.	
5.7	CL	CWLEP Growth Hub	10-10.8	E1	<p>Enabling long term and sustainable business growth and ensuring that there is an adequate supply of employment land available within Nuneaton & Bedworth is key. This includes all levels of the market, including an appropriate mix of small, medium, large, affordable, and high quality. The Coventry & Warwickshire Authorities Market Signals Report (2019) available at https://www.cwlep.com/sites/default/files/employment_market_signals_study_-_final_report_v6_clean_170719.pdf , emphasises the importance of small business units to enable SME's to establish and grow, and increase levels of economic growth for the Borough.</p> <p>A continuing shortage of affordable and small-scale spaces risks hampering enterprise, the growth of SME's, and the important positive impacts they have on local economy</p>	Policies to proactively enable growth in small units for a wider range of clusters, R&D activities, and other opportunities would help foster greater enterprise in the local economy	Policy E2 enables the redevelopment/expansion of sites for R&D activities.
5.8	CL	CWLEP Growth Hub	10.8-10.20	E2	Losses in employment land often take place when removing lower quality, smaller sized spaces, which are often utilised by SME's and small-scale businesses to grow out of. Removing these opportunities may be to the detriment of businesses, who may not be able to afford alternatives or must look to relocate outside of the Borough. Taking employment estates out of protection is a policy which removes opportunities for these sorts of businesses to thrive and grow into the future.	10.12 emphasises that 20ha of employment land could be lost throughout the planning period from removing protection from some employment sites. CWLEP queries whether another 20ha should be added to the 80ha of land allocated to make up for this - the ICENI report does not mention these potential losses being factored into their calculations around future need	Noted. The final version of the sub-regional HEDNA (2022) will likely set a new figure for employment site provision, so this will have to be taken into account.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
6.1		George Eliot Hospital NHS Trust		DS1 and H1	<p>George Eliot Hospital NHS Trust (the Trust) welcomes the opportunity to comment on Borough Plan Review Preferred Options document. The Trust recognises that the Borough Plan review process sets out a clear way to ensure the planning policies that are developed to meet future development needs in terms of housing and job growth reflect the views of the local population and key partners.</p> <p>The Trust requests that the council works closely with place partners, recognising the Place Executive and the Place Partnership as key stakeholder groups at place, as well as the recently constituted Coventry and Warwickshire Integrated Care Board and ensure the evidence base and local health and wellbeing strategy informs the plan. In addition, the NHS Long Term Plan has set a clear future direction of travel for the NHS in England places strong emphasis on the need to expand and strengthen local community and healthcare delivery systems. 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 key to delivering the vision detailed in the Borough Plan Review document.</p> <p>The Trust is required to provide commissioned health services to all people that present or who are referred to the Trust. This obligation extends to all services from emergency treatment at A and E to routine/non-urgent referrals. Whilst patients are able in some cases to exercise choice over where they access NHS services, in the case of an emergency they are taken to their nearest appropriate A&E Department by the ambulance service. Therefore, the Trust, working with local partners is keen to ensure that local population planned growth and development, outlined in this plan considers the impact on local healthcare delivery systems, particularly in relation to required physical infrastructure delivery requirements. The Trust is a District General Hospital and provides a full range of DGH service to the local population which will be impacted by housing growth</p> <p>The Trust welcomes the following key points from the latest documents:</p> <ul style="list-style-type: none"> • Ensuring infrastructure provision keeps pace with new development - this is a key component of delivering the Borough Plan Review. • When considering development proposals, the Council will take a positive approach that reflects the 		We will review Coventry and Warwickshire Integrated Care Board's local health and wellbeing strategy.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
					<p>presumption in favour of sustainable development (Policy DS1)</p> <ul style="list-style-type: none"> • A focus on development that will enable older people to stay in their own homes including the development of extra care housing, residential care homes and other housing options supporting this (Policy H1), particularly noting the proportional increase in older people as a percentage of the total population. • Most development will be directed to Nuneaton as the primary town. Other development will be directed to other settlements, at a scale that reflects the role and function of the settlement. <p>The Trust has reviewed the comments made by Coventry and Warwickshire CCG (now the Coventry and Warwickshire Integrated Care Board), and is pleased that the Council:</p> <ul style="list-style-type: none"> • Has noted the comments made and incorporated them into the process • is keen to work collaboratively with local community partners to ensure the Borough Plan is developed. <p>A response to the Issues and Options consultation has also been submitted.</p>		
7.1		Hinckley and Bosworth Borough Council			<p>Housing need</p> <p>It is noted that Nuneaton and Bedworth Borough Council have decided to use an updated Housing and Economic Development Needs Assessment (HEDNA) to calculate its housing need instead of the standard method in order to provide a more-up-date assessment. The NPPF' paragraph 61's guidance on using an alternative approach to the standard method would need to qualify as an exceptional circumstance which reflects current and future demographic trends and market signals. We understand that Icenis' analysis considers recent population growth is higher than reflected in the 2014 based household projections and the concerns over the accuracy of the Office of National Statistics population estimates for Coventry. This will need to be fully justified as the plan progresses.</p> <p>We approve the approach of allocating sites in the main spatial areas of Nuneaton, Bedworth, Bulkington and the northern Coventry fringe as their existing infrastructure can be utilised.</p> <p>It is noted that The Infrastructure Delivery Plan will be updated to consider the infrastructure requirements to support all proposed allocations.</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
7.2		Hinckley and Bosworth Borough Council			<p>Cross boundary implications of development The plan proposes a strategic housing allocation, Top Farm for 1700 dwellings, along the A5 which is in relatively close proximity to the boundary with Hinckley and Bosworth and the rural village of Higham on the Hill. Proposals for development, regardless of proximity to Hinckley and Bosworth Borough should be planned alongside necessary infrastructure requirements to minimise any impact on the services and infrastructure within Hinckley and Bosworth. The A5 is currently operating over capacity, and it is likely that a development of this scale would have an adverse impact on the highway network in this area, including HBBC.</p> <p>HBBC is cognisant of potential impact on the A5 affecting pinch points at the Dodwells and Longshoot junctions of some of its own proposed site allocations in the emerging Local Plan as well as planned expansion of the Horiba MIRA site north and south of the A5 as well as potential impact arising from the expected NSIP Hinckley National Rail Freight Interchange proposal, which is expected to be submitted before the end of this year. All of these proposals must therefore be accounted for in any transport assessment relating to the Top Farm proposal to demonstrate that the A5 has capacity to cope with the cumulative additional traffic and that suitable highway improvements are provided for in the IDP should that not be the case.</p> <p>Policy SHA-1 Top Farm refers to a transport modelling report to justify that it mitigates impacts to the A5. However, this is not cited nor does it form part of the consultation documentation. The most recent transport modelling report found on the Nuneaton and Bedworth website is a version dating back to 2016. It is unlikely that the findings of this modelling report are still valid especially given that the RIS2 scheme is no longer moving forward.</p> <p>We note that an updated Strategic Transport Assessment has been commissioned to assess the potential impacts of the Borough Plan Review allocations and proposals on the highway network. We would welcome the opportunity to review this document in due course and wish to continue working with Officers of your Council, Warwickshire County Council and Leicestershire County Council to explore the most effective delivery mechanisms for cross-boundary strategic transport schemes required to accommodate the combined impact of growth in our respective Boroughs.</p> <p>HBBC would like to reserve further comment regarding the 'soundness' of the plan until the pre-submission consultation stage, when any remaining evidence base documents and the policies contained within the Plan have been fully drafted.</p> <p>We look forward to continue working with Nuneaton and Bedworth Borough Council in the development of our respective local plans and on wider cross boundary planning issues</p>		<p>The North Warwickshire Borough Council Local Plan employment allocation at MIRA was explicitly accounted for in the modelling assessment of our Borough Plan. Our modelling utilises the trip generation linked to the current application for the MIRA expansion to the south of the A5 and as such represents the latest assumptions.</p> <p>With respect to the Hinckley National Rail Freight Interchange (HNRFI) impacts, the site is not allocation in any plans, and the pre-app stage commenced in September, which is after the completion of the Borough Plan modelling work. On this basis the site would not have been explicitly accounted for, nor would we be required to due to its planning status in terms of any potential inclusion in modelling uncertainty logs. There will be some allowance for the site contained in the external growth, which will have been applied to the forecasts, of which HNRFI would potentially be a part of. Further to this, any forecasts relating to background growth would be adjusted to account for new developments as they come forward.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
							<p>Despite HNRFI not being explicitly accounted for, emerging work to support the application has been shared with Warwickshire County Council's Highways team and they are comfortable that the impacts on Warwickshire roads within the Nuneaton and Bedworth area is minimal.</p> <p>The most recent transport modelling was undertaken in 2018 and 2019 as part of Borough Plan examination. Whilst a new transport assessment may have to factor in HBBC's proposed site allocations, SHA-1 is an adopted site allocation, and therefore needs to be considered in HBBC's own transport assessment.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.1		Historic England			<p>HE welcomes that the Plan now includes the matter of conserving and enhancing the historic environment. This addresses an earlier concern from the Issues & Options stage in which it was not proposed to update policies on this matter until a later date. We set out our specific comments on the relevant policies and proposals below.</p> <p>Whilst it supports the overall vision of the Plan and Objective 7 (historic and natural environments), HE has serious concerns about the lack of a heritage evidence base for the Nuneaton and Bedworth Borough Plan.</p> <p>It is our view that at this stage the Plan does not demonstrate a positive approach to the historic environment as required by NPPF para. 190 and we would query the soundness of the Plan in respect of historic environment issues at this time.</p> <p>Whilst we note that the Plan is not accompanied by a Heritage Impact Assessment (HIA), we understand that the Council has recently appointed consultants to assess the impact of development on designated and non-designated heritage assets and their settings. However, HE recommends that a HIA, or similar assessment, is prepared, either by or on behalf of the LPA, at an early stage of the plan process. A HIA produced after publication of the Preferred Options document, clearly indicates that the historic environment has not been fully considered in the site selection, or the Sustainability Appraisal, process.</p> <p>As you will be aware, HE recommends that the site assessment methodology used is generally in line with that set out in HE's Advice Note 3: The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3), as a basis for the consideration of the historic environment as part of the site allocation process:</p> <p>https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/</p> <p>and that the advice of Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3) is followed:</p> <p>https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>There may also be opportunities to enhance or better reveal the significance of heritage assets (NPPF para. 206), or opportunities to tackle heritage at risk through sensitive development, and such opportunities should also be identified through the HIA and carried through into plan policies and the associated Sustainability Appraisal.</p> <p>With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. We recommend that the views of your chosen specialist archaeological adviser are sought at an early stage in the plan process, ideally before any growth options/proposed allocations are selected.</p> <p>This should enable confirmation that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is</p>		<p>The heritage evidence base has now been completed.</p> <p>We will undertake a Heritage Impact Assessment before the Publication stage of the Borough Plan Review</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
					required through field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site.		
8.2		Historic England			<p>Vision</p> <p>HE welcomes that the conservation and enhancement of the historic environment is now included within the vision set out for Nuneaton and Bedworth in this document.</p>		Noted
8.3		Historic England			<p>Broad Issues</p> <p>Under the Local Environment section on p.9 HE welcomes that the Reference to 'English Heritage's' Building's at Risk Register has been amended to 'Historic England's' Building's at Risk Register.</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.4		Historic England			<p>Objectives</p> <p>HE welcomes the amended wording of Objective 7 to “sustains and enhances” to better reflect the wording of the NPPF, as suggested in our previous comments to the Issues and Options consultation document.</p>		Noted
8.5		Historic England		DS1	<p>Policy DS1 – Presumption in favour of Sustainable Development</p> <p>HE welcomes the inclusion in the policy of the requirement for development to sustain and enhance the historic environment.</p>		Noted
8.6		Historic England		DS5	<p>Policy DS5 – Residential allocations</p> <p>In terms of proposed residential allocations, HE 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.</p> <p>With regard to specific proposed allocations which have the potential to affect the historic environment please see the accompanying Appendix A for our detailed comments on the Strategic Housing Allocations, and Appendix B for our detailed comments on the Non-strategic sites.</p> <p>Please note that in the absence of any HIA, or similar historic environment assessment information, we have considered the assessment of impacts on heritage assets as set out for each site within the SHLAA and commented accordingly. However, we stress that our advice does not negate the need for an appropriate HIA or similar assessment work to be undertaken as part of your Plan’s evidence base.</p>		<p>Our heritage assessment used the site selection methodology from HEAN3, in addition to conducting an impact assessment.</p> <p>Officer responses to both Appendix A and B can be found in separate documents.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.7		Historic England		DS6	<p>Policy DS6 – Employment allocations</p> <p>In terms of proposed employment allocations, HE 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.</p> <p>With regard to specific proposed allocations which have the potential to affect the historic environment please see our accompanying Appendix A for our detailed comments on the Strategic Employment Allocations.</p>		<p>Our heritage assessment used the site selection methodology from HEAN3, in addition to conducting an impact assessment.</p> <p>Officer responses to Appendix A can be found in a separate document.</p>
8.8		Historic England		TC2	<p>Policy TC2 – Nature of Town Centre Growth</p> <p>Whilst HE 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.</p> <p>Therefore, HE supports the policy aspiration to deliver appropriate enhancements in the town centres which complement existing historic assets and help define the town centres sense of place.</p> <p>HE notes that instead of a separate Town Centres Area Action Plan document, specific residential proposals within Nuneaton and Bedworth Town Centres are now included within this Preferred Options Plan. For our detailed comments on specific town centre allocations which have the potential to affect the historic environment please see our accompanying Appendix B.</p>		<p>Officer responses to Appendix B can be found in a separate document.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.9		Historic England		NE1	<p>Policy NE1 – Green and Blue Infrastructure</p> <p>HE welcomes that heritage, and industrial heritage in particular, has been acknowledged in principle as a key part of the green-blue infrastructure of the Nuneaton and Bedworth area. However, we consider that the policy could more explicitly recognise the value of the historic environment in contributing to the multi-functionality of green-blue infrastructure via cultural heritage, recreation and tourism through assets such as historic parks, gardens and canals.</p>		<p>Agreed. Policy NE1 will be amended to explicitly recognise the value of the historic environment in contributing to the multi-functionality of green-blue infrastructure via cultural heritage, recreation and tourism through assets such as historic parks, gardens and canals.</p>
8.10		Historic England		NE4	<p>Policy NE4 – Managing flood risk and water quality</p> <p>HE considers that this policy should acknowledge the risks to traditional buildings from flooding, especially the need for such buildings to be able to dry out slowly and that care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building.</p> <p>You may wish to refer to HE’s guidance note on ‘Flooding and Historic Buildings’: https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/heag017-flooding-and-historic-buildings/</p> <p>In addition, sustainable drainage systems should be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS features.</p>		<p>Agreed. Policy NE4 will be amended to state that care must be taken not to introduce inappropriate retrofitted measures which would prevent effective drying and shorten the life of the building.</p> <p>Policy NE4 will also be amended to state the following "Sustainable drainage systems should be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS features.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
							<p>In addition to this, we will be adding a plan to the document to note areas with potential for the discovery of non-designated heritage assets with archaeological interest.</p>
8.11		Historic England		NE5	<p>Policy NE5 – Landscape Character</p> <p>HE welcomes this policy and considers that under ‘Key characteristics and distinctiveness’ specific reference could be made to the historic environment in the opening paragraph.</p>		<p>Agreed. Policy NE5 will be amended under 'Key characteristics and distinctiveness' to make reference to the historic environment in the opening paragraph.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.12		Historic England		BE2	<p>Policy BE2 – Renewable and Low Carbon Energy</p> <p>HE recognises the urgent need for positive action and is committed to achieving net zero through supporting actions that address the causes of climate change and that reduce greenhouse gas emissions.</p> <p>With reference to small scale wind energy, we note that protecting heritage is an issue included in para. 15.21 of the supporting policy text, but we suggest that reference should be made to the impact of development for small scale wind energy on the historic environment within the criteria of the policy itself.</p>		<p>Agreed. Policy BE2 will be amended to make reference to the impact of small scale wind energy on the historic environment within the criteria of the policy.</p>
8.13		Historic England		BE3	<p>Policy BE3 – Sustainable Design and Construction</p> <p>HE welcomes the inclusion of this policy and would stress that heritage assets can be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation.</p> <p>For example, retaining, repairing, refurbishing, retrofitting and reusing heritage assets, and especially historic buildings, can contribute to reducing carbon emissions. We therefore suggest that the policy also references the importance of the historic environment in respect of the embodied carbon value of historic buildings. In particular, the contribution that the retention and reuse of old buildings makes, together with the sustainability of traditional building materials and design.</p> <p>Historic England's 'Heritage Counts' information may be useful:</p> <ul style="list-style-type: none"> • https://historicengland.org.uk/content/heritage-counts/pub/2020/heritage-environment-2020/ • https://historicengland.org.uk/research/heritage-counts/2020-know-your-carbon/reducing-carbon-emissions-in-traditional-homes/ <p>and also, Energy Efficiency and Traditional Homes - HEAN 14 –</p> <ul style="list-style-type: none"> • https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/heag295-energy-efficiency-traditional-homes/ 		<p>Agreed. Policy BE3 will be amended to state "Heritage assets can be a valuable aid to achieving sustainable development, in both climate change and mitigation and adaptation. For example, retaining, repairing, refurbishing, retrofitting and reusing heritage assets, and especially historic buildings, can contribute to reducing carbon emissions. The historic environment is also important in respect of the embodied carbon value of historic buildings. In particular, the contribution that the retention and reuse of old buildings makes, together with the sustainability of traditional building materials and design."</p> <p>We will also follow the links sent, and review the documents in order</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
							to include information which would strengthen the protections afforded by this policy.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.14		Historic England		BE4	<p>Policy BE4 – Valuing and Conserving our historic environment</p> <p>HE is pleased to see the inclusion of a specific policy on the historic environment encompassed within the Preferred Options document and considers that overall the policy sets out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>However, whilst we acknowledge that there are some references to setting within the policy we suggest that in sections 1 and 2 (p.188) setting should be including and referenced throughout, such as in the sub-titles ‘Understand the asset and its setting’ and ‘Conserve the asset and its setting’. In section 2 we also suggest adding reference to setting in the first line to read: ‘Great weight will be given to the conservation of the borough’s heritage assets and their settings’. This would ensure the wording is in line with NPPF requirements and terminology.</p> <p>HE welcomes the references to local heritage assets within the supporting policy text and also reference to those assets currently on HE’s Heritage at Risk Register and is pleased to see that the Council’s list of non-designated heritage assets is currently being reviewed.</p> <p>Para. 15.67 refers to the policy delivering Borough Plan Objective 6. However, HE believes that this should in fact refer to Objective 7.</p>		<p>Policy BE4 will be amended to ensure that in sections 1 and 2 (p 188) setting will be included and referenced throughout, such as amended the sub-titles to 'Understand the asset and its setting' and 'Conserve the asset and its setting'. This will include in section 2, adding reference to setting in the first line to read: 'Great weight will be given to the conservation of the borough's heritage assets and their settings'.</p> <p>Paragraph 15.67 will also be amended to refer to objective 7, rather than objective 6.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.15		Historic England			<p>Sustainability Appraisal (SA) Second Interim Report: Regulation 18 June 2022</p> <p>With regard to Chapter 8 of the SA Report, we note the recommendation that proposals with potential impacts on conservation areas should provide a detailed heritage impact assessment and include appropriate mitigation measures to minimise adverse impacts. Whilst HE agrees with this recommendation, we strongly suggest that heritage impact assessments are undertaken for all proposals that may have potential impacts on designated and non-designated heritage assets, and not just on conservation areas. Please see our detailed comments on proposed allocations contained our attached Appendices A and B.</p> <p>We also note the recommendation that development at ABB-8 needs to ensure that it is of an appropriate height and does not dominate the townscape and that a site-specific policy would be useful in this respect. Again, we re-iterate the need for a heritage impact assessment to inform this proposed allocation and please see our detailed comments on this site contained in the attached Appendix B.</p> <p>With regard to the SA's Appendix A: Appraisal of alternatives, HE notes the detailed comments in relation to the potential effects of several proposed allocations on the historic environment and the detailed scoring contained within Appendix C to the SA. However, HE re-iterates that a heritage impact assessment should be undertaken and that this should inform the next version of the SA.</p>		<p>Heritage impact assessments have now been undertaken on all proposals, including their impacts on designated and non-designated heritage assets, in addition to their impacts on conservation areas.</p> <p>In relation to site ABB-8, we do not have site specific policy requirements for non-strategic allocations, however we will add text to ensure any applications on non-strategic sites must follow the recommendations of the heritage assessment.</p> <p>A heritage impact assessment has now been undertaken, and will inform the next version of the SA.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.16		Historic England			<p>We would also re-iterate that, as set out in our comments at the Issues and Options stage, where specific allocations are being considered HE 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 or similar, as part of the evidence base for the Borough Plan Review.</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 HE's Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, 2016 (HEAN8):</p> <p>Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment</p> <p>HE would be happy to provide further comments as the Nuneaton and Bedworth Local Plan Review is progressed over the coming months. We should like to stress that the above opinion is based on the information provided by the Council in their consultation.</p> <p>To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.</p> <p>We hope that the above comments will assist, but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.</p>		The 5-step site selection methodology with HEAN3 has been used to inform the heritage assessment.
8.17		Historic England			<p>Policy SHA-1</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.18		Historic England			<p>Policy SHA-2</p> <p>SHLAA - No impacts.</p> <p>HE - notes that there is no Heritage Impact Assessment (HIA) information available and therefore no assessment has been undertaken of the likely impact of this large mixed-use development proposal on heritage assets and their settings. The NPPF (para. 190) requires that a positive approach to the historic environment is demonstrated as part of the Plan process and since this is not clear at this time, this raises issues over the soundness of the Local Plan document.</p> <p>Historic England notes that this proposed development would lie within the setting of Grade II* Arbury Hall Registered Park and Garden, less than 1km from Grade 1 Arbury Hall & less than 500m from Grade II* The Tea House, which is included on the 'Heritage at Risk' register, as is the Grade II* Park Farmhouse, located to the west of North Drive.</p> <p>However, we note that the Key development principles of Policy SHA-2 include a requirement at clause 13 for an asset management plan for the Arbury Estate, which includes measures to be taken and commitments to the repair and maintenance of the Park Farmhouse and the Tea House. We also note the requirement for a landscape buffer on southern & western edge of site (clause 14) and that no access is to be taken from North Drive (clause 29). We also note that para.8.42 refers to a heritage partnership agreement as an alternative mechanism for securing the repair and maintenance of the LBs at risk, and the reference at clause 33 of the policy to the recent Arbury Design Guide SPD, on which HE commented in March 2022.</p> <p>HE considers that whilst there may be opportunities for harm to be mitigated, through the design of the development, landscaping and enhancements, this would require further assessment.</p> <p>Historic England would be willing to work in partnership with the Council as it progresses its heritage evidence base, any further masterplan for the site and also on any modifications to Strategic Policy SHA-2 in order to minimise the harm to the heritage assets nearby.</p>		<p>The Arbury site remains unchanged from the adopted allocation, therefore an assessment had already been undertaken of the development on heritage assets and their settings.</p> <p>Any additional opportunities for harm to be mitigated proposed in the new heritage assessment will be considered, and where appropriate, included in the publication version of the plan.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.19		Historic England			<p>Policy SHA-3</p> <p>SHLAA - No impacts.</p> <p>HE agrees with the conclusion and welcomes the reference to local listed heritage assets i.e. provisions in clause 17 which require enhancements to accessibility and structural condition of heritage assets along Coventry Canal, including retention of the heritage buildings including the locally listed beehive kiln.</p>		Noted
8.20		Historic England			<p>Policy SHA-4</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted
8.21		Historic England			<p>Policy SHA-5</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted
8.22		Historic England			<p>Policy SHA-6</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted
8.23		Historic England			<p>Policy SEA-1</p> <p>Not included in SHLAA, but HE considers there would be no impacts on the historic environment.</p>		Noted
8.24		Historic England			<p>Policy SEA-2</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted
8.25		Historic England			<p>Policy SEA-3</p> <p>Not included in SHLAA, but HE considers there would be no impacts on the historic environment</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.26		Historic England			<p>Policy SEA-4</p> <p>Not included in SHLAA.</p> <p>HE supports policy clause 15 and the objectives of para.8.108, to pursue, where possible, opportunities to improve the heritage features of the area and their link to the work of George Elliot.</p>		Noted
8.27		Historic England			<p>Policy SEA-5</p> <p>Not included in SHLAA, but HE considers there would be no impacts on the historic environment.</p>		Noted
8.28		Historic England			<p>Policy SEA-6</p> <p>SHLAA - No impacts.</p> <p>Historic England notes that there is no Heritage Impact Assessment (HIA), or similar assessment information available and therefore no assessment has been undertaken of the likely impact of this proposal on heritage assets and their settings. The NPPF (para. 190) requires that a positive approach to the historic environment is demonstrated as part of the Plan process and since this is not clear at this time, this raises issues over the soundness of the Local Plan document.</p> <p>The site is within setting of Grade II Exhall Hall, and other LBs and SM Moated site at Exhall Hall (which lie on western/opposite side of Bowling Green Lane). HE therefore considers that rather than the 'no impacts' stated in the SHLAA, this should be noted as some impacts/amber.</p> <p>HE welcomes inclusion of clause 10 of policy to provide an enhanced buffer in south-eastern corner to protect setting of Exhall SM & LBs and the requirement that the scale of development does not detract from the prominence and importance of the LBs, but we would advise that this and any associated landscaping should be informed by a heritage assessment in relation to the designated heritage assets and their setting.</p>		<p>A heritage impact assessment was undertaken when the site was adopted, therefore an assessment has been undertaken of the likely impact of the site on heritage assets and their settings, albeit the site was previously assessed on the basis of the site being solely for employment use. The new heritage assessment has however now taken into account the proposed mixed use of the site.</p> <p>The SHLAA will be amended to some impacts / amber, with reference made to the Grade II Exhall Hall, other listed buildings and scheduled monument moated site at Exhall Hall.</p>
8.29		Historic England			<p>Policy CEM-1</p> <p>Not included in SHLAA, but HE considers there would be no impacts on the historic environment.</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.30		Historic England			<p>NSHA-1</p> <p>SHLAA - No impacts.</p> <p>HE - notes that there is no Heritage Impact Assessment (HIA), or similar assessment information available and therefore no assessment has been undertaken of the likely impact of this proposal on heritage assets and their settings. The NPPF (para. 190) requires that a positive approach to the historic environment is demonstrated as part of the Plan process and since this is not clear at this time, this raises issues over the soundness of the Local Plan document.</p> <p>The Eastern boundary of site abuts Abbey Conservation Area and the site is within the setting of a SM & LBs – less than 250 metres from the Benedictine priory and precinct of St. Mary, Nuneaton Scheduled Monument, and less than 500m from Grade II Church of St. Mary & Grade II St. Mary's Vicarage. In addition, the site includes a local Warwickshire HER record (MWA6318) for medieval dam and millpond. Historic mapping shows this as to the east side of the site with a connecting lead to the north. Located in close proximity to the precinct of the priory there is the potential this was a priory mill on the edge of the precinct.</p> <p>HE therefore considers that rather than the 'no impacts' stated in the SHLAA, this should be noted as some impacts/amber.</p> <p>Whilst the remains of the earthworks are probably substantially affected by the current buildings on the site, HE considers that the design of the allocation should be informed by a heritage assessment that considers the nearby designated heritage assets, the former extent of the priory precinct and the known archaeology recorded on the site.</p>		<p>A heritage impact assessment has now been carried out for this site.</p> <p>The SHLAA will be amended to state "no impacts / amber" for this site.</p> <p>In relation to the recommendation for a heritage assessment to be carried out at the design stage, applicants would need to provide this in order to comply with Policy BE4 - Valuing and conserving our historic environment.</p>
8.31		Historic England			<p>NSHA-2</p> <p>SHLAA - no impacts</p> <p>HE - agree</p>		Noted
8.32		Historic England			<p>NSHA-4</p> <p>SHLAA - no impacts</p> <p>HE - agree</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.33		Historic England			<p>NSHA-5</p> <p>SHLAA - some impact on Conservation Area & Designated heritage assets & significant impact on non-designated heritage assets</p> <p>HE – re-iterates previous comments on Site 7 of TCAAP – part of site (southern area) lies within Nuneaton Town Centre Conservation Area boundary and the rest of the site is therefore within the setting of the Conservation Area. HE advises that a Heritage Impact Assessment should be undertaken to inform the impact of proposed development on the significance of the Conservation Area. In particular, any new development needs to respect the setting and connection with the Grade I St. Nicholas Parish Church, which lies opposite to this site and new buildings should be of a suitable scale & height, which does not over-power existing development within the Town Centre Conservation Area. These requirements should be included in any policy criteria/development principles.</p>		Heritage impact assessment has now been undertaken for this site.
8.34		Historic England			<p>NSHA-6</p> <p>SHLAA - No impacts</p> <p>HE - agree but may affect setting of Ashby Canal (no designation)</p>		Noted
8.35		Historic England			<p>NSHA-7</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted
8.36		Historic England			<p>NSHA-3</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.37		Historic England			NSHA-8 SHLAA - No impacts HE - agree		Noted
8.38		Historic England			NSHA-9 SHLAA - some impact on Conservation Area & Designated heritage assets & significant impact on non-designated heritage assets HE – re-iterates previous comments on Site 2 in TCAAP – site is located within the setting of the Grade II Listed Ritz Cinema building, which is located on the other side of Abbey Street. HE advises that development of the site should consider opportunities to enhance the setting of this heritage asset, including low rise development so as not to compete with the scale of the cinema. These requirements should be included in any policy criteria/development principles. HE – re-iterates previous comments on Site 12 in TCAAP – site lies within the Nuneaton Town Centre Conservation Area. HE advises that a HIA should be undertaken to inform the impact of proposed development on the significance of the Conservation Area, taking into consideration the scale and pattern of development in the area, particularly the alignment of historic burgage plots. These requirements should be included in any policy criteria/development principles.		Policy BE4 - Valuing and conserving our historic environment will ensure opportunities for enhancing the setting of the heritage asset are considered. A heritage impact assessment has now been undertaken for this site.
8.39		Historic England			NSHA-10 SHLAA - No impacts HE - agree		Noted
8.40		Historic England			NSHA-11 SHLAA - No impacts HE - agree		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.41		Historic England			NSHA-11 SHLAA - No impacts HE - agree		Noted
8.42		Historic England			NSHA-12 SHLAA - No impacts HE - agree		Noted
8.43		Historic England			NSHA-13 SHLAA - No impacts HE - agree		Noted
8.44		Historic England			NSHA-14 SHLAA - No impacts. HE - Site is on opposite side of A444 to the Grade II Listed Ritz Cinema building. HE commented on Site 2 of TCAPP (site lies within setting of Grade II Listed Ritz Cinema Building) and would advise that development of the site should consider opportunities to enhance the setting of this heritage asset, including low rise development so as not to compete with the scale of the cinema. These requirements should be included in any policy criteria/development principles.		Policy BE4 - Valuing and conserving our historic environment will ensure opportunities for enhancing the setting of the heritage asset are considered.
8.45		Historic England			NSHA-15 SHLAA - No impacts HE - agree		Noted
8.46		Historic England			NSHA-16 SHLAA - No impacts HE - agree		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.47		Historic England			<p>NSHA-17</p> <p>SHLAA - some impact on Conservation Area & Designated heritage assets</p> <p>HE – re-iterates previous comments on Site 11 in TCAAP – southern area of site lies within the Nuneaton Town Centre Conservation Area, also classified on HAR as vulnerable. HE advises that a Heritage Impact Assessment should be undertaken to inform the impact of the proposed allocation on the significance of the Conservation Area. This requirement should be included in the “Important Considerations for Development”.</p>		<p>A heritage impact assessment has now been undertaken for the site.</p> <p>Policy BE4 - Valuing and conserving our historic environment requires the submission of heritage impact assessments at the planning application stage where necessary.</p>
8.48		Historic England			<p>NSHA-18</p> <p>SHLAA - No impacts</p> <p>HE - agree</p>		Noted
8.49		Historic England			<p>NSHA-19</p> <p>SHLAA - site not included</p>		The SHLAA assessment for this site was missed off the published version, however this will be added to the revised SHLAA at the next consultation stage.
8.50		Historic England			<p>NSHA-20</p> <p>SHLAA - significant impact on Conservation Area & Designated heritage assets.</p> <p>HE - site contains Grade II Listed Engine House and lies within Hawkesbury Junction Conservation Area. HE advises that a Heritage Impact Assessment should be undertaken.</p>		A heritage impact assessment had now been undertaken for this site.
8.51		Historic England			<p>NSHA-21</p> <p>SHLAA - No impacts</p> <p>HE - Eastern boundary of site abuts Nuneaton Town Centre Conservation Area and it is not clear how any impact has been considered.</p>		A heritage impact assessment had now been undertaken for this site.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
8.52		Historic England			NSHA-22 SHLAA - No impacts HE - agree		Noted
8.53		Historic England			NSHA-23 SHLAA - No impacts HE - Site is close to boundary of Nuneaton Town Conservation Area & Grade II Kind Edward the Sixth College (on opposite side of King Edward Road) – it is not clear how any impact on heritage assets and their setting has been considered.		A heritage impact assessment had now been undertaken for this site.
8.54		Historic England			NSHA-24 SHLAA - No impacts HE - agree		Noted
8.55		Historic England			NSHA-25 SHLAA - No impacts HE - agree		Noted
8.56		Historic England			NSHA-26 SHLAA - no impacts HE - agree		Noted
8.57		Historic England			NSHA-27 SHLAA - No impacts HE - agree		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.1	PS	Inland Waterways Association, Lichfield Branch	Local Cont ext 2.10		As worded, this suggests that the Coventry and Ashby-de-la-Zouch canals are historic legacies of the coal mining industry. Whilst coal was a very important traffic for the canals, they carried a wide variety of goods, and would be better described as part of a historic transport network. Whilst the paragraph goes on to acknowledge the canals as green and blue links and wildlife corridors, it could better reference their recreational value.	Reword para. 2.10 as: “Historic legacies of the coal mining industry are present within the borough, along with the historic transport network of the Coventry and Ashby de-la-Zouch canals. The canals are heritage assets in their own right as well as the buildings and structures that are closely associated with them. ⁵ They form recreational green and blue links and wildlife corridors along with the disused Nuneaton Ashby Railway (Weddington Walk) through the centre, east, and north of the Borough.”	Considered a reasonable amendment.
9.2	PS	Inland Waterways Association, Lichfield Branch		DS5 / SHA-3 – Tuttle Hill (Judkins)	It is confusing that Policy DS5 refers to allocation SHA-3 as Judkins whereas Policy SHA-3 is titled Tuttle Hill. There is also a nearby employment site named Tuttle Hill (site ref. E43 in Table 12) which adds to this confusion. The document is ‘unsound’ in this respect. IWA commented on Outline planning applications for this site in 2018, and contributed to the SPD Concept Plan for HSG11 Tuttle Hill in 2019 which covered the land to the east of the Coventry Canal. IWA is generally content that the Key development principles and Form of development for SHA-3 appropriately recognise the need for protecting and enhancing the heritage, recreational and wildlife value of the Coventry Canal through the site, and the potential for the canal and its towpath to enhance the development. However, the requirement that houses along the canal frontage should be limited to 2 storeys (Concept Plan 3.5.3) should be carried through into this policy.	Resolve the inconsistent naming of site SHA-3 in Policy DS5 with Policy SHA-3. Form of Development Add paragraph (20): “Building heights nearest the canal should be limited to 2 storeys in order to limit their visual impact above and through the canal-side woodland corridor.”	Considered reasonable amendments.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.3	PS	Inland Waterways Association, Lichfield Branch		DS6 / SEA-1 – Faultlands Farm	<p>The Faultlands strategic employment site was first allocated as EMP1 in the Borough Plan adopted in 2019, and its land use, development principles and infrastructure requirements were set out in a Concept Plan SPD adopted in 2020.</p> <p>The re-allocation of the site through Policy SAE-1 allows for restatement of key development principles for this site which will have major visual and other impacts on the adjacent Coventry Canal.</p> <p>IWA supports the requirement (12) that development should be set back from the Coventry Canal corridor to the east to allow for a landscape buffer and ecological mitigation, with tree and shrub planting, and for new development to address the canal (15).</p> <p>IWA also supports use of the canal turnover bridge for a cycle path link and enhancement of the canal towpath (3 & 4), development to be set back from the northern boundary with a landscape buffer and improved access to the Griff Arm of the Coventry Canal (11 & 14)</p> <p>However, Outline consent (034901) was given in 2020 for development with indicative plans for 6 large and medium sized warehouse style sheds that would be visually intrusive and with large water attenuation basins alongside the canal which severely limit the space available for screen planting.</p> <p>The plans were then amended to 4 large sheds, and an application (038542) for a higher percentage of B8 use has just been approved along with a Reserved Matters application (038687) for just 2 sheds, of which Unit 2 conflicts with all the approved and proposed development principles.</p> <p>The Unit 2 warehouse is a massive, and massively intrusive, building which extends further east and closer to the canal than the previously consented scheme, and the protruding office block extends even further to the east and very close to the canal. This does not comply with the adopted Borough Plan requirement for the development to be set back from the Coventry Canal corridor or for it to address the canal.</p> <p>The size, scale and largely featureless appearance of the warehouse, and its location on elevated ground, would have a major adverse visual impact on the canal environment, as well as on housing on the other side of the canal. The protruding layout of the office block, with a blank end wall unrelieved by any fenestration or architectural merit, is particularly offensive. It would dominate views from the canal for boat and towpath users approaching the site from the south, and its height and elevated position would overshadow any existing or new planting along the entire canal frontage. It would also be extremely intrusive for the new houses on the Gypsy Lane site on the other side of the canal, which have been designed to face the amenity corridor of the canal and what was previously assumed would be a significant landscaped buffer zone to the nearest industrial unit. A large Attenuation Pond is proposed alongside the Coventry Canal, occupying most of the area between the building and the canal. Its presence severely limits the space available for any effective screen planting, which does not comply with the Borough Plan requirement to provide a landscape buffer.</p> <p>This reprehensible decision makes a mockery of this Preferred Options consultation and undermines the integrity of the whole Local Plan consultation and approval process.</p>	<p>It is understood that the decisions to grant approval for Unit 2 are conditional, although the planning website does not show what those conditions may be.</p> <p>The decision should not be confirmed prior to completion of this consultation and the subsequent submission and examination of the Borough Plan Review. If the examination finds that the application consent is in major conflict with the adopted and emerging Plan, as it logically must, then the application approval should be rescinded.</p>	<p>Comments noted. Previous approvals cannot be rescinded.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.4	PS	Inland Waterways Association, Lichfield Branch		DS6 / SEA-4 – Coventry Road	IWA notes that the allocation of this employment site provides an opportunity to finance the reopening of the culverted Griff Brook and maintain an open corridor with appropriate planting along the public right of way to the south of the site, creating habitat linkages with the Coventry Canal. IWA also fully endorses the proposal at para. 8.108 to re-establish the canal branch through the site and link it to the remaining portion to the east. This imaginative proposal will recover the Griff Arm Canal as part of the Borough's canal heritage as an amenity and biodiversity asset.		Comments noted.
9.5	PS	Inland Waterways Association, Lichfield Branch		CEM-1 – Land north of Marston Lane, Bedworth	IWA notes the safeguarding of this site as cemetery burial grounds or alternative green-belt compatible uses, and that the key development principles include: 2. Provision of a suitable stand-off zone/buffer from the Coventry Canal IWA suggests that an appropriate stand-off/buffer zone would be 10 metres in width, free from any significant built development and with native species landscape planting.		No modifications are recommended but considers the buffer should be 10m.
9.6	PS	Inland Waterways Association, Lichfield Branch		NE1 – Green and blue infrastructure	IWA notes and supports the various canal-related proposals in this policy including: development support for blue infrastructure; providing new habitat links to the Coventry Canal; upgrading the Coventry Canal towpath and restoring the canal vernacular; and strengthening greenway links to the Coventry Canal and Ashby Canal.		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.7	PS	Inland Waterways Association, Lichfield Branch		BE4 – Valuing and conserving our historic environment	<p>Policy BE4 recognises canals as heritage assets, and para. 15.55 references the unique private canal system at Arbury Hall within the Listed park and garden.</p> <p>The Coventry Canal and the Ashby Canal are historic waterways and valuable amenity and recreational corridors, providing leisure boating, walking, angling, cycling and nature conservation benefits to the area. They are part of the national waterway system which attracts millions of visits each year from local people and holidaymakers from home and abroad, and is a major component of the nation’s tourism industry.</p> <p>Some individual canal bridges and other structures are Listed but the waterway itself with its earthworks, water channel, towpath and hedgerow is a linear heritage asset that merits the protection of Conservation Area status. Many other waterways around the country are so designated, including the whole of the Ashby Canal within Leicestershire.</p> <p>The Hawkesbury Junction Conservation Area includes a small part of the Coventry Canal, but the Coventry Canal and the Ashby Canal throughout the Borough are major heritage, amenity and recreational assets warranting Conservation Area status.</p> <p>The Coventry Canal and Ashby Canal conservation areas should include adjacent heritage assets and a buffer zone of 10m on either side within which any development would be restricted to waterways-related or high-quality proposals.</p>	<p>The text to Policy BE4, under Conservation Areas as 15.64 or 15.65 should include:</p> <p>“The designation of additional Conservation Areas along the Coventry Canal and the Ashby Canal within the Borough will be progressed.”</p>	<p>The modification seems reasonable.</p>
9.8	PS	Inland Waterways Association, Lichfield Branch		DS5 Non-strategic site NSHA-4 (BAR-1)	<p>Former Manor Park School Playing Field, Nuneaton.</p> <p>Also known as the Tomkinson Road Recreation Ground, this is a valuable green space alongside the Coventry Canal and its loss would be most regrettable. It would reduce the attractiveness of the canal corridor through Nuneaton for recreational walking and boating, impacting local people and diminishing the amenity and tourism value of the whole canal as part of the historic national waterways system.</p> <p>Whilst possibly redundant as a school playing field, alternative long term public sports, recreation and/or parkland uses for the site that would preserve its essentially open space character should be considered, in accordance with policies HS6, NE1 and NE2 in this Plan.</p> <p>IWA therefore objects to its allocation for housing.</p> <p>If, however, this allocation is confirmed, then the design and layout should respect the amenity value of the Coventry Canal corridor. Canalside housing should be of traditional design and no more than 2 storeys high, facing the canal across gardens, access drives and canalside landscaping, to provide a 10 metre building-free buffer zone along the canal frontage.</p>	<p>Delete the Policy DS5 Non-strategic site NSHA-4 (BAR-1) housing allocation.</p> <p>If this allocation is retained, then the policy should require canalside housing to be of traditional design and no more than 2 storeys high, facing the canal across gardens, access drives and canalside landscaping, to provide a 10 metre building-free buffer zone along the canal frontage. The allocation of 72 dwellings should be reduced if necessary to meet these objectives.</p>	<p>The Outline application has already been approved subject to the signing of a S106 agreement therefore the site cannot be deleted. Inland Waterways will be consulted upon on any formal Reserved Matters planning application.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.9	PS	Inland Waterways Association, Lichfield Branch		DS5 Non-strategic site NSHA-18 (WEM-1)	<p>Land at Donnithorne Avenue, Nuneaton. Known locally as Knebley Crescent Woodland, this site is a valuable amenity and wildlife asset alongside the Coventry Canal and its loss to any form of built development would be unacceptable. It would significantly reduce the attractiveness of this section of the canal corridor through Nuneaton for local recreational use and diminish the heritage, amenity and tourism value of the whole canal as part of the historic national waterways system.</p> <p>The site should be retained as an amenity woodland and managed for improved biodiversity and public access, in accordance with policies NE1 and NE3 in this Plan.</p> <p>IWA therefore objects to its allocation for housing.</p>	Delete the Policy DS5 Non-strategic site NSHA-18 (WEM-1) housing allocation.	Comments noted. An Ecological Assessment of the site will be carried out as part of the evidence base and will provide the basis on whether this site can be developed or not.
9.10	PS	Inland Waterways Association, Lichfield Branch		DS5 Non-strategic site NSHA-6 (BED-3)	<p>The name given this site is misleading. Firstly, there is only one Charity Dock, so the use of the plural is incorrect. Secondly, the site does not include Charity Dock. Thirdly, the area is named Wharf Meadow on several notice boards on the site.</p> <p>This is a valuable green space alongside the Coventry Canal and its loss would be most regrettable. It would reduce the attractiveness of the canal corridor through Nuneaton for recreational walking and boating, impacting local people and diminishing the amenity and tourism value of the whole canal as part of the historic national waterways system.</p> <p>As an extensive area of meadow land and woodland bordering the canal, this site is also a valuable informal public open space amenity for the local community, with significant wildlife value. The site should be largely retained as an amenity area and managed for improved biodiversity and public access, in accordance with policies NE1, NE2 and NE3 in this Plan.</p> <p>IWA therefore objects to its allocation for 62 dwellings. It may be acceptable to accommodate a small number of dwellings in the areas furthest from the canal, accessed off Beechwood Road, whilst retaining the greater part of the public open space including a continuous buffer zone along the canal, but the size of the allocation needs to be significantly reduced.</p> <p>It should also be noted that the inevitable noise from boat maintenance work at the historic Charity Dock boatyard means that the areas closest to the Dock may not be suitable for residential use.</p>	Delete the Policy DS5 Non-strategic site NSHA-6 (BED-3) housing allocation. Failing that, correct the name of NSHA-6 (BED-3) to "Wharf Meadow, Bedworth" and reduce the allocation to, say, no more than 10 dwellings.	Comments noted. An Ecological Assessment of the site will be carried out as part of the evidence base and will provide the basis on whether this site can be developed or not.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.11	PS	Inland Waterways Association, Lichfield Branch		DS5 Non-strategic site NSHA-24 (POP-4)	<p>Acacia Crescent, Bedworth.</p> <p>This site includes land alongside the Coventry Canal used as boat moorings in conjunction with the adjacent Charity Dock. The Acacia car park occupies most of the remaining area and provides essential access to the moorings which are in part used residentially. Its development for the indicated quantity of housing (7 dwellings) would be likely to severely limit access to the current boating residents and could make their tenure unsustainable.</p> <p>It should also be noted that the inevitable noise from boat maintenance work at the historic Charity Dock boatyard means that the area closest to the Dock may not be suitable for residential use.</p> <p>It is acknowledged that the adjacent Charity Dock, whilst 'quirky', is perceived as somewhat of an eyesore to many, due to the large quantities of disused vehicles and materials retained on site. However, it is a historic boatyard providing essential boat maintenance facilities for the canal community and this allocation would significantly hamper its operation whilst not directly addressing the visual amenity issues.</p> <p>IWA considers that this housing allocation should not proceed without an overall plan for the retention of the working boatyard and the associated residential and leisure boat moorings, in conjunction with environmental improvements to the boatyard premises to reduce its intrusive visual impact.</p>	<p>Policy DS5 for Non-strategic site NSHA-24 (POP-4) should make clear that any housing development should enable retention of the current canal boat moorings with sufficient adjacent land and vehicle access to maintain their viability.</p>	<p>The impact to existing businesses and residents and noise will be considerations with any submitted planning application. Inland Waterways will be consulted upon on any formal planning application.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.12	PS	Inland Waterways Association, Lichfield Branch		DS5 Non-strategic site NSHA-20 (POP-2)	<p>Hawkesbury Pump House, Heritage Drive, Hawkesbury.</p> <p>This site includes the Engine House (or Pump House) which is a Grade II Listed Building and part of the Hawkesbury Junction Conservation Area, as described in the Appraisal and Management Plan SPD (2022). The Engine House dates from 1837 and formerly housed a Newcomen beam engine which itself dates from round 1725 and is the world's oldest surviving steam engine. It was moved to Dartmouth for preservation in 1963. The construction of early engines was integral with their engine house, and the building at Hawkesbury is a rare survival from the industrial revolution of national and international importance.</p> <p>Preservation of the Engine House is essential, and maintaining open views of its setting at the side of the Coventry Canal is important for the proper appreciation of its heritage value within the wider Conservation Area. It is of concern that this site allocation includes the Engine House and the canalside land that is an essential part of its setting. It should be made clear that any new housing must be set well back from the engine house and the canal, outside the Conservation Area on the open space immediately adjacent to Heritage Drive. Whether this provides sufficient space for the allocated 12 dwellings is doubtful, and if necessary the target allocation should be reduced to avoid undue visual impact on the setting of the historic Engine House.</p>	Policy DS5 for Non-strategic site NSHA-20 (POP-2) should require that the housing be set well back from the Engine House and the Coventry Canal, outside the Conservation Area, and the number of dwellings should be reduced to ensure this.	The setting of the Pump House will need to be considered as part of any planning application.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
9.13	PS	Inland Waterways Association, Lichfield Branch		DS6 / SHA-6 Hawkesbury Golf Course (remaining land)	<p>This is a very large site with a long frontage to the Coventry Canal, formerly a golf course which helped preserve the essentially open green setting of this section of the canal. Further loss of this green space would reduce the attractiveness of the canal corridor through Nuneaton & Bedworth for recreational walking and boating, impacting local people and diminishing the amenity and tourism value of the whole canal as part of the historic national waterways system.</p> <p>It is noted that a key development principle (12) is that dwellings should address the canal and make use of the opportunities the canal can provide. The canal provides leisure boating, walking, angling, cycling and nature conservation benefits to the area as part of an amenity corridor that should be protected from intrusive development.</p> <p>In order to address the canal, the canalside housing should be of traditional design and no more than 2 storeys high, facing the canal across gardens, access drives and canalside landscaping, to provide a 10 metre building-free buffer zone along the canal frontage.</p>	Policy SHA-6 should require canalside housing to be of traditional design and no more than 2 storeys high, facing the canal across gardens, access drives and canalside landscaping, to provide a 10 metre building-free buffer zone along the canal frontage.	This wording is considered appropriate.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
10.1	AC	National Highways			<p>Consultation on the Borough Plan Review – Preferred Options 2024 - 2039</p> <p>National Highways welcomes the opportunity to comment on the Borough Plan Review – Preferred Options. National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is in safeguarding the operation of the M6 and M69 Motorways and the A5 Trunk Road which route through the area.</p> <p>In responding to Local Plan consultations, we have regard to DfT Circular 02/2013 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the Strategic Road Network should be considered in the making of local plans. Paragraph 16 of the Circular sets out that: "Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth."</p> <p>In addition to the DfT Circular 02/2013, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>We understand that this Borough Plan review is as a result of publication of the updated National Planning Policy Framework 2021. We previously reviewed the Issues & Options Consultation where we commented that 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 (SHLAA) should be undertaken. We note the SHLAA identifies 98 potential sites for development of which 34 were deemed suitable and available. We welcome the fact that the Strategic Transport Assessment which forms part of this evidence base is also currently under review.</p> <p>We previously raised concerns regarding Option 2 and 3 relating to the location of future employment areas. However, we welcome the preference towards Option 1 which focusses on the extension of existing employment estates within Policy E2.</p> <p>Strategic Policy DS4 identifies the need for 9,690 dwellings to come forwards in the Plan period. Additionally, a total of 82.5 ha of employment land is set to come forwards. It is noted that this may be subject to change when the HEDNA 2022 is published. We would welcome ongoing engagement regarding the location of these sites to fully understand any impact that there may be on the SRN.</p> <p>We note various strategic housing allocations have been identified in the Plan these include:</p> <ul style="list-style-type: none"> • Policy SHA-1 Top Farm – 1700 dwellings • Policy SHA-2 Arbury – 1525 dwellings • Policy SHA-3 Judkins – 400 dwellings • Policy SHA-4 Hospital Lane – 398 dwellings • Policy SHA-5 West of Bulkington – 348 dwellings • Policy SHA-6 at Hawkesbury – 176 dwellings <p>Additionally, several strategic employment allocations have been identified these are:</p> <ul style="list-style-type: none"> • Policy SEA-1 Faultlands Farm – 26ha • Policy SEA-2 Wilsons Lane – 18ha • Policy SEA-3 Prologis Extension – 5.3ha • Policy SEA-4 Coventry Road – 9ha • Policy SEA-5 Longford Road – 2ha • Policy SEA-6 Bowling Green Lane – 19ha <p>We know that a number of these strategic development sites are located in close proximity to SRN junctions and are likely to impact on the capacity of our network. This in-turn can create potential congestion and safety</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
					<p>issues. Therefore, we would welcome early discussions with the Council on sites which would interact with the SRN to consider their appropriateness.</p> <p>We have no further comments to provide and trust the above is useful in the progression of the Nuneaton and Bedworth Borough Plan. We welcome continued engagement with Nuneaton and Bedworth Borough Council as the local plan is developed, particularly in terms of assessing the impacts of proposed growth on the operation of the SRN.</p>		
11.1	MJ	Network Rail			<p>Strategic Planning welcomes the opportunity to comment on the above Plan.</p> <p>Network Rail Infrastructure Limited (Network Rail) is the owner and operator of the rail network in Great Britain and is responsible for its safe operation, maintenance, renewal and enhancement for the benefit of passengers and freight users. Network Rail Strategic Planning plans the future development of Britain's railway system, so that the needs of passengers are balanced to support economic and sustainable growth. In the North West & Central Region, the long-term strategic objectives include alleviating overcrowding and accommodating growth on the rail network; facilitating regional growth by reducing journey times; and encouraging modal shift, fitting into three broader categories: Capacity, Connectivity and Carbon.</p> <p>To deliver these objectives, Strategic Planning continues to support and promote rail schemes in conjunction with industry partners. These projects are either directly funded by Network Rail, by third parties, or jointly funded with Train Operating Companies, Local Authorities and Transport Bodies. Strategic Planning works with its partners to establish priorities for rail investment within their economic region and builds strategic cases, within the constraints and limits of the transport funding available.</p> <p>Strategic Planning is responsible for ensuring strategic fit with the current network and will look at any proposed developments for potential:</p> <ul style="list-style-type: none"> • alignments or conflicts with current plans • impact on the current timetable • performance impact (based on current commitments for the Region), and • any impact on the rail network, both physically (engineering disruption) and on operating the timetable. <p>Where new employment, housing or station developments are being considered, we continue to engage with developers as early as possible in the process, particularly to discuss any challenges related to the location and size of development.</p> <p>As you will be aware, Network Rail is working closely with key stakeholders on the current phase of the NUCKLE project and continues to promote the benefits of an improved level of service between Coventry and Nuneaton. Network Rail will continue to work with West Midlands Rail Executive, Midlands Connect and rail industry partners to investigate ways to integrate local train services on the Nuneaton to Coventry corridor, in support of the wider connectivity objectives outlined in the Infrastructure Delivery Plan.</p> <p>Network Rail is currently continuing the development of the Midlands Rail Hub project to deliver improved frequencies and generalised journey times across the whole of the West Midlands and towards the East Midlands.</p> <p>Additionally, Network Rail is working with industry partners to establish the optimal use for capacity on the</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
					<p>West Coast Main Line, following the commencement of services on High Speed Two, enabling better opportunities for improved access to Rail in the Nuneaton area.</p> <p>We look forward to discussing these opportunities further with our industry partners, in order to improve services for passenger and freight customers.</p> <p>Thank you for consulting us on the Nuneaton and Bedworth Preferred Options Borough Final 9.6.22.</p>		

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
12.1	AC	NHS Coventry & Warwickshire Integrated Care Board			<p>NHS Coventry and Warwickshire Clinical Commissioning Group was statutorily dissolved at the end of June 2022 and from 1st July 2022 has been subsumed into the NHS Coventry and Warwickshire Integrated Care Board (ICB). The ICB is responsible for commissioning health and care services on behalf of people in Coventry and Warwickshire. It plans the delivery of services in a way that both meets local health and care needs and reduces inequalities between different groups in consultation with local partners.</p> <p>The ICB is pleased to see that comments submitted by CWCCG on the Issues and Options document have been noted and that the key health factors for the location of new housing will be considered at the next stage of the review. The development of community health infrastructure is key to ensuring that the NHS England Long Term Plan is delivered and therefore the ICB welcomes the opportunity to work with local partners to ensure that:</p> <ul style="list-style-type: none"> - the impact of strategic housing developments on healthcare delivery is considered, - the local evidence base and health and wellbeing strategy informs the local plan. <p>The ICB welcomes the Council's approach to sustainable development. In October 2020, the NHS became the world's first health service to commit to reaching carbon net zero, in response to the profound and growing threat to health posed by climate change. The Health and Care Act 2022, further underscores the importance of the NHS's robust response to climate change, placing new duties on NHS England, and all trusts, foundation trusts, and integrated care boards to contribute towards statutory emissions and environmental targets.</p> <p>The ICB notes the levels of housing development planned for within Nuneaton and Bedworth Borough between 2024 and 2039 and welcomes the development of policies for each of the strategic site allocations to outline the specific requirements including infrastructure delivery. The publication of progress monitoring reports against the housing delivery trajectory will also support the ICB with estate and primary care service planning.</p> <p>The ICB notes that the number of older people both in absolute numbers and as a proportion of the population is increasing significantly and is expected to continue to do so and that the development of extra care housing, residential care homes and other housing options which allow older people to stay in their own homes will be approved where a local need can be demonstrated. The ICB 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 retirement housing development due to the increased demand on GP practices to ensure that this is managed correctly. This cohort of patients has a greater need for services compared with the total population.</p>	Reference to contributions to the CCG to be amended to NHS Coventry and Warwickshire Integrated Care Board (ICB) in relation to strategic housing sites.	Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
13.1	DB	North Warwickshire Borough Council			<p>The Consultation Statement that accompanies the Preferred Options of the Borough Plan Review (2019) as required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) is fairly limited in its reference to the wider consultation with stakeholders, including the adjoining Local Authorities. There are therefore some concerns that the statutory 'Duty to Co-operate' has not been adequately addressed and the wider sub-regional and regional development issues and implications for NBBC have not been fully considered or taken into account. The Duty to Co-operate is a statutory duty which lies at the soundness of a Local Plan. Although NBBC has been involved with officer meetings, with the wider Warwickshire Local Authorities and Hinckley and Bosworth Borough, it is not considered the duty to cooperate has been fully dealt with. Although there is a proposal within the Levelling Up and Regeneration Bill to have this duty changed it is still in place and must be complied with.</p> <p>It is noted that paragraph 1.9 has a brief, limited section on the Duty to Cooperate which does not address how this engagement will occur, or how the legal requirement for the Duty to Cooperate will be appropriately, fully addressed.</p> <p>Previously, NBBC were, and still are, signatories to a Memorandum of Understanding with Coventry and all other Warwickshire Local Authorities to jointly agree measures to help address cross border issues and sub-regional needs or potential shortfalls. However, arising from the Consultation on the earlier Issues and Options stage, the Preferred Option in Chapter 5 (Outcome to the Issues and Options stage) makes a specific commitment to revoke the Memorandum of Understanding with Coventry City Council (paragraph 5.6 point 2), once the emerging ONS/CENSUS figures are checked and the Housing and Employment Development Needs Assessment (HEDNA) is finalised and published.</p> <p>NWBC is very disappointed that NBBC is withdrawing from the Coventry & Warwickshire MoU. Withdrawal from the MoU without consideration of a replacement MoU or agreed stance is not acceptable and does not deal with the wider than local issues.</p>	<p>It is noted that paragraph 1.9 has a brief, limited section on the Duty to Cooperate which does not address how this engagement will occur, or how the legal requirement for the Duty to Cooperate will be appropriately, fully addressed.</p> <p>This can be rectified by fully engaging and being part of the discussion in terms of needs from Coventry. Clearly setting out how NBBC is "positively engaging with all the relevant bodies during the plan making process" (see paragraph 1.9). It is noted that the brief, limited section on the Duty to Cooperate does not address how this engagement will occur, or how the legal requirement for the Duty to Cooperate will be appropriately, fully addressed.</p> <p>A new Memorandum of Understanding is required to assist in complying with the legal Duty to Cooperate which will give confidence and re-assurance to other adjoining local authorities that measures to address cross border issues and sub-regional needs have or will be agreed. (A meeting has now been arranged with officers from both local authorities)</p>	<p>NBBC recognise that the Duty to Co operate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required. The Consultation Statement will be updated as part of the Review</p>
13.2	DB	North Warwickshire Borough Council		Employment	<p>The Borough Review is not sound as it has not been positively prepared to deal with a number of issues. The Borough Council notes and supports the N&BBC objectives to widen and diversify their employment base. But little reference is made to wider cross border issues and sub-regional pressures that are already impacting on N&BBC at sites such as Padgett Farm in adjoining Rugby Borough, alongside Nuneaton and the A5 Hinckley Island.</p>	<p>Suggested modifications to be discussed with officers from both local authorities.</p>	<p>Comments noted.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
13.3	DB	North Warwickshire Borough Council		Housing	<p>The Borough Review is not sound as it has not been positively prepared to deal with a number of issues. It is noted that the Preferred Options Housing Section makes reference to the emerging findings of the HEDNA and is supported in so far as it seeks to provide “appropriate local housing options”. However, the wider sub-regional needs implications are not noted or referred to in any significant way. In terms of the documents reference in the N&BBC Settlement hierarchy the preferred options do note the wider context in which the borough is located, with particular reference to the close proximity of other settlements outside the borough boundary such as Coventry, but provides no clear options to address this issue, which as the closest neighbour to Coventry and having a close functional relationship with the Borough is unsatisfactory.</p> <p>There are also significant concerns over the timing of the Preferred Option being published prior to the completion of the joint Warwickshire Authorities HEDNA, which is currently still in progress, addressing growth pressures/needs across the sub-region and intends to address the latest CENSUS Population data that is also currently being released over summer this year. The potential implications of both the emerging HEDNA and the CENSUS data may well result in further changes or work being necessary to the Plan and Preferred Options, as highlighted above in Strategic policy DS4 and Chapter 5, paragraph 5.6 dealing with the “Outcome to the Issues and Options stage”.</p>	Suggested modifications to be discussed with officers from both local authorities.	Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
13.4	DB	North Warwickshire Borough Council		Scope of the Local Plan	<p>The Borough Review is not sound as it has not been positively prepared to deal with a number of issues. These includes the scope of the Preferred Options. The Preferred Options are considered to be too inward looking dealing primarily only with local needs, with insufficient account taken, or reference made, to wider development pressures and cross border issues. This concern was specifically raised by North Warwickshire at the Issues and Options Stage, (highlighted in N&BBC’s Consultation statement appendix - summary of responses to the Issues and options) where the Borough Council noted;</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 & 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 cooperation 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”.</p> <p>It is considered that these concerns have not been sufficiently addressed in the preferred options consultation, although it is noted that Strategic Policy DS4 states that strategic needs are ‘to be reviewed when the HEDNA 2022 is published’.</p>	Suggested modifications to be discussed with officers from both local authorities.	Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
13.5	DB	North Warwickshire Borough Council		Transport	<p>The Borough Review is not sound as it has not been positively prepared to deal with a number of issues. This includes cross border transport.</p> <p>One of the main cross border issues impacting on all development proposed is the highway infrastructure, network capacity and traffic levels. This is noted in Chapter 5 again, dealing with the Issues and Options responses (see Point 4 in Paragraph 5.6), and in paragraphs 7.7 and 8.13 to 8.16 of the document. Any development in Nuneaton and Bedworth will potentially impact on the transport system and infrastructure in North Warwickshire. As NBBC grows these impacts are escalating and need to be considered when sites are both allocated or brought forward outside of the Local Plan process.</p> <p>A strategic transport assessment must consider the cross-border issues. NWBC is not aware that this is yet available and seeks to be informed as soon as it becomes available and then be party to the discussion as to the items for inclusion in the IDP.</p> <p>There are particular highway issues the Borough Council would like to draw NBBC's attention to:</p> <p>1 Any major development in Nuneaton & Bedworth should seek S106 monies to deal with cross border issues. The money should then be spent on dealing with that cross-border issue even if the impacted infrastructure lies within North Warwickshire.</p> <p>2. Where other transport infrastructure network capacity constraints are impacted by development within Nuneaton, such as noted in criterion 9 of Strategic housing allocation SHA-2, and criterion 10 of Strategic housing allocation SHA-4, these should also be highlighted as needing to address the infrastructure needs of the Borough and adjoining authorities through CIL and S106 funding. These transport infrastructure points/allocation criteria would benefit from greater stress and identification, where known, of the network constraints and issues that will be directly impacted by the strategic development allocations, or specific inclusion in a supporting Infrastructure Delivery Plan.</p> <p>For example, S106 monies should be secured on any further planning permissions to the north of Nuneaton to assist in the improvements to the A5. The A5 is a major constraint to future growth along its whole corridor from junction 10 M42 to junction 3 of the M69. Given the current transport issues impacting the A5, it is considered that the Preferred Options should note that any development along the A5 or to the north of Nuneaton should seek S106 monies for highways improvements.</p> <p>3 The junction of Plough Hill Road and Camphill Road is a major constraint to growth in North Warwickshire especially in the Hartshill, Ansley Common and Ansley areas as well as any future growth in and around Galley Common. Junction improvements or a relief road to the west to avoid the junction should be part and parcel of any IDP/STA requirements.</p> <p>4 Further consideration of a northern relief road to address traffic and road infrastructure constraints in Nuneaton and linking to the development along the A5, such as Strategic housing site SHA-1, should also be considered/included. and work needs to be done to develop a relief road to address traffic and road infrastructure constraints in the whole of the northern Nuneaton area.</p> <p>5 The reference to a new distributor link road through Strategic housing site SHA-1, to include primary access points from Higham Lane through to Weddington Road is not considered sufficient to address and accommodate the wider network constraints and traffic growth as well as impacts on and flows through Nuneaton Town Centre.</p> <p>6 Rat running is a problem in North Warwickshire caused by lack of infrastructure investment especially on new or improved highways as a result of growth in NBBC. The issue needs to be investigated and solutions discussed / drawn up to avoid and mitigate these impacts.</p>	Suggested modifications to be discussed with officers from both local authorities.	The IDP is to be updated as part of the Review. Look at contributions on Policies SHA-4 and SHA-2. Any contributions required for the A5 will be requested from National Highways who will be continually consulted as part of the Review including updates to the IDP. review. An STA is to be carried out.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
14.1	PH	Rugby Borough Council		General	<p>Thank you for consulting Rugby Borough Council setting out your preferred options for your local plan review. In addition thank you for holding a meeting with my officers that gave both sides the opportunity to have a fuller discussion to help our understanding of how your plan has evolved.</p> <p>Through the work of the A5 Partnership all Authorities on the A5 are aware of the capacity issues so we would be keen to see your Strategic Transport Assessment currently being undertaken by County Highways on the impact of your potential allocations on/near the A5.</p> <p>While your Review has much to commend it RBC finds it difficult to make any meaningful comments on your plan. The jointly commissioned Housing and Economic Needs Assessment (HEDNA) had not been completed when your plan was published. Coventry City Council are not yet in a position to be able to advise any of the Warwickshire Authorities on how much growth they would be looking for neighbouring authorities to take. As such the numbers set out in DS4 may need to be revised leading to a further increase in of the level of new dwellings required above the level envisaged in paragraph 7.27. An upward revision could require a Green Belt review which, in turn, may have implications for Rugby BC.</p> <p>We are keen to participate in the ongoing discussions around the development of your Local Plan.</p>		The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
15.1	RM	Severn Trent Water		General	<p>Thank you for the opportunity to comment on your consultation, we have some specific comments to make on your plan. We have answered the questions that we felt most applicable to interactions with Severn Trent. In addition to this document we have attached the results of a high level risk assessment on the potential impact of the proposed allocations on the sewer network – ‘L1SCA PrO_NB_2022’. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice and if you have any questions please let us know.</p> <p>Position Statement</p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
15.2	RM	Severn Trent Water		Responding to questions asked in the Issues and Options stage	<p>Question 1 Yes, we agree that a plan period 2023-2039 is appropriate. Although we would note that some local planning authorities are planning to 2041 and we appreciate a longer term view for our strategic planning.</p> <p>Question 4 In general Severn Trent has no preference between the employment options, however we would prefer focussing employment growth in one or two locations, therefore if capacity improvements are needed on the network they can be focussed on a smaller number of locations rather than disparate.</p> <p>Question 7 In general, we would prefer Option 3 – prioritise in the most sustainable locations regardless of designation. However, we would strongly encourage the redevelopment of brownfield land as a priority as there is the potential for including surface water betterment through new design of drainage of brownfield sites which could release spare capacity in the sewer network to accommodate population growth.</p> <p>Question 8 In general, we would prefer Option 3 – prioritise in the most sustainable locations regardless of designation. However, we would strongly encourage the redevelopment of brownfield land as a priority as there is the potential for including surface water betterment through new design of drainage of brownfield sites which could release spare capacity in the sewer network to accommodate population growth.</p> <p>Question 9 We would encourage brownfield re-development as highest in the priority and would encourage any hierarchy to consider suitability to sustainable surface water drainage following the concepts of the drainage hierarchy (see the 'Surface Water' section below for more information on this) .</p> <p>Question 10 No preference, we think this should be the decision of the Borough Council. We would note that we are planning a Strategic Growth scheme to undertake infrastructure improvements in the Nuneaton-Hartshill catchment considering the existing planned growth, so we would encourage you to let us know promptly regarding any changes to the allocated sites so that customer funding is not spent unnecessarily in the wrong locations.</p> <p>Question 11 No preference based on these criteria, however we would encourage you to use our high level sewer capacity assessment document attached 'L1SCA PrO_NB_2022' as a guide as to suitable site specific locations. We have highlighted where there may be future risks to the sewer network and based on surface water connections based on a RAG system.</p> <p>Question 13 Not sure whether a targeted approach is the right thing to do, however we are supportive of tree planting as part of a blue green infrastructure approach to a site due to the potential benefits to surface water management.</p> <p>Question 14 Not sure, however we are supportive of tree planting as part of a blue green infrastructure approach to a site due to the potential benefits to surface water management.</p> <p>Question 24 We believe there is opportunity in Local Plan documents to include some useful and important design criteria, for example water efficient design and SuDS criteria that is important at policy level to be included.</p>		Noted
15.3	RM	Severn Trent Water		DS1	<p>Severn Trent is supportive of this policy, it is in line with our advice regarding water efficiency and development of blue green infrastructure that can have multiple sustainable benefits including flood risk, water quality protection, biodiversity and amenity.</p>		Noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
15.4	RM	Severn Trent Water		DS3	Severn Trent is supportive of this policy, we presume that within this there is the understanding that climate change adaptation includes building new developments in line with water resource efficient design to 110 litres/person/day, as well as environmental mitigation includes sustainable urban drainage SuDS.	Climate change adaptation includes building new developments in line with water resource efficient design to 110 litres/person/day, as well as environmental mitigation includes sustainable urban drainage SuDS.	Consider reviewing wording on Policy
15.5	RM	Severn Trent Water		DS5 and DS6	<p>Please see the attached document 'L1SCA PrO_NB_2022' which is a high level desktop assessment of the potential impacts of each proposed allocation on the sewerage network as well as the potential impact from surface water connections. A RAG assessment has been undertaken which identifies areas of higher risk, a number of sites have been identified as Medium Risk, this indicates that there may be some constraints with accommodating this site.</p> <p>In addition, it is worth noting that for sites within Nuneaton - Hartshill catchment there is a strategic growth scheme which is due to be undertaken in two phases. The first phase due for completion by 2025 will provide capacity for the current planned developments in the North East of the catchment in particular i.e Top Farm/Weddington area, it will also accommodate growth to the east of the catchment. Other planned growth will be targeted in the 2nd phase of the scheme likely to be undertaken between 2025-2030.</p>	A RAG assessment has been undertaken which identifies areas of higher risk, a number of sites have been identified as Medium Risk, this indicates that there may be some constraints with accommodating this site.	Noted.
15.6	RM	Severn Trent Water		SA1	<p>Severn Trent is supportive particularly of sub-section 2 the retention of landscape features including trees, hedgerows and habitat corridors, this is because of the benefits that green permeable area can have on managing surface water runoff. We encourage you to go further here by including protection of existing watercourses and drainage ditches which can provide vital corridors for wildlife and also be useful in providing available outfalls for surface water connections, to avoid future connections into the combined sewer network. We are supportive of sub-section 4 and the encouragement to incorporate green roofs into design. We are supportive of sub-section 11 and encourage you to include water efficient design within this scope of mitigation for climate change.</p>	<p>Encourage you to go further here by including protection of existing watercourses and drainage ditches which can provide vital corridors for wildlife and also be useful in providing available outfalls for surface water connections, to avoid future connections into the combined sewer network. Encourage you to include water efficient design within this scope of mitigation for climate change.</p>	Consider reviewing wording on Policy
15.7	RM	Severn Trent Water		TC2	We are supportive of this policy and would encourage you to get in touch with Severn Trent where there may be opportunities to support with retro-fit SuDS and public realm improvements that could have multiple benefits to reducing the impact of sewer flooding from the impacts of new development and climate change.	Encourage you to get in touch with Severn Trent where there may be opportunities to support with retro-fit SuDS and public realm improvements that could have multiple benefits to reducing the impact of sewer flooding from the impacts of new development and climate change.	This would be negotiations between the Developer and STW rather than any specific policy wording.

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15.8	RM	Severn Trent Water		NE1	We are supportive of this policy. These align with Severn Trent's ambition to Get River Positive. More information on this can be found on our website here - https://www.stwater.co.uk/get-river-positive/		Noted.
15.9	RM	Severn Trent Water		NE2	We are supportive of this policy and especially the last point regarding utilising new open space as multi-functional flood storage. We would however encourage you to take out the reference to 'expect for children's play areas' as it has been demonstrated that SuDS can work well alongside or incorporated into play area design e.g https://www.susdrain.org/delivering-suds/using-suds/benefits-of-suds/recreation.html	encourage you to take out the reference to 'expect for children's play areas' as it has been demonstrated that SuDS can work well alongside or incorporated into play area design e.g https://www.susdrain.org/delivering-suds/using-suds/benefits-of-suds/recreation.html	Suds would not be adopted by NBBC Parks and some Suds would be a potential safety issue in proximity to play areas.
15.10	RM	Severn Trent Water		NE4	We are supportive of your policy, in particular reference to the drainage hierarchy, see our section on Surface water below for supporting wording for your evidence base. We encourage you to include the following: <ul style="list-style-type: none"> • Inclusion of sewer flooding as a source of flooding • Inclusion of encouragement of developers to contact Severn Trent regarding sewer capacity at an early stage of planning to ensure we have adequate time to assess the risk and develop any network improvements should they be required. 	Encourage you to include the following: <ul style="list-style-type: none"> • Inclusion of sewer flooding as a source of flooding • Inclusion of encouragement of developers to contact Severn Trent regarding sewer capacity at an early stage of planning to ensure we have adequate time to assess the risk and develop any network improvements should they be required. 	Consider reviewing wording on Policy
15.11	RM	Severn Trent Water		BE3	We are supportive of this policy particularly sub-section 5 relating to water and energy efficiency and the inclusion of the 110 litres/person/day standards.		Noted.

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15.1 2	RM	Severn Trent Water		General guidance on policy wording	<p>For your information we have set out some general guidelines and relevant policy wording that may be useful to you.</p> <p>Wastewater Strategy We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks. Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.</p> <p>Surface Water Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy: Drainage Hierarchy Policy New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible. Supporting Text: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: "Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable: 1. into the ground (infiltration);</p>	<p>We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy: Drainage Hierarchy Policy <i>New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.</i> Supporting Text: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: "Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable: 1. into the ground (infiltration); 2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer."</p>	<p>Consider reviewing wording on relevant Policies.</p>

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					<p>2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer.” Sustainable Drainage Systems (SuDS) Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS: Sustainable Drainage Systems (SuDS) Policy All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate. All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity. Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity. Supporting Text: Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads. Blue Green Infrastructure We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups. We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the</p>	<p>Sustainable Drainage Systems (SuDS) We recommend that the following policy wording is included within your plan regarding SuDS: Sustainable Drainage Systems (SuDS) Policy <i>All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.</i> <i>All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.</i> <i>Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.</i> Supporting Text: Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual,</p>	

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					<p>principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:</p> <p>Blue and Green Infrastructure Policy</p> <p>Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.</p> <p>Supporting Text:</p> <p>The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:</p> <p>“Planning policies and Decisions should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</p> <p>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</p> <p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”</p> <p>Green Open Spaces Policy</p> <p>Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</p> <p>Supporting Text:</p> <p>We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.</p> <p>Water Quality and Resources</p> <p>Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment</p>	<p>CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.</p> <p>Blue Green Infrastructure</p> <p>To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:</p> <p>Blue and Green Infrastructure Policy</p> <p><i>Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.</i></p> <p>Supporting Text:</p> <p>The incorporation of Sustainable Drainage Systems (SuDS) into blue</p>	

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					<p>Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.</p> <p>Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand. New developments have a role to play in protecting water resources, we encourage you to include the following policies:</p> <p>Protection of Water Resources Policy New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.</p> <p>Supporting Text: National Planning Policy Framework (July 2018) Paragraph 163 states: "Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;"</p> <p>Water Efficiency Policy We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction</p>	<p>green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States: "Planning policies and Decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</p>	

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					<p>to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard: New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.</p>	<p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;" Green Open Spaces Policy <i>Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</i> Supporting Text: We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits. Water Quality and Resources New developments have a role to play in protecting water resources, we encourage you to include the following policies: Protection of Water Resources Policy <i>New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.</i> Supporting Text:</p>	

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						<p>National Planning Policy Framework (July 2018) Paragraph 163 states: “Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”</p> <p>Water Efficiency Policy We would therefore recommend that the following wording is included for the optional higher water efficiency standard: <i>New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.</i></p> <p>Supporting Text: National Planning Policy Framework (July 2018) Paragraph 149 states: “Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as</p>	

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						<p>providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”</p> <p>This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – link.</p> <p>We recommend that all new developments consider:</p> <ul style="list-style-type: none"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres per minute or less. • Water butts for external use in properties with gardens. 	
16.1	RB	Sport England	1.8		Following the completion of the Council’s Playing Pitch Strategy the Infrastructure Development Plan should be updated to reflect improvements i.e. new pitches, improved pitches and ancillary improvements to meet the demand generated from new developments.	This is currently being updated and will be available early 2023.	This may affect Policies and site allocations.

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16.2	RB	Sport England	SA1		Sport England notes Policy SA1 requirement 10, though it is considered that the policy could be more effective by making reference to Sport England's Active Design Guidance. The guidance wraps together the planning and considerations that should be made when designing and adapting the places and spaces we live in, to encourage activity in our everyday lives, making the active choice the easy choice. The use of the Active Design Guidance Checklist would assist in the decision maker in assessing whether the proposal would meet requirement 10.	Requirement 10. Community, sport, physical activity, play and open space facilities should relate well to each other and to existing areas, and the new facilities and spaces should be safe, convenient, accessible, well designed, easy to maintain, and function well. Proposals shall be assessed against Sport England's Active Design Guidance and its checklist.	Consider adding to Policy.
16.3	RB	Sport England	8.19		Sport England seeks clarity as to whether playing pitches (and ancillary provision) is considered within the scope of Community, sports and physical activity facilities. If so, reference should be made to Council's Playing Pitch Strategy alongside the Open Space Strategy.	Should playing pitches being considered within the scope of Community, sports and physical facilities then reference should be made to the Council's Playing Pitch Strategy.	Reasonable request.
16.4	RB	Sport England		SHA-1	Sport England welcomes Policy SHA-1 investment to enhancing indoor and sports provision through the development principle of financial contributions towards; community use sports facilities at the new secondary school located off Higham Lane; Bedworth Physical Activity Hub; Pingles athletics; rugby provision at Nicholas Chamberlaine School and community centre and outdoor tennis facilities at the Pingles. However, the prioritisation for contributions for pitch sports should be revisited upon the completion of the Council's Playing Pitch Strategy in line with NPPF paragraph 98. Further to this clarity is sought as to works envisaged at Nicholas Chamberlaine School site.	Please see comments.	Top Farm has already been approved subject to the signing of a S106 Agreement and therefore no further S106 contributions can be requested.
16.5	RB	Sport England		SHA-2	Sport England notes the key development principle of financial contributions towards sport and physical activity, though clarity is sought as to what the priorities are for indoor sports facilities (note specific sites identified within SHA.1). Further to this any playing pitch priorities should be informed by the Council's Playing Pitch Strategy in line with NPPF paragraph 98, which could result in the need for onsite provision as opposed to offsite contributions.	Please see comments.	The S106 contributions will be considered when the planning application is submitted and will be based on the most up to date Playing Pitch Strategy available at that time.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
16.6	RB	Sport England		SHA-4	Sport England notes the key development principle of financial contributions towards sport and physical activity, though clarity is sought as to what the priorities are for indoor sports facilities (note specific sites identified within SHA.1). Further to this any playing pitch priorities should be informed by the Council's Playing Pitch Strategy in line with NPPF paragraph 98, which could result in the need for on site provision as opposed to off site contributions (sites should be reviewed as to whether identified proposed pitch improvements are still relevant).	Please see comments.	The Outline application has been submitted and is currently being considered and the S106 contributions will be based on the most up to date Playing Pitch Strategy available at the time of the determination.
16.7	RB	Sport England		SHA-5	Sport England notes the key development principle of financial contributions towards sport and physical activity, though clarity is sought as to what the priorities are for indoor sports facilities (note specific sites identified within SHA.1). Further to this any playing pitch priorities should be informed by the Council's Playing Pitch Strategy in line with NPPF paragraph 98, which could result in the need for onsite provision as opposed to offsite contributions (sites should be reviewed as to whether identified proposed pitch improvements are still relevant).	Please see comments.	The S106 contributions will be considered when the planning applications are submitted for each parts of the allocation and will be based on the most up to date Playing Pitch Strategy available at that time.
16.8	RB	Sport England	8.11 5	CEM-1	It is noted that Policy CEM1 allocates the land for the extension of the existing cemetery and that the allocation could also be used for playing pitch provision where it will facilitate the development of the wider land allocation for burial space. However, it is unclear what is meant by the wider land allocation for burial space with the existing playing field site falling outside the allocation. For clarity, it is recommended that the playing field site is incorporated within the allocation alongside a requirement for the playing field site to be retained in situ or replacement provision being provided within the allocation site prior to the loss of the existing playing field site.	It is recommended that the playing field site is incorporated within the allocation alongside a requirement for the playing field site to be retained in situ or replacement provision being provided within the allocation site prior to the loss of the existing playing field site.	The land may include the previously used playing pitch so further consultation with the stakeholders will be required.
16.9	RB	Sport England	12.4 0	HS4	Sport England objects to the proposal as it is not consistent with NPPF paragraph 99. The scope of NPPF 99 relates to open space, sports and recreational buildings and land, including playing fields. Whilst the supporting text of Policy HS6 highlights that the policy does not seek to replicate NPPF paragraph 99 in relation to playing pitches it does not cover indoor sports provision and open spaces, which appears to be covered by Policy HS4. As such, it is considered that the HS4 in relation to open space, sports and recreational buildings, is not consistent with NPPF paragraph 99. The proposed policy does not require the replacement to be equivalent or better provision in terms of quantity and quality in a suitable location (NPPF paragraph 99b). The policy as currently drafted also fails to set out how bullet point 4 will be assessed.	Should open space, sports and recreational buildings and land be retained within the scope of the policy then it should be amended to reflect NPPF paragraph 99. Set out within the supporting text as to how bullet point 4 will be assessed by the decision maker.	12.40 already refers to sports centres and multi-use halls and green spaces/parks and states the list is not exhaustive. However, open space, indoor sports and recreational buildings and land, including playing fields could be included to make the list clearer. Policy HS4 point 2 does state local alternative facilities need to be enhanced

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
16.1 0	RB	Sport England	12.6 2	HS6	Sport England supports the positive approach of utilising up to date evidence base to inform sports, leisure, and recreation facilities requirements from developments. However, Sport England objects to the wording of 12.62 as NPPF paragraph relates to playing field and not playing pitches as worded. Sport England also considers that clarity should be provided that open space, sports and recreational buildings and land, also falls within the scope of NPPF paragraph 99.	To ensure consistency with NPPF paragraph 99 the following amendment is proposed: 12.62 Paragraph 99 of the NPPF contains detailed planning application requirements associated with playing pitch open space, sports and recreational buildings and land, including playing fields losses. These are identified below:	This seems a reasonable amendment.
16.1 1	RB	Sport England	13.1 7	NE2	Sport England objects to supporting text of 13.17 related to Policy NE2 due to the muddled approach as to how losses to existing open space, sports and recreational buildings and land, including playing fields, will be assessed. The supporting text in one hand acknowledges NPPF paragraph 99 and then continues to state HS4 sets out the local approach to the loss of such facilities. It then continues to state where losses are proposed, the Council will consider the criteria in the NPPF. Given that HS4 is not consistent with the NPPF Sport England would not be supportive of the policy being utilised for the assessment of the loss of open space, sports and recreational buildings and land, including playing fields. Sport England therefore considers that policies HS4, HS6 and NE2 are consistent that proposed losses are assessed against NPPF paragraph 99.	Given that HS4 is not consistent with the NPPF Sport England would not be supportive of the policy being utilised for the assessment of the loss of open space, sports and recreational buildings and land, including playing fields. Sport England therefore considers that policies HS4, HS6 and NE2 are consistent that proposed losses are assessed against NPPF paragraph 99.	It is assumed that this is reference to NE2 . Add playing pitches to 13.17. As the paragraph refers to HS4 which is proposed to be in line with Sports England request then it is considered that this will address their objections. A separate consultation and discussion will be carried out with Sport England once the amendments are carried out. Sport England are a statutory consultee and would be consulted on any individual planning application received and incur potential call in by the Secretary of State if their objections were ignored.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
16.1 2	RB	Sport England		DS5	<p>Sport England objects to a number of the non-strategic housing allocations (listed below) which are sited on playing field sites, with it not being demonstrated that the sites are surplus to requirement or replacement provision is to be provided in line with NPPF paragraph 99. The loss of playing field sites is also not mentioned as an issue within the policy unlike biodiversity and heritage issues.</p> <p>Sport England would expect any loss of playing field sites should be informed by an up to date Playing Pitch Strategy (PPS) to ascertain whether the sites should be retained to meet existing/future demand (in line with NPPF paragraph 99a). Where it has been demonstrated that there is not a quantitative need for the playing field land there still might be need for mitigation to fund qualitative improvements (pitch improvements and ancillary facilities) to help address identified shortfalls in demand.</p> <p>NSHA-1 contains a redundant playing pitch.</p> <p>NSHA-2 Site previously contained 2no rugby pitches, 2no bowling greens, clubhouse and car parking.</p> <p>NSHA-3 Site historically marked out for football pitches and artificial cricket wicket.</p> <p>NSHA-8 Site contained a football pitch (varying pitch sizes) and car parking</p> <p>NSHA-13 Site allocation does not appear to incorporate playing field land though it should be made clear that any re-provisioned car parking on the playing field site.</p> <p>Proposed residential development should also not prejudice the use of the playing field site.</p>	<p>Sport England considers that the policy is inconsistent with national planning policy as currently drafted. It is therefore recommended that the policy should make reference to playing field sites needing to demonstrate compliance with NPPF paragraph 99 (as there is no protection policy contained within the Plan).</p>	<p>The loss of playing pitches would be considered with any application and would work with Sport England to ensure any loss would be compensated and would be reliant on the most UpToDate planning pitch assessment at the time of the application. It is anticipated that the assessment need will be updated in the near future and these sites can then be reconsidered in terms of viability and potential loss.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.1	PS	Stagecoach		General Introductory Comments	<p>1. Introductory Comments</p> <p>Stagecoach Midlands is the largest bus operator within the Borough of Nuneaton and Bedworth. Most of our services are operated commercially, sustained directly by patronage. We run a much smaller number of local services supported in part by the County Council, which cannot be sustained otherwise.</p> <p>Stagecoach has maintained a consistent and active interest in and engagement with the Borough’s Local Plan. We are keen to provide as much input as we can at this Regulation 18 stage to help shape the emerging plan in a manner that maximises the opportunities for us - and potentially other bus operators - to provide a relevant service to existing and new residents.</p> <p>This is even more crucial if the plan is to be delivered without unsustainable increases in car use and traffic pressure on a highways network that is obviously approaching or at saturation across many parts of the Borough, notwithstanding some recent improvements, for example at Coton Arches. Much of the most serious congestions lies around the town centre of Nuneaton and on its immediate approaches, as well as around the Long Shoot junction on the far northern edge of the Borough.</p> <p>Ongoing delivery of development – much of which was consented outside of the currently adopted planning policy framework – continues to add additional pressure. As we warned during the gestation of the current Local Plan, there are great and rising risks that without a properly conceived strategy to achieve a substantial mode shift of currently car-borne journeys to more sustainable modes, operating conditions for bus will continue to deteriorate, leading to slower, less reliable and less attractive services. This in turn increases both unit bus operating costs, as well as eroding patronage and revenue. We need to make very plain that these trends need to be reversed in the short term, to first protect the existing level of service and then provide the basis for buses to play their fullest possible role in meeting mobility needs.</p> <p>Quite apart from the need to rebuild after the serious disruption caused by COVID, to make the best use of existing local finite highway capacity, and support social exclusion and public health, national policy is now formed on the basis that a mode shift to public transport is unavoidably required to meet the legally binding trajectory to “net zero” greenhouse gas emissions by 2050. This is expressed in the National Decarbonisation Plan for Transport, which underlines that walking cycling and public transport need to be much more consistently and strongly prioritised in all local strategies, so that they become “the natural first choice” for local trips. The Decarbonisation Plan is explicit in Section 5 that land-use planning is a key mechanism to support evolution of patterns of development and built form to support a very challenging transport decarbonisation agenda.</p> <p>This response has been prepared at a particularly challenging time for our industry and business. For that reason, it comes a short time after the close of the consultation, for which we apologise. However, we take our responsibility to input seriously and we hope that notwithstanding this small delay, the following comments are helpful in shaping the plan and its policies. We hope they can be given due weight.</p>		Contents noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.2	PS	Stagecoach	3.5		<p>2. Issues the Plan must address This is covered in section 3.5.</p> <p>The Plan identifies stubborn challenges surrounding employment, accessibility, inequality, social inclusion and peripherality. As is typical these tend to reinforce one another and these causative links unsurprisingly have a profoundly spatial expression. Therefore, it is within the power of the Council to seek to address them through planning policy, and its links with transport and accessibility.</p> <p>The issues identified do not include the contribution of excessive car dependency to the Borough's emissions. The National Decarbonisation Plan for Transport (July 2021) makes explicit that proper alignment of Local Plan strategies and policies to support radically more sustainable patterns of access and movement are an essential component in the Strategy – which focuses on the largest single source of domestic emissions.</p> <p>While car use and ownership the Borough is lower than much of Warwickshire and the surrounding areas, this does not in any way reduce the importance of properly aligning the Plan to accelerate a wider transition to walking cycling and public transport. First, it is essential that in seeking to secure higher prosperity and productivity – including more skilled and better paid employment – this does not translate into higher levels of car ownership and use.</p> <p>There serious problems that arise from exactly this are clearly evident at MIRA, just outside the Borough, all but adjacent to the northern edge of Nuneaton, which by virtue of its location and design, simply cannot sustain a relevant high quality public transport offer despite the revenue support that has been applied to this end since 2013.</p> <p>While the Borough's urban spine is clearly broadly aligned north-south – including links to Hinckley to the immediate north east and Coventry to the South – it is unhelpful to conflate this with a single public transport corridor – whether rail or road. The attractiveness of car use stems ultimately from the completely seamless single-mode journeys it offers, which are not dependent on a timetable, and the direct routes that can be taken. A spatial strategy that maximises the attractiveness of walking cycling and public transport has to recognise the need to support and enhance a network of services that effectively penetrates neighbourhoods and efficiently links them to key destinations.</p> <p>While simple and direct public transport corridors are of the essence in anchoring such a network, the ongoing rapid evolution of the man urban areas, much of this already committed and under construction in the adopted Local Plan 2031, and their expansion, needs to respond to the best possible opportunities to consolidate the most attractive and relevant public transport corridors, and, then, ensure that this kind of network can be</p>		Excessive car dependency is an issue. The need for alternative forms of transport is recognised and reference to other forms of transport have been included throughout the Borough Plan.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
					<p>extended judiciously to serve as may existing as well as new journey demands as effectively as possible. In particular, tying the most deprived western wards much better into a frequent public transport network, also extending to key destinations outside the Borough such as at Keresley/Exhall, Atherstone/Birch Coppice, parts of south and west Hinckley, and even the Birmingham International area, needs to be looked at very urgently. This will also demand much more rapid and reliable cross-town public transport connectivity in Nuneaton, and on the edges of the Borough at The Long Shoot, and towards the Coventry urban area around Exhall and Hawkesley.</p> <p>For any of this to happen bus productivity and reliability must radically improve. The congestion around the town centre – which also forms the main public transport node in the Borough but around which a great deal of cross town and longer-distance traffic must also circulate is now an urgent and serious threat to maintaining the bus service offer – as we warned at the time of the preparation of the last Local Plan. Again, as was foreseeable at that time, there is no realistic way of “building your way out” of unconstrained traffic growth in the Borough. As the Review seeks to add further allocations to meet longer-term development needs, perpetuation the previous approach is neither justifiable nor possible.</p>		
17.3	PS	Stagecoach	4.1		<p>3. The Plan Vision This is covered in Section 4.1. Stagecoach welcomes the placing of sustainable transport quality and connectivity at the heart of the Plan’s Vision. Specifically the Council is seeking as follows through the Plan: “The environment of the Borough will be improved through greater sustainable transport options...” This is essential to direct the logic and evidence base of the Plan towards achieving such an outcome, as well as the much wider range of policy goals that are the focus of national policies, and reflecting an appropriate response to the wider challenges also identified in the Issues.</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.4	PS	Stagecoach	4.1		<p>4. The Plan Objectives</p> <p>However, the Vision is not properly driving the eight Objectives. Specifically, while active travel is mentioned, public transport is not, at any point. Without the Plan expressly aiming to facilitate radically improved public transport, the kind of transport mix and choices available to residents, visitors and employees in the Plan area, both existing and future, cannot develop positively. In fact, most likely, it will go backwards.</p> <p>We would add that Stagecoach buses in the Borough in 2019 alone accounted for about x,x00,000 annual boardings in the Borough. The total estimated number of rail boardings at the three passenger stations in the Borough – two of which have only opened within the last few years – was about 742,000 in 2019-20. Bermuda Park had just 19,000 boardings, Bedworth about 51,000. As is quite typical, but accounts for more than an order of magnitude more journeys than rail. There has been a great deal of policy attention and investment directed at local rail services and facilities in the County and Borough for at least 30 years, with demonstrably modest impact on traffic generation, or on the wider socio-economic challenges that continue to be faced by the Borough. The correspondingly minimal of attention paid to bus, by comparison, to a great extent explains why we are struggling to maintain the quality and relevance of the service we offer to existing communities in the Borough – much less offer a much relevant choice to serve new developments.</p> <p>The spatial strategy chosen is crucial to this. However, master planning and development control policies and processes are scarcely less important. It is fair to say that the incremental and at times highly disjointed manner in which strategic allocations have been brought forward – for a number of reasons not all in the Council’s control– has hugely mitigated against us being able to provide meaningful service of any kind that is conveniently accessible to residents. The situation at the largest allocation in the current Plan – HSG 1 – exemplifies this to a degree that is quite extreme.</p> <p>Subsequent to the HSG1 allocation being confirmed, additional sites have been consented as Departures to the Plan. These adjoining parcels if anything compound the problems, as they cannot be penetrated by bus services and, worse, do not allow residents to walk through to existing or committed future adjoining development that might potentially offer a public transport route at any stage in the foreseeable future.</p> <p>Many of the draft Objectives of the Plan could usefully be “tightened up”.</p> <p>From our perspective, the most important change we would urge is Objective 6 which to make the Plan compliant with and in conformity with NPPF Paras 104-105, should read:</p> <p>Objective 6</p> <p>To locate and design new development, and direct investment priorities in support of development to improve public transport, cycling and walking networks...</p>	<p>From our perspective, the most important change we would urge is Objective 6 which to make the Plan compliant with and in conformity with NPPF Paras 104-105, should read:</p> <p>Objective 6</p> <p>To locate and design new development, and direct investment priorities in support of development to improve public transport, cycling and walking networks...</p>	<p>Public Transport is important</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.5	PS	Stagecoach	5.5		<p>5. The Plan’s Evidence Base</p> <p>This matter is covered in section 5.5 Stagecoach welcomes the recognition that the transport evidence base needs update. This exercise appears to be a Strategic Transport Assessment.</p> <p>We note the commentary at point 4 of this section at pages 18-19, and equally that even existing Local Plan Policy seeks to achieve mode shift at Policy HS2. Thus far, there is no evidence that any such mode shift has been achieved. Thus, it is clear a more ambitious, focused and effective strategy is required. This in turn needs a change in the approach to the evidence base.</p> <p>Accordingly, we would object to simply re-running the methodology used by the County Council for the last Local Plan. This was a traffic-based exercise, using a fairly traditional traffic forecasting and assignment model, though we would certainly agree that the use of a micro-simulation approach using PARAMICS was much more robust and appropriate than a much more crude Strategic Traffic model such as SATURN. As is well recognised through the transport policy community, and beyond, if you plan only with increased traffic in mind, that is all you will see. It would be highly imprudent for NBBC as LPA, to assume that national planning policy will permit this kind of approach to be perpetuated. During the lifetime of this Local Plan preparation process, NPPF and supporting Planning Practice Guidance is certain to change to reflect national decarbonisation and transport policy objectives.</p> <p>In any event it should be obvious by now even from the evidence within the Plan area, that in practical terms the approach that “predicts and provides” (for traffic and unconstrained car use) is spent and discredited. By contrast, we would expect and urge in the strongest terms that a modelling approach that robustly supports mode shift to active travel and public transport is employed. Such a model should be able to assign travel demands by mode depending on relative attractiveness of modes – such that specific improvements to walking cycling and public transport level of service can be evaluated for their impact. This will require a clear and transparent definition of key improvements to these networks. That in turn would flow through to the Infrastructure Delivery Plan, once a suitable packages of demonstrably effective and deliverable interventions are identified.</p>		WCC Highways are the statutory consultee and will be carrying out the STA.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.6	PS	Stagecoach		DS3	<p>6. The Strategic Policies</p> <p>6.1. Strategic Policy DS3 Development Principles</p> <p>NPPF is to be reviewed and its intent is to rationalise planning policy to remove the need for Local Plans and policies to duplicate national policy and standards. It is likely that this draft policy will need substantial review to reflect this in any event, for example in the light of the publication and implementation of the Future Homes Standard.</p> <p>In this regard, substantial changes are taking place in the transport environment that have a wider impact on built form and urban design. Manual for Streets 3 is on the point of publication and this will carry much greater weight than its predecessors, that were not promulgated as formal policy. This follows the publication of DfT Local Transport note LTN01/20 (July 2020) and a pending review of LTN 01/97 “Keeping Bus Moving”, publication of which is expected by the time the Plan is submitted for examination.</p> <p>The text should reflect explicitly these, at the very least making reference to “national standards for highways design and sustainable transport infrastructure”.</p>	<p>The text should reflect explicitly these, at the very least making reference to “national standards for highways design and sustainable transport infrastructure”.</p>	<p>This point seems reasonable.</p>

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.7	PS	Stagecoach		DS4	<p>6.2. Strategic Policy DS4 - Overall development needs</p> <p>We note that the Plan anticipates the need to deliver 9,690 homes based on 646 dwellings per annum (15 years starting in 2024).</p> <p>Current Local Plan involves a delivery rate and quantum based on 735 pa including an agreed contribution to meeting Coventry’s unmet need, under the Duty to Co-operate binding on the Council.</p> <p>We note that “The updated 2021 Census information will need to inform the updated sub-regional HEDNA work which will propose housing need requirements for each of the six local planning authorities. Where any authority in the housing market area is able to demonstrate that they are unable to meet their housing or employment land requirement figure and can quantify the unmet need, the Council will cooperate with such authorities in order to fulfil its obligations under the Duty to Co-operate”. We strongly endorse this approach, notwithstanding possible changes under the Levelling up and Regeneration Bill to the legal Duty to Cooperate found in the Localism Act 2011.</p> <p>The approach to calculating the capacity and availability of land already committed for development is critical to establishing the residual figure that will need to be accommodated. Given that so many of the strategic sites in the current Local Plan are yet to commence, this is especially critical.</p> <p>However we are sceptical that only about 1100 additional units will need to be identified to meet the housing needs of the area, even accepting that the latest interim figures from Icen work can be relied upon, and also that there will be no need to accommodate unmet needs from Coventry. Thus, we think it inevitable that further site will need to be accommodated for the Plan to be positively prepared at the point of submission. Thus, the Council and wider stakeholders are currently in a somewhat difficult position, as it is impossible to be confident that the plan strategy as a whole is sound, alongside its supporting mitigations (transport in particular), until a robust basis to establish the housing and other development quanta is established.</p>		The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
17.8	PS	Stagecoach		DS7	<p>6.3. Strategic Policy DS7 - Green Belt</p> <p>We agree that there is no clearly demonstrable set of Very Special Circumstances that require another Green Belt Review. In fact to do so in the current context of the Borough implies a pattern development that would tend to take new housing and employment further away from the key public transport routes and nodes, and would be unsustainable for that reason.</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.9	PS	Stagecoach		DS5	<p>6.4. Strategic Policy DS5 - Residential allocations</p> <p>Stagecoach notes that the vast majority of proposed strategic allocations reflect those in the existing Local Plan that have yet to secure consent. Thus, the strategy is to “roll forward the Local Plan without identifying material new development. This is in essence an approach driven by arithmetic but it certainly greatly diminishes the risks that a great deal more or different transport infrastructure is required to support the Plan Review, from first principles.</p> <p>Leaving aside the question of how far the Plan is “positively prepared” in the sense of NPPF, it would erroneous to assume that the existing traffic impacts arising from the current development commitments, and these unconsented allocations, has been fully or quite satisfactorily addressed. On the contrary, the previous Infrastructure Delivery Plan suffers from many initiatives that are neither defined nor costed, much less funded.</p> <p>Thus it is vital that the opportunity is taken to properly review the wider transport mitigation strategy having regard to the latest transport modelling evidence, such that the Review strengthens greatly the achievement of a net improvement in the relevance and attractiveness of bus services across the Borough, and especially to and near the allocated sites.</p> <p>This is about a great deal more than simply morphing an existing pattern of service to go “closer to new homes”.</p> <p>A decisive break with the past approach to transport needs to be taken to ensure that all the mobility demands of the Plan strategy can be properly accommodated, on a more sustainable basis, substantially reducing net carbon emissions from transport as well as mitigating the impact of additional demand on the network, which has been the sole driver previously.</p> <p>By the time this plan is examined it is certain that NPPF will mandate transparent carbon reduction, including from the transport impacts of the spatial strategy. Thus, even if little additional land is identifiable, the wider supporting Plan mitigation strategy is likely to come under significant scrutiny on this basis, and is likely to need some substantial re-examination from first principles to be found sound.</p>		Comments noted. Awaiting the STA.
17.10	PS	Stagecoach		SA1	<p>7. Strategic Allocations Policy SA1</p> <p>There is no reference whatsoever to ensuring that all Strategic Allocations will be conveniently served by and thus accessible to public transport. This is unacceptable and out of conformity with NPPF Chapter 9 at paragraphs 104-105 and 113. To progress the Plan on this basis would therefore obviously be unsound. The lack of reference to public transport anywhere in paragraphs 8.11-8.15 is deeply troubling and quite unsound given the need for the plan to conform to the requirements of NPPF Chapter 9. We note that specific reference to walking and cycling infrastructure has been added.</p> <p>We therefore propose the following text for insertion in Draft Policy SA1</p> <p>TBC</p> <p>We especially welcome point 12</p> <p>“12. In the event of a part submission of a strategic site, the proposal will need to illustrate that the applicant has worked with owners of the other parts of the allocation in order to ensure the entire site will ultimately provide a cohesive scheme including contiguous linkages without ransom strips to ensure the allocation can be provided in their entirety. Any infrastructure provided within a staged submission such as road widths and visibility splays must be suitable for the provision of the entire allocation.”</p>	Awaiting wording from Stagecoach.	Chased Stagecoach for wording.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.1 1	PS	Stagecoach		SHA1	<p>8. Site Specific allocations</p> <p>8.1. Strategic Allocation SHA1 Top Farm</p> <p>We note that this allocation is reconfirmed to accommodate 1700 dwgs, and a new Secondary School. We also note that the site benefits from a resolution to grant application 035279 in May 2022 for what we understand to be a nominal 1390 dwellings and can be expected to move forward in the fairly foreseeable future. We are unclear where the residual capacity of about 300 dwellings will be provided.</p> <p>Draft policy to support the site coming forward includes:</p> <p>“15. Provision of a strategic access road / spine road through the site, with integrated footway and cycleway provision across the strategic site.</p> <p>16. Provision of on-site bus infrastructure and contribution to secure diversion of local bus services to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.</p> <p>17. Transport improvements/upgrades required to alleviate impacts of the development including along Higham Lane, A47 Hinckley Road, Weddington Road, the A5 and the Long Shoot.</p> <p>18. Financial contributions towards Borough-wide strategic highway infrastructure works identified within the Nuneaton area.”</p> <p>This is supported.</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.1 2	PS	Stagecoach	8.30		<p>We note the additional comments in Para 8.30.</p> <p>The Council's position on the land outwith the allocation to the north, subject to a current planning application for up to 700 dwellings (NBBC Ref 038602), is nevertheless unclear. This grounds to resist this seem to be challengeable. Irrespective, as far as this Plan is concerned, the strip between the proposed allocation/development and the A5 needs to be properly integrated in some manner and covered by an appropriate policy with the existing allocated land to create a comprehensive development, even if it can be robustly evidenced that built development should not take place on these parcels.</p> <p>Given that to the east the existing development north of current LP allocation HSG 1 has established the principle that the A5 should be taken as defining the northern edge of the BUA, it seems irrational and imprudent not to consider the appropriateness of this being consistently applied as a principle here. This is especially relevant as there appears to be a quantum of about 400 dwellings that the current Top Farm application may struggle to accommodate?</p> <p>In these circumstances, including the evidence submitted as part of the planning application, and in the absence of compelling contrary evidence, the current policy approach appears to be arbitrary, inconsistent and capricious. Worse, it risks a short-term development management decision in advance of the Review Plan being adopted, that perpetuates and reinforces the already problematic balkanisation of an extensive tract of built development within the current allocation HSG1. This is evident in the development currently being constructed east of Higham Road, The worst impacts of this have been the creating of fragmented suburban form where walking and cycling links are few and exceptionally indirect, and public transport provision and therefore use is practically impossible.</p>		Comments noted.
17.1 3	PS	Stagecoach	8.31		<p>Para 8.31 The timing of delivery as well as the alignment of the spine road to be used by a bus service/s is crucial. The phased delivery of the site referred to in paragraph 8.30 must have critical regard to this matter, to avoid replicating the problems evident across the Borough and beyond. Well over 1000 occupations having taken place on HSG1. However, with the exception of Lower Farm, Weddington, it is impossible to penetrate the developments with a relevant bus service and this looks likely to be the case until close to or after the final occupation of over 2000 units between The Long Shoot and Higham Road. Were good walking and cycling links to be available to adjoining development and facilities and services, this would be less problematic. However, this is simply not the case.</p> <p>Unsurprisingly, then, current development on HSG1 east of Higham Lane is exceptionally and car-dependent, directly and seriously aggravating problems on the local network and SRN in the near vicinity. It is vital that this situation is not aggravated and perpetuated on land to the west of Higham Lane.</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.1 4	PS	Stagecoach		SHA2	<p>8.2. Strategic Allocation SHA2 Arbury</p> <p>We note that this existing strategic allocation is re-affirmed with a quantum of 1525 dwgs. We are not aware that an allocation has yet been forthcoming.</p> <p>Policy continues to make specific requirements explicit to support sustainable delivery of this allocation including:</p> <p>“5. Provision of a distributor link road through the site with integrated footway/cycleway provision in accordance with the concept plan. The distributor link road will need to secure a connection that links the site to the A444.</p> <p>8. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services to access the strategic housing site, based on dialogue with Warwickshire County Council and bus operators.”</p> <p>The above measures are necessary, rational and supported by Stagecoach.</p> <p>We must point out that there are no bus services, run by Stagecoach or any other operator, that run in the immediate vicinity of this site. Further, the alignment of the spine road means that a bus route will not align well with any existing bus corridor, and as such, a simple diversion of bus services cannot occur.</p> <p>Rather, a major bus service intervention will be required having regard to robust evidence of the actual desired destinations for which such a service should provide a relevant and indeed “natural first choice” for residents, to quote the National Decarbonisation Plan for Transport.</p> <p>The scale of the development will on its own be entirely insufficient to support such a service in the longer term. Accordingly, as well as substantial developer funding, the package must be designed to synergise as far as possible with the existing commercial bus network on the one hand, and identifiable needs arising across extensive existing development both adjoining the allocation and nearby. We would strongly urge and recommend that discussions on this a matter take place to inform the IDP and the Regulation 19 stage sooner rather than later.</p>		Discussions with Stagecoach will be carried out as part of the IDP review.
17.1 5	PS	Stagecoach		SHA3	<p>8.3. Strategic Allocation SHA3 “Judkins”/Tuttle Hill</p> <p>This site is an existing allocation for at least 400 dwgs, as HSG 11 in the Local Plan of which at least 200 in NBBC. It is supported by current application 036826 awaiting determination, for 382 units. The nomenclature of the site in the text is inconsistent. We are also aware of another application lying in North Warwickshire Borough, that is also under determination to the west. It is not clear how an increased site capacity of 400 units within NBBC has been arrived at.</p> <p>The site lies north of the main existing bus corridor between Nuneaton and Atherstone. The topography and ground conditions are exceptionally challenging in places, but the allocation does not well lend itself to diversion in of bus services from Tuttle Hill, nor are we aware that this is proposed. Maximising walking and cycling accessibility to adjoining bus stops will therefore be of the essence and this should be reflected in site-specific policy.</p> <p>9. Financial contribution towards local bus services, including new bus infrastructure if required, based on dialogue with Warwickshire County Council and bus operators.</p>		WCC Highways have requested that bus access is provided and is to be added to the Policy.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.1 6	PS	Stagecoach		SHA4	<p>8.4. Strategic Allocation SHA 4 Hospital Lane, Goodyers End</p> <p>This re-allocates current HSG5 for an identical quantum of 398 dwgs. We are not aware of any application having been either lodged or determined, or even if the site is actually under promotion and thus “available”. We note proposed policy includes the following:</p> <p>“8. Provision of on-site bus infrastructure and contribution to secure diversion of frequent local bus services to access the strategic housing site based on dialogue with Warwickshire County Council and bus operators.”</p> <p>We welcome the principle of this.</p> <p>Significant caution nevertheless should be applied regarding assumptions about the diversion of our commercial services to serve so small a quantum of development. The way the site is accessed, and the master plan will determine if this is feasible or even desirable. Extension of Anderton Road into the site linking directly south to Hospital Lane, preferably reorienting the junction to avoid a change of priority, could be well worth examination as part of a wider bus routing strategy. However the existing primary school and nursery would probably make it necessary to make the link only passable by buses, and active travel modes through the creation of a CCTV controlled mode filter, probably at the northern access point.</p>		Comments noted, the Outline application has been subsequently received and it is assumed that Stagecoach have entered into discussions with NBBC and WCC Highways in relation to bus access to the site.
17.1 7	PS	Stagecoach		SHA5	<p>8.5. Policy SHA-5 – West of Bulkington</p> <p>This land reconfirms existing Local Plan Allocation HSG 8 that was anticipated to accommodate 490 dwellings. Applications for some of this have been lodged and determined. We note this allocation is for “at least 348 dwgs”; thus we assume this is net of consents already issued including 036491 for 190 dwellings. The lack of transparency on this site and several others as to what is accounted for within and without proposed renewed allocations is quite unhelpful.</p> <p>The site is alongside a commercial bus service. We note and welcome Para 8.73:</p> <p>“Contributions towards highway improvements and bus infrastructure will be sought.”</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.1 8	PS	Stagecoach		SHA6	<p>8.6. Policy SHA-6 – Land at former Hawkesbury Golf Course</p> <p>We note that this accounts for 176 dwgs (net of accounting for approval 036870) and is in and of itself not of strategic scale.</p> <p>This land was introduced at a late stage to the Plan during the Examination process and confirmed during Public Examination as HSG12 for 380 dwellings. It is now entirely covered by two outline planning applications, the first of which is consented for 204 dwgs. An application for this second phase has been lodged as 037807.</p> <p>We note at Paragraph 8.80</p> <p>“Financial contributions towards strategic highway improvements and bus infrastructure will be sought recognising that the implications for the wider highway network will involve consideration of relevant junctions within the wider B4113 Longford Road corridor. This will require dialogue with Warwickshire County Council and Coventry City Council as the relevant authorities responsible for the corridor.”</p> <p>This is welcome and necessary as this land forms part of a significant emerging growth location that lies on the far eastern flank of the built up area somewhat distant from established public transport corridors. Significant bus service contributions are likely to be required, given the weak baseline position in this locality.</p>		Comments noted.
17.1 9	PS	Stagecoach		SEA-1	<p>8.7. Policy SEA-1 – Faultlands</p> <p>This 26 ha employment site lies east of the main service 48 corridor on Coventry Road. It confirms an existing LP allocation and covered by a current approval in Outline 034901 for about 93,000 sqm of employment. It is not clear if this permission has in fact been issued alongside a made developer obligation deed.</p> <p>We note and welcome the site specific policy for this site and in particular:</p> <p>“7. A proportionate financial developer contribution towards Gipsy Lane canal bridge strengthening / widening works, in order to enhance local bus service accessibility to the employment site from Griff Roundabout, Coventry Road, etc.”.</p> <p>This is especially relevant and necessary as this site stretches a considerable distance east of the existing bus corridor, beyond which a alive consent for 575 dwellings (LP HSG ref 035037) is now moving to commencement. Bus service penetration to this area and existing residential beyond that is currently poor.</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.2 0	PS	Stagecoach		SEA-2 Wilsons Lane	8.8. Policy SEA-2– Wilsons Lane Exhall This is a substantial mixed use employment-led allocation for 18 Ha plus 73 dwellings closely related to the Coventry Urban Fringe south of the M6 and near junction 2. About 550,000 sq ft B class uses is proposed, which is substantial. We made observations on application 037237 on its submission. The main public transport corridor is the B4114 Bedworth Road and this is some distance to the east. The employment site to the west is still further distant and provision for bus access is required, if only to facilitate buses to serve shift changes.		Comments noted.
17.2 1	PS	Stagecoach		SEA-3	8.9. Policy SEA-3 – Prologis extension, Keresley Stagecoach has no specific comments to make on this allocation for 5.3 Ha which is a rounding out.		Comments noted.
17.2 2	PS	Stagecoach		SEA-4	8.10. Policy SEA-4 – Coventry Road This 9 Ha sites is bounded on its east by the main Coventry Road route which is one of the main public transport corridors in the plan area. The site is also within walking distance of Bermuda Park Station. This is certainly a highly sustainable location. The biggest question surrounds whether this land is best dedicated to employment or residential use.		Comments noted.
17.2 3	PS	Stagecoach		SEA-5	8.11. Policy SEA-5 – Longford Road, Exhall This 2 Ha is a rounding out directly west of the B4114 which is the main bus corridor in the area, and north of the M6. This is a sustainable location and certainly a range of employment sites to meet different needs is both appropriate and justified. However, is this realistically a “strategic allocation”?		Comments noted.
17.2 4	PS	Stagecoach		SEA-6	8.12. Policy SEA-6 – Bowling Green Lane Exhall This is a mixed use employment-led allocation for 19 Ha and 150 dwgs lying west of the A444 and north of the M6 which forms an enduring southern boundary to the built-up area. While adjoin the M6 and being in very close proximity to junction 2, HGV access to what would be a substantial amount of employment is a question that is begged, This would require the use of extensive lengths of residential streets, and multiple turns and changes of priority, involving articulated vehicles in all probability. We are thus surprised that this allocation is being advanced for consultation. This site is likely to be greatly more appropriate for residential development, even having regard to the amenity issues presented by the M6, which have not prevented development south of School Lane a short distance to the east. There are a number of bus routes in the area, the two most frequent of which, 55 and 56, pass the site frontage at this writing. However, diversion of any service to serve the School Lane allocation (SHA4) to the northwest would tend to “rob” this site. There is also an argument that a single consistent route running more frequently would be greatly more relevant to most people.		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.2 5	PS	Stagecoach		TC1	<p>9. Policy TC 1 Town Centres</p> <p>Stagecoach is directly exposed as a business to the changes in the retail landscape, as trips to meet shopping and leisure needs are a significant part of our business.</p> <p>It bears re-emphasising that one key reason that town centres have explicit and strong protection policies within NPPF is because, among other things, they can host uses that generate significant demand to travel in a place which is most accessible by public transport in particular. However, the market pressure for extensive out-of-town retail and leisure sites is obviously entirely a response to the ability to maximise accessibility only by car, and to accommodate large amounts of parking on extensive surface lots. This has many deleterious consequences, which apart from a direct contribution to car-dependency also presents attendant wider issues surrounding the promotion of sedentary lifestyles, and also pose issues for social inclusion as those who aren't motorists often struggle to access these sites conveniently, safely, or at all.</p> <p>The clear requirements in national policy that have posed a sequential test for the location of town centre uses have clearly failed across Warwickshire. If real progress is to be made in halting increasing level of energy intense car-dependency, the formulation and application of these policies needs to be significantly tightened up.</p> <p>We recognise that the retail landscape has changed, and it will no doubt continue to evolve. We note too that the share of retail accounted by on-line has stalled and even fallen back, indicating that a ceiling may have been reached.</p> <p>Nuneaton in particular has been especially challenged by the loss of comparison and fashion retailers over the last 5 years. We recognise that consolidation of uses and a flexible approach to E-classes, intended by the reform of the Use Classes Order for this very reason, needs to be pursued.</p> <p>This flexibility need to be applied to some town centre streets which clearly no longer form part of the "prime pitch" and have been, essentially abandoned. The very widespread pedestrianisation of these streets at times actually contributes to their blight, as there is no passing trade. However, in Nuneaton, over the last 20 years, buses have been displaced by pedestrianisation out of the main retail core, to a single bus station, on the fringes of the centre. Buses are condemned to sit in serious traffic congestion in a ring road system that despite its high level of engineering to facilitate high volumes of car-borne traffic, cannot manage the flows it must accommodate.</p> <p>As we have been urging for many years, the opportunity should therefore be taken not just to review the retail frontages, but the way this affects the use of these streets to circulate to and through the centre by sustainable modes. The current approach has clearly had its day, if it ever worked properly. Introducing buses into Abbey Street and potentially Coton Street/Coventry Street even on a limited basis, could transform the reliability productivity and attractiveness of many of the Borough's bus services. Such an approach would provide a bus only crossing of the Ring Road.</p> <p>However, irrespective, much more rigorous control, of retail and leisure uses in car-dependent locations needs to be applied, with strongly-worded policies. Where such developments are considered to be warranted, there needs to be hugely greater emphasis on provision of direct and attractive walking, cycling and public transport links into and through them.</p>		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
17.2 6	PS	Stagecoach		Concluding comments	<p>10. Concluding Comments</p> <p>Stagecoach Midlands welcomes this opportunity to comment on the emerging Local Plan Review. We trust that the foregoing is of direct assistance in further refining the approach to be taken as a draft is worked up for pre-submission consultation.</p> <p>The text of the current draft makes explicit a need to discuss a number of site specific requirements with the County Council and Bus Operators. We would urge this dialogue to start well before the pre-submission draft is finalised.</p> <p>However, there is a great deal more that need to be discussed on a more strategic basis if the Review is to be found sound. This kind of input is explicitly required by NPPF at paragraphs 15 and 16, most pointedly at 16 c): "Plans should be shaped by... be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees..".</p> <p>Again, we would urge that these conversations commence as soon as is reasonably possible to ensure that the Plan can move forward in an especially dynamic national policy environment. This is one where it is reasonable to anticipated that climate change mitigation and carbon reduction will play a hugely greater role in steering policy approaches This means that perpetuating many aspects of previous approaches to plan making and decision taking is highly unlikely to be considered acceptable, including where transport is concerned.</p> <p>We look forward to continuing our engagement with NBBC and the County Council to this end and we would like to discuss the best means of facilitating this. In the meantime, do not hesitate to contact the Commercial Director, Patrick Stringer, or the undersigned to discuss any of the matters raised.</p>		Comments noted.
18.1	SW	WCC Flood Risk Management Team			<p>The LLFA would highlight that historic flooding records should be taken into consideration for some of the sites highlighted as amber in the SHLAA spreadsheet. The link below is to our historic flood records, these have also been provided to NBBC as part of the update to the SFRA evidence base document.</p> <p>https://maps.warwickshire.gov.uk/historical-flooding/</p>		A SFRA Level 2 of each of the sites will be carried out as part of the evidence base.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
18.2	SW	WCC Flood Risk Management Team		NE4	The LLFA strongly support this policy outlining that all sources of flood risk must be taken into account. In paragraph 2, whilst we appreciate that not every site will be required to have an FRA by national policy, every application must have a drainage strategy which demonstrates how surface water will be managed and flood risk will not be increased downstream. WCC Local Guidance for Developers should also be reference for drainage design and guidance on discharge rates. We strongly support outlining that all developments should reduce discharge rates to greenfield Qbar. It could also be added that a 50% betterment should be provided on brownfield sites given the number proposed in Nuneaton. We strongly support the policy encouraging SuDs to be dispersed throughout the site. We strongly support the Water Quality section of the policy.		The wording of the Policy was originally provided by WCC FRM Team. WCC FRM recognise that not all sites will require a FRA and requests that every application must have a drainage strategy which demonstrates how surface water will be managed and flood risk will not be increased downstream. However, WCC FRM are the specialists consultee on Flood Risk but will only respond on major applications. Therefore this can be added to the Policy but will be reliant on WCC FRM responding to the information provided at the time of the application. An SFRA level 2 will be carried out for all of the sites during the Review process.
18.3	SW	WCC Flood Risk Management Team	13.1	NE1	The LLFA strongly support this policy and the inclusion of ordinary watercourses requiring an 8m easement as well as main rivers. The LLFA would highlight that the paragraph below could be expanded to include mention of retro-fit Sustainable Drainage features such as rain gardens, bi-retention areas and tree pits which can also help with urban cooling and biodiversity, water quality and surface water flooding to give climate resilience. Examples of these features can be seen at the link below: https://www.susdrain.org/case-studies/case_studies/bridget_joyce_square_london.html	Create spaces for people in town centres and microclimates to adapt to climate change by: a. Planting trees and install retro-fit SuDs such as rain gardens, bio-retention and tree pits within Nuneaton and Bedworth town centres to create urban cooling as well as visual connections to green spaces. b. Restoring a strong landscape structure to development in the north of Nuneaton in order to create a sense of place, improve habitat connectivity, achieve urban greening, integrate development into its context and maintain separation between Nuneaton and Hinckley.	The modifications seem acceptable.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
19.1	TL	WCC Regeneratio n & Place Shaping via WCC Policy Team			Comments in relation to "Employment: 10" Policy E2 – existing employment sites Evidence base is 2016 (Employment Land Study: Nuneaton and Bedworth Borough Council, Final Report.) Protection of identified existing employment sites (table 11) question the limitations this places on these sites to remain wholly employment focussed. e.g. Weddington Terrace employment area: existing status maintain as employment area – this site's proximity to the train station opens up opportunities for the site to be used for wider development uses which could greatly benefit the town centre and wider area including leisure, residential, transport facilities and mixed use schemes. By limiting its uses, this area cannot maximise on proximity to the train station and town centre.		Policy E2 does not preclude other uses at Weddington Terrace, as long as it can be demonstrated that there is no current need of the site for employment.
20.1	TL	Warwickshire Fire and Rescue Service via WCC Policy Team			Warwickshire Fire and Rescue Service is keen to open dialogue with the Borough Council to ensure that the service is able to continue to respond effectively to meet the needs of those within the Borough. It is possible that the service might look to relocate or repurpose their fire stations and this is something we would be keen to discuss with you when you feel it is appropriate. Janet Neale in her role within Strategic Growth and Infrastructure should be your contact point with regards to Warwickshire Fire and Rescue Service and the Borough Plan.		NBBC would be happy to open dialogue with Warwickshire Fire and Rescue Service about relocation or repurposing of their assets.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
21.1	TL	WCC Education via WCC Policy Team			<p>We are grateful to Officers at the Borough taking the time to talk through some of the key changes proposed in the Plan and how these might impact thinking in respect of School Place Planning. The removal of site HSG4, Woodlands, would remove land identified in the current plan for a new primary school. However, the need was linked to the Woodlands development rather than to meet wider growth and so the remove of the allocation site and land is not seen as being problematic. Secondary school places were to be provided through expansion of existing schools if needed and that remains unchanged.</p> <p>We believe it would be helpful to make some reference within the Borough Plan about the need for development to enable safe routes to schools. Also, the need for contributions towards the provision of home to school transport in areas where it isn't possible to provide school places within the recommended maximum safe walking distances.</p> <p>Ensuring a sufficient supply of school places is complex and we have to consider when and where to provide additional places. The current growth to the north of Nuneaton, has seen the delivery of a new primary school at Lower Farm with further primary schools planned at Callendar Farm and Top Farm. We also expect to see a new secondary school at Top Farm. If the Borough needs to consider an increase in the number of new dwellings, we suggest that from a school places planning point of view, further growth in north Nuneaton would support the longer term sustainability of the new schools and have the least impact on existing schools. The County Council provides guidance on the type of developer contributions we would look to secure from growth and a link to that in the Borough Plan might prove helpful.</p>	<p>We believe it would be helpful to make some reference within the Borough Plan about the need for development to enable safe routes to schools. Also, the need for contributions towards the provision of home to school transport in areas where it isn't possible to provide school places within the recommended maximum safe walking distances.</p>	<p>Reference can be made to this within the Borough Plan. Any further S106 requirements will need to be assessed to ensure CIL compliancy and included within the Infrastructure Delivery Plan which will be updated alongside the Review.</p>
22.1	TL	WCC Archaeology Information and Advice via WCC Policy Team		BE4	<p>We are pleased to note, and support, the inclusion of Policy BE4 and that it refers to applicants consulting this office prior to any submissions.</p> <p>Whilst we are pleased that it refers to evaluation by trial trenching, we would recommend that it be amended as follows to take into account that evaluation may also include geophysical survey – recommended additional text included in bold:</p> <p>‘Where there are likely to be valuable archaeological remains, archaeological evaluation, which may include geophysical survey and/or trial trenching, trench surveys are likely to be required prior to the determination of any planning application’.</p> <p>We would also recommend that any references to ‘WCC Archaeology’ in the various plan documents be changed to our team name ‘WCC Archaeological Information and Advice’. ‘WCC Archaeology’ does not exist and could be confused with the County Councils commercial field unit, Archaeology Warwickshire.</p>	<p>we would recommend that it be amended as follows to take into account that evaluation may also include geophysical survey – recommended additional text included in bold:</p> <p>‘Where there are likely to be valuable archaeological remains, archaeological evaluation, which may include geophysical survey are likely to be required prior to the determination of any planning application.’</p> <p>We would also recommend that any references to ‘WCC Archaeology’ in the various plan documents be changed to our team name ‘WCC Archaeological Information and Advice’. ‘WCC Archaeology’ does not exist and</p>	<p>Amendments seem appropriate</p>

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						could be confused with the County Councils commercial field unit, Archaeology Warwickshire.	
22.2	TL	WCC Archaeology Information and Advice via WCC Policy Team		Strategic Allocation Site Policies	<p>Many of the proposed strategic sites have significant archaeological potential. As such it is probable that pre-application archaeological evaluation will be necessary to ensure that sufficient archaeological information is available to enable a reasoned and informed planning decisions to be made (see also Policy BE4).</p> <p>Whilst this is referred to in the overarching Policy BE4, we would recommend that the need for pre-application assessment, including evaluative fieldwork if necessary, be referred to into the individual site policies where appropriate. We would be happy to provide further advice on which sites this should apply to and recommended wording on request.</p>	We would recommend that the need for pre-application assessment, including evaluative fieldwork if necessary, be referred to into the individual site policies where appropriate. We would be happy to provide further advice on which sites this should apply to and recommended wording on request.	Amendments seem appropriate
22.3	TL	WCC Archaeology Information and Advice via WCC Policy Team		Heritage Assessment evidence base	We understand that a Heritage Assessment of the proposed strategic sites is underway (Borough Plan Review Preferred Options, pg. 189). We would request that we, as archaeological advisors to the Planning Authority, are given opportunity to review and comment on that document before its formal publication.		Reasonable request
23.1	TL	WCC Transport Planning via WCC Policy Team			<p>Not had a chance to adequately be consider the issues fully, partly because of the differing timescales, which are explained below. He has commented that that "We (WCC) are working with NBBC on the development of a new STA, however this will not be completed prior to 22nd July. Clearly any response to the consultation will be based on the outcome of the STA work."</p> <p>So, from his point of view, he would obviously welcome the opportunity to comment further once he has seen the results of the STA work and then make a more considered comment at a later stage. I trust this is acceptable but would welcome confirmation this is acceptable please?</p>		The STA work will be carried out shortly and will require ongoing discussions with WCC Transport at the same time.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
24.1	TL	WCC Highways via WCC Policy Team		SHA-1	Policy SHA-1 - point 7 & para 8.13 - WCC will expect any transport/highway proposals that are to be on the adopted network or to be dedicated for highway adoption to accord with WCC's Design Guide, and where safe to do so reflect the design guidance within Local Transport Note 1/20 (Cycling), and make suitable provision to accord with WCC's Cycle Network Development Plan for Nuneaton and Bedworth. Para 8.13 - should be re-phrased to say that 'the delivery of infrastructure or contributions, as agreed with WCC will be required....'	Para 8.13 - should be re-phrased to say that 'the delivery of infrastructure or contributions, as agreed with WCC will be required....'	Seems reasonable request
24.2	TL	WCC Highways via WCC Policy Team	8.15		para 8.15 - some of the non-strategic residential sites may also require Transport Assessments to be submitted.		Seems reasonable request
24.3	TL	WCC Highways via WCC Policy Team	8.16		para 8.16 - suggest remove ' and subsequent planning obligation' - as written it suggests all infrastructure may be converted to a planning obligation. It may be that the infrastructure should be delivered by way of a section 278 highway agreement	suggest remove ' and subsequent planning obligation	Seems reasonable request
24.4	TL	WCC Highways via WCC Policy Team	8.32		para 8.32 - comments received during planning consultation process to the Top Farm application referred to improving access options into the railway station - whilst not part of this application, should this be considered as part of the Nuneaton Area Improvement Schemes (Transforming Nuneaton)?		Unclear how this would be carried out. Need to have discussions with WCC Highways
24.5	TL	WCC Highways via WCC Policy Team		SHA-2	Policy SHA-2 - 5 - concept plan shows a link along Griff Lane to Walsingham Drive - why is this required as a vehicle link?		Need to understand point raised.
24.6	TL	WCC Highways via WCC Policy Team		SHA-2	Policy SHA-2 - 6 - primary school is shown on concept plan as adj to distributor route, does the SPD make it clear that access should not be from the distributor link road as WCC previously advised?		Need to understand point raised.
24.7	TL	WCC Highways via WCC Policy Team		SHA-2	Policy SHA-2 -27 - does that route continue on a publicly accessible route to Seeswood Pool?		Need to understand point raised.
24.8	TL	WCC Highways via WCC Policy Team	8.44		para 8.44 - specifies access to Walsingham Drive - is this at the northern end? if so currently unadopted with developer to progress, if to south at Griff Lane (see prev comment), should it ref A444 roundabout with Walsingham Dr?		Need to investigate point raised.
24.9	TL	WCC Highways via WCC Policy Team	SHA-3		Policy SHA-3 - 6 - red line changed from previous local plan, but submitted as part of 035595 August 2020, for additional number of dwellings, will require 2 separate points of access, scope for bus public access may be required if all dwellings not within 400m walk distance of existing stops. Alan Law wanted 3 access points as existing modelling showed queuing.		This has been discussed recently and modelling has possibly been carried out.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
24.1 0	TL	WCC Highways via WCC Policy Team	SHA- 3		Policy SHA-3 - 5 - is the land to deliver the bridge and connection to the towpath within the developers control?		Amendments close to the canal will require the consent of the Canal and River Trust who have already requested links to towpath.
24.1 1	TL	WCC Highways via WCC Policy Team	SHA- 3		Policy SHA-3 - 9 - with the additional site area and numbers of dwellings provision may be required for bus service to enter the site to meet walk distance criteria, this should be specified as will require development to provide bus stop infrastructure and access roads to design guide specification		Seems reasonable request
24.1 2	TL	WCC Highways via WCC Policy Team		8.51	para 8.51 - 2 or possibly 3 accesses may be required to serve the larger residential proposal. An access strategy where the residential uses mix with the HGV/LGV traffic associated with the quarry and the Waste Recycling Centre is not appropriate, particularly for residential and cycle movements that the residential proposal will generate.		This has been discussed recently and modelling has possibly been carried out.
24.1 3	TL	WCC Highways via WCC Policy Team		8.52	para 8.52 - given the additional dwellings proposed there may be other improvements that will be required via section 278 agreement, this is separate to contributions towards the Transforming Nuneaton improvement		Review Policy wording.
24.1 4	TL	WCC Highways via WCC Policy Team		8.53	para 8.53 - are CRT in agreement?		Need to discuss with Canal and River Trust.
24.1 5	TL	WCC Highways via WCC Policy Team	SHA- 4		Policy SHA-4 - 10 - does this description also include the improvement works at M6 jct 3?		Review Policy wording.
24.1 6	TL	WCC Highways via WCC Policy Team		8.63	para 8.63 - ref should be made to primary accesses this scale of development will require a minimum of two vehicle accesses which are capable of accommodating and new or diverted bus services as well as refuse vehicles, Jeffrey Close and Maynard Ave are not suitable for use as two-way vehicle accesses but could provide ped/cycle access subject to confirmation of highway adoption extents, Mavor Drive has potential to provide a secondary access subject to confirmation of access strategy as this is a 5m wide road and the footway may need to be widened.		Review Policy wording.
24.1 7	TL	WCC Highways via WCC Policy Team	SHA- 5		Policy SHA-5 - Removed northern parcel - more access points. Key development principle 10 (para's 8.68 & 8.69) still cannot be achieved - ransom strip. Land currently split into 6 parcels. Four plots currently being applied for 038375 x 89 dwellings, 038448 x 3 dwellings, 037425 x 42 dwellings & 038856 x 149 dwellings. Pre-app for larger section of southern plot x 110 dwellings. Access issues. Leaving a small plot that can only be accessed from application 038856 unless a house on Coventry Road is demolished.		Need to investigate point raised.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
24.1 8	TL	WCC Highways via WCC Policy Team	HEA- 1		resi area added, will need Transport Assessment to support any planning application, access arrangements (all modes) will need to consider existing school on-street parking arrangements and boundary trees/hedges		Seems reasonable request.
24.1 9	TL	WCC Highways via WCC Policy Team	SEA- 2		Policy SEA-2 - concept plan shows additional housing area not included in recently approved planning application, and this area has been included within employment area for employment buildings and to provide footway/cycleway connections to Wilsons Lane - should it be shown on this policy and ref at para 8.90 & 8.93?		Policy will need to be relooked at to bring in line with submitted Outline application.
24.2 0	TL	WCC Highways via WCC Policy Team		8.94	para 8.94 - should also ref M6 jct 3 improvement that is required		Seems reasonable request but need to check with Highways England.
24.2 1	TL	WCC Highways via WCC Policy Team	Rem oved site HSG- 7		Removed from the existing Local Plan but required to contribute towards necessary infrastructure also associated with HSG8, including combined cycleway / footway and junction improvements. S106 contributions based on both HSG7 & HSG8 being constructed and that process has started with applications being approved, implications for IDP infrastructure will need to be considered by NBBC		IDP will be updated during review
24.2 2	TL	WCC Highways via WCC Policy Team	SEA- 2		Policy SEA-2 - 3 - should this also ref Pickards Way?		Seems reasonable request.
24.2 3	TL	WCC Highways via WCC Policy Team	SEA- 4		Policy SEA-4 - 2 - which existing point of access is intended to be upgraded? if B2/B8 proposed can the access accommodate HGVs swept paths?		Need to discuss with WCC Highways. This is likely to be considered within the STA.
24.2 4	TL	WCC Highways via WCC Policy Team	SEA- 4		Policy SEA-4 - 8 - which crossing on Coventry Road? if the toucan crossing ref to in Policy SEA-1 -3 then state toucan, if other required it would be s278 infrastructure delivery by the development		Need to discuss with WCC Highways. This is likely to be considered within the STA.
24.2 5	TL	WCC Highways via WCC Policy Team	SEA- 6		Policy SEA-6 - 3 - ref to development site on School Lane, this has already been approved and is under construction so no additional land for improvements (other than that agreed for the cycle connection to the toucan crossing outside that site) can be negotiated. Use of CPO powers by the LHA may not be appropriate to enable other third party development. Concerns over two-way HGV movements along School Lane particularly where there is frontage housing with no alternative to on-street parking		Need to discuss with WCC Highways. This is likely to be considered within the STA.
24.2 6	TL	WCC Highways via WCC Policy Team	SEA- 6		Concerns over two-way HGV movements along School Lane particularly where there is frontage housing with no alternative to on-street parking - would advise this site be considered as a residential allocation only		Need to discuss with WCC Highways. This is likely to be considered within the STA.

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24.27	TL	WCC Highways via WCC Policy Team	SEA-6		Policy SEA-6 - 6 - add to read Developer delivery, or contribution, as agreed with WCC, to secure provision of bus infrastructure to complement the point above		Seems reasonable point.
24.28	TL	WCC Highways via WCC Policy Team		8.113	para 8.113 - include ref to M6 jct 3 improvement and need to contribute to that too		Seems reasonable request but need to check with Highways England.
24.29	TL	WCC Highways via WCC Policy Team	CEM-1		Policy CEM-1 - para 8.115 - should the playing field provision increase in size and/or be used for formalised sports facilities eg. pitches, consideration should be given to visitor parking		Seems reasonable point.
24.30	TL	WCC Highways via WCC Policy Team	Non strategic sites	Non strategic sites	For all of the Non-Strategic Residential allocations - in order to provide comments on these sites, we will need to understand what the access arrangements are intended to be. Some area already the subject of submitted planning applications and those will be responded to. We would expect any planning applications for these sites to be accompanied by either a Transport Assessment or Transport Statement depending on the scale of impact - that should be agreed with WCC as part of pre-application advice, the submission to be in accordance with the published highway design guide and other national guidance as appropriate. As a minimum consideration should be given to swept path tracking for a range of vehicle types, visibility splays (pedestrian and vehicular), requirement for emergency access separate to the vehicle access point, providing convenient access to local facilities for pedestrians and cyclists, and provision for public transport access - within or near to the site as appropriate, further advice is provided in the design guide. Land ownership and the extent of adopted highway should also be checked to ensure all access infrastructure is deliverable.		This is all part of the pre application process.
24.31	TL	WCC Highways via WCC Policy Team		General	The key development principles state 'provision of at least X dwellings' - this has led to developers submitting applications for more dwellings, and assuming that the STA modelling work carried out allows them to do this. Usually the modelling work will be carried out for the number specified - therefore it should be made clear that if more dwellings are subsequently applied for, transport and other mitigation infrastructure will potentially be in excess of that identified as part of the IDP		Noted but the wording of 'at least' was required by the Inspector for the previous Borough Plan. It would seem reasonable to add as a caveat to each site.
24.32	TL	WCC Highways via WCC Policy Team		General	Where ref made to cycle links, it should be made clear that if requiring the use of existing adopted highway or to be offered for highway adoption, these should accord with WCC's design guide and current national guidance eg. LTN 1/20		Seems reasonable response

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
25.1	JJ	Warwickshire Wildlife Trust		General	It is a shame there is no specific standalone climate change policy and clear link to delivery in line with the Climate change emergency.		Comments noted. Consider introducing climate change policy
25.2	JJ	Warwickshire Wildlife Trust		Vision	In terms of the 'Vision' WWT is pleased to see increased tree planting, but the Vision need more mention of protecting the natural environment and biodiversity.		Comments noted.
25.3	JJ	Warwickshire Wildlife Trust		Evidence Base	We agree that the landscape character assessments and GI studies need updating. To be able to deliver real benefits on the ground. WWT are also working in collaboration to put together a 'Nature Recovery Network' which should feed into future versions.		Comments noted
25.4	JJ	Warwickshire Wildlife Trust	6		Regarding the comment that 'Local Wildlife Sites need to be regularly reviewed'. This should be within reason and not be used to reduce their status. As they are designated by specialist ecologists, and their ecological status shouldn't be allowed to fall in to decline, in line with monitoring requirements. We do agree that further sites should be reviewed for addition protection though. Also we are glad to see that ecology assessments are being carried out.		Comments noted
25.5	JJ	Warwickshire Wildlife Trust	8		WWT suggests that more needs to be done for climate change, in line with an Action plan, not just the required flood risk assessment.		Comments noted
25.5	JJ	Warwickshire Wildlife Trust	18		We are concern regarding the inclusion of the river, as this is an important wildlife habitat.		Comments noted. Point 18 relating to considering the river in Nuneaton Town Centre was raised in responses to the Issues and Options consultation. Policy NE1 seeks to protect, manage and enhance the boroughs green and blue infrastructure assets.
25.6	JJ	Warwickshire Wildlife Trust		DS1	Policy DS1 climate change needs to also include protection of grasslands as well as tree planting. As these are important environments for cooling and flood risks management as well.		Comments noted. Consider reviewing policy
25.7	JJ	Warwickshire Wildlife Trust		General	Warwickshire Wildlife Trust Supports that the Green belt won't be further released. As this is an important tool to help protect the wider countryside and ecological habitats.		Comments noted.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
25.8	JJ	Warwickshire Wildlife Trust		SA1 Point 2	Should also state blue infrastructure. It's also not just about tree planting, but protection of important grassland which is in decline in the county and a BAP priority. We also note that busy cycle routes aren't beneficial to important habitats and protected species so should be separate. Stepping stones should also include more than just trees and wooded areas, but grassland as well. It would also be appropriate to provide such habitats away from busy housing/ employment sites to ensure the preservation of protected species and key habitats.		Comments noted and consideration should be given to included further reference to blue infrastructure. The site has an approved design code.
25.9	JJ	Warwickshire Wildlife Trust		SA1 Point 5	Reword that designated LWS should be surveyed for their ecological importance. As these sites have already gone through a rigorous process with trained unbiased habitat species. These designated LWS sites should be given protection and only the potential sites need to be surveyed. We however support more detailed further survey work in order to enhance the biodiversity. This wording currently reads to undermine the designation.		Comments noted. Point 5 to be reworded
25.10	JJ	Warwickshire Wildlife Trust			Biodiversity should be mentioned and the 10% net gain requirement in the Environment Act. Using the County Councils biometric tool at present		This is mentioned on Page 48
25.11	JJ	Warwickshire Wildlife Trust	8.9		Important areas for biodiversity need to be protected and buffered from noise and busy through flow. Rather than integrated. In order to fulfil the Council's legal requirement to protect Protected Species in Wildlife and Countryside Act (1981).		Comments noted. Review viewing
25.12	JJ	Warwickshire Wildlife Trust	8.11		Pleased to see a Biodiversity section with net gain and the metric tool mentioned.		Comments noted
25.13	JJ	Warwickshire Wildlife Trust	8.12		word 'seek' to create areas of green space is not strong enough. They should be 'required to'. SUDs may not always be suitable for wildlife and biodiversity as well, if surrounded by busy roads and high pedestrian movement		Comments noted. The comments relate to the supportive text. Point 6, 7 and 9 set out the policy requirements relating to biodiversity and green space.
25.14	JJ	Warwickshire Wildlife Trust		Appendix 1	WWT are pleased to see Appendix 1 LWSs these need to be shown on the final proposals map, along with nature reserves and SSSIs.		Comments noted
25.15	JJ	Warwickshire Wildlife Trust		SEA6	Hawsbury golf course Concern regarding impact on the known wildlife and protected species using the Hawsbury golf course site. We previously made detailed objections on this site.		Comments noted

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
25.1 6	JJ	Warwickshire Wildlife Trust		SHA3	Tuttle hill- concern regarding impact on canal water environment. Talk of improving public access, whilst also making a wildlife corridor. One side should remain path free for local wildlife.		Comments noted
25.1 7	JJ	Warwickshire Wildlife Trust		SHA3	16- Remove words 'where necessary' and 'where possible' from enhance biodiversity. As this weakens the policy.		Comments noted
25.1 8	JJ	Warwickshire Wildlife Trust		SHA2	Arbury- concern regarding impact on Ensor Pool, historically known for crayfish and local wildlife. Surrounding fields are currently a wildlife corridor.		Comments noted
25.1 9	JJ	Warwickshire Wildlife Trust		SEA1	Faultlands Concern regarding the impact on Griff brook and Griff hollows Local wildlife Site as well as the Wem brook and canal		Comments noted
25.2 0	JJ	Warwickshire Wildlife Trust		SEA3	Prologes extension Impact on woodland which forms part of the site boundary and impact on protected species Great created nests.		Comments noted
25.2 1	JJ	Warwickshire Wildlife Trust		SEA4	Coventry road WWT is concerned regarding the Impact on the Local Wildlife Site (LWS) and broadleaf woodland.		Comments noted
25.2 2	JJ	Warwickshire Wildlife Trust		NE1	Appreciate the inclusion of the Wild Belt wording. We are also pleased to see the proposed wildlife buffers, these are key to help to preserve important legally protected species and important habitats.		Comments noted
25.2 3	JJ	Warwickshire Wildlife Trust		NE1 2d	Improved access on the canal should also consider the impact on biodiversity.		Comments noted
25.2 4	JJ	Warwickshire Wildlife Trust		NE3	Should mention 10% minimum net gain in the Environment Act 2021.		Comments noted. Reference is given to the need to exceed the pre-development biodiversity value of the onsite habitat by 10% in the supporting text.
25.2 5	JJ	Warwickshire Wildlife Trust	13.3 0		Remove emphasis on word 'appropriate' mentioned twice- 'appropriate protection' to their status, based on 'appropriate weight', as this gives developers a negotiation tool. Whereas this should not be up for debate. It should be based on ecological gains.		Comments noted. This text is taken from the NPPF and forms part of the text supporting the policy requirements of Policy NE3.

Ref	Initials	Organisation	Para	Policy	Comments	Suggested modifications	Officer Response
26.1	YB	Natural England			<p>Due to the short consultation deadline we were given and current resource issues in the team, Natural England was unable to provide detailed comments on the above consultation. We therefore will aim to comment at the next consultation stage of the local plan making process. However we would like to make you aware of the emerging evidence outlined below which will need to be considered as part of the Habitats Regulations Assessment (HRA) of the local plan.</p> <p>The recent judgement (Case C-461/17 Holohan v An Bord Pleanála 7/11/18) highlighted the importance of consideration, as part of the HRA, of potential implications for habitat types and species outside the boundaries of European designated sites, those implications being liable to affect the conservation objectives of the site.</p> <p>The Plan area is located upstream of the Severn Estuary Special Area of Conservation (SAC) and Ramsar Site and is hydrologically linked to the designated sites through the River Sowe tributary of the Warwickshire River Avon. The Plan area also located upstream of the Humber SAC and is hydrologically linked to the designated site through the River Anker which flows into the River Trent tributary of the River Humber.</p> <p>The Severn Estuary migratory fish species (Atlantic salmon, Sea trout, Allis Shad, Twaite Shad, Sea lamprey, River lamprey, European eel) travel upstream through the River Severn and its tributaries, spending part of their life cycle in the wider Severn hydrological catchment. Currently the tidal weir at Tewkesbury is believed to present an obstacle to most of the migratory fish species, with the exception of the European eel, which has been recorded within the Warwickshire Avon. In the last few decades eel numbers have declined internationally by as much as 95% and European eel has been listed by the International Union for Conservation of Nature (IUCN) on their Red List as critically endangered species. Barriers to their journey upstream and degradation of habitat and pollution are some of the contributing factors for the decline. The Humber Estuary migratory fish species are the Sea lamprey and River lamprey. The River lamprey has been recorded as far upstream as the R. Dove (Staffordshire/Derbyshire).</p> <p>The removal or modification of existing weirs to facilitate fish passage is identified as a key action in River Basin Management Plans under the Water Framework Directive. In addition to European eel, the Warwickshire Avon and its tributaries are believed to offer scope for species such as River lamprey, Sea lamprey, Atlantic salmon and Sea trout. Similar scope is believed to exist during the plan's lifetime for River lamprey to reach the Warwickshire tributaries of the Humber Estuary.</p> <p>In view of the local plan's timeframe, the 25 year Environment Plan's 'nature recovery' objectives (25 Year Environment Plan - GOV.UK (www.gov.uk)) and in line with the Severn Estuary's conservation objectives (European Site Conservation Objectives for Severn Estuary SAC - UK0013030 (naturalengland.org.uk)) and Humber Estuary conservation objectives (European Site Conservation Objectives for Humber Estuary SAC - UK00300170 (naturalengland.org.uk)), Natural England advises that the local plan's HRA should consider ecological linkage in relation to the proposed Plan, the migratory fish theme and the context regarding the Holohan judgement. Maintaining or achieving a good standard of water quality (Good Ecological Status under the Water Framework Directive is considered an appropriate standard for functionally linked watercourses used by migratory fish species</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf)and sufficient flows is a necessary consideration when considering the potential impact of plans on functionally linked watercourses used by migratory fish species and longer term there should be an aspiration to restore connectivity by removing barriers and to improve the quality of our freshwater habitats.</p>		The Borough Plan refers to the need for protecting and enhancing the water quality. The comments will be addressed within the updated HRA which will need to be provided for the Publication Version of the Borough Plan.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
101.01	JP	Asteer Planning LLP			Cross Boundary Legal and Procedural Issues - Preferred Options Local Plan does not consider any cross boundary need, nor is it able to consider the emerging sub-regional Coventry and Warwickshire Housing Market Area1 ("HMA") Housing and Economic Development Needs Assessment ("HEDNA"), which has yet to be published and requires dissemination of the latest Census results before it can be prepared...probable that not only the Coventry and Warwickshire HMA will demonstrate a large unmet need, but the needs of the Birmingham HMA region will also need to be considered.		NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
101.02	JP	Asteer Planning LLP			Deficient Evidence Base - The Coventry and Warwickshire sub-regional HEDNA; An Urban Capacity Study , Updated Housing Trajectory; Review of the Settlement Boundary; Local Plan Viability Assessment, Landscape Assessment, Strategic Transport Assessment, An Infrastructure Delivery Plan (IDP), Other core technical reports – which are required to support the Council's site selection strategy, such as Ecology and Geodiversity, Heritage and Archaeology and Air Quality. The proposed approach to the emerging spatial strategy and land allocations is flawed and fundamentally unsound without key elements of the evidence base being prepared. The spatial strategy and land allocations are comprehensively revisited once this evidence is prepared and considered. The LDS is unrealistic.		The evidence base will be updated and will inform the Publication version of the Borough Plan. The LDS has been updated to reflect the time needed to complete the evidence base.
101.03	JP	Asteer Planning LLP			Supporting Growth and Meeting Need - NBBC should capitalise on its strategic location and support the Borough's potential to achieve significant economic growth. ASL consider that the relationship between housing and employment should be acknowledged and NBBC should plan for a positive economic growth scenario, with a spatial strategy that will support the sustainable economic growth of the Borough in the long term. The Council should also be pro-active in supporting the growth potential of the wider sub-region including the Birmingham and Coventry & Warwickshire HMA's.		The HEDNA data will be used to determine the amount of employment land required.
101.04	JP	Asteer Planning LLP			Review of the Settlement Boundaries - If the outcome of this evidence is an increase in housing need and a requirement to include additional sites in the Local Plan, this should include a review of the existing settlement boundaries around Nuneaton, as the Borough's primary location for growth. Sequentially, any review should consider deliverable sites within the open countryside before any amendment to the Green Belt is considered.		The HEDNA data will be used to determine the amount of housing and employment land required. A Green Belt review will be undertaken to support the Publication version of the Borough Plan. Any changes to the settlement boundary will be supported by evidence.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
101.05	JP	Asteer Planning LLP	Key Diagram		The Local Plan Key Diagram requires updating to accurately reflect the Nuneaton Urban Area. Land to the east of Plough Hill Road at Galley Common is depicted as “rural area”. This area has been developed or is being developed by Taylor Wimpey and Countryside Properties and should be illustrated as part of the “urban area”.		Agreed.
101.06	JP	Asteer Planning LLP		Policy DS1 (Presumption in Favour of Sustainable Development)	ASL support recognition in Policy DS1 of the presumption in favour of sustainable development, in accordance with the NPPF.		Comment noted
101.07	JP	Asteer Planning LLP		Policy DS2 (Settlement Hierarchy and Roles)	ASL fully support the proposed settlement hierarchy in Policy DS1 and the identification of Nuneaton as the Borough’s primary town where “most growth will be directed”.		Comment noted
101.08	JP	Asteer Planning LLP		Policy DS3 (Development Principles)	ASL support the principle of sequentially prioritising the use of previously developed land within the urban area. However, Policy DS2 should be explicitly clear that if urban capacity is exhausted, then non-Green Belt sites in the open countryside should be considered for development in advance of any consideration of sites within the Green Belt.		The HEDNA data will be used to determine the amount of housing and employment land required. A Green Belt review and a Settlement Boundary review have been commissioned to support the Publication version of the Borough Plan.
101.09	JP	Asteer Planning LLP		Policy DS4 (Strategic Overall Development Needs)	Notwithstanding the need to reconsider the overall housing requirement in the context of the sub-regional HEDNA and a cross boundary duty-to-co-operate, ASL also consider that there are other material factors which should support an increase in the Borough’s overall housing requirement, including: 1. Economic growth - there is a significant opportunity to capitalise on the strategic location and growth potential of the Borough. 2. Affordable housing provision - the Borough HEDNA identifies an overall Borough need of 653 affordable homes per annum.		The HEDNA data will be used to determine the amount of housing and employment land required. The issues of economic growth and affordable housing will be considered in further research commissioned by the Council.
101.10	JP	Asteer Planning LLP		Policy DS5 (Residential Allocations)	Carrying forward allocations from the adopted Local Plan does not provide the quantum or trajectory of housing to meet the requirements of the proposed Plan Period. New allocations are required to support a balanced approach to housing delivery across the Plan Period and ensure that an adequate supply of housing is provided to meet identified needs. Additional strategic sites and an amendment to the settlement boundary should be considered, based on emerging evidence, to ensure that the Local Plan is sound and the Borough’s overall strategic development needs are met.		The HEDNA data will be used to determine the amount of housing and employment land required. A Settlement Boundary review has been commissioned to support the Publication version of the Borough Plan.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
101.11	JP	Asteer Planning LLP		Policy DS5 (Residential Allocations)	Non-Strategic Sites - it is critical that the Council undertakes a robust urban capacity study and assessment of viability to ensure that these sites are available, viable and deliverable at the quantum and densities of development proposed.		The Council has commissioned an updated viability assessment which will be used to inform the site selection process..
101.12	JP	Asteer Planning LLP		Policy DS7 (Green Belt)	Sites within the open countryside should be considered for allocation if an amendment to the settlement boundary is required, before any amendment to the Green Belt is considered. It is unclear what will be the designation of sites that were removed from the Green Belt in 2019 but have not been "carried through" into draft strategic allocations in the Preferred Options Local Plan, particularly where these sites do not benefit from planning consent or any committed delivery		A Green Belt review will be undertaken to support the Publication version of the Borough Plan. Any changes to the settlement boundary will be supported by evidence.
101.13	JP	Asteer Planning LLP		Policy H1 (Range and Mix of Housing)	ASL support the need for a range and mix of housing across the Borough		Comment noted
101.14	JP	Asteer Planning LLP		Policy H2 (Affordable Housing)	ASL support the provision of 25% affordable housing on new residential developments in order to address the identified affordability issues that are being experienced in the Borough. However, in order to ensure that this policy contributes to meeting affordable housing needs, it is crucial that viable and deliverable sites are allocated in the emerging Local Plan that can deliver policy compliant levels of affordable housing.		The Council has commissioned an updated viability assessment which will be used to inform the policy.
101.15	JP	Asteer Planning LLP		Policy HS1 (Ensuring the Delivery of Infrastructure)	Policy HS1 will need to be informed by an up to date Infrastructure Delivery Plan ("IDP").		A review of the IDP will be undertaken.
101.16	JP	Asteer Planning LLP		Policy NE1 (Green and Blue Infrastructure) and Policy NE3 (Biodiversity)	Strategic sites should be identified that have the capacity and scope to provide opportunities for multi-functional green and blue infrastructure, as opportunities to create new habitats that support increased biodiversity.		Strategic sites will be supported by a range of assessment studies which form the evidence base.
101.17	JP	Asteer Planning LLP		Policy BE2 (Renewable and Low Carbon Energy) and BE3 (Sustainable Design and Construction)	Viable and deliverable strategic sites have the potential to be exemplar in the design and construction of low carbon developments and should be considered as part of the Council's site selection.		Strategic sites will be supported by a range of assessment studies and Viability Assessment which form the evidence base.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
101.18	JP	Asteer Planning LLP			A Development Statement submitted that sets out the availability, suitability and deliverability of land at Galley Common, which has the potential to provide the type and quality of homes and community infrastructure to meet the needs the Borough during the forthcoming Plan Period;		The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.
101.19	JP	Asteer Planning LLP			A Briefing Note submitted which addresses the unmet housing needs of the Coventry & Warwickshire Housing Market Area, prepared by Lichfields on behalf of Ainscough Strategic Land and a developer Consortium.		The HEDNA data will be used to determine the amount of housing and employment land required.
102.01	RM	Avison Young			Land East of Callendar Farm, Nuneaton - Jelson purchased this land in 2021 and is now looking to bring it forward for residential development, as a logical extension to the existing SUE. Jelson alerted the Council to the site's availability through the submission it made to its Call for Sites process in October 2021.		The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.
102.02	RM	Avison Young		Policy DS2 – Settlement Hierarchy and Roles	Overall, Jelson agrees that a spatial strategy which focusses the majority of development in Nuneaton with proportionate growth at other sustainable settlements would be the most appropriate and sustainable strategy.		Comment noted
102.03	RM	Avison Young		Policy DS4 – Overall Development Needs	The Preferred Options document confirms that it is the Council's intention to allocate the southern part of Jelson's site for housing however, the northern part of Jelson's land holdings east of Callendar Farm is not currently included in the list of proposed housing allocations identified in the Plan. The omission of this land from the Plan should be reconsidered. The northern part of Jelson's site would make a sensible, logical and deliverable housing allocation given the land around it (to the south, west and east) is allocated for development in the adopted Plan and this allocation is proposed to be carried over into the new Plan. Moreover, the local authority has already granted planning permissions that will see the adjacent land developed for housing over the coming years. This includes the recent development along the frontage of the site by Midland Heart.		The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
102.04	RM	Avison Young		Policies DS3, SA1, H1 and H2	Need for the local authority to properly justify / evidence any requirement for new development to deliver a specific mix and tenure of house types and achieve the optional space standards for accessible and adaptable dwellings		<p>The HEDNA data will be used to determine the amount of housing and employment land required.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p>
102.05	RM	Avison Young		Policy BE3.	Need for the local authority to properly justify / evidence any requirement for new housing proposals to accord with optional water efficiency and higher energy efficiency standards		The requirement will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.
102.06	RM	Avison Young		Policy NE3	Policy needs to make clear that in such circumstances, off-site measures can be provided flexibly and, if necessary / appropriate across administrative boundaries.		The policy uses a hierarchal order where habitat loss cannot be prevented on site. There are biodiversity strategic locations available within the Borough close to development areas where this can be accommodated..
103.01	MP	AXIS P.E.D		DS3	<p>In overall terms there is a lack of clarity, justification or evidence for a number of the requirements within Policy DS3, including:</p> <ul style="list-style-type: none"> • The need for new development to contribute to the national need to achieve net zero carbon emissions. • where or when tree and orchard planting is appropriate in new development. It will not be appropriate for all types of development within the Borough. • the extent to which new dwellings to comply with the latest Nationally Described Space Standards, Building for a Healthy Life and Future Homes and Buildings Standard. National Planning Practice Guidance (NPPG) requires Local Planning Authorities to gather evidence to justify the need for such standards. 		<p>The policy sets out broad development principles. Individual policies set out the requirements.</p> <p>Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p>
103.02	MP	AXIS P.E.D	7.25		Further updates and information is needed in the HEDNA before it can be properly reviewed.		An updated HEDNA has been commissioned and will be published. The HEDNA data will be used to determine the amount of housing and employment land required.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
103.03	MP	AXIS P.E.D		DS5	<p>We support the allocation of land at Judkins as one of the strategic housing allocations within Nuneaton and Bedworth – reference SHA-3. It is considered that the site’s allocation would contribute towards the soundness of the Local Plan given its clear compliance with the Plan’s overarching strategy and objectives and its consistency with national policy, specifically:</p> <p>Whilst supporting the Allocation, we do have specific concerns regarding the current drafting of policy SHA-3 and the Sustainability Appraisal that has been carried out in support of the allocation. The latter contains inaccuracies, a lack of overall clarity in terms of how it has been prepared and scored in addition to a lack of any formal conclusions on the assessment of individual sites.</p>	<p>The statement that 7.9ha of the site is within Grade 3 agricultural land is incorrect.</p> <ul style="list-style-type: none"> • It is not clear how the assessment has arrived at a moderate impact in relation to landscape character and there is no evidence of the methodology that has been used to carry out the assessment. • It is not agreed that the site is 716m from a local centre – Abbey Local Centre is situated circa 350m from site. • There are employment sites within 800m, and this should not be classified a major negative effect in the site appraisal, it should be neutral at worst • It is difficult to see why the presence of 7 bus stops within 800m of the site has been classified a moderate negative effect in the SA, it is surely a positive aspect of the development. • The fact there are no railway stations within 800m is marked as a major negative effect. However, the station is only circa 1000m from the site and should only be a minor / moderate negative effect. • There are 2 primary schools within 800m not 1 - both Abbey C of E School and Camp Hill Primary School are within 800m of the site. In addition, St Annes Catholic Primary is only just over that distance. • There is more than 1 green / open space within 800m of the site, this includes but not limited to, Weddington Meadows (including Weddington Walk), the public open space 	<p>Comments of support noted.</p> <p>The Sustainability Appraisal will be reviewed for inaccuracies.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						(including MUGA and Skate Park) to the rear of Camp Hill School, Stanley Road recreation Ground, the Dumbles Nature Area, and Sandon Park	
103.04	MP	AXIS P.E.D		SA1	<p>Criterion 1 This requires development to comply with various standards / requirements. However, there is currently no justification for doing so and it is unclear whether the standards are appropriate and should be applied in Nuneaton and Bedworth.</p> <p>Criterion 5 The wording of Criterion 5 is welcomed. However, it not considered that the current wording goes far enough in terms of addressing the outcome of any survey associated with the ecological importance of a LWS or part thereof. Particularly if the survey reveals that the value of the site / part of the site included within, or potentially affected by, a strategic allocation, is below the thresholds for acceptance as a LWS and does not contain the features / species that led to its destination.</p>	<p>It is recommended that criterion 5 is modified to read as follows (or similar): 5. Designated and potential local wildlife sites within or affecting the site will be surveyed for their ecological importance. The results of the survey will inform an assessment of the impact on or loss of the local wildlife site and any associated mitigation measures.</p>	<p>Criterion 1 will be supported by evidence or amended accordingly for the Publication version of the Borough Plan .</p> <p>Criterion 5 - Policy NE3 elaborates that existing and potential local wildlife sites will be protected from development. The level of protection sought for the site will be at an appropriate scale to the site's designation status, and the contribution it makes to the ecological network.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
103.05	MP	AXIS P.E.D			<p>Criterion 15 asks for strategic developments to comply with the relevant Concept Plan SPD and Design Code. However, these plans do not form part of the consultation in the context of the emerging Local Plan, and they should be if they are to be relied upon. In addition, many of the adopted SPD's / Design Codes no longer reflect the proposed allocations. For example, the site area associated with SHA-3 differs significantly to the area allocated in HSG 11 (it now includes land to the east and west of the Coventry Canal). Consequently, the HGS 11 SPD is no longer properly reflects the allocated area.</p> <p>If reliance is to be placed upon the SPD's and Design Codes, it will be necessary for them to be updated (where required) and for them to be the subject of wider public consultation as part of the Local Plan evidence base.</p>		It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.
103.06	MP	AXIS P.E.D	Final paragraph - viability		Site-specific policies should be reviewed and informed by a viability assessment	Flexibility should be added to the wording of certain site-specific policies, to reflect their specific circumstances and to support the clear 'brownfield first approach that is advocated within the development plan	The Council has commissioned an updated viability assessment which will be used to inform the Publication version of the Borough Plan.
103.07	MP	AXIS P.E.D	8.14		The current version of the Strategic Transport Assessment (STA) only considers the site allocations that are contained within the Adopted Local Plan, and it is not clear whether it has been updated to reflect the site allocations that are being promoted in the emerging Local Plan. In addition, it does not currently feature in the evidence base to the Local Plan.		Warwickshire County Council as the highway authority will commission an STA which will be used to inform the Publication version of the Borough Plan.
103.08	MP	AXIS P.E.D		SHA - Tuttle Hill	<p>Requirements appear contradictory, for example- development to address the canal but preserve woodland planting along its boundaries. Some further thought is needed as to how these requirements are framed.</p> <p>The form of development also states that the development should: "Retain views towards the man-made mound (Mount Judd) as a feature and landmark within the landscape.</p>	Whilst it is acknowledged that Mount Judd is a local landmark, it is not conferred any formal heritage or landscape status, nor does it have any features that make it particularly attractive or distinctive. In addition, views towards Mt Judd would also encompass the former quarry and operational landfill. With this in mind, it is questionable whether views should be directed towards Mt Judd, particularly when there is already an imperative of the policy to make the Coventry	The policy is informed by the Landscape Assessment which recommends that development proposal on the Site should seek to retain views towards the man made colliery mound (Mount Judd) as a feature and landmark within the landscape

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						Canal the focal point of future development	
103.09	MP	AXIS P.E.D	8.49		Reference to commercial matters is not relevant to the site's allocation	"The site will deliver approximately 400 new dwellings in a mix of sizes and tenures. The site is understood to be in two ownerships, and the landowners have an agreement but the landowners see the value in working together to bring the site forward in a comprehensive and integrated manner. It is essential that landowners come to a voluntary agreement based on sharing the cost of off-site and on-site infrastructure requirements"	Infrastructure requirements are important in establishing the deliverability of the site. It is considered relevant to the site's allocation.
103.10	MP	AXIS P.E.D	8.53		Improvements can only be made to the Canal and the land under the control of the Canal and Rivers Trust (CRT) with their agreement. Whilst there have been positive discussions with the CRT regarding the redevelopment of the allocated site, we suggest the wording of Paragraph 8.53 should be amended to reflect the fact that FCC Environment do not have control over the canal corridor. The suggested changes to the wording are set out below.	"The development of the site will take the should seek to improving the setting of the canal, and explore opportunities of including for better public access and interpretation. The canal offers the opportunity to become part of green infrastructure for the strategic site and a sustainable transport route with an existing towpath, which should be upgraded to encourage access.	The supportive text does not set out any specific requirements, but recognises the opportunity to improve the canal.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
103.11	MP	AXIS P.E.D	8.54		Whilst there is no objection to the inclusion of the wording on flooding, it must be noted that the Coventry Canal is in a cutting as it passes through the site and the flood risk assessment carried out in support of the existing planning application for redevelopment of the site has concluded that the Canal can be discounted as a potential source of flood risk for the site. Consequently, there is no risk of canal flooding or the need for a specific investigation in this regard.	Perhaps the wording could be revised to require a flood risk and drainage assessment more generally as part of any future planning application	The supportive text makes general observations concerning the flood risk associated with sites at or below canal bank level. The measure seems reasonable.
103.12	MP	AXIS P.E.D	13.32		We are concerned that the status and boundaries of the designated sites may no longer reflect the actual status of the designated sites by the time the Plan is adopted. For example, there has been a notable deterioration in the part of the LWS that is included within SHA-3 which has been verified through ecological assessments carried out over the last 5 years. The deterioration in that part of the LWS means that it no longer contains the specific features and characteristics that led to its designation in 2015		An updated Ecology and Geodiversity Assessment has been commissioned. Designated sites will reflect the status at the time of publication.
104.01	RW	Cerda Planning		SHA5 – West of Bulkington	Key development principle 25 - , it should be acknowledged within the policy, that this requirement for cohesive working and contiguous links can only be progressed as far as reasonably possible dependent on the stage of preparation of the adjoining landowners and that development on one parcel should not be inhibited by another landowner.	‘Any applications will require a concept framework or plan to ensure that all the parcels that make up the allocation can come forward in a comprehensive manner and cohesive manner. Development proposals should be in accordance with the extant HSG8 Concept Plan SPD and ensure access arrangements including widths of access points and spine roads are sufficient to ensure the delivery of all of the sites. Any links must also be contiguous to the adjacent development parcel, as far as reasonably practicable.’	Development principle 25 ensures the issue of connectivity between different parcels of land is considered.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
104.02	RW	Cerda Planning		Policy SA1 – Development principles on strategic sites	<p>Point 1 of the policy seeks to introduce a requirement for 100% M4(2) and 5% M4(3) Building Regulations standards, as well as consolidating the current SPD requirement for NDSS to be specifically stated within policy, where technically and financially feasible</p> <p>In addition to the above change, point 6 introduces the requirement for a 10% biodiversity net gain, in line with the Environment Bill.</p> <p>There is concern that additional requirements are being introduced without due consideration of potential financial implications and viability of sites.</p> <p>Point 11 - there is no supporting text to justify its inclusion nor anything to identify how a developer can meet this/what needs to be demonstrated to achieve this. Without sufficient detail the inclusion is not justified.</p> <p>Point 12 - Two primary concerns: 1) the requirement to illustrate worked with owners of other parts of the allocation, and 2) provision of contiguous linkages without ransom strips. The retention of a ransom strip does not seek to prohibit development but is a mechanism to mitigate adverse impacts caused by future phases.</p>	<p>it should be acknowledged within the policy, that this requirement for cohesive working can only be progressed as far as reasonably possible dependent on the stage of preparation of the adjoining landowners.</p> <p>The additional policy seeks to ensure that all ransom strips are removed where contiguous linkages are required between parcels. Vistry has significant concerns regarding the inclusion of this element of the policy and does not consider that it is justified. The planning process/legislation cannot dictate land ownership and therefore cannot require that ransom strips are removed for linkages.</p> <p>The requirement to remove ransom strips should be removed from the policy, with its inclusion, it is considered that the policy cannot be found sound.</p>	<p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p> <p>Point 11 - Agreed, it is not clear how the policy requirement can be demonstrated.</p> <p>Point 12 - The requirements to ultimately provide a cohesive scheme and ensure future phases are not stalled due to ransom strips and is considered to be reasonable.</p>
104.03	RW	Cerda Planning		Sustainability Appraisal	<p>implications of this de-allocation of HSG7 on provision of infrastructure needs to be considered. Where infrastructure is to be provided, this should not be at an uplifted cost to the remaining allocation; costs must remain proportionate to the effect and required mitigation of the proposed homes.</p>		<p>An updated IDP will be prepared when the final strategic sites are selected. A viability assessment has been commissioned to support the policies in the Publication version of the Borough Plan.</p>
105.01	KM	Deeley Group		Policy E2 – Existing Employment Land	<p>The research which underpins the policy contains errors concerning land use. The site is a viable employment site.</p>		<p>Comment noted, the ELR needs to be reviewed.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
106.01	KM	Deeley Group	8.30	Policy SHA-2 Arbury	Paragraph 8.30 of the policy states that the site is currently in single ownership. However, the allocation in its current form also includes a number of industrial units to the southeast end that lie within the existing Hazell Way Industrial Estate. The land in question, along with the industrial units referred to above, are let on long leases in favour of Deeley Group Ltd by the rights granted by transfer dated 29 June 1973. The outstanding length of the lease is 91 years. In turn, Deeley Group has sold various of these industrial units to owner/occupiers on co-terminus long leases.	Acknowledging Deeley Group ownership for the length of the leasehold, we request that the outlined land to be removed from the allocation. This will in no way prevent council aspirations for the site or impact housing provision within the allocation.	It is agreed the site is not in single ownership. Part of the site is currently occupied by industrial units and there has been a planning application which if approved would preclude residential use.
106.02	KM	Deeley Group	24	Policy SHA-2 Arbury	Paragraph 24 suggests creation of a significant area of grassland habitat between Ensor's Pool and Bermuda Clay Pits. This is to be done utilizing the land that is currently in Deeley Group ownership. A planning permission for the site outlined below was granted in early 1970s for the erection of an industrial unit to the east of the site in question, now occupied by IFCO, with the outlined land allocated for future expansion. Deeley Group has plans for a comprehensive redevelopment of this site in the next 5 years to include the safeguarded expansion land.	Adjoining unconstrained greenfield land to the west, which is in the ownership of the Arbury Estate, can accommodate the required environmental improvements.	Part of the site is currently occupied by industrial units and there has been a planning application which if approved would preclude the creation of grassland habitat.
106.03	KM	Deeley Group	23	Policy SHA-2 Arbury	Paragraph 23 proposes a minimum buffer zone of 100 m around Ensor's Pool. We believe that the minimum buffer zone should be reduced to 50m due to the buildings already present to the east and south of Ensor's Pool. Furthermore, additional ecological mitigations and environmental improvements should be accommodated within the greenfield area on the western boundary of the pool without compromising the current use of adjacent land.		Part of the site is currently occupied by industrial units and there has been a planning application which if approved would preclude the creation of a 100 m buffer zone to the east and south of Ensor's Pool.
106.04	KM	Deeley Group	8.44	Policy SHA-2 Arbury	Paragraph 8.44 proposes a new link road through the allocation to include a primary access point on Hazell Way which is located in Deeley Group ownership. In line with our submission for Arbury Design Code Consultation, we are confident that there is an excellent opportunity to create a sustainably designed 'Gateway Area' to the new scheme and we are now considering options to improve the area of our land holding to help facilitate this. We would like to highlight that we welcome an opportunity to discuss options for a new getaway.		Comment noted.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
107.01	CB	First City Limited		DS2 – Settlement hierarchy and roles	<p>We support the inclusion of Ash Green within the settlement hierarchy and that the settlement can support residential development.</p> <p>We support the inclusion of residential development in this area and consider our clients land south of New Road would suitably accommodate residential development in Ash Green.</p> <p>The site is currently located outside of the settlement boundary but is effectively an infill site located between a site which has recently been developed and The Haven Nursing Home.</p> <p>The site would round off the development boundary of Ash Green in an obvious and appropriate way.</p> <p>We therefore would support additional growth in Ash Green and the inclusion of the land south of New Road.</p>		Comment noted.
107.02	CB	First City Limited		DS3 – Development Principles	<p>We understand the premise of the development principles as set out in DS3 and support sustainability being the forefront all development.</p> <p>We also agree that new development should be directed to previously developed land as a priority, however, it is important to acknowledge that not all development can be accommodated within the existing settlement boundaries or on previously developed land.</p> <p>it is therefore important to acknowledge that there may be the requirement to provide development outside of the settlement boundaries that are not limited to agriculture, forestry and leisure. In these instances it is important for the plan to be flexible and also</p> <p>provide the ability for the presumption in favour of sustainable development to be implemented when proposals/ applications are viewed on their merits.</p>		The Council has commissioned a Green Belt review and Settlement Boundary Assessment which will be used to inform the Publication version of the Borough Plan.
107.03	CB	First City Limited		DS4 – Overall development needs	<p>It is important to ensure the duty to cooperate has been fully taken into consideration to ensure sufficient housing has been planned for throughout Coventry and Warwickshire, therefore emphasising any housing figures stated within the Borough Plan should be minimum figures in line with the Government objectives set out in the NPPF including the presumption in favour of sustainable development and to significantly boost the supply of housing.</p>	<p>The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2024 and 2039;</p> <ul style="list-style-type: none"> • A minimum of 9,690 homes based on 646 dwellings per annum (to be reviewed when the HEDNA 2022 is published). 	NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
107.04	CB	First City Limited		DS5 – Residential Allocations	<p>Our clients land is located south of New Road on the edge of the settlement of Ash Green. It is currently located outside of the settlement boundary and located within the Green Belt. However, the site is surrounded to the north, east and west by existing development and effectively has the appearance of an infill site.</p> <p>The site has the ability to accommodate approximately 14 dwellings of a mix of 2,3 and 4 bedroomed properties and is a reasonable size site for the settlement of Ash Green. We note there is one other site that has been proposed for Ash Green (Land rear of Burbages Lane, Ash Green site ref EXH-8) however, the land south of New Road has the ability to provide additional dwellings for the settlement in a sustainable location.</p> <p>The site is surrounded by residential development on 3 sides and effectively is an infill development that would have no impact on the wider Green Belt.</p> <p>We note that some of the non-strategic sites listed in policy DS5 have biodiversity and heritage issues including the setting of the Coventry Canal. The land at New Road has no constraints that would prevent residential development.</p> <p>We do not consider there is any material considerations why the site should not be allocated for future residential development and would contribute to providing a positive residential scheme to Ash Green in an obvious and sustainable location.</p>		The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.
107.05	CB	First City Limited		DS7 – Green Belt	<p>We do not consider the land south of New Road effectively performs well against all of the above criteria and should be removed from the Green Belt and allocated for future development.</p> <p>We consider the review of the Local Plan is the optimal time for land within the Green Belt to be considered against the NPPF to ensure it is fulfilling its role against the key aims, if not alternative opportunities should be considered for the site even if the site is not previously developed land.</p> <p>We also consider that a level of flexibility should be included within the Borough Plan to allow for development in the Green Belt over the 15 year period should the circumstances of both National policy or the characteristics of a site change to a degree where its designation of Green Belt no longer applies and development would be suitable on the site.</p>		<p>The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p> <p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p>
107.06	CB	First City Limited		DS8 – Monitoring of Housing delivery	<p>We are pleased to see the Council have given some thought to the possibility of delivery rates falling short of expectations. This is especially likely on larger sites that are anticipated to accommodate a significant percentage of the overall housing supply</p>		Comment noted

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
107.07	CB	First City Limited		DS9 – Review	We welcome the introduction of a policy focused on the possibility of an early review being required. This is a real possibility when consideration is given to the recently published Regeneration and Levelling Up Bill. This again, further reinforces our comments to other policies within the Preferred Options where the Council should allow a level of flexibility to be built into the plan considering the plan is to cover a 15 year period and given the real possibility for significant political changes both nationally and locally.		Comment noted
107.08	CB	First City Limited		H1 – Range and mix of housing	We acknowledge the need for a mix of housing and understand the type, sizes and tenures will be based on the need and demand identified in the most up to date HEDNA. We do not object to the suggested mix of housing mix set out in paragraph 9.4 on the whole. However, we do consider each site should be based on its own merits and the particular circumstances of the site as opposed to a ‘one size fits all’ across the whole Borough which has significantly different characteristics from one area to another. It is important to ensure a level of individuality/ uniqueness can be achieved and the correct size and types of housing is directed to the areas in which it would best serve the population of that area.		The HEDNA data will be used to determine the housing mix required at the strategic level. Individual applications will need to justify an alternative housing mix.
107.09	CB	First City Limited		H2 – Affordable housing	We note the Council’s proposals to include 2 affordable dwellings on all proposals consisting of between 11 to 14 dwellings. We do not object to this proposed policy and could accommodate 2 affordable dwellings on the land south of New Road, Ash Green.		Comment noted.
108.01	JT	Frampton Town Planning Ltd		Strategic Policy DS3 – Development principles	In stating that development must the Council’s Sustainable Design and Development DPD, Nationally Described Space Standards, Building for a Healthy Life and Future Homes and Buildings Standards, is over prescriptive and does not recognise that the principles contained within these documents may change or be replaced over the plan period as technology advances.	The word ‘must’ to be replaced with the word ‘should’ and the policy amended to reflect that amended/replacement advice may be published/adopted during the plan period. It is suggested that the following wording, which is to be found in Policy SA1 (1) be incorporated within Policy DS3 ‘where technically and financially feasible. Where assessment methods are changed or superseded, the appropriate replacement standards should be used.’	It is agreed that the wording used in the policy does not offer flexibility to changing industry standards.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
108.02	JT	Frampton Town Planning Ltd		Strategic Policy DS4 – Overall development needs.	A review of the Local Plan should not commence until the updated 2021 Census information is available and the HEDNA has been updated only then will there be an accurate assessment of housing need for each authority in the Coventry and Warwickshire housing market area. A bespoke assessment of the borough in isolation from the other authorities within the housing market area which is not based upon the 2021 Census outputs is unsound.	The Local Plan review should be delayed until the HEDNA has been updated.	An updated HEDNA has been commissioned and will be used to determine the number of housing and amount of employment land required.
108.03	JT	Frampton Town Planning Ltd		Policy DS5 – Residential allocations	<p>There is no justification for the removal of strategic housing allocation HSG4. This site has been through Examination and found to be available, viable and deliverable.</p> <p>Response to SHLAA assessment: The submission of a pre-application consultation demonstrates an intent to develop within the remaining 9 years of the plan period.</p> <p>The site is in two separate ownerships, this is not a constraint to development.</p> <p>The scale of development proposed in the strategic allocations all will require the provision of new infrastructure including schools and local centres. A first phase of development of 170 dwellings will provide the basis and benefit the viability of the scheme going forward.</p> <p>Despite the perceived marginal viability of the site the Inspector still supported its allocation and considered it to be deliverable. The Inspector would have been aware of the site ownership of the various strategic sites but still supported their allocation and considered them to be deliverable.</p>	Strategic housing allocation HSG4 should be reinstated.	The SHLAA sets out the reasons for why HSG4 has not been included in the Preferred Options version of the Borough Plan. An updated HELAA has been undertaken by the Council. The site will be re-assessed as part of the HELAA process. The representations received from the consultation will be considered as part of the assessment.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
108.04	JT	Frampton Town Planning Ltd		Policy SA1 – Development principles on strategic sites	<p>Criterion 1 does not recognise that not all sites will be able to meet 100% M4(2) and 5% M4(3) of the Building Regulations due to circumstances outside of the Developers control for example topography. These standards are quite rightly dealt with under the Building Regulations and it not for planning policy to impose artificial 'requirements' over and above those contained within the Building Regulations.</p> <p>Criterion 4 green roofs and living walls should be encouraged but not necessarily maximised and are considered more appropriate to an employment/commercial use rather than residential.</p> <p>Criterion 12 the Council should be prepared to use its compulsory purchase powers to ensure the deliverability of allocated strategic sites where one land owner is preventing the development coming forward in a cohesive way.</p>	<p>Criterion 1 – The word 'must' to be replaced with the word 'should'.</p> <p>Criterion 4 new examples of sustainable materials more appropriate to a residential use should be provided.</p> <p>Criterion 12 The Policy should refer to the use of compulsory purchase powers to ensure the delivery of strategic allocations.</p>	<p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p> <p>The policy does not set a minimum requirement for the use of green roofs and living walls but requires the use be maximised. This will be different on each site, the policy wording allows a degree of flexibility.</p> <p>Criterion 12 sets out the Council's policy approach to ensure sites are planned in a cohesive manner. Compulsory purchase is a legal mechanism and not a matter for policy.</p>
108.05	JT	Frampton Town Planning Ltd	Para 8.28 Housing densities		An overall net density of 28 dwellings per hectare is very low.	The overall net density should be increased to a minimum of 30 dwellings per hectare.	Noted. The council is considering alternative densities.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
108.06	JT	Frampton Town Planning Ltd		Policy H1 – Range and mix of housing	Policy H1 does not recognise that not all sites will be able to meet 100% M4(2) and 5% M4(3) of the Building Regulations due to circumstances outside of the Developers control for example topography. These standards are quite rightly dealt with under the Building Regulations and it not for planning policy to impose artificial 'requirements' over and above those contained within the Building Regulations.	The words 'is required to' should be replaced with the word 'should'	The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan. PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.
108.07	JT	Frampton Town Planning Ltd		Policy TC3 – Hierarchy of centres	Criterion 1 The 1.2km referred to is from the Guidelines for Providing for Journeys on Foot which was published in 2000. There is an upward trend since the early 2000's in people walking for longer, on a more regular basis. Therefore, the guidance stated does not take into account that people are more willing to around 1.6km.	Change 1.2km in Criterion 1 to 1.6km.	Research by CIHT 'Planning for Walking', shows the period between 2002 and 2012 there was an increase in journeys made by foot for short journeys, however as journey length increases there has been a decrease in journey made since 2002. It is considered 1.2km is the correct balance to encourage journeys on foot.
109.01	BW	Gladman			The figure of 9690 new homes does not include any unmet any housing need arising from the wider sub region and so is not consistent with national policy.	<ol style="list-style-type: none"> 1. Accept the 646 dpa figure is a minimum justified by the current evidence base. 2. Explore needs of adjoining authorities 3. Explain the outcome and whether should increase above 646 new homes. 4. Explain the position in respect of proposing a buffer within the Local Plan Review for housing delivery. 	NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
109.02	BW	Gladman			Not possible to tell if the Council will be able to discharge its DtC.	Council has a legal duty to co-operate with neighbouring authorities including Coventry's potential unmet need.	NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
110.01	PC	Godfrey Payton	7.51-7.56	Green Belt Policies	A Green Belt review has not been undertaken since 2015, the Council claim exceptional circumstances do not exist to remove land from the Green Belt. There are small parcels of land in the south of the district which should be considered for release from the Green Belt.	As the Green Belt Study is out of date it should be reviewed and consider releasing small parcels of Green Belt for development.	A Green Belt review will be undertaken to support the Publication version of the Borough Plan. Any changes to the settlement boundary will be supported by evidence.
110.02	PC	Godfrey Payton		DS5 - Residential Allocations	Omission of HSG4 in favour of non-strategic does not serve the interests of the residents as they do not provide community benefit.	HSG4 Bedworth Woodlands should be reconsidered for inclusion in the plan.	The SHLAA sets out the reasons for why HSG4 has not been included in the Preferred Options version of the Borough Plan. An updated HELAA has been undertaken by the Council. The site will be re-assessed as part of the HELAA process. The representations received from the consultation will be considered as part of the assessment.
110.03	PC	Godfrey Payton		Policies E1 and E2	There are no strategic employment sites identified other than Faultlands which is under construction. Policy should reflect need for employment allocations. Improvements to the A45 in Coventry City district will provide opportunity for employment sites in the vicinity of Ash Green and Kersley in conjunction with a green belt review.	Recommend a more flexible approach to identify future medium sized employment sites where infrastructure improvements enable sites to come forward in future years.	The HEDNA data will be used to determine the amount of employment land required.
110.04	PC	Godfrey Payton	7.25	DS4 – Overall development needs	The figure of 9690 new homes does not include any unmet any housing need arising from the wider sub region and so is not consistent with national policy.	Where future research identifies more than 9690 homes, the site HSG4 should be reconsidered as the site was examined publicly and pre-application studies demonstrate that HSG4 is deliverable.	NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
111.01	SS	Heatons			The Council's latest SHLAA (2021) concludes that ransom strips prevent access from Bramcote Close and Lancing Road, and that with provision of additional housing to the west of Bulkington and other less constrained and deliverable sites in Nuneaton, the site should not be taken forward. No further information has been provided to substantiate the existence of ransom strips, which is factually incorrect. The application demonstrates a clear intention to the delivery of a major housing development on the site with two possible vehicular access points off Nuneaton Road and Bramcote Close.	HSG7 East of Bulkington should be reconsidered for inclusion in the plan.	The outline application for the site is still to be determined. The adopted concept plan SPD shows access for the site off Lancing Road and not Bramcote Close. The submitted red line boundary does not include the strip of land which allows access to the site off Bramcote Close. Based on these concerns there is an unresolved policy objection regarding the achievability of access off Bramcote Close

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
112.01	JH	Home Builders Federation (HBF)		Policy DS1 – Presumption in favour of Sustainable Development	Not required as repeats NPPF	Remove policy	Comment noted.
112.02	JH	Home Builders Federation (HBF)		Strategic Policy DS3 – Development Principles	<p>This policy states that all new development will be sustainable, contributing to the national need to achieve net zero carbon emissions.</p> <p>Policy also requires that new development will be prioritised to previously developed land. NPPF has no requirement to prioritise PDL.</p> <p>Requirement to meet the standards set out in any future design SPD to do so elevates SPD to the same level of Local Plan without same scrutiny.</p> <p>The Policy goes on to state that new dwellings must comply with the Nationally Described Space Standards (NDSS) - Evidence of need required.</p> <p>Requirement to meet Building for a Healthy Life - may be appropriate as a guide for development and to be encouraged in new development however, it is not considered appropriate to require compliance.</p> <p>Requirement for development to comply with the Future Homes and Building Standard. - These will be implemented through Building Regulations from 2025 and there is no need for planning policies to repeat Building Regulation requirements.</p> <p>Requirement that new development will be acceptable subject to there being a positive impact on amenity, the surrounding environment and local infrastructure. - Open to interpretation and inconsistent with national policy and the presumption in favour of sustainable development.</p>	<p>Need to clarify how this policy will be implemented.</p> <p>Need to clarify how this requirement will be implemented.</p> <p>Review and amend.</p> <p>Evidence requirement or amend.</p> <p>Review and amend.</p> <p>Review and amend.</p> <p>Review and amend.</p>	<p>The policy sets out broad development principles. Individual policies set out the requirements.</p> <p>The requirement is supported in the NPPF para. 119.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The requirement is supported in the NPPF para. 133.</p> <p>It is considered that the higher building regulations for energy efficiency and Future Homes and Buildings Standard should be included in the Borough Plan review policy making from its adoption rather than waiting for the new Building Regulations to come into force.</p>
112.03	JH	Home Builders Federation (HBF)		Strategic Policy DS4 – Overall Development Needs	Should use the Standard Method as a starting point and in using the most up to date information in line with the requirements of the NPPF and PPG to determine the most appropriate housing requirement for their area, including consideration of circumstances where it is appropriate to plan for a higher figure.	None suggested	The HEDNA data will be used to determine the amount of housing and employment land required.
112.04	JH	Home Builders Federation (HBF)		Policy DS5 – Residential allocations	The Council's overall Housing Land Supply should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development.	None suggested	Comment noted.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
112.05	JH	Home Builders Federation (HBF)		Policy DS8 – Monitoring of housing delivery	The HBF considers that it is appropriate for the Council to consider what actions may be appropriate if housing delivery rates fall.	None suggested	Comment noted.
112.06	JH	Home Builders Federation (HBF)		Policy DS9 – Review	The HBF considers that it can be useful to clearly set out when a quicker review may be required, and that the circumstances set out seem generally appropriate.	None suggested	Comment noted.
112.07	JH	Home Builders Federation (HBF)		Policy SA1 – Development principles on Strategic Sites	<p>Requires residential development to meet 100% M4(2) and 5% M4(3) standards and must meet the requirements set out with the relevant SPDs. - Should be implemented in accordance with NPPF requirements.</p> <p>The policy also refers to NDSS and the Future Homes and Building Standards.</p> <p>Requirement to comply with various SPDs.</p> <p>The HBF considers that recognition that requirements may not always be viable is appropriate and considers that the submission of a viability assessment is an appropriate way to address this issue.</p>		<p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
112.08	JH	Home Builders Federation (HBF)		Policy H1 – Range and Mix of Housing	<p>The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.</p> <p>The HEDNA only provides a snapshot in time, which may no longer be appropriate.</p> <p>Question the inclusion of tenure as part of the mix, firstly as this policy appears to relate to market housing and secondly as Policy H2 provides a policy in relation to the provision of affordable housing and alternative tenures.</p> <p>Optional standards for accessible and adaptable dwellings - see earlier point</p> <p>Homes for Older People and Other Specialised Housing, - the need to comply with M4(3) standards as a minimum, and with the emerging WCC Technical guidance for Specialised Supported Housing and Housing with Care Developments. - Concerns regarding viability, the need to evidence M4(3) standards and the level of scrutiny the WCC guidance has undertaken.</p>	<p>it is not clear from this policy how all new residential developments will be able to address the mix of housing particularly where this is a small site for example, and it may be more appropriate for the policy to look for development to 'contribute to' the mix of housing.</p> <p>The policy is amended to include a reference to other sources of evidence, this could include evidence provided by an applicant or by the Council e.g. the Council Housing Waiting List</p> <p>Review and amend as necessary.</p> <p>Review and amend as necessary.</p>	<p>The HEDNA data will be used to determine the housing mix required at the strategic level. Individual applications will need to justify an alternative housing mix.</p> <p>The HEDNA data will be used to determine the amount of housing and employment land required. Policy H2 requires the tenure split and affordable housing mix sought will be based upon evidence provided by the council's Housing Register</p> <p>Agree tenure is not applicable to general market housing.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant. The Council has commissioned an updated viability assessment.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
112.09	JH	Home Builders Federation (HBF)		Policy H2 – Affordable Housing	<p>The requirement for at least 25% of affordable homes to be First Homes and for 10% of homes to be for affordable home ownership is appropriate and in line with the requirements of the NPPF and PPG</p> <p>The requirement for all affordable housing to be M4(2) and for 5% to be M4(3), as set out previously, the HBF considers that the Council will need to ensure it has the evidence in line with the PPG.</p> <p>The Council will need to ensure they have an appropriate and viable balance between the delivery of homes and the delivery of affordable homes.</p>	<p>Review and amend as necessary.</p> <p>Review and amend as necessary.</p>	<p>Noted.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The Council has commissioned an updated viability assessment which will be used to inform the policy.</p>
112.10	JH	Home Builders Federation (HBF)		Policy BE3 – Sustainable Design and Construction	<p>Policy requires proposals to adhere to any relevant Concept Plan SPD and designed to the principles in the Sustainable Design and Construction SPD - SPDS not subject to same level of scrutiny as Local Plan.</p> <p>Requirement to maximise water and energy and efficiency, and meet the higher standard for building regulations in regard to both water and for energy use - should be supported by evidence.</p>	<p>Review and amend as necessary.</p> <p>Review and amend as necessary.</p>	<p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p>
113.01	IG	Land & Planning Consultants Limited	Appendix I	NE3	The LWS map is not of a legible quality. It's important that it does not contain the former railway land at Weddington Road which is devoid of any ecological interest.	Better quality map and removal of land at Weddington Road (former railway) if included as per attached red outlined plan.	All designated sites will be reviewed before publication
114.01	IG	Land & Planning Consultants 2	7.48	DS7, DS5 and Appendix A	Omission of land at Park Lane, Nuneaton for residential allocation and removal from the Green Belt.	Allocation of land at Park Lane for residential development and removal from the Green Belt.	A Green Belt review will be undertaken to support the Publication version of the Borough Plan.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
115.01	IG	Land & Planning Consultants	Appendix I	NE3	The LWS map is not of a legible quality. It's important that it does not contain the former railway land at Weddington Road which is devoid of any ecological interest.	Better quality map and removal of land at Weddington Road (former railway) if included as per attached red outlined plan.	All designated sites will be reviewed before publication
116.01	LH	Lichfields		DS4 – Overall development needs	<p>Not positively prepared as not informed with agreements with other authorities. Not effective as cross boundary matters are deferred.</p> <p>Housing requirement - The HEDNA seeks to attribute a higher housing provision to both demographic trends and affordable housing need, which would be improper given that it fails to explicitly recommend an uplift to overall housing need to assist the delivery of affordable housing need.</p> <p>The HEDNA does not justify why no upward adjustment would be necessary to support economic growth.</p> <p>New housing should be allocated nearby employment sites to prevent excess commuting.</p> <p>Housing Land Supply - Greater flexibility should be built into BPR.</p> <p>Coventry Unmet Housing Need - The issue of unmet need should be addressed now rather than deferred under policy DS9. Also, the withdraw of the MoU with Coventry is unsound and risks that Coventry's future housing need is not addressed and the BPR will be unsound.</p> <p>Green Belt - There is need to review the Green Belt. Exceptional circumstances exist due to the unmet housing need within Coventry.</p>	<p>The council increase to overall housing need to assist in the delivery of affordable housing.</p> <p>Need to justify why an upward adjustment is not necessary.</p> <p>Whitestone Farm would be a sustainable location for housing and should be considered for housing growth.</p> <p>To ensure there is sufficient land available the council will need to identify additional sites.</p> <p>Undertake a Green Belt review.</p>	<p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.</p> <p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan. Any changes to the settlement boundary will be supported by evidence.</p>
116.02	LH	Lichfields		DS5 - Residential Allocations	<p>Policy is unsound as it not effective - deliverable over the plan period. The council should set out an anticipated annualised rate of delivery for strategic sites for the plan period.</p> <p>Research by Lichfields indicates a protracted delivery rate than anticipated in SHA -2</p>	The council should produce a detailed site specific housing trajectory and allocate additional land to deliver the housing requirement.	The rate of delivery for strategic sites is presented in the evidence base available on the Council's website.

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116.03	LH	Lichfields		DS8- Monitoring of housing delivery	<p>The policy is not justified or effective.</p> <p>The council's evidence in support of the policy, the capacity analysis and housing trajectory, does not set out delivery rates per site for the plan period up to 2039.</p> <p>The mechanism by which under delivery is addressed is not clear neither is the term 'bringing forward additional sites'.</p>	The council should allocate additional land to deliver the housing requirement and avoid potential under delivery.	The Capacity analysis information including trajectory is available on the Preferred Option Consultation page on the Council's website. NPPF 74 states, all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Site delivery rates are set out in the Council's 5YHLS.
116.04	LH	Lichfields		DS9 – Review	<p>The policy is not positively prepared as it is not supported with agreements from neighbouring authorities regarding unmet need.</p> <p>The policy is not justified as it is not an appropriate strategy.</p> <p>The policy is not effective as it is not based on joint cross boundary working.</p> <p>The Council should not submit the BPR until the issue of unmet need is addressed.</p>	The council should review the Green Belt to establish which parcels of land could be released to assist in meeting the council's/unmet housing need.	<p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.</p> <p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan. Any changes to the settlement boundary will be supported by evidence.</p>
117.01	DF	Marrons Planning for Bellways		DS4 – Overall development needs	The proposed requirement of 646dpa is unjustified. There remains considerable uncertainty as to the final requirement pending publication of the Coventry and Warwickshire HEDNA and addressing the unmet needs of neighbouring authorities via Duty to Cooperate discussions.		NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
117.02	DF	Marrons Planning for Bellways		DS5 - Residential Allocations	<p>the extant allocations from the adopted BLP – which are proposed to be carried forward (eight sites, with capacity for c. 4,770 homes) – need to be reviewed, assessing their deliverability, developability and viability, prior to inclusion in the Borough Plan review. The fact that NBBC has committed to such a review is supported.</p> <p>The non-strategic allocations identified in Policy DS5 are currently unsound, with many facing overriding constraints to their deliverability and developability, constraints which are clearly identified in the SHLAA.</p>	Proposed change should be made to Policy DS5 to add site GAL-4 as an allocation for up to 160 homes (Vision document submitted).	The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.

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117.03	DF	Marrons Planning for Bellways		DS3 – Development Principles	The settlement limits defined under Policy DS3 are in need of review to ensure that they are up-to-date for the purpose of future decision-making. A specific review is required to the west of Nuneaton, broadly defining Plough Hill Road as the town's western boundary, consistent with recent development that took place since the plan's adoption.	The proposed change to the boundary has been submitted.	There has been development on Plough Hill Road which should be reflected in the settlement boundary.
118.01	DP	Marrons Planning for Richborough Estates		DS2 – Settlement hierarchy and roles	The Borough's settlement hierarchy set out in Strategic Policy DS2 has been appropriately informed by a Settlement Hierarchy Study and associated evidence base. The recognition of Bedworth as having a secondary role for employment, housing, town centre, leisure and service provision behind Nuneaton is appropriate and reflects the position set out within the adopted Borough Plan and strategy.		Comment noted.
118.02	DP	Marrons Planning for Richborough Estates		DS4 – Overall development needs	The NPPF recognises that exceptional circumstances can justify an alternative approach to the 'Standard Method'. The draft Plan clarifies that a number of concerns that have been raised regarding the accuracy of the Office of National Statistics' population estimates for Coventry (and as recognised by the Office for Statistics Regulation), therefore the HEDNA analysis is considered to be the best starting point for determining housing need over the new plan period.	We are therefore supportive of the use of this alternative approach to the Standard Method which is considered appropriate and justified.	Comment noted.
118.03	DP	Marrons Planning for Richborough Estates		DS5 - Residential Allocations	See below.		
118.04	DP	Marrons Planning for Richborough Estates		SHA -4 Hospital Lane	<p>The retention of Hospital Lane is supported.</p> <p>Pre-application discussions with the education authority confirmed that the Newdigate Primary School has already been extended and land is not required within the site (HSG5 / SHA-4). Policy SHA-4 should therefore be amended to remove Principle 6 to reflect these recent changes of circumstances.</p> <p>An application has been submitted for 455 dwellings which makes efficient use of the land. Policy DS5 and Policy SHA - 4 should be amended to reflect the number in the application.</p>	<p>Review and amend as necessary.</p> <p>Review and amend as necessary.</p>	<p>Planning application does not include the land for school.</p> <p>A Planning application has been submitted.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
119.01	BJ	Newlands			<p>The Plan period 2023-2039 is appropriate.</p> <p>Do you agree that the existing evidence base set out above needs to be updated or replaced? - The evidence based does need updating needs to reflect population growth and also address unmet need from Coventry.</p> <p>Which of the options set out below do you favour for the locating of new residential uses? - Housing to meet Coventry's needs should be provided on the edge of the city as a sustainable location.</p> <p>The 2021 and 2016 draw conclusions which are contrary to the 2013 SHLAA and Landscape Character Assessment.</p> <p>A preliminary green belt appraisal has been undertaken which shows site 'Land at Exhall House Farm' makes only a partial contribution towards the first three of the five green belt purposes in the NPPF.</p> <p>Are there any other spatial options that need to be considered? - Locating housing in the south of the Borough in proximity to Coventry would be a sustainable location and will require land to be released from the Green Belt. The approach is supported under Policy DS2 which identifies the 'Northern Fringe of Coventry ' as providing a supporting role for housing, shopping and commercial.</p>	<p>Review Sustainability Appraisal and Strategic Transport Assessment to ensure they take account of uplift in growth.</p> <p>In relation to Land at Exhall House Farm; the site is located in a sustainable location in relation to Coventry, exceptional circumstances exist to release land from the Green Belt. Reconsider allocation of the site for residential development.</p>	<p>The Council has commissioned a HEDNA to consider economic growth in the Borough. A STA will be undertaken by WCC when the final employment and housing sites are known.</p> <p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan. Any changes to the settlement boundary will be supported by evidence.</p> <p>The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p>
120.01	MG	Green Light Developments	Paragraph 1.2		<p>NPPF paragraph 22 states, "Strategic policies should look ahead over a minimum 15-year period from adoption." The Council assumes the new Borough Plan will be adopted in February 2024, hence the period of 2024 - 2039, however, this does not factor in any time for slippage.</p>	<p>A more appropriate period, consistent with the current Borough Plan (2011 - 2031) would be over 20 years, (2024 - 2044), to allow for any slippage in the programme.</p>	<p>The publication version of the Borough Plan will cover the appropriate time period as set out in the NPPF.</p>

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120.02	MG	Green Light Developments		Policy DS2 – Settlement Hierarchy and Policy DS5 – Residential Allocations	<p>The continued inclusion of the ‘northern fringe’ of Coventry is recognised, as part of the Borough's settlement hierarchy. The new Borough Plan does not deliver any meaningful housing numbers to the ‘northern fringe’ of Coventry, and therefore the options for locating new residential development does not build upon this established hierarchy.</p> <p>The new Borough Plan does not deliver any meaningful housing numbers to the ‘northern fringe’ of Coventry, and therefore the options for locating new residential development does not build upon this established hierarchy.</p>	The ‘northern fringe’ of Coventry, (given its functional relationship with Coventry) is well positioned to help meet potential unmet need. Greenlight’s land interest off the Exhall Road at Keresley would be an ideal location to help accommodate this additional housing requirement in the borough. Policy DS5 – Residential Allocations will need to be updated appropriately.	The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.
120.03	MG	Green Light Developments		DS4 – Overall development needs	The Council cannot meet the requirements of NPPF paragraph 65. We fail to recognise how the Council can formulate and consult upon credible allocation sites 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.	The Coventry and Warwickshire HEDNA is clearly required, to clarify the unmet need for Coventry, and the proportion Nuneaton and Bedworth should accommodate, (given its strong functional relationship with the City).	NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
120.04	MG	Green Light Developments		Paragraph 7.27	Paragraph 7.27 of the Preferred Options asserts that a higher figure, (than 22 dwellings per annum), may be expected. 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.	The Council sticks with the windfall allowance of 22 dwellings per year throughout the plan.	Amendments to the windfall allowance will be supported by available evidence.
120.05	MG	Green Light Developments		DS6 - Employment Allocations	The current Borough Plan allocates 26ha of employment land. Whereas, across the same sites, the new Borough Plan allocates 19ha of employment land. The difference being the loss of 7ha of employment land at the Bowling Green Lane site (SEA-6); this element of the site has been proposed for 150 dwellings instead.	There is insufficient levels of employment land being allocated in the new Borough Plan. Greenlight’s land interest off the Exhall Road at Keresley would be an ideal location to help accommodate additional employment requirements in the borough.	The HEDNA data will be used to determine the amount of housing and employment land required.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
120.06	MG	Green Light Developments		Green Belt Review	<p>No new Green Belt Review. Methodological flaws in current Green Belt Review:</p> <ol style="list-style-type: none"> 1. Excessive size of parcels. 2. Methodological concerns about how the criteria for assessing purposes have been applied with respect to specific parcels. How sprawl has been assessed regarding 'ribbon development' and 'openness'. The purpose "to prevent neighbouring towns from merging into one another" has been incorrectly applied to coalescence of villages. A failure to apply tests in paragraphs 142 and 143 of the NPPF to the review of Green Belt boundaries in the Plan. <p>In addition, the SHLAA and SA needs up-dating. Greenlight made representations at the last Borough Plan examination to ensure its land interest was evidenced correctly in the SHLAA and SA. The site is within SHLAA site NUN178 and Greenlight will work with the Council to ensure the SHLAA assessment for the site is accurate. It is of concern that we cannot find site NUN178 in the latest SHLAA (2021), included within the evidence base for this Preferred Options consultation.</p>	<p>A new/up-dated Green Belt Review is to be undertaken in accordance with national planning policy, to inform the new Borough Plan evidence base. Confirmation is required from the Council that site NUN178 has not been excluded from the SHLAA, especially given all the previous work done by Greenlight to ensure its land interest was evidenced correctly in the SHLAA and SA.</p>	<p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan. Any changes to the settlement boundary will be supported by evidence. The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p> <p>NUN178 Land off Exhall Road, Keresley End (Fields 1, 2 and 3) has been assessed and will appear in the updated HELAA as EXH-16 Land off Exhall Road, Keresley End (Fields 1, 2 and 3).</p>
120.07	MG	Green Light Developments			<p>Council cannot form credible spatial options on future housing needs without wider HMA HEDNA. The SA concludes that it is unnecessary to release land from the Green Belt which is contrary to current Borough Plan which identified the need to release land from the Green Belt.</p>	<p>The Coventry and Warwickshire HEDNA is clearly required, to clarify the unmet need for Coventry, and the proportion Nuneaton and Bedworth should accommodate, (given its strong functional relationship with the City). This will confirm the level of housing requirement for the borough, and in turn the number of sites required to deliver this requirement; particularly when considering the unmet needs of Coventry, with the most logical location being the 'northern fringe', (given its functional relationship).</p>	<p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.</p>

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121.01	AG	Pegasus Group - north of Pickards way			<p>Plan period - 15 years is the minimum time for a Local Plan. Should increase time period to 30 years to provide certainty. Green Belt boundaries should endure for the whole of the plan period.</p> <p>Evidence - All relevant evidence should be updated before excluding the option of Green Belt release.</p> <p>Duty to Co-operate - Sub-regional HEDNA will need to be addressed before the duty to co-operate can be met.</p> <p>Vision and Objectives - The vision should extend to cover a 30-year time period. Objective 8 should be amended to; "To address climate change by driving sustainability in all new development and supporting proposals for renewable energy development".</p>		<p>The publication version of the Borough Plan will cover the appropriate time period as set out in the NPPF.</p> <p>The Borough Plan will be supported by a range of assessment studies which form the evidence base. A Green Belt study has been commissioned to support the publication version of the plan.</p> <p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out.</p> <p>Renewable energy is addressed in Policy BE2 Renewable and low carbon energy.</p>
121.02	AG	Pegasus Group - north of Pickards way		DS1 - Presumption in favour of sustainable development	<p>Duplication of parts of NPPF unnecessary.</p> <p>Reference to UN sustainable goals not supported as ambiguous.</p> <p>Measures to adapt to climate change and delivering net zero not sufficient.</p>		Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.
121.03	AG	Pegasus Group - north of Pickards way		DS2 – Settlement hierarchy and roles	The policy identifies the northern fringe of Coventry as having "a supporting role for housing, shopping and local services". This does not fully reflect the important role parts of the northern fringe play in the delivery of employment land.	It is recommended that the policy text is altered to reflect the role of this area in providing employment development.	It is considered the policy text reflects the role of the area in the settlement hierarchy.
121.04	AG	Pegasus Group - north of Pickards way		DS3 – Development Principles	<p>Supports the aspiration for developments to be resilient to climate change. - No mention of renewable energy developments to support the overall principles, especially when new developments will be prioritised toward previously developed land which can be more constrained to provide sufficient tree and orchard planting.</p> <p>The policy also states that new unallocated development outside the settlement boundary is limited to rural enterprises, and other uses that can be demonstrated to require a location outside of the settlement boundaries</p>	<p>To achieve net zero carbon emissions, a more holistic approach should be explored whereby renewable energy developments are encouraged as an integrated part of responding to climate change.</p> <p>This should be expanded to include renewable energy developments, which require open spaces to operate e.g.</p>	<p>Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.</p> <p>Renewable energy is addressed in Policy BE2 – Renewable and low carbon energy.</p>

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						solar and wind, and are more suited to be located outside of a development boundary.	
121.05	AG	Pegasus Group - north of Pickards way		DS4 – Overall development needs	The supporting text to Policy DS4 identifies that “the extent of Green Belt restricts opportunities for delivering further employment land to deliver strategic warehousing to serve sub-regional need” and that “further constraints analysis would need to be undertaken at sub-regional level to determine the potential scope for accommodating strategic warehousing for each local authority area”.	The most appropriate option for locating development is to prioritise the most sustainable locations no matter whether these are designated as countryside or Green Belt and that the Green Belt should not be utilised in a way which would exclude the consideration of the most sustainable options for the allocation of development. As a result the supporting text to DS4 should be amended	Releasing land from the Green Belt will only occur where there are exceptional circumstances. A Green Belt review will be undertaken to support the Publication version of the Borough Plan.
121.06	AG	Pegasus Group - north of Pickards way		DS6 - Employment Allocations	Employment need in allocations is insufficient.	Necessary for NBBC to identify additional employment allocations to ensure growth rate targets can be met and that further additional allocations will be required following the emergence of the Sub-Regional HEDNA. The area of land around M6 Junction 3 is appropriately located on the strategic road network within the M6 transport corridor, a priority area for strategic investment according to the Coventry and Warwickshire Sub-Regional Employment Market Signals Study (July 2019). Additional allocations in this location would represent a continuation of a strategy begun through the adopted NBBP, which allocated sited EMP2, EMP6 and EMP7 in the vicinity of M6 Junction 3 based	The HEDNA data will be used to determine the amount of housing and employment land required.

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						on the NBBP evidence base including the 2014 Employment Land Review.	
121.07	AG	Pegasus Group - north of Pickards way		DS9 – Review	Early review supported	Mechanism to for a quicker review should include clear evidence of a significant change in the Borough's employment need.	Comment noted.
121.08	AG	Pegasus Group - north of Pickards way		SA1 - Development principles on strategic sites	<p>SA1.13 imposes a requirement for employment sites “to demonstrate how the development will encourage like-minded uses such as network clusters for similar technology-based companies”. The justification and planning purpose of applying this requirement to all employment development at the strategic allocations is unclear and it is recommended that it should be deleted.</p> <p>The supporting text to this policy includes a number of potential requirements of strategic development that are not included within the policy itself. It is suggested that NBBP should review the supporting text at paragraphs 8.8 to 8.28 and consider which of the requirements within it would more appropriately form the content of additional policies, to enable developers and decision makers to distinguish clearly between development plan policy requirements and explanatory information.</p>		<p>Agreed, the policy as worded assumes all employment development will be technology based.</p> <p>The policy text supports the overall approach towards development on strategic sites. The principles are carried forward to the policies for specific strategic site.</p>
121.09	AG	Pegasus Group - north of Pickards way		E1 – Nature of employment growth	<p>Focus on use classes B2 and B8 is supported.</p> <p>Favourable consideration should be given to logistics development. The inclusion is supported by various studies.</p>		<p>Comment noted.</p> <p>Employment sectors identified are in line with those prioritised in the Economic Development Strategy.</p>

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121.10	AG	Pegasus Group - north of Pickards way		HS1 - Ensuring the delivery of infrastructure	The supporting text to Policy HS1 states (at 12.4) that while the infrastructure requirements for each of the strategic sites are outlined in the site-specific policies, any additional on-site infrastructure required for the strategic sites "will be included in the updated Infrastructure Delivery Plan/Schedule". In order to avoid ambiguity within the site-specific policies, L&Q Estates considers it will be necessary to ensure this updated evidence precedes the final version of the Plan and that clear and justified expectations with regard to infrastructure delivery and contributions are identified within the relevant policies.		Strategic sites will be supported by a range of assessment studies which form the evidence base, including infrastructure requirements. The Infrastructure Development Plan will be produced in consultation with infrastructure stakeholders.
121.11	AG	Pegasus Group - north of Pickards way		HS2 - Strategic accessibility and sustainable transport	Requirement to accord with various SPDs is questioned. There is a clear direction in this policy to encourage carbon neutral transport and be resilient to climate change. The necessary infrastructure needs to be provided to achieve these goals and this should be from renewable energy developments.		It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan
121.12	AG	Pegasus Group - north of Pickards way		BE2 - Renewable and low carbon technology	Policy should include that renewal energy developments are acceptable outside the settlement boundary.		The NPPF para 151 states, when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. It would not be appropriate to allow renewable energy projects outside of the settlement boundary, given the Borough is constrained by a large amount of Green Belt land.
122.01	AG	Pegasus Group - L&Q SEA-2 policy		Policy SEA-2 – Wilsons Lane	The site has been approved for development.	The two plans at 'SEA-2 Employment area' and 'SEA-2 Housing area' should be amended to reflect the approved Land Use Plan. Paragraph 8.90 should be amended to read, "Residential development will be focused to the south-eastern part of the site, adjacent to the existing residential areas. The remainder of the site will be brought forward for employment uses."	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.

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122.02	AG	Pegasus Group - L&Q SEA-2 policy	8.90	Policy SEA-2 – Wilsons Lane	For the planning application ref: 037237, the Committee Report includes Planning Obligations requested, and recognises that the County Council Infrastructure team did not seek primary education financial contribution as there is forecast to be sufficient capacity within the local area, with contributions sought for secondary level education instead.	"8. Financial contribution towards primary education at local schools in order to meet anticipated demand for school places, if demonstrated through discussions with Warwickshire County Council." "9. Financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry, if demonstrated through discussions with Warwickshire County Council." 14. Larger B2 and B8 uses to west of the landscape	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.
122.03	AG	Pegasus Group - L&Q SEA-2 policy		Policy SEA-2 – Wilsons Lane	14. Larger B2 and B8 uses to west of the landscape corridor -	The wording of this point is too prescriptive and is inconsistent with the planning application ref: 037237, the approved Land Use Plan and Illustrative Masterplan (refer to Figures 4 and 5). No landscape corridor is proposed and the maintenance of this wording would potentially jeopardise a reserved matters application being realised. This point is no longer relevant and should be deleted.	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.
122.04	AG	Pegasus Group - L&Q SEA-2 policy		Policy SEA-2 – Wilsons Lane	15. Scale and massing around eastern edge - The wording of this point assumes that reduced scale and massing is the only solution to prevent undue impact upon existing residential amenity, but does not factor other considerations such as distance or screening.	Amend this point to read: "Scale and massing of building form around eastern edge of site should demonstrate that there would be no material detrimental impact caused upon existing residential amenity."	The policy seeks to prevent a hard edge to the settlement boundary.
122.05	AG	Pegasus Group - L&Q SEA-2 policy		Policy SEA-2 – Wilsons Lane	16. Ridge and furrow "Retain areas of ridge and furrow within open spaces."	The loss of ridge and furrow has been assessed in detail by the County Archaeologist and does not have such significance to merit preservation, this point is no longer relevant and should be deleted	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
122.06	AG	Pegasus Group - L&Q SEA-2 policy		Policy SEA-2 – Wilsons Lane	<p>20. Retain Public Right of Way (PRoW) through middle of site</p> <p>As part of the design development before the application ref: 037237 was submitted, an option to retain the PRoW (B25) within a landscape corridor through the middle of the site was considered (although not on its existing alignment). There was concern, however, that whilst the policy requirement would be fulfilled it resulted in issues of potentially inappropriate amenity as well as concerns with regard to surveillance for security. Following discussions with the Development Control Officer and relevant consultees as part of the application ref: 037237, it was agreed that the most appropriate option would be to divert the footpath along the southern boundary toward the A444,</p>	Amend this point to read: "The section of public right of way routed through the middle of the site shall be appropriately diverted, as necessarily required to allow development, along a route that does not materially inconvenience the public."	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.
122.07	AG	Pegasus Group - L&Q SEA-2 policy		Policy SEA-2 – Wilsons Lane	22. Retain and strengthen central hedgerow	This point is in conflict with the planning application ref: 037237 and the type and quantum of land use proposed, given that the hedgerow splits one large strategic site into two smaller parcels. It is proposed that the hedgerow be removed, and compensated for through extensive replacement planting throughout the Site, with boundary planting retained and strengthened where possible, improving the green infrastructure network. This point is no longer relevant and should be deleted.	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.
122.08	AG	Pegasus Group - L&Q SEA-2 policy	8.91	Policy SEA-2 – Wilsons Lane	This requirement is based upon there being landscape corridor through the centre of the Site, and does not consider the planning application ref: 037237, which is not bringing this forward. It is taken that the wording of this paragraph is to protect the amenity of neighbouring residential properties, with class E(g) being seen as a 'compatible neighbour'. However, it prevents B2 or B8 uses locating towards the eastern end and this is not warranted as long as it can be demonstrated that no material detrimental impact would be caused upon the amenity of the residential properties; as has been demonstrated by the planning application ref: 037237 which includes associated conditions for noise and landscape mitigation.	This paragraph should be amended as follows: "Any proposed B2 or B8 uses that are located towards the eastern part of the site adjacent to existing residential properties, should demonstrate that there would be no material detrimental impact caused upon residential amenity. Scheme layouts need to take into consideration potential stand-offs and easements associated with the overhead power line and early discussions with National Grid are essential in informing any	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						detailed layout, but it is considered that parking and storage areas will be provided in the vicinity of the power line."	
122.09	AG	Pegasus Group - L&Q SEA-2 policy	8.93	Policy SEA-2 – Wilsons Lane	This point is in conflict with the planning application ref: 037237, which proposes the whole residential element to be delivered to the southeast part of the Site, and the bus services element should be included to reflect point 5.	This paragraph should be amended as follows: "Access to the residential area will be via a new access point onto Wilsons Lane. The existing pedestrian access to public footpaths B23 and B25 will be retained. Contributions towards associated improvements to Wilsons Lane, the B4113 and bus infrastructure or bus services will be sought."	A planning application has been received. It would be appropriate to consider revisions, where these are approved by consultees.
123.01	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10 - vision doc			A Vision Document submitted demonstrating how Land West of the A444 and South of M6 Junction 3 could be appropriately developed for residential or employment development. This Vision Document is submitted in support of L&Q Estates' representations to the Nuneaton and Bedworth Borough Plan Review Preferred Options consultation and should be considered alongside the representations.		Noted.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
124.01	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10 -			<p>Plan period - 15 years is the minimum time for a Local Plan. Should increase time period to 30 years to provide certainty. Green Belt boundaries should endure for the whole of the plan period.</p> <p>Evidence - All relevant evidence should be updated before excluding the option of Green Belt release.</p> <p>Duty to Co-operate - Sub-regional HEDNA will need to be addressed before the duty to co-operate can be met.</p> <p>Vision and Objectives - The vision should extend to cover a 30-year time period. Objective 8 should be amended to; "To address climate change by driving sustainability in all new development and supporting proposals for renewable energy development".</p>		<p>The publication version of the Borough Plan will cover the appropriate time period as set out in the NPPF.</p> <p>The Borough Plan will be supported by a range of assessment studies which form the evidence base.</p> <p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out.</p> <p>Renewable energy is addressed in Policy BE2 Renewable and low carbon energy.</p>
124.02	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS1 - Presumption in favour of sustainable development	<p>Duplication of parts of NPPF unnecessary.</p> <p>Reference to UN sustainable goals not supported as ambiguous.</p> <p>Measures to adapt to climate change and delivering net zero not sufficient.</p>		Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.
124.03	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS2 – Settlement hierarchy and roles	The policy identifies the northern fringe of Coventry as having "a supporting role for housing, shopping and local services". This does not fully reflect the important role parts of the northern fringe play in the delivery of employment land.	It is recommended that the policy text is altered to reflect the role of this area in providing employment development.	It is considered the policy text reflects the role of the area in the settlement hierarchy.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
124.04	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS3 – Development Principles	<p>Supports the aspiration for developments to be resilient to climate change. - No mention of renewable energy developments to support the overall principles, especially when new developments will be prioritised toward previously developed land which can be more constrained to provide sufficient tree and orchard planting.</p> <p>L&Q Estates recommends that the wording in Policy DS3 on the use of brownfield land should be reconsidered.</p> <p>Policy DS3 seeks to afford policy status to the full contents of existing (Sustainable Design and Construction SPD) and future supplementary planning documents (“SPDs”) in a way that is inappropriate and cannot be supported.</p> <p>The proposed requirement in Policy DS3 for all new dwellings to comply with the latest Nationally Described Space Standards is not supported, in the absence of clear justification.</p> <p>The inclusion of compliance with the Future Homes and Building Standard within Strategic Policy DS3 is potentially unnecessary as these standards will be required by Building Regulations from 2025.</p> <p>L&Q Estates recommend that more clarity is added on the elements that will be considered in assessing whether new development within settlement boundaries will have “a positive impact on amenity, the surrounding environment, and local infrastructure”.</p>	<p>To achieve net zero carbon emissions, a more holistic approach should be explored whereby renewable energy developments are encouraged as an integrated part of responding to climate change.</p>	<p>Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.</p> <p>Prioritising the use of brownfield land is accordance with the NPPF Para. 120 which requires policies to give substantial weight to the value of using suitable brownfield land.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The requirement to achieve space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>it is considered that the higher building regulations for energy efficiency and Future Homes and Buildings Standard should be included in the Borough Plan review policy making from its adoption rather than waiting for the new Building Regulations to come into force.</p>
124.05	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS4 – Overall development needs	<p>The most appropriate option for locating development is to prioritise the most sustainable locations no matter whether these are designated as countryside or Green Belt and that the Green Belt should not be utilised in a way which would exclude the consideration of the most sustainable options for the allocation of development.</p> <p>The forthcoming Sub-Regional HEDNA is likely to underline existing need for employment growth and additional housing to meet unmet needs and that exceptional circumstances justifying changes to Green Belt boundaries through the Borough Plan Review will be demonstrable.</p>	<p>The most appropriate option for locating development is to prioritise the most sustainable locations no matter whether these are designated as countryside or Green Belt and that the Green Belt should not be utilised in a way which would exclude the consideration of the most sustainable options for the allocation of development. As a result the supporting text to DS4 should be amended</p>	<p>The HEDNA data will be used to determine the amount of housing and employment land required. A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
124.06	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS5 - Residential Allocations	Following publication of the sub regional HEDNA more residential allocations will be requires. Sustainably located sites in the Green Belt should not be excluded.		A Green Belt review will be undertaken to support the Publication version of the Borough Plan.
124.07	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS6 - Employment Allocations	Following publication of the sub regional HEDNA more employment allocations will likely be required. Sustainably located sites in the Green Belt should not be excluded.	Necessary for NBBC to identify additional employment allocations to ensure growth rate targets can be met and that further additional allocations will be required following the emergence of the Sub-Regional HEDNA. The area of land around M6 Junction 3 is appropriately located on the strategic road network within the M6 transport corridor, a priority area for strategic investment according to the Coventry and Warwickshire Sub-Regional Employment Market Signals Study (July 2019). Additional allocations in this location would represent a continuation of a strategy begun through the adopted NBBP, which allocated sited EMP2, EMP6 and EMP7 in the vicinity of M6 Junction 3 based on the NBBP evidence base including the 2014 Employment Land Review.	The HEDNA data will be used to determine the amount of housing and employment land required. The comments concerning the site are noted.
124.08	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS8 – Monitoring of Housing delivery	A clear set of actions should be set out within Policy DS8, explaining the steps that will be taken by NBBC in the event that housing delivery falls below the required standards.		Any review would be in accordance with the requirements as set out in the NPPF, para 31-33.
124.09	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		DS9 – Review	Early review supported	Mechanism to for a quicker review should include clear evidence of a significant change in the Borough's employment need.	Noted.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
124.10	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		SA1 - Development principles on strategic sites	<p>Nationally Described Space Standard to all residential development would require clear justification.</p> <p>Concerns regarding the proposed requirement for 100% of residential development on strategic sites to meet the M4(2) Building Regulations standard and 5% of residential development on strategic sites to meet the M4(3) Building Regulations standard. Needs to be evidenced.</p> <p>Requirement to comply with SPDs - not appropriate.</p> <p>SA1.13 imposes a requirement for employment sites “to demonstrate how the development will encourage like-minded uses such as network clusters for similar technology-based companies”. The justification and planning purpose of applying this requirement to all employment development at the strategic allocations is unclear and it is recommended that it should be deleted.</p>		<p>The requirement to achieve space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>Agreed, the policy as worded assumes all employment development will be technology based.</p>
124.11	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		H1 – Range and mix of housing	<p>Policy should allow for deviation from HEDNA where appropriate for a site.</p> <p>Optional technical standards M4(2) and M4(3) should be justified through evidence.</p> <p>Compliance with WCC Technical Guidance not supported as not subject to same level of scrutiny as plan policies.</p> <p>Policy H1 includes references to issues that might better be addressed within policies. This includes, for example, the Council’s approach to self-build and custom housebuilding. It is suggested that NBBC should review the supporting text at paragraphs 9.1 to 9.17 of the BPR PO and consider which of the requirements within it would more appropriately form the content of additional policies, to enable developers and decision makers to distinguish clearly between development plan policy requirements and explanatory information.</p>		<p>The HEDNA data will be used to determine the housing mix required at the strategic level. Individual applications will need to justify an alternative housing mix.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The evidence which supports the WCC Technical Guidance will need to be examined.</p> <p>The Policy text contains detailed evidence which could contribute towards clearer policy requirements.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
124.12	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		H2 – Affordable housing	<p>First Homes should be addressed in the Local Plan policy and not through the IPS.</p> <p>The requirement for 10% of the number of homes to be allocated for affordable home ownership unless the proposal meets one of the exemption tests in the NPPF does not align entirely with NPPF paragraph 65.</p> <p>Regarding the remainder of the affordable home ownership that is to be delivered, that the tenure sought should be based on up-to-date evidence rather than specifically based on the latest Affordable Housing SPD.</p> <p>There should be flexibility for an alternative tenure mix which should include the submission of a Housing Mix Statement.</p>		<p>First Homes is an evolving national policy which will require local clarification through an IPS. Nonetheless, the Publication version should include a policy which features the most up to date understanding of First Homes.</p> <p>The policy aligns with the NPPF and the WMS and guidance covering First Homes.</p> <p>The Affordable Housing SPD is based on evidence from the Council's Housing Register.</p> <p>The council's Housing Register and HEDNA are an evidence based approach towards tenure mix.</p>
124.13	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		E1 – Nature of employment growth	<p>Focus on use classes B2 and B8 is supported. The Borough Plan Review must recognise the importance of logistics and warehousing development locally and sub-regionally and ensure that such development is appropriately supported.</p> <p>Favourable consideration should be given to logistics development. The inclusion is supported by various studies.</p>		<p>Comment noted.</p> <p>The policy is supported by the HEDNA</p>
124.14	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		HS1 - Ensuring the delivery of infrastructure	<p>The supporting text to Policy HS1 states (at 12.4) that while the infrastructure requirements for each of the strategic sites are outlined in the site-specific policies, any additional on-site infrastructure required for the strategic sites “will be included in the updated Infrastructure Delivery Plan/Schedule”. In order to avoid ambiguity within the site-specific policies, L&Q Estates considers it will be necessary to ensure this updated evidence precedes the final version of the Plan and that clear and justified expectations with regard to infrastructure delivery and contributions are identified within the relevant policies.</p>		<p>Strategic sites will be supported by a range of assessment studies which form the evidence base, including infrastructure requirements.</p>
124.15	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		HS2 - Strategic accessibility and sustainable transport	<p>Requirement to accord with various SPDs is questioned.</p> <p>There is a clear direction in this policy to encourage carbon neutral transport and be resilient to climate change. The necessary infrastructure needs to be provided to achieve these goals and this should be from renewable energy developments.</p>		<p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>Measures to adapt to climate change and deliver net zero are</p>

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							supported in many of the policies throughout the Plan.
124.16	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		HS6 - Sport and exercise	<p>The term 'where justified' requires further clarification in which delivery will be considered justified.</p> <p>The supporting text to Policy HS6 states that “developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site”. It is recommended that the Plan includes further detail on the forum for such collaboration and the role that will be played by NBBC and other relevant bodies.</p>		Infrastructure requirements are set out in the IDP and detailed in the policies for strategic sites.
124.17	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10		BE3 - Sustainable design and construction	<p>Nationally Described Space Standards to all development proposals, needs to be evidenced.</p> <p>point 5 requires all development proposals to meet the higher standard for Building Regulations in regard to water (110 litres per person per day), needs to be evidenced.</p> <p>Policy BE3 residential point 9 seeks to apply requirements that 100% of market housing must meet M4(2) and 5% M4(3) Building Regulations standards, needs to be evidenced.</p> <p>Requirement to comply with current and future SPDs not appropriate.</p>		<p>The requirement to achieve space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p>

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124.18	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10			<p>Following analysis, it is anticipated that additional allocations are likely to be required as a result of further evidence arising, and, as set out in Section 5 of these representations, the Land West of the A444 and south of M6 Junction 3 is considered an appropriate location for removal from the Green Belt and allocation for residential or employment development. To not consider Green Belt sites to prejudge the conclusions of yet to be submitted evidence. L&Q Estates questions some aspects of the scoring of the Site within the schedule to the SA Interim Report:</p> <ul style="list-style-type: none"> • The red score for access to a GP surgery within 800 m is incorrect – the nearest GP surgery to the Site is 712 m away (as noted within the SA). <p>The Site is categorised as red with regard to Tree Preservation Orders due to the presence of the St Giles Church and Land Adjacent Bedworth TPO. This categorisation conflicts with the SHLAA, which finds that development at the Site would have “no/minor impact” on TPOs.</p> <ul style="list-style-type: none"> • Whilst the Site is categorised as red for impacts on a local wildlife site, due to Breach Brook cutting through the Site, this is the lowest category of wildlife designation (the Site score green for all higher categories) and the submitted Vision Document demonstrates how development can come forward sensitively incorporating the brook and avoiding any impacts. • The loss of Grades 1, 2 and 3 Agricultural Land is provided an aggregate score, which does not distinguish between those sites which include the highest grades of agricultural land and those which only contain Grade 3. The Site comprises only Grade 3 Agricultural Land • The use of an 800 m yardstick to gauge accessibility to facilities and public transport masks the overall accessibility of the Site. The Site scores red for access to built up centres, being only 812 m from the nearest built up centre – the SHLAA identifies the Site as “all facilities reasonably accessible”. The scores green for its distance from the nearest railway station (1,167 m) but nevertheless also receives a red score as the distance is greater than 800m 		<p>The HEDNA data will be used to determine the amount of housing and employment land required. A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p> <p>The Sustainability Appraisal will be reviewed for accuracy.</p>
124.19	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10			<p>Neither the quantum of employment land nor the quantum of housing land required during the plan period is yet known. Once the quantum is known, L&Q maintains that the most appropriate option for locating development is to prioritise the most sustainable locations no matter whether it is designated as countryside or Green Belt – which corresponds to Option 3 for the location of residential development and Option C for the location of employment development under the Issues and Options Plan.</p>		<p>The HEDNA data will be used to determine the amount of housing and employment land required.. A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
124.20	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10			<p>The site receives an amber score (some impact) on a number of categories. Several of these scores relate to factors that can be successfully mitigated through design.</p> <p>The Site scores red on three criteria, namely access to public transport services, Public Rights of Way and the site's location in the Green Belt. Public transport is within close proximity; the PRoW could be incorporated into the design; a proposed landscape strategy would create a new Green Belt boundary.</p> <p>The SHLAA states that there are a number of constraints which make the site unsuitable for development and that noise/air pollution, sensitive landscape and flooding constraints would need to be considered in the northern part of the site. - the emerging proposals for the Site have been informed by a number of technical disciplines and there are no suitability constraints to the site coming forward for residential or employment development.</p> <p>The land is under option to a developer and there are no identified constraints.</p>		The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.
124.21	AM	Pegasus Group - L&Q sw of M6 J3 - EXH-10			<p>Plan period - 15 years is the minimum time for a Local Plan. Should increase time period to 30 years to provide certainty. Green Belt boundaries should endure for the whole of the plan period.</p> <p>Evidence - All relevant evidence should be updated before excluding the option of Green Belt release.</p> <p>Duty to Co-operate - Sub-regional HEDNA will need to be addressed before the duty to co-operate can be met.</p> <p>Vision and Objectives - The vision should extend to cover a 30-year time period. Objective 8 should be amended to; "To address climate change by driving sustainability in all new development and supporting proposals for renewable energy development".</p>		<p>The publication version of the Borough Plan will cover the appropriate time period as set out in the NPPF.</p> <p>The Borough Plan will be supported by a range of assessment studies which form the evidence base.</p> <p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out.</p> <p>Renewable energy is addressed in Policy BE2 Renewable and low carbon energy.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
125.01	AM	Pegasus Group - Opus Land			<p>Evidence - All relevant evidence should be updated before excluding the option of Green Belt release.</p> <p>Duty to Co-operate - Sub-regional HEDNA will need to be addressed before the duty to co-operate can be met.</p> <p>Vision and Objectives - The vision should extend to cover a 30-year time period. Objective 8 should be amended to; "To address climate change by driving sustainability in all new development and supporting proposals for renewable energy development".</p>		<p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p> <p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out.</p> <p>Renewable energy is addressed in Policy BE2 Renewable and low carbon energy.</p>
125.02	AM	Pegasus Group - Opus Land		DS1 - Presumption in favour of sustainable development	<p>Duplication of parts of NPPF unnecessary.</p> <p>Reference to UN sustainable goals not supported as ambiguous.</p> <p>Measures to adapt to climate change and delivering net zero not sufficient.</p>		<p>Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.</p>
125.03	AM	Pegasus Group - Opus Land		DS2 – Settlement hierarchy and roles	<p>The policy identifies the northern fringe of Coventry as having "a supporting role for housing, shopping and local services". This does not fully reflect the important role parts of the northern fringe play in the delivery of employment land.</p>		<p>It is considered the policy text reflects the role of the area in the settlement hierarchy.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
125.04	AM	Pegasus Group - Opus Land		DS3 – Development Principles	<p>Supports the aspiration for developments to be resilient to climate change. - No mention of renewable energy developments to support the overall principles, especially when new developments will be prioritised toward previously developed land which can be more constrained to provide sufficient tree and orchard planting.</p> <p>Opus recommends that the wording in Policy DS3 on the use of brownfield land should be reconsidered.</p> <p>Policy DS3 seeks to afford policy status to the full contents of existing (Sustainable Design and Construction SPD) and future supplementary planning documents (“SPDs”) in a way that is inappropriate and cannot be supported.</p> <p>The proposed requirement in Policy DS3 for all new dwellings to comply with the latest Nationally Described Space Standards is not supported, in the absence of clear justification.</p> <p>The inclusion of compliance with the Future Homes and Building Standard within Strategic Policy DS3 is potentially unnecessary as these standards will be required by Building Regulations from 2025.</p> <p>Opus recommend that more clarity is added on the elements that will be considered in assessing whether new development within settlement boundaries will have “a positive impact on amenity, the surrounding environment, and local infrastructure”.</p>		<p>Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.</p> <p>Prioritising the use of brownfield land is accordance with the NPPF Para. 120 which requires policies to give substantial weight to the value of using suitable brownfield land.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The requirement to achieve space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>it is considered that the higher building regulations for energy efficiency and Future Homes and Buildings Standard should be included in the Borough Plan review policy making from its adoption rather than waiting for the new Building Regulations to come into force.</p>
125.05	AM	Pegasus Group - Opus Land		DS4 – Overall development needs	<p>The most appropriate option for locating development is to prioritise the most sustainable locations no matter whether these are designated as countryside or Green Belt and that the Green Belt should not be utilised in a way which would exclude the consideration of the most sustainable options for the allocation of development.</p> <p>The forthcoming Sub-Regional HEDNA is likely to underline existing need for employment growth and additional housing to meet unmet needs and that exceptional circumstances justifying changes to Green Belt boundaries through the Borough Plan Review will be demonstrable.</p>		<p>The HEDNA data will be used to determine the amount of housing and employment land required. A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
125.06	AM	Pegasus Group - Opus Land		DS5 - Residential Allocations	Should it be confirmed through further evidence that additional residential allocations are required to ensure flexibility in supply and meet all identified needs, the Council should consider allocating additional sustainably located sites rather than relying on further alterations to the balance at sites already proposed for allocation.		<p>The HEDNA data will be used to determine the amount of housing and employment land required.</p> <p>The Council will publish the site selection methodology.</p>
125.07	AM	Pegasus Group - Opus Land		DS6 - Employment Allocations	As is the case with residential development, should it be confirmed through further evidence that additional employment allocations are required to ensure flexibility in supply and meet all identified needs, the Council should consider allocating additional sustainably located sites rather than relying on further alterations to the balance at sites already proposed for allocation.		<p>The HEDNA data will be used to determine the amount of housing and employment land required.</p>
125.08	AM	Pegasus Group - Opus Land		DS8 – Monitoring of Housing delivery	A clear set of actions should be set out within Policy DS8, explaining the steps that will be taken by NBBC in the event that housing delivery falls below the required standards.		<p>Any review would be in accordance with the requirements as set out in the NPPF, para 31-33.</p>
125.09	AM	Pegasus Group - Opus Land		DS9 – Review	Early review supported	<p>Mechanism to for a quicker review should include clear evidence of a significant change in the Borough's employment need.</p>	<p>Any review would be in accordance with the requirements as set out in the NPPF, para 31-33.</p>
125.10	AM	Pegasus Group - Opus Land		SA1 - Development principles on strategic sites	<p>Nationally Described Space Standard to all residential development would require clear justification.</p> <p>Concerns regarding the proposed requirement for 100% of residential development on strategic sites to meet the M4(2) Building Regulations standard and 5% of residential development on strategic sites to meet the M4(3) Building Regulations standard. Needs to be evidenced.</p> <p>Requirement to comply with SPDs - not appropriate.</p> <p>SA1.13 imposes a requirement for employment sites “to demonstrate how the development will encourage like-minded uses such as network clusters for similar technology-based companies”. The justification and planning purpose of applying this requirement to all employment development at the strategic allocations is unclear and it is recommended that it should be deleted.</p>		<p>The requirement to achieve space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>Agreed, the policy as worded assumes all employment</p>

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							development will be technology based.
125.11	AM	Pegasus Group - Opus Land		SEA - 6 Bowling Green Lane	<p>Supports proposed allocation.</p> <p>Development principles should align with latest evidence.</p> <p>The wording with regard to the retention of the existing public right of way through the site is amended to allow for the appropriate diversion of the public right of way should this be justified.</p> <p>Should the balance between employment and residential change there will need to be flexibility in the layout requirements.</p> <p>SPDs are material considerations, it is not appropriate to apply design guidance inflexibly and previously adopted Concept Plan SPDs to development proposals for the mixed use development site.</p> <p>The supporting text at 8.113 seeks contributions towards a corridor road improvement scheme based on a 2017 transport modelling report – and Opus would recommend this is amended to allow for contributions to reflect any more up-to-date evidence.</p>		<p>Noted.</p> <p>Updated evidence which will support the Publication version of the Borough Plan.</p> <p>The HEDNA data will be used to determine the amount of housing and employment land required.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The Publication version of the Borough Plan will be informed by an updated STA.</p>

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125.12	AM	Pegasus Group		H1 – Range and mix of housing	<p>Policy should allow for deviation from HEDNA where appropriate for a site.</p> <p>Optional technical standards M4(2) and M4(3) should be justified through evidence.</p> <p>Compliance with WCC Technical Guidance not supported as not subject to same level of scrutiny as plan policies.</p> <p>Policy H1 includes references to issues that might better be addressed within policies. This includes, for example, the Council’s approach to self-build and custom housebuilding. It is suggested that NBBC should review the supporting text at paragraphs 9.1 to 9.17 of the BPR PO and consider which of the requirements within it would more appropriately form the content of additional policies, to enable developers and decision makers to distinguish clearly between development plan policy requirements and explanatory information.</p>		<p>The HEDNA data will be used to determine the housing mix required at the strategic level. Individual applications will need to justify an alternative housing mix.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan. PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p> <p>The evidence which supports the WCC Technical Guidance will need to be examined.</p> <p>The Policy text contains detailed evidence which could contribute towards clearer policy requirements.</p>

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125.13	AM	Pegasus Group - Opus Land		H2 – Affordable housing	<p>First Homes should be addressed in the Local Plan policy and not through the IPS.</p> <p>The requirement for 10% of the number of homes to be allocated for affordable home ownership unless the proposal meets one of the exemption tests in the NPPF does not align entirely with NPPF paragraph 65.</p> <p>Regarding the remainder of the affordable home ownership that is to be delivered, that the tenure sought should be based on up-to-date evidence rather than specifically based on the latest Affordable Housing SPD.</p> <p>There should be flexibility for an alternative tenure mix which should include the submission of a Housing Mix Statement.</p>		<p>First Homes is an evolving national policy which will require local clarification through an IPS. Nonetheless, the Publication version should include a policy which features the most up to date understanding of First Homes.</p> <p>The policy aligns with the NPPF and the WMS and guidance covering First Homes.</p> <p>The Affordable Housing SPD is based on evidence from the Council's Housing Register.</p> <p>The council's Housing Register and HEDNA are an evidence based approach towards tenure mix.</p>
125.14	AM	Pegasus Group - Opus Land		E1 – Nature of employment growth	<p>Focus on use classes B2 and B8 is supported. The Borough Plan Review must recognise the importance of logistics and warehousing development locally and sub-regionally and ensure that such development is appropriately supported.</p> <p>Favourable consideration should be given to logistics development. The inclusion is supported by various studies.</p>		<p>Comment noted.</p> <p>The policy is supported by the HEDNA</p>
125.15	AM	Pegasus Group - Opus Land		HS1 - Ensuring the delivery of infrastructure	<p>The supporting text to Policy HS1 states (at 12.4) that while the infrastructure requirements for each of the strategic sites are outlined in the site-specific policies, any additional on-site infrastructure required for the strategic sites "will be included in the updated Infrastructure Delivery Plan/Schedule". In order to avoid ambiguity within the site-specific policies, Opus considers it will be necessary to ensure this updated evidence precedes the final version of the Plan and that clear and justified expectations with regard to infrastructure delivery and contributions are identified within the relevant policies.</p>		<p>Strategic sites will be supported by a range of assessment studies which form the evidence base, including infrastructure requirements.</p>
125.16	AM	Pegasus Group - Opus Land		HS2 - Strategic accessibility and sustainable transport	<p>Requirement to accord with various SPDs is questioned.</p> <p>There is a clear direction in this policy to encourage carbon neutral transport and be resilient to climate change. The necessary infrastructure needs to be provided to achieve these goals and this should be from renewable energy developments.</p>		<p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>Noted</p>

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125.17	AM	Pegasus Group - Opus Land		HS6 - Sport and exercise	<p>The term 'where justified' requires further clarification in which delivery will be considered justified.</p> <p>The supporting text to Policy HS6 states that “developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site”. It is recommended that the Plan includes further detail on the forum for such collaboration and the role that will be played by NBBC and other relevant bodies.</p>		Infrastructure requirements are set out in the IDP and detailed in the policies for strategic sites.
125.18	AM	Pegasus Group - Opus Land		BE3 - Sustainable design and construction	<p>Nationally Described Space Standards to all development proposals, needs to be evidenced.</p> <p>point 5 requires all development proposals to meet the higher standard for Building Regulations in regard to water (110 litres per person per day), needs to be evidenced.</p> <p>Policy BE3 residential point 9 seeks to apply requirements that 100% of market housing must meet M4(2) and 5% M4(3) Building Regulations standards, needs to be evidenced.</p> <p>Requirement to comply with current and future SPDs not appropriate.</p>		<p>The requirement to achieve space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The requirement to achieve Building Regulations in regard to water (110 litres per person per day) will be supported by evidence or amended accordingly in the publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p>
125.19	AM	Pegasus Group - Opus Land			Neither the amount of employment land nor the amount of housing land required during the plan period is yet known and is open to challenge.		The HEDNA data will be used to determine the amount of housing and employment land required.
126.01	MO	Pinnacle Planning		DS3 – Development Principles	Policy requirement for NDSS needs to be supported by evidence. NDSS; Building for a Healthy Life; Future Homes and Buildings Standard; National Design Guide and net zero requirements should be supported by viability assessment. If adopted there should be a transitional period before the policies are implemented.	Building for a Healthy Life and instead state that its use as a guide for developers should be encouraged. Richborough is of the view that rigorous viability work needs to be provided that tests all modified development management policies, including changes to Building Regulations and likely changes to the NPPF, so as to clearly evidence that they do not	The Council has commissioned an updated viability assessment which will be used to inform the policy. The Publication version of the Borough Plan will be supported by a range of assessment studies which form the evidence base.

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						result in onerous requirements that would prohibit much needed sustainable development being brought forward.	
126.02	MO	Pinnacle Planning		DS4 – Overall development needs	<p>The adopted Borough Plan housing need calculation includes provision for economic uplift. As the standard method is a minimum requirement the economic uplift should be retained due to the reasons outline in Inspectors Final report and poor level of housing delivery.</p> <p>Support the preparation of the Sub-regional HEDNA and is of the view that the figure from the standard method result, plus the affordability ratio - 435 dwellings - represents only the 'starting point'.</p> <p>Consultation is premature and should only take place once the sub-regional HEDNA has been published and key information in regard to housing numbers and employment land is available for comment.</p> <p>The affordable housing need is not directly comparable with the overall housing need, however, the annual need for this tenure clearly needs to be addressed as part of the Local Plan Review. The need for affordable housing should be addressed by allocating more residential sites and factoring this need into an increased housing land requirement.</p> <p>Housing trajectory - Planning applications show North of Nuneaton is the most viable area for housing. A buffer for non-delivery should be added to the overall housing requirement, rather than just small sites, to allow for uncertainties in sites being delivered.</p> <p>Windfall - Any assessment of historic windfall development should only record sites that would have come forward under any circumstances.</p> <p>The proposed timeframe for adoption does not cover the minimum 15 year period, which should be 2040 at the earliest.</p>	<p>An uplift to support economic growth should be retained.</p> <p>The sub-regional HEDNA will likely result in a significant modification that there will need to be further consultation prior to Regulation 19 consultation.</p> <p>There should be a review of sites which have delivered housing to better understand the reasons for delivery.</p> <p>A buffer for non-delivery should be added for all sites not just small sites.</p> <p>Assessment of historic windfall should take account of slow delivery of strategic sites and lack of 5YHLS and only record sites that would have come forward in any circumstance.</p> <p>Plan period should cover period up to 2040 at the earliest.</p>	<p>Comment noted.</p> <p>The HEDNA data is awaited in order to finalise the numbers of residential units and employment required. There are no plans for further consultation prior to Regulation 19 consultation.</p> <p>Amendments to the windfall allowance will be supported by available evidence.</p> <p>There is no evidence to suggest a buffer for non-delivery is required for all sites. The local evidence suggests medium/large sites tend to over deliver.</p> <p>The publication version of the Borough Plan will cover the appropriate time period as set out in the NPPF.</p>

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126.03	MO	Pinnacle Planning		DS5 - Residential Allocations	<p>The BPRPO acknowledges the gap between the identified requirement and the capacity of deliverable sites and confirms that the shortfall will be met by additional housing allocations (strategic and non-strategic). additional strategic and non-strategic allocations should have been included within the BPRPO to ensure sufficient commentary and discussion on the preferred sites.</p> <p>Several non-strategic sites are considered not to be deliverable as defined in the NPPF and PPG. Problems include; sites without historic developer interest; ownership status; site constraints; lack of viability interest. Full analysis of sites included.</p>	<p>N&BBC should identify a deliverable and developable supply that is compliant with national guidance and which meets the identified housing requirement, with the addition of a non-delivery buffer. This should include the identification of additional Strategic Sites.</p> <p>Richborough has an interest in a parcel of land to the north of Nuneaton to the west of Higham Lane.</p> <p>Richborough is promoting this land as a potential draft allocation and can demonstrate that the site is capable of sustainably delivering around 700 dwellings. Benefits of the site included.</p>	<p>The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p>
126.04	MO	Pinnacle Planning		SA1 - Development principles on strategic sites	<p>Policy requires residential development must meet 100% M4(2) and 5% M4(3) standards and meet the requirements set out in other relevant SPDs. Compliance with this optional national standard is also referenced in Policies H1, H2 and BE3. - Requires evidence.</p>	<p>The Council should provide robust justification for the implementation of this optional standard and ensure that the policy takes into account other elements set out in the PPG including viability and site specific factors.</p>	<p>The requirement to achieve optional space standards and building regulations will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan. The requirement will be considered in the viability assessment.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p>

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127.01	AC	The Planning Bureau Limited		Policy H1 – range and mix of housing	100% requirement for M4(3) Housing for specialised housing for older people is not appropriate. No evidence to justify requirement; has negative impact on independence; limits housing choice. Does not conform to PPG Paragraph: 009 Reference ID: 56-009-20150327 and Paragraph: 007 Reference ID: 56-007-20150327.	Recommendation: For all the reasons stated, this part of the Policy should be deleted	PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant. The evidence for the requirement should be set out in the supporting text.
127.02	AC	The Planning Bureau Limited		Policy H2 - Affordable housing	25% affordable housing requirement is not supported by viability assessment.	Recommendation: That the policy is not progressed until such a time that an appropriate Plan wide viability assessment has been carried out and properly consulted upon	The Council has commissioned an updated viability assessment which will be used to inform the policy.
128.01	ZT	Planning Issues Ltd		Policy H1 – range and mix of housing	M4(3) requirements for specialist older persons housing are higher than general needs housing. - NPPF states this should be where it would address an identified need. No evidence to support policy. Policy assumes that a person over 65 will require a wheelchair, which is not appropriate. Policy increase costs of development whilst serving no identified need. PPG Para. 009 states local plan policies for wheelchair accessible homes should only be applied to dwelling the LA is responsible for allocating or nominating a person to live in that dwelling.		PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant. The evidence for the requirement should be set out in the supporting text.
128.02	ZT	Planning Issues Ltd		Policy H2 - Affordable housing	Affordable housing requirement of 25% is not supported by a viability assessment.	The Viability Study should be available to comment on prior to the Regulation 19 consultation.	The Council has commissioned an updated viability assessment which will be used to inform the policy. There are no plans for a consultation prior to the Regulation 19 consultation.
128.03	ZT	Planning Issues Ltd		Policy NE3 - Biodiversity and Geodiversity	The policy of achieving a minimum of 10% net gain for biodiversity is not supported by a Viability Assessment.		The Council has commissioned an updated viability assessment which will be used to inform the policy.

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128.04	ZT	Planning Issues Ltd		Policy BE3 - Sustainable Design and Construction	The sustainable design requirements should be supported by the Viability Assessment. PPG states that the Assessment will ensure the policies are realistic and the cost does not undermine the deliverability of the plan.		The Council has commissioned an updated viability assessment which will be used to inform the policy.
129.01	BF	Planware Ltd		HS7 - Creating a healthier food environment	<p>The 400m Exclusion Zone is Inconsistent with National Policy - NPPF paras.; 81; 82 and PPG Paragraph: 002 (Reference ID: 53-002-20140306); Paragraph: 006 (Reference ID: 53-006-20170728).</p> <p>The Policy is inconsistent, discriminatory and disproportionate - The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools.</p> <p>The Policy is not justified because of a lack of an evidence base.</p> <p>Similar policies have been found unsound when promoted in other plans.</p>	<p>Planware Ltd considers there is no sound justification for Policy HS7 which imposes commercial restrictions on restaurants that include an element of hot food takeaways within a 400m radius from a school or college. The exclusion zone should therefore be removed to provide consistency and to abide by the Framework.</p> <p>Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.</p>	Paragraphs 81 and 82 concern general support for business to encourage economic growth. The policy is consistent with the NPPF para 92 which concerns the enablement of and support of healthy lifestyles and access to healthy food. The policy is consistent with PPG para Paragraph: 004 Reference ID:53-004-20190722 which states policies may need to have particular regard to locations where children and young people congregate such as schools, community centres and playgrounds. The exclusion distance is equivalent to a five-minute walk and it is widely used across the country
130.01	BW	Rosconn Group		DS2 – Settlement hierarchy and roles	Support settlement hierarchy and that growth should be focused in locations which are or can be made sustainable and consider that growth should be allocated in accordance with the hierarchy identified at Policy DS2.		Comment noted.
130.02	BW	Rosconn Group		DS3 – Development Principles	support the general principle of identifying suitable and deliverable brownfield sites for sustainable re-use. However, it is essential that such sites are deliverable within the plan period to ensure sufficient forward supply and delivery of new homes.	suggest deletion of the statement that “New development will be prioritised to previously developed land” and suggest that it is amended to instead “encourage” the delivery of suitable brownfield sites for housing and to also recognise the benefits of allocating suitable sites within existing settlement boundaries	All sites will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
130.03	BW	Rosconn Group		DS4 – Overall development needs	We note that the housing requirement provided by the BPR has not been informed directly by the need to accommodate unmet housing need from Coventry as the work to establish the extent and external apportionment of the city's unmet need is currently ongoing. However, it is evident that the approach within the BPR to setting the housing requirement above the minimum Standard Method/LHN figure will future-proof the BPR process to some degree by providing "headroom" to accommodate unmet need arising from outside the Borough.		NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
130.04	BW	Rosconn Group		SHA-5 – West of Bulkington	<p>Rosconn Strategic Land supports the identification of Land rear of Lilleburne Drive and Willow Close, Nuneaton (Ref NSHA-11) for an allocation of approximately 29 dwellings. The SHLAA notes potential access issues.</p> <p>Strategic Sites/Policy SHA-5 – West of Bulkington: - Whilst we support the general thrust of Policy SHA-5, we consider that certain elements of the draft policy should be reconsidered for soundness reasons.</p> <p>Point 25 of the policy states that: "Any applications will require a concept framework or plan to ensure that all the parcels that make up the allocation can come forward in a comprehensive and cohesive manner. Development proposals should be in accordance with the extant HSG8 Concept Plan SPD.</p> <p>That element of the policy is supplemented through further guidance in the supporting text which states that: "Linkages between the northern and southern parcels should be explored to ensure a comprehensive and integrated redevelopment of the strategic housing site, and to provide permeability through the development, however, this involves third party land not included within the allocation."</p>	<p>The LHA has confirmed that it is content with the proposed site access and so we would request that the SHLAA is updated to reflect this position.</p> <p>It is not clear why applications would require a concept framework or plan to demonstrate comprehensive development when there is already a detailed SPD adopted for this purpose - the HGS8 Concept Plan SPD. The SPD includes a framework plan which clearly shows how the individual parcels link together and it is not clear why applicants would, in effect, need to re-produce this work to support individual planning applications. This element of the policy should be modified to clearly explain what the Council expects in this regard.</p> <p>We do not agree with the clause of the policy which requires development proposals to be in accordance with the HSG8 Concept Plan SPD. This clause would have the effect of elevating a supplementary planning document to the status of a development plan, which would not be sound or</p>	<p>Noted</p> <p>Agreed</p> <p>The policy states the proposals should be in compliance with the SPD. The wording recognises that alternative proposals may be appropriate following detailed assessments which will inform any planning application.</p> <p>The text states linkages between northern and southern parcels should be explored. It is considered to be reasonable to explore the possibility.</p> <p>Noted</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						<p>legally compliant.</p> <p>We do not support the requirement the in supporting text (paragraph 8.68) to provide linkages between the southern and northern parcels of the allocation. Whilst the opportunities for such linkages can be retained to the boundary of each parcel, it is not clear how these can be delivered over land that is not included within the allocation and we would recommend deletion of this paragraph.</p> <p>We note that paragraph 8.73 of the supporting text refers to access points for the southern parcel being from Coventry Road with an additional secondary vehicular access being possible from Leyland Road. We welcome the recognition that access can be provided from Leyland Road albeit this is noted as a secondary access.</p>	

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131.01	PH	RPS Group		DS4 - Overall development needs	<p>In principle, RPS broadly supports and welcomes the Council's seeking an 'alternative' approach which, at face value, could suggest an uplift of 209 dpa over and above the baseline minimum need figure using the standard method. Such an approach is consistent with current practice guidance which emphasises that the use of the standard method in its purest form is not mandatory, and that alternatives are allowed for 'in exceptional circumstances'. Nonetheless, RPS does not agree that the housing requirement should be set at only 646 dpa, instead a higher figure should be considered more appropriate.</p> <p>The updated strategy should reflect (as a minimum) the current adopted levels of growth planned for in the Borough, with a view to increasing the housing requirement to ensure wider housing needs are sufficiently met, including the delivery of more affordable housing.</p> <p>The strategy does not adequately address affordable housing need in the Borough - The overall housing requirement is less than the affordable housing need.</p> <p>The Plan does not seek to address the wider development needs of the CWHMA. The plan review process carried out up to the Preferred Options stage has not considered any reasonable alternatives relating to the ongoing accommodation of any unmet need from other areas within the CWHMA; notably Coventry</p>	<p>The Council take the following practical measures to increase the delivery of much needed affordable housing in the Borough through modifications prior to the next consultation stage.</p> <p>the Council honours its existing commitment in the adopted plan to deliver a proportion of Coventry's unmet need up to 2031 as part of the updated housing requirement up to 2039.</p>	<p>The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p> <p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out.</p>
131.02	PH	RPS Group		DS2 - Settlement hierarchy and roles	<p>the settlement study ignores other factors, including the potential for growth to assist in improving existing infrastructure and services as well as taking opportunities to assist in offering local populations a genuine choice of transport mode, in line with national policy.</p> <p>Deselection of HSG7 - the Council provides no clear evidence to demonstrate the 196 dwellings lost at Bulkington cannot be replaced by alternative sites located at or around Bulkington and that other location should be given preference.</p>	<p>The spatial strategy should have a greater focus on locational issues. This can be achieved by focusing a greater quantum of growth at sustainable locations including Bulkington, which has the potential to accommodate larger scale development.</p>	<p>All sites will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
131.03	PH	RPS Group		DS3 5- Residential allocations	<p>Small sites allocated when there are alternative larger sites that are well located, and which accord with the spatial strategy and settlement hierarchy set out in the POD and which should be allocated through the Local Plan review.</p> <p>RPS has reviewed the analysis presented for the Land at Shilton Lane, Bulkington in the updated SHLAA and disputes the Council's findings: Access, the Council is categorical in its view that this cannot be achieved via Shilton Lane. However, the Council provides no evidence to justify this statement. Furthermore, the view that the access is an absolute constraint on development is not supported by the SHLAA, which scores the Site as 'amber' (major works required). The conclusions of the SHLAA are therefore contradictory and also unjustified. RPS disputes that access will be insufficient for the size of development potential off Shilton Lane. Without sufficient evidence of its own, the Council should remove or amend the reference to highway access from the commentary in the SHLAA.</p> <p>RPS therefore contend that the Land at Shilton Lane has been unfairly treated in the Green Belt study evidence used by the Council to justify excluding the site from potential allocation. When the potential impacts on the Green Belt purposes are considered in the context of the Site, the impact is lower, and this should be reflected in the SHLAA, and the Green Belt evidence relied upon by the Council.</p>		<p>All sites will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p> <p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p>
131.04	PH	RPS Group		DS7 - Green Belt	<p>RPS disputes the approach now being progressed through the POD and that exceptional circumstances do exist to justify releasing Green Belt through the local plan review.</p> <p><u>Unmet</u> need from the wider HMA remains strategic exceptional circumstances that justifies the release of Green Belt through the plan review.</p> <p>RPS contend that land supply issues at Bulkington constitute exceptional circumstances to justify the release of Green Belt at the settlement.</p> <p>RPS contends that the lack of impact on the wider Green Belt purposes from developing the Land at Shilton Lane, Bulkington constitutes local exceptional circumstances that justifies its release from the Green Belt.</p>	<p>RPS recommend that the Council should reconsider its stated position on the Green Belt with regards to the potential need for Green Belt release and the exceptional circumstances needed to justify it.</p>	<p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
131.05	PH	RPS Group			<p>The Council has decided not to publish an updated SA to that which accompanied the Issues and Options consultation document.</p> <p>The scale and nature of the economic (as well as wider sustainability) benefits should be reflected in the appraisal of site options in the SA, including Land at Shilton Lane Bulkington.</p>		The Nuneaton and Bedworth Borough Plan Review: Sustainability Appraisal (2022) is available on the Council's website.
132.01	SF	Tetlow-King Planning		Policy DS5 – Residential allocations	<p>Out of the 26 non-strategic site, 12 sites have various constraints ranging from 'remote from public transport' to 'part within flood zones 2 and/or 3' (details provided). Question the deliverability of the majority of the sites and their ability to achieve the anticipated number of houses allocated. Sites within flood zones 2 and 3 will need to be accompanied by a sequential test to demonstrate that there are no other comparable sites available. If this, then demonstrates that there are no other reasonable alternative tests it is necessary to then undertake the exception test as set out in the PPG before development will be deemed acceptable. This causes uncertainty over suitability of those sites affected by such a constraint.</p>	<p>Clients own a parcel of land to the rear of 2 Royal Oak Lane Coventry. The site comprises approximately 0.8 hectares of Green Belt land. Further details concerning the suite are provided. We consider further assessment of the potential delivery from this site should be considered, even if only to be identified as a reserve site should the other identified allocations fail to deliver the necessary numbers in the first five-year period.</p>	<p>The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p> <p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan</p>
133.01		Tetlow King Planning on behalf of Terra Strategic	Paragraph 7.12	DS3 - Development Principles	<p>We object to the development strategy proposed in the Preferred Options to proceed with option 1. We remain of the opinion that option 1 is not a feasible strategy as there were not enough sites to fulfil the housing requirement of the adopted Borough Plan and the situation has not changed in the three years since the Borough Plan was adopted.</p> <p>Policy DS3 states that development must meet the National Design Guide and National Model Design Codes characteristics and any future Design SPD that would be prepared by the Council. We object to this. It is inappropriate for the policy to require development to meet the requirements of a future design SPD because the requirements of the SPD are unknown and will not be tested at Examination.</p> <p>Policy DS3 also requires development to meet the requirements of a future Sustainable Design SPD. Again, we object to this. It is inappropriate for the policy to require development to meet the requirements of a future Sustainable Design SPD because the requirements of the SPD are unknown and will not be tested at Examination.</p>		<p>Comment noted.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>Agreed, the requirements of a future SPD are not known and will not be tested at Examination.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
133.02		Tetlow King Planning on behalf of Terra Strategic	Paragraphs 7.24, 1.9	DS4 – Overall Development Needs	<p>Plan period - It is positive that NBBC has chosen a forward looking Plan period Starting in 2024 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 it has a minimum timeframe of at least 15 years to comply with the NPPF requirements. The Plan may need to be adjusted depending on the date of the Plan's adoption.</p> <p>Duty to Cooperate - The NPPG is clear that authorities that are unable to provide robust evidence to support a strategy that does not plan for the unmet requirements of another local planning authority may fail the test of compliance with the duty to cooperate or the Plan may be found unsound.</p> <p>Housing Land Requirement - We object to the proposed housing requirement because there are too many unknown variables. The housing requirement proposed in the Preferred Options document is not robust and cannot be relied upon. The housing requirement is incorrect and the next version – the Publication Plan – of the Borough Plan Review should not be published for consultation until the missing evidence base is available and relied upon to calculate the housing requirement.</p>		<p>The Borough Plan will cover the appropriate time as set out in the NPPF.</p> <p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.</p> <p>The publication version of the Borough Plan will cover the appropriate time period as set out in the NPPF.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
133.03		Tetlow King Planning on behalf of Terra Strategic	Paragraph 7.41	DS5 – Residential Allocations	<p>It is important that the Joint Green Belt Study and the Landscape Capacity Study are reviewed and updated, to reflect the existing allocations and recent Green Belt releases, and form the evidence base to identify future growth options.</p> <p>The next version – the Publication Plan – of the Borough Plan Review should not be published for consultation until the missing evidence base is available and relied upon to calculate the housing requirement and residential allocations identified by draft Policy DS5.</p> <p>Deletion of Existing Allocated Sites in Strategic Policy DS5 - Any suggestion that the Strategic Housing Allocations are not deliverable (NPPF definition) seems unwarranted given their recent scrutiny by the Borough Plan Examination Planning Inspector.</p> <p>NBBC has no justification for deleting Strategic Housing Allocations or reducing the number of homes at a Strategic Housing Allocation on the basis that some of those homes have been granted planning permission. The allocation of a site lasts for the duration of the Borough Plan period 15 years. In contrast planning permission only lasts for three years and future application proposals might be necessary that should be able to rely on the site’s allocation. Therefore, we object to the proposal in draft Policy DS4 of the Preferred Options to delete or reduce the number of homes at the Strategic Housing Allocations in the adopted Borough Plan.</p>		<p>A Green Belt review and Landscape Character Assessment will be undertaken to support the Publication version of the Borough Plan.</p> <p>The Publication Plan will be supported by a range of assessment studies which form the evidence base.</p> <p>The reasons for deselection are set out in the SHLAA.</p> <p>The HEDNA data will be used to determine the amount of housing and employment land required.</p>
133.04		Tetlow King Planning on behalf of Terra Strategic		SHA-6 – Land at Former Hawkesbury Golf Course	<p>Support the proposal to delete the key development principle for Policy HSG12 for a canal marina.</p> <p>Object to the proposal in draft Policy SHA-6 of the Borough Plan Review Preferred Options document to reduce the number of dwellings from at least 380 dwellings in Policy HSG12 of the adopted Borough Plan to 176 dwellings. Draft Policy SHA-6 states that the number of dwellings is reduced to account for approval of the full application 036870 for 204 dwellings (380 – 204 = 176 dwellings). However, for the reasons given in our response to draft Policy DS5 Residential Allocations NBBC has no justification for reducing the number of homes at the Strategic Housing Allocation on the basis that some of those homes have been granted planning permission. The allocation of the site lasts for the duration of the Borough Plan period 15 years. In contrast planning permission only lasts for three years.</p>		<p>Noted.</p> <p>The housing figure should include the 204 dwellings from the planning application as permission may lapse, unless building has commenced..</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
133.05		Tetlow King Planning on behalf of Terra Strategic		H1 – Range and Mix of Housing	Carbon neutrality - we ask NBBC to be wary of the way that such policies could impact development viability. Building requirements in the Borough should be reflective of Government requirements. As such the Council should not be seeking to introduce stringent building standards on issues already covered by adopted and emerging national Policy.		The Council has commissioned an updated viability assessment which will be used to inform the policy.
133.06		Tetlow King Planning on behalf of Terra Strategic		DS3 – Development Principles	Space standards - Recommend that meeting the NDSS is not made mandatory unless it can be demonstrated that there is a clear need for such a standard in dwellings in Nuneaton and Bedworth.		The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.
134.01		Tetlow King Planning on behalf of Terra Strategic	7.12	DS3 - Development Principles	Land South of Former Hawkesbury Golf Course - more sites including land south of Hawkesbury Golf Course should be allocated to meet specialist housing needs such as for the elderly. The land south of former Hawksbury Golf Course is surrounded by development that is outside of the Green Belt – to the north by Strategic Housing Allocation HSG12; to the south by dwellings off Sephton Drive; to the west by Bayton Road Industrial Estate; and bordered to the east by Coventry Canal. The site performs poorly in the purposes of the Green Belt; it provides an opportunity for infill development; and should be removed from the Green Belt.		The HEDNA data will be used to determine the amount of housing and employment land required. A Green Belt review will be undertaken to support the Publication version of the Borough Plan.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
134.02		Tetlow King Planning on behalf of Terra Strategic	7.24, 1.9	DS4 – Overall Development Needs	<p>Plan Period 2024 - 2039 - Plan period - It is positive that NBBC has chosen a forward looking Plan period Starting in 2024 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 it has a minimum timeframe of at least 15 years to comply with the NPPF requirements. The Plan may need to be adjusted depending on the date of the Plan's adoption.</p> <p>Duty to Cooperate - The NPPG is clear that authorities that are unable to provide robust evidence to support a strategy that does not plan for the unmet requirements of another local planning authority may fail the test of compliance with the duty to cooperate or the Plan may be found unsound.</p> <p>Housing Land Requirement - We object to the proposed housing requirement because there are too many unknown variables. The housing requirement proposed in the Preferred Options document is not robust and cannot be relied upon. The housing requirement is incorrect and the next version – the Publication Plan – of the Borough Plan Review should not be published for consultation until the missing evidence base is available and relied upon to calculate the housing requirement.</p>		<p>The publication version of the Borough Plan will cover the appropriate time period as set out in the NPPF.</p> <p>NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
134.03		Tetlow King Planning on behalf of Terra Strategic	7.41	DS5 – Residential Allocations	<p>It is important that the Joint Green Belt Study and the Landscape Capacity Study are reviewed and updated, to reflect the existing allocations and recent Green Belt releases, and form the evidence base to identify future growth options.</p> <p>The next version – the Publication Plan – of the Borough Plan Review should not be published for consultation until the missing evidence base is available and relied upon to calculate the housing requirement and residential allocations identified by draft Policy DS5.</p> <p>Deletion of Existing Allocated Sites in Strategic Policy DS5 - Any suggestion that the Strategic Housing Allocations are not deliverable (NPPF definition) seems unwarranted given their recent scrutiny by the Borough Plan Examination Planning Inspector.</p> <p>NBBC has no justification for deleting Strategic Housing Allocations or reducing the number of homes at a Strategic Housing Allocation on the basis that some of those homes have been granted planning permission. The allocation of a site lasts for the duration of the Borough Plan period 15 years. In contrast planning permission only lasts for three years and future application proposals might be necessary that should be able to rely on the site's allocation. Therefore, we object to the proposal in draft Policy DS4 of the Preferred Options to delete or reduce the number of homes at the Strategic Housing Allocations in the adopted Borough Plan.</p>		<p>A Green Belt review and Landscape Character Assessment will be undertaken to support the Publication version of the Borough Plan.</p> <p>The HEDNA data will be used to determine the amount of housing and employment land required.</p> <p>All sites will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p>
134.04		Tetlow King Planning on behalf of Terra Strategic		SHA-6 – Land at Former Hawkesbury Golf Course	<p>Support the proposal to delete the key development principle for Policy HSG12 for a canal marina.</p> <p>Object to the proposal in draft Policy SHA-6 of the Borough Plan Review Preferred Options document to reduce the number of dwellings from at least 380 dwellings in Policy HSG12 of the adopted Borough Plan to 176 dwellings. Draft Policy SHA-6 states that the number of dwellings is reduced to account for approval of the full application 036870 for 204 dwellings (380 – 204 = 176 dwellings). However, for the reasons given in our response to draft Policy DS5 Residential Allocations NBBC has no justification for reducing the number of homes at the Strategic Housing Allocation on the basis that some of those homes have been granted planning permission. The allocation of the site lasts for the duration of the Borough Plan period 15 years. In contrast planning permission only lasts for three years.</p>		<p>Noted.</p> <p>Agreed. The housing figure should include the 204 dwellings from the planning application.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
134.05	JA	Tetlow King Planning on behalf of Terra Strategic		DS3 - Development Principles	Space standards - Recommend that meeting the NDSS is not made mandatory unless it can be demonstrated that there is a clear need for such a standard in dwellings in Nuneaton and Bedworth.		The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.
134.06	JA	Tetlow King Planning on behalf of Terra Strategic		H1 – Range and Mix of Housing	It is evident that none of the existing adopted Borough Plan or Borough Plan Review allocations are required to make provision for C2 residential care development. More sites including land south of Hawkesbury Golf Course should be allocated to meet specialist housing needs such as for the elderly.		The HEDNA data will be used to determine the amount of housing and employment land required.
135.01	IE	Tetlow King Planning on behalf of the West Midlands Housing Association Planning Consortium		DS3 - Development Principles	Space standards - Recommend that meeting the NDSS is not made mandatory unless it can be demonstrated that there is a clear need for such a standard in dwellings in Nuneaton and Bedworth.		The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.
135.02	IE	Tetlow King Planning on behalf of the West Midlands Housing Association Planning Consortium		DS4 - Overall development needs	Duty to Cooperate - The NPPG is clear that authorities that are unable to provide robust evidence to support a strategy that does not plan for the unmet requirements of another local planning authority may fail the test of compliance with the duty to cooperate or the Plan may be found unsound.		NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.
135.03	IE	Tetlow King Planning on behalf of the West Midlands Housing Association Planning Consortium		H2- Affordable housing	It is acknowledged that the proposed policy wording is consistent with the current adopted Borough Plan (2019), it is suggested that the wording be changed to the following to ease interpretation.	Change to; "At least 25% affordable housing is to be delivered where residential development proposals consist of 15 dwellings or more. For residential development proposals that consist of between 11 to 14 dwellings, a contribution of two affordable housing units will be required (irrespective of any demolitions)."	Noted

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
135.04	IE	Tetlow King Planning on behalf of the West Midlands Housing Association Planning Consortium			The Preferred Options document (paragraph 7.24) explains that the missing information includes an updated HEDNA for the Coventry and Warwickshire HMA, and agreements with Coventry and neighbouring Warwickshire authorities on the distribution of any unmet housing need within the Borough. Missing documents also include: a review of the Joint Green Belt Study (LUC 2015); a review of the Landscape Capacity Study (TEP 2017); and Viability Appraisal. Until this missing evidence is available we have no option but to respond that at the moment, the WMHAPC considers that the Borough Plan Review is not sound because the policies in the Preferred Options document are not fully 'justified',		<p>A Green Belt review and Landscape Character Assessment will be undertaken to support the Publication version of the Borough Plan.</p> <p>The HEDNA data will be used to determine the amount of housing and employment land required.</p> <p>All sites will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p>
136.01	JC	Arbury Estate/Savills		DS8	Reference is made in this policy to working with developers and promoters, particularly of the two largest strategic sites, to review the requirements and phasing of infrastructure provision, where such re-phasing would assist with viability. Reference is also made to: "bringing forward additional sites where it can be demonstrated that such sites will assist with delivery to address short-term needs". We consider that it is appropriate for the Council to consider what actions may be appropriate if housing delivery rates were to fall to too low a rate. A similar policy should be proposed for employment development too.		<p>Situations where the Council cannot demonstrate a five housing land year supply or where the Housing Delivery Test indicates that the delivery of housing is less than 75% of the housing requirement over the previous three years will follow process set out in the NPPF, para. 11.</p> <p>Any review would be in accordance with the requirements as set out in the NPPF, para 31-33.</p>
136.02	JC	Arbury Estate/Savills		DS9	The council should consider amending this policy to ensure that a review of the plan is undertaken if it shown that employment needs of the Borough cannot be met from the sites that are allocated within the Borough Plan as adopted.		<p>The HEDNA data will be used to determine the amount of housing and employment land required. Any application for employment would be assessed against the policies in the Plan. A review of the Plan would occur within five years, in accordance with the requirements as set out in the NPPF, para 31-33.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.03	JC	Arbury Estate/Savills		NE2	<p>Criterion 10 of this policy states that: “Open space should provide areas of tree planting of a mix of predominantly native trees, street trees of appropriate species and where appropriate community orchards.”</p> <p>Street trees are not always appropriate, even if the species are considered appropriate. Please see NPPF paragraph 131 which states that planning policies should ensure that new streets are tree lined. However footnote 50 in this paragraph states that this is: “Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate”. The policy should be worded to reflect this footnote and consider that the delivery of street trees should be considered as something that is preferable rather than a hard requirement.</p>		The NPPF para 131 goes on to say planning policies and decisions ensure: ‘...that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards)’. In the case of street trees, the NPPF footnote would apply.
136.04	JC	Arbury Estate/Savills	1.1		<p>We note that reference is made to this preferred options consultation being: “An informal stage between the Issues and Options and Publication stages”. We consider that NBBC should clarify what is meant by “informal” consultation.</p> <p>Evidence base documents missing , including the viability assessment and Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) are required to be published to inform progression of the Plan. We understand that the Coventry and Warwickshire HEDNA is due to be published in late August 2022.</p>		<p>The document states at para. 1.1 that the consultation is an optional informal consultation and that a Regulation 18 consultation was undertaken at the Issues and Options stage.</p> <p>The Council has commissioned an updated viability assessment which will be used to inform the policy.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.05	JC	Arbury Estate/Savills	1.2		<p>Paragraph 1.2 states that the emerging plan will extend the timeframe covered by the adopted Borough Plan until 2039. It is not clear what the Council mean by extending the timeframe, if it is to begin in 2024 and run until 2039. The current plan runs until 2031, so there is an overlap of 7 years. We assume that rather than a straightforward extension, the emerging plan is proposed to supersede the currently adopted Borough Plan on adoption. On the basis that sites are proposed to be removed that are adopted in the currently adopted Plan, the emerging Borough Plan is fundamentally changing, so it is less of a plan extension, and in actual fact a full review.</p> <p>The Council should clarify what form they intend this Borough Plan review to take once it is adopted, and whether it is only the timeframe of the plan being extended, whether all policies will be replaced, or if some may remain adopted, whilst others are revoked / superseded by policies in the emerging Borough Plan. At present the plan being consulted upon is not clear to transparent on which policies are being saved and where previous proposals and policies in the adopted plan are being dropped, what the justification is for these changes.</p> <p>Throughout the consultation document reference is made to: "National Planning Practice Guidance". Reference should instead be made to "Planning Practice Guidance".</p>		The review of the Borough Plan follows the requirements as set out in the NPPF, para 31-33 and includes a review of the policies.
136.06	JC	Arbury Estate/Savills	1.8		We consider that a clear timetable should be set out as to the IDP will be produced. NBBC should undertake a further regulation 18 consultation once these evidence base documents are published. It is unclear how key strategic plan making decisions can be taken without the latest evidence on infrastructure costs being made available.		The Council is preparing an updated IDP and viability assessment which will be used to support the publication version of the Borough Plan.
136.07	JC	Arbury Estate/Savills	3.4		<p>This section of the plan highlights a number of issues associated with the local economy. These include: "There are fewer knowledge-based employment opportunities. If this does not change, there will be fewer jobs in the future and more people will have to look for work outside the borough."</p> <p>Manufacturing and distribution jobs are important for the Borough too. The HEDNA states at paragraph 2.3 that manufacturing accounts for 22% of GVA, and that a similar proportion of GVA is associated with transport, warehousing and retail activities. This demonstrates the strength of these sectors for the economy of the Borough, and that there should not be an undue emphasis on knowledge based employment over other strong industries.</p>		The strategic employment sites include employment uses comprising use classes B2 and B8.

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136.08	JC	Arbury Estate/Savills	3.5		<p>Access to Bermuda Park has been improved with the opening of Bermuda Park train station, which provides an hourly service to Nuneaton, Coventry and Kenilworth, with plans to increase this level of frequency. The lack of public footpaths on the A444 does not prevent access to the wider Bermuda / Griff area. There is access available to the area via Coventry Road (B4113) rather than using Griff Way. Pedestrian crossings and footpaths are available to access Bermuda Park.</p> <p>We assume that when reference is made to A444, that it refers to Bedworth Bypass and Griff Way. Most of the Bedworth Bypass is subject to a 70mph speed limit, and on Griff Way the speed limit is 50mph. It is questionable whether a public footpath would be appropriate here. This statement also does not take into account the benefits being brought about by the Bermuda Bridge connectivity project. Bringing forward development in this location would allow for further improvements to take place and connections around and through sites to be provided.</p>		The paragraph highlights connectivity issues for pedestrians to access Bermuda Park rather than advocating a public footpath.
136.09	JC	Arbury Estate/Savills	7.7		<p>We consider that the Borough is well placed to provide good quality accessible employment sites to reduce the level of out commuting.</p> <p>A high level of out commuting also means that business rates are not retained locally.</p>		Noted.
136.10	JC	Arbury Estate/Savills	7.25		We request further detailed information on how NBBC plan the trajectory to progress up to end of the plan period in 2039. This information does not appear to be available, leading to further concerns regarding the transparency of the plan process.		The Housing Trajectory is available on the from the Evidence Base page on the Council's website.
136.11	JC	Arbury Estate/Savills	7.30		<p>There is clear demand for employment land in the Borough, with industrial & logistics rents having increased by 49% since 2011, indicating new supply has struggled historically to keep pace with the strong demand. This is more than double the rate of inflation over the same period. Given how attractive Nuneaton and Bedworth is to occupiers, there should be consideration for how NBBC should take a proactive role in delivering employment land within the sub-region in order to support economic growth and hence sustainable development.</p> <p>Having reviewed the current HEDNA we are of the opinion that a much larger level of employment need exists in the Borough. Savills analysis suggests that at least circa 30 hectares of additional employment land is required within the Borough, excluding any additional need that may be identified on a sub-regional basis by the Coventry and Warwickshire HEDNA. Ultimately considerations of need for the Borough will also have to account for demand and supply factors from the wider region.</p>		<p>The HEDNA data will be used to determine the amount of housing and employment land required.</p> <p>A Green Belt review will be undertaken to support the Publication version of the Borough Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.12	JC	Arbury Estate/Savills	7.31		Para 7.31 makes the point that the need for strategic warehousing will need to be established at sub regional level. As discussed in response to para 7.30, Savills consider that there is scope for the Borough to target a higher level of employment growth. This is evidenced through analysis of the Nuneaton and Bedworth HEDNA, without consideration of the emerging Coventry & Warwickshire HEDNA. It is therefore unclear why the provision of strategic warehousing needs to be established at a sub-regional level, when there is a level of additional need identified at the Borough level anyway.		The HEDNA data is the most appropriate method to determine the amount of housing and employment land required.
136.13	JC	Arbury Estate/Savills	7.53		At para 7.53 the Council assert that: "It is considered that exceptional circumstances do not exist to justify further green belt release." We consider that exceptional circumstances exist regarding the need for employment development in Bermuda Park; an area that the Council itself has recognised as being a location of regional significance for inward and local investment in policy DS6.		The HEDNA data is the most appropriate method to determine the amount of housing and employment land required. A Green Belt review will be undertaken to support the Publication version of the Borough Plan.
136.14	JC	Arbury Estate/Savills	8.28		We request clarification of the rationale for a density of 28 dwellings per hectare. The policy should acknowledge site specific circumstances for density outside of this range, and not apply a blanket approach across the Borough. (Continue on a separate sheet / expand box if necessary)		Para 8.28 states that some of the site specific policies have noted where alternative densities would be suitable.
136.15	JC	Arbury Estate/Savills	9.16 & 9.17		We support the Council's approach to the provision of self and custom built housing.		Noted.
136.16	JC	Arbury Estate/Savills	BE3		The policy suggests that SPD they must be adhered to, rather than being a consideration in the determination of an application. We consider that as SPD and or design code requirements will not be tested to the same level as the Local Plan, that the Council should only refers to them as guidance or as a consideration. The Optional Technical Housing Standard is 110 litres per day per person, if the Council wishes to adopt the optional standard for water efficiency, then the Council should justify doing so by applying the criteria set out in the PPG1. The section of the policy in relation to residential development states that major development proposals must provide a statement showing how their proposal will meet the 100% requirement for M4(2) and the 5% requirement for M4(3) standards. We have concerns in relation to this requirement have been set out previously. The PPG2 is clear that LPAs need to gather appropriate evidence to justify the use of such standards in their area.		It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan. The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan. PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
							worded requires 5% of all schemes to be M4(3) compliant.
136.17	JC	Arbury Estate/Savills	DS1		<p>Part of this policy states that: "Development will need to address the prudent use/safeguarding of natural resources, adaptation to climate change and transition to a net zero carbon economy. This will include the planting of trees and orchards and sustaining and enhancing the historic environment."</p> <p>We question what the specific low and zero carbon requirements for development are? There is perhaps a need for a specific policy in relation to low and zero carbon requirements to ensure there is a suitable level of clarity. Reference to the requirement for planting of trees and orchards is also questionable. We are not clear what the Council's justification for requiring this planting is, and whether this requirement applies to all new development sites, regardless of size or scale.</p>		<p>The policy refers to open space, the NPPF para 131 states that should planning policies and decisions ensure: '...that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards)'. It is consider the policy is in accordance with the NPPF.</p> <p>Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.</p>
136.18	JC	Arbury Estate/Savills	Policy DS5		<p>HSG4 is a policy within the currently adopted Borough Plan. The emerging Borough Plan does not contain this policy, in effect de-allocating Woodlands for residential development. The sustainability appraisal states at footnote 1 of page 11 that this is in relation to the deliverability of the site. We refute this, as the Borough Plan was only adopted in June 2019, meaning it has only been in place for just over two years.</p>		<p>The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.19	JC	Arbury Estate/Savills	Policy DS6		<p>The proposed portfolio of employment land within Nuneaton & Bedworth is deficient for a number of reasons:</p> <ol style="list-style-type: none"> 1. There is insufficient provision of strategic scale land (25Ha +) , of which there is an acknowledged urgent need regionally within the West Midlands, and as forthcoming evidence will likely demonstrate, also within the sub-region. 2. The majority of sites are smaller scale. The only site of strategic scale is Faultlands; this is being delivered and is likely to be taken up in very short timescales. <p>Good progress is being made on nearly all the sites in terms of bringing them forward through the planning process and it is therefore a very real possibility that the Borough could have little or no available employment land for the majority of the Plan Period without significant further allocations.</p>		The HEDNA data will be used to determine the amount of housing and employment land required.
136.20	JC	Arbury Estate/Savills		E1	<p>Aside from Faultlands (which is being built out) No strategic (i.e. 25ha +) employment sites have been included as draft allocations in the Borough Plan. The policy should be worded to make reference to the need for a varied portfolio of draft employment allocations, including strategic sites. Reference should also be made to the high levels of out commuting from the Borough, and how this will tackled through the Borough Plan.</p>		The policy concerns the nature of employment rather than strategic employment sites. The HEDNA data will ultimately be used to determine the amount of housing and employment land required.
136.21	JC	Arbury Estate/Savills		E2	<p>It should be noted that of the 22 sites that are set out in the Council as existing employment sites, only 3 of them are of a strategic nature. 17 of the sites are less than 10 hectares, showing that there is both a shortfall in medium sized and strategic sites.</p>		The HEDNA data will be used to determine the amount of housing and employment land required.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.22	JC	Arbury Estate/Savills		H1	<p>A number of additional technical standards in relation to homes for older people and other specialised housing are mentioned in this policy. The PPG1 is clear that LPAs need to gather appropriate evidence to justify the use of such standards in their area. We are also concerned as to the status of the WCC Guidance referred to in the policy. We would suggest unless the requirements are to be tested to the same standards as the Borough Plan that it would not be appropriate to require it to be complied with.</p> <p>The last paragraph of the policy states that: "Housing is required to consider the fundamentals of climate change and achieving carbon neutral emissions by 2050 within their design." The Council should provide more detail on what this means in practice, and the specific criteria they require developments to meet in order to comply with this requirement.</p> <p>The supporting text of Policy H1 - In supporting text of policy H1, reference is made to "older people" and "people with a disability" and what is required for them. This is based on 2013 SHMA and the 2022 HEDNA, which itself is partly based on 2011 census data. It is therefore limited as to what the validity of the these documents are for drawing conclusions from in relation to the provision of housing for older people and people with a disability.</p>		<p>The HEDNA data will be used to determine the housing mix required at the strategic level. Individual applications will need to justify an alternative housing mix.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The evidence which supports the WCC Technical Guidance will need to be examined.</p>
136.23	JC	Arbury Estate/Savills		H2	<p>25% affordable housing is required, which is the same as the adopted plan. Latest viability work for currently adopted plan was undertaken in 2016, meaning that a revised viability assessment is required to be undertaken and consulted upon before this figure can be confirmed.</p>		<p>The Council has commissioned an updated viability assessment which will be used to inform the policy.</p>
136.24	JC	Arbury Estate/Savills		HS2	<p>Criterion 1 states that one of the issues to be considered is: "How the development ensures adequate accessibility in relation to all principal modes of transport to drive carbon neutrality and resilience to climate change."</p> <p>This is a broad requirement, with no reference made to the recently adopted Warwickshire Design Guide, which is particularly relevant to highways. and further clarity on the specific requirements of the policy is required.</p>		<p>Para. 12.21 provides greater clarity concerning the requirements of point 1 of the policy.</p> <p>The Warwickshire Design Guide is referenced in point 7 of the policy.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.25	JC	Arbury Estate/Savills		HS4	<p>Taking on board this policy, it appears that sites such as NSHA-3 / BAR-1: Former Manor Park School Playing Field, Nuneaton should be retained. It is unclear whether the development of this site meet the criteria of it being no longer demand for the use or no longer viable / appropriate.</p> <p>It appears that this site is currently part of a recreation ground and is open and publicly accessible for members of the public to utilise. Further evidence is also required to be provided in relation to evidencing that paragraph 99 of the NPPF can be complied with in view of the site being allocated as a non-strategic site for development. Until this can be demonstrated, and the subject of clear and transparent evidence base, the site is in effect undeliverable.</p>		The Council's updated Playing Pitch strategy will support the Publication version of the Borough Plan.
136.26	JC	Arbury Estate/Savills		NE1	<p>We note that reference is made to a requirement for a 50m buffer to ancient woodland. This is not justified. Government Guidance called: "Ancient woodland, ancient trees and veteran trees: advice for making planning decisions" produced by Natural England and Forestry Commission states that: "For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area)".</p> <p>Policy NE1 should be amended to reflect this standing advice.</p> <p>We also note that reference is made to: "b. Creating a country/community park at Arbury in order to increase access to nature, and to provide new habitat and corridors to link to Bermuda Lakes and the Coventry Canal."</p> <p>Further details are required about how this is to be delivered.</p> <p>When refence is made to "Arbury". We question whether is this in relation to the current HSG2: Arbury allocation or the wider Arbury ward perhaps? To ensure links to Bermuda Lakes and the Coventry Canal there is a need to cross third party land.</p> <p>Coventry Canal is at least approximately 0.8 miles from the edge of the site, and there is a need to cross roads and through existing development to reach the canal. The Council should provide evidence of how this is achievable in this context.</p>		<p>Guidance refers to a buffer of <u>at least</u> 15 meters, the proposal is likely to need a larger buffer from development that results in a significant increase in traffic.</p> <p>The community park refers to the current HSG2 Arbury and is carried forward in the BPR as SHA-2.</p> <p>Agreed - it is unclear how the provision of new habitat and corridors to link to Bermuda Lakes and the Coventry Canal can be achieved.</p>
136.27	JC	Arbury Estate/Savills		NE5	<p>Reference is made in the policy to a Land Use Designations Study. These assessments are dated 2011 to 2012. In addition the Nuneaton & Bedworth Landscape Capacity Study was produced in 2017, so also out of date, particularly considering recent developments in the Borough. A revised policy should then be considered in light of updated evidence base.</p>		A Landscape Character study has been commissioned an updated viability assessment which will be used to inform the policy.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.28	JC	Arbury Estate/Savills		SA1	<p>A list of strategic sites should be included within this policy to make it clear of the sites which are classed as strategic. The Council should also clarify what viability testing has been undertaken to support the allocation of strategic policies.</p> <p>Criterion 1 We question what evidence base has been produced to justify the additional technical standards set out in criterion 1 of this policy. PPG1 is clear that LPAs need to gather appropriate evidence to justify the use of such standards in their area. This is further reinforced by footnote 49 to paragraph 130 f) of the NPPF which states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties.</p> <p>Criterion 9 The requirement to retain ridge and furrow should only apply where it is of a value that it would be deemed reasonable to protect. Not all ridge and furrow is of a state that warrants protection, and such a blanket policy is not appropriate and should be proportionate to the state of the ridge and furrow that is present.</p> <p>Criterion 12 Further clarification is required regarding the wording of this criterion of the policy. It is unclear whether the requirement applies to outline applications only, or if reserved matters will also be considered. It would also be useful to understand what evidence would be deemed suitable by the Council in respect of this policy criterion. Not all landowners have aligned interests and so this policy potentially becomes a ransom to delivery of otherwise deliverable sites.</p> <p>Criterion 15 Point 15 looks for proposals to comply with the requirements of the relevant Concept Plan SPD and Design Code. We do not consider this requirement is appropriate as these documents are not being tested and examined as part of the Local Plan. We consider it would be more appropriate to make reference to the SPD and Design Codes as guidance rather than a requirement. Otherwise the SPD and Design Code should be the subject of wider public consultation form part of the Borough Plan evidence base.</p> <p>Viability The final paragraph of this policy states that if any requirements of this policy are considered unviable, then an independent viability assessment must be submitted with the planning application. We welcome consideration that all requirements are not always simultaneously viable on all sites. However, this policy would be better informed by a viability assessment undertaken by the Council in support of the Borough Plan review.</p>		<p>Section 8.0 Strategic Allocations of the BPR contains the details of the strategic sites.</p> <p>The Council has commissioned an updated viability assessment which will be used to inform the policy.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The policy requirement to retain ridge and furrow applies where possible. It is considered the wording provides flexibility between sites.</p> <p>The intention of point 12 is that in the event of a part submission of a strategic site, the proposal will need to illustrate that the applicant has worked with owners of the other parts of the allocation. Some judgment will be required as to when it will be necessary to demonstrate cooperation between different sites.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.29	JC	Arbury Estate/Savills		SA Appraisal – Appendix C Site Appraisal Matrix	<p>It would be useful to have a plan of submitted sites to provide a helpful spatial context. A number of the sites submitted have the same name and or similar names to each other, which makes precise identification of the sites in question extremely difficult. No conclusions are reached in this document. It is not clear what the respective scoring means for the consideration of the development potential of the site. We appreciate that summary of site's credentials is provided in the SHLAA, but it is not clear how the data set out in appendix C has influenced this.</p> <p>Not all categories that employment sites are assessed against appear relevant. This includes: Distance to doctors surgery , primary school, sports / recreation facilities etc. Employment is more related to distance to transport links, other similar uses for to build up an agglomeration and critical mass of skills & knowledge in a particular sector etc.</p>		<p>The plan of sites is available on the Council's consultation website.</p> <p>Employment sites will be assessed in the Council's updated HELAA which be support the publication version of the Plan.</p>
136.30	JC	Arbury Estate/Savills		SEA 4	<p>Arbury Estate is a landowner at SEA-4 - Coventry Road. Arbury Estate is working collaboratively with fellow landowner Warwickshire County Council to bring development forward. This site is allocated within the currently adopted Borough Plan. The allocation and policy wording is the same as is currently adopted. Arbury Estate support the site continuing to be allocated in the emerging Borough Plan. Arbury Estate is currently working pro-actively to bring forward development proposals at this site. Pre-application dialogue with NBBC is ongoing, and written advice has been recently been received.</p>		Noted.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.31	JC	Arbury Estate/Savills		SHA-2 - Arbury	<p>As the single landowner of this site, Arbury Estate is supportive of proposals to continue the allocation of the site within the emerging Borough Plan review.</p> <p>Criterion 33 of the policy states that: "Development proposals must comply with the requirements of the latest adopted Concept Plan SPD and design Code SPD". The policy suggests that these documents must be adhered to, rather than being a consideration in the determination of an application. We consider that as SPD and or design code requirements will not be tested to the same level as the Borough Plan, that the Council should only refer to them as guidance or as a consideration.</p> <p>Bullet point 4 of the policy makes reference to the provision of a distributor link road through the site. We consider that reference should be made within the policy and / or supporting text to how the design of this road will need to comply with the requirements of the Warwickshire Design Guide.</p> <p>Bullet point 15 makes reference to: "...New woodland should be buffered on its eastern side by open space, which the existing houses should face." We are not clear why new woodland is required to buffer on the eastern side by open space. We request further clarification of the rationale for this area of buffer.</p> <p>Bullet point 20 of the policy makes reference to a maximum building height of two stories. We consider that there should be scope allowed for taller buildings, such as three storey townhouses where appropriate.</p> <p>Bullet point 23 makes reference to a minimum buffer zone of 100m to Ensor's Pool. We object to a 100m buffer being required to Ensor's Pool. The document notes that further ecological work is required. Therefore, until this work has been undertaken it is premature to calculate the most appropriate buffer to Ensor's Pool.</p> <p>Bullet point 24 makes reference to creating a significant area of grassland habitat to strengthen a south-north national flow around the west of Nuneaton. We request clarification as to what this is, and what is involved in delivering it.</p>		<p>Noted.</p> <p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The Warwickshire Design Guide is referenced in Policy HS2</p> <p>Edge treatments and landscape buffers align with the policy requirements and recommendations of the 2017 Landscape Capacity Study for the site. Development should be at a maximum height of two storeys with the aim of screening views of the urban edge entirely behind woodland. Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. Regarding Ensor's Pool it would be remiss of the Council to neglect the need for a buffer zone around the site. Formal public open space to be provided with a new community park to be provided forming an open space and habitat corridor linking Ensor's Pool and the local wildlife sites to the south. Further details can be found in the HSG2 Concept Plan. SPD.</p>
136.32	JC	Arbury Estate/Savills		Sustainability Appraisal – Second Interim Report: Regulation 18	<p>Bedworth Train station is a key sustainability feature which should also be included on the map.</p> <p>The proposed train stations at Galley Common / Stocking ford should be highlighted on the map as proposed stations.</p>		<p>Figure 2.1 shows the plan area, rather than sustainable features to consider.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.33	JC	Arbury Estate/Savills	1.6		Paragraph 1.6 states that a range of further evidence base documents are required to inform policy requirements going forward, and it is set out where this is required and which documents are required, but yet to be produced. Para 1.6 states that: "In particular, an updated 2022 Viability Assessment is in production and that will inform policy requirements going forward". A clear timetable should be set out as to when such important documents are being produced. NBBC should undertake a further regulation 18 consultation once these evidence base documents are published. At present the plan review being undertaken lacks transparency.		The Publication version of the Borough Plan will be supported by a range of assessment studies which form the evidence base. The timetable for the Borough Plan Review can be found in the Council's Local Development Scheme.
136.34	JC	Arbury Estate/Savills	1.9		<p>The consultation document has a single paragraph set aside to discuss Duty to Cooperate. No evidence is made to meetings that have taken place, and how the plan is supported by any clear supporting evidence in respect of strategic matters that have been discussed.</p> <p>We are unclear how the Duty to Cooperate can be met when stakeholders only have the ability to comment on NBBC's proposed approach at the Regulation 19 consultation. This is a fundamental point, and further reinforces the need for a further Regulation 18 consultation is undertaken, once NBBC are clear what their proposed approach to Duty to Cooperate is. Gathering of this evidence should already have taken place. We consider that for the engagement between stakeholders involved in the duty to Cooperate process to take place constructively, actively and on an ongoing basis in the context of strategic cross boundary matters¹. That no evidence is being made available means the Borough Plan review process is lacking transparency.</p> <p>It should be noted that from review of the Matters, Issues and Questions posed by Inspectors of the examination of other Local Plans, reference is often made to providing evidence for the duty to cooperate. For example, at the current Shropshire examination, the Inspector has posed the question asking evidence to be provided regarding the: "type, timing, duration and extent of duty to cooperate activity and the availability of supporting evidence for that activity." 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 determined². We would therefore suggest that NBBC engage with Coventry City Council (and other Warwickshire authorities) and agree a Statement of Common Ground regarding Coventry's expected unmet housing and employment need. This statement can then be updated and refined throughout the plan making process, as required by the</p>		NBBC recognise that the Duty to Cooperate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
					PPG. 1		
137.01	JC	FCC/Savills	9.16 / 9.17		<p>We support the Council's approach to the provision of self and custom built housing. The Council is right to take this approach, as opposed to the approach of some other LPAs who seek to require a certain percentage of self and custom built provision on allocated sites for example.</p> <p>The very nature of self and custom build housing means that it is difficult to plan for precise locations of delivery. This is particularly the case in light of the Council asserting that there is limited demand for self-build and custom housebuilding serviced plots of land across the Borough in paragraph 9.17.</p>		Noted.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.02	JC	FCC/Savills		BE3	<p>The policy suggests that SPD they must be adhered to, rather than being a consideration in the determination of an application. We consider that as SPD and or design code requirements will not be tested to the same level as the Local Plan, that the Council should only refers to them as guidance or as a consideration.</p> <p>The Optional Technical Housing Standard is 110 litres per day per person, if the Council wishes to adopt the optional standard for water efficiency, then the Council should justify doing so by applying the criteria set out in the PPG1.</p> <p>The section of the policy in relation to residential development states that major development proposals must provide a statement showing how their proposal will meet the 100% requirement for M4(2) and the 5% requirement for M4(3) standards. We have concerns in relation to this requirement have been set out previously. The PPG2 is clear that LPAs need to gather appropriate evidence to justify the use of such standards in their area.</p>		<p>It is agreed that the wording used in the policy elevates the importance of SPDs in relation to the local plan.</p> <p>The requirement to achieve optional space/technical standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>PPG states wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The policy as worded requires 5% of all schemes to be M4(3) compliant.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.03	JC	FCC/Savills		DS5	<p>We support the inclusion of land at Judkins as allocation SHA-3 – Judkins for 400 dwellings, which is the subject of separate representations submitted by Axis on behalf of FCC Environment. A call for sites form was submitted in respect of FCC's wider land holding at the Judkins site and the potential for a residential led mixed use development to come forward. The site is listed in the SHLAA as CAM-2 – Former Judkins Quarry, north west of Nuneaton (previous refs: NUN099, NUN161). The SHLAA concludes that the site is not to be taken forward for further consideration. We question why further consideration has not been given to the site's inclusion, considering its brownfield status, and ability to provide an expansion to what is currently the Borough's only brownfield residential allocation (HSG11 – Judkins). This would support the Council's aspiration for development to be primarily directed towards brownfield sites. FCC's land at Judkins and other surrounding land holdings is considered for inclusion. This opportunity could begin to be delivered within the proposed 15 year plan period, and potentially has a capacity of 3,000 – 5,000 dwellings. This could include wider land holdings outside of their ownership to bring forward a wider development area. Subject to further discussions this could include other land holdings outside of their ownership to enable delivery of a strategic link road from the B4114 to A444 and A5.</p> <p>The principle of such a northern relief road was considered within an area wide paramics model, developed by Vectos Microsim, which provided results presented in the Strategic Transport Assessment (2017). Whilst the modelling analysis indicated that the route would significantly improve network stability as well as improving journey times, geographical constraints were noted as potentially being cost prohibitive. The inclusion of a strategic development at this location would potentially provide a mechanism for bringing forward the necessary infrastructure.</p> <p>We have reviewed the analysis of CAM-2 in the SHLAA. We disagree with the assessment's conclusion that the site is not accessible by bus. No buses currently run though the site, because there is no development that warrants it. However, the site entrance is located 200m from bus stops, which are served by a frequent bus services including the following amongst others:</p> <ul style="list-style-type: none"> • 48a / 48c – every 30 mins to Atherstone and Coventry • <p>Various buses into / from Nuneaton town centre, providing a frequent service of more than one bus every 10 mins on weekdays</p> <p>Amber landscape issues are highlighted by the assessment. However, a summary of 2012 landscape study seems to suggest that any perceived constraints can be overcome. As set out above the landscape work should be reviewed and revised as</p>		The site will be assessed in the Council's updated HELAA which will support the Publication version of the Borough Plan.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
					<p>appropriate. It is likely out of date, particularly considering recent developments in the Borough.</p> <p>The site is assessed as “red” in the Local Wildlife Site and Local Geological Site categories. These designations only cover part of the site, and mitigation may be possible to remove these issues as part of a comprehensive development. For example, FCC Environment have received initial advice from Natural England that relocation of Great Crested Newts currently on site, and the mitigation for the loss of habitats from development may be acceptable in principle. FCC have already purchased land nearby with a view to allow this to be facilitated. This is positive in demonstrating that there is potentially scope for development on the LWS portion of the site.</p> <p>Integration with settlement is highlighted as an amber issue. We disagree, the site connects well in the urban area. It is currently a former industrial area, with some existing employment uses. However the character could be changed, and it’s location allows for incorporation into the existing urban area</p> <p>Other assessments around contaminated land and natural features for example appear to mostly be based on desktop assessments, which may not provide an accurate picture of the technical considerations for the site. We also question why no assessment of the suitability, availability and achievability of the site has taken place. This should be undertaken to justify the Council’s decision whether to include the site in the Borough Plan review.</p> <p>NSHA-3 / BAR-1: Former Manor Park School Playing Field We note that one of the largest non-strategic sites proposed is NSHA-3 / BAR-1: Former Manor Park School Playing Field. It appears that this site is currently part of a recreation ground and is open and publicly accessible for members of the public to utilise. Further evidence needs to be provided that paragraph 99 of the NPPF can be complied with in view of the site being allocated as a non-strategic site for development. Until this can be demonstrated the site is considered to be undeliverable. Further evidence from the Council would assist in providing a greater understanding of this proposed allocation.</p>		
137.04	JC	FCC/Savills		DS8	<p>Reference is made in this policy to working with developers and promoters, particularly of the two largest strategic sites, to review the requirements and phasing of infrastructure provision, where such re-phasing would assist with viability.</p> <p>Reference is also made to: “bringing forward additional sites where it can be demonstrated that such sites will assist with delivery to address short-term needs”. We consider that it is appropriate for the Council to consider what actions may be appropriate if housing delivery rates were to fall to too low a rate. A similar policy should be proposed for employment development too.</p>		Any review would be in accordance with the requirements as set out in the NPPF, para 31-33.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.05	JC	FCC/Savills		DS9	The council should consider amending this policy to ensure that a review of the plan is undertaken if it shown that employment needs of the Borough cannot be met from the sites that are allocated within the Borough Plan as adopted.		Any review would be in accordance with the requirements as set out in the NPPF, para 31-33.
137.06	JC	FCC/Savills		HS2	Criterion 1 states that one of the issues to be considered is: "How the development ensures adequate accessibility in relation to all principal modes of transport to drive carbon neutrality and resilience to climate change." This is a broad requirement, with no reference made to the recently adopted Warwickshire Design Guide, which is particularly relevant to highways. and further clarity on the specific requirements of the policy is required. In relation to criterion 5, it is unclear how development can provide all of the provisions set out in criterion 5. It is unclear how viable / deliverable the provision of such facilities is.		Para. 12.21 provides greater clarity concerning the requirements of point 1 of the policy. The Warwickshire Design Guide is referenced in point 7 of the policy.
137.07	JC	FCC/Savills		HS4	Taking on board this policy, it appears that sites such as NSHA-3 / BAR-1: Former Manor Park School Playing Field, Nuneaton should be retained. It is unclear whether the development of this site meet the criteria of it being no longer demand for the use or no longer viable / appropriate. It appears that this site is currently part of a recreation ground and is open and publicly accessible for members of the public to utilise. Further evidence is also required to be provided in relation to evidencing that paragraph 99 of the NPPF can be complied with in view of the site being allocated as a non-strategic site for development. Until this can be demonstrated, and the subject of clear and transparent evidence base, the site is in effect undeliverable.		The Council's updated Playing Pitch strategy will support the Publication version of the Borough Plan.
137.08	JC	FCC/Savills		NE1	We note that reference is made to a requirement for a 50m buffer to ancient woodland. This is not justified. Government Guidance called: "Ancient woodland, ancient trees and veteran trees: advice for making planning decisions" produced by Natural England and Forestry Commission states that: "For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area)". Policy NE1 should be amended to reflect this standing advice.		Guidance refers to a buffer of at least 15 meters, the proposal is likely to need a larger from development that results in a significant increase in traffic.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.09	JC	FCC/Savills		NE2	<p>Criterion 10 of this policy states that: “Open space should provide areas of tree planting of a mix of predominantly native trees, street trees of appropriate species and where appropriate community orchards.”</p> <p>Street trees are not always appropriate, even if the species are considered appropriate. Please see NPPF paragraph 131 which states that planning policies should ensure that new streets are tree lined. However footnote 50 in this paragraph states that this is: “Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate”.</p> <p>The policy should be worded to reflect this footnote and consider that the delivery of street trees should be considered as something that is preferable rather than a hard requirement.</p>		The NPPF para 131 goes on to say planning policies and decisions ensure: ‘...that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards)’. In the case of street trees, the NPPF footnote would apply.
137.10	JC	FCC/Savills		NE5	<p>Reference is made in the policy to a Land Use Designations Study. These assessments are dated 2011 to 2012. In addition the Nuneaton & Bedworth Landscape Capacity Study was produced in 2017, so also out of date, particularly considering recent developments in the Borough. A revised policy should then be considered in light of updated evidence base.</p>		A Landscape Character study has been commissioned an updated viability assessment which will be used to inform the policy.
137.11	JC	FCC/Savills	1.1		<p>We note that reference is made to this preferred options consultation being: “An informal stage between the Issues and Options and Publication stages”. We consider that NBBC should clarify what is meant by “informal” consultation.</p> <p>Evidence base documents missing , including the viability assessment and Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) are required to be published to inform progression of the Plan. We understand that the Coventry and Warwickshire HEDNA is due to be published in late August 2022.</p>		<p>The document states at para. 1.1 that the consultation is an optional informal consultation and that a Regulation 18 consultation was undertaken at the Issues and Options stage.</p> <p>The Council has commissioned an updated viability assessment which will be used to inform the policy.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.12	JC	FCC/Savills	1.2		<p>Paragraph 1.2 states that the emerging plan will extend the timeframe covered by the adopted Borough Plan until 2039. It is not clear what the Council mean by extending the timeframe, if it is to begin in 2024 and run until 2039. The current plan runs until 2031, so there is an overlap of 7 years. We assume that rather than a straightforward extension, the emerging plan is proposed to supersede the currently adopted Borough Plan on adoption. On the basis that sites are proposed to be removed that are adopted in the currently adopted Plan, the emerging Borough Plan is fundamentally changing, so it is less of a plan extension, and in actual fact a full review.</p> <p>The Council should clarify what form they intend this Borough Plan review to take once it is adopted, and whether it is only the timeframe of the plan being extended, whether all policies will be replaced, or if some may remain adopted, whilst others are revoked / superseded by policies in the emerging Borough Plan. At present the plan being consulted upon is not clear to transparent on which policies are being saved and where previous proposals and policies in the adopted plan are being dropped, what the justification is for these changes.</p> <p>Throughout the consultation document reference is made to: "National Planning Practice Guidance". Reference should instead be made to "Planning Practice Guidance".</p>		The review of the Borough Plan follows the requirements as set out in the NPPF, para 31-33 and includes a review of the policies.
137.13	JC	FCC/Savills	1.8		We consider that a clear timetable should be set out as to the IDP will be produced. NBBC should undertake a further regulation 18 consultation once these evidence base documents are published. It is unclear how key strategic plan making decisions can be taken without the latest evidence on infrastructure costs being made available.		The Council is preparing an updated IDP and viability assessment which will be used to support the publication version of the Borough Plan.
137.14	JC	FCC/Savills	7.25		We request further detailed information on how NBBC plan the trajectory to progress up to end of the plan period in 2039. This information does not appear to be available, leading to further concerns regarding the transparency of the plan process.		The Housing Trajectory is available on the from the Evidence Base page on the Council's website.
137.15	JC	FCC/Savills	8.28		We request clarification of the rationale for a density of 28 dwellings per hectare. The policy should acknowledge site specific circumstances for density outside of this range, and not apply a blanket approach across the Borough.		Para 8.28 states that some of the site specific policies have noted where alternative densities would be suitable.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.16	JC	FCC/Savills	1.6		Paragraph 1.6 states that a range of further evidence base documents are required to inform policy requirements going forward, and it is set out where this is required and which documents are required, but yet to be produced. Para 1.6 states that: "In particular, an updated 2022 Viability Assessment is in production and that will inform policy requirements going forward". A clear timetable should be set out as to when such important documents are being produced. NBBC should undertake a further regulation 18 consultation once these evidence base documents are published. At present the plan review being undertaken lacks transparency.		The Publication version of the Borough Plan will be supported by a range of assessment studies which form the evidence base. The timetable for the Borough Plan Review can be found in the Council's Local Development Scheme.
137.17	JC	FCC/Savills	1.9		<p>The consultation document has a single paragraph set aside to discuss Duty to Cooperate. No evidence is made to meetings that have taken place, and how the plan is supported by any clear supporting evidence in respect of strategic matters that have been discussed.</p> <p>We are unclear how the Duty to Cooperate can be met when stakeholders only have the ability to comment on NBBC's proposed approach at the Regulation 19 consultation. This a fundamental point, and further reinforces the need for a further Regulation 18 consultation is undertaken, once NBBC are clear what their proposed approach to Duty to Cooperate is.</p> <p>Gathering of this evidence should already have taken place. We consider that for the engagement between stakeholders involved in the duty to Cooperate process to take place constructively, actively and on an ongoing basis in the context of strategic cross boundary matters¹. That no evidence is being made available means the Borough Plan review process is lacking transparency.</p> <p>It should be noted that from review of the Matters, Issues and Questions posed by Inspectors of the examination of other Local Plans, reference is often made to providing evidence for the duty to cooperate. For example, at the current Shropshire examination, the Inspector has posed the question asking evidence to be provided regarding the:</p> <p>"type, timing, duration and extent of duty to cooperate activity and the availability of supporting evidence for that activity."</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 determined². We would therefore suggest that NBBC engage with Coventry City Council (and other Warwickshire authorities) and agree a Statement of Common Ground regarding Coventry's expected unmet housing and employment need. This statement can then be updated and refined throughout the plan making process, as required by the</p>		NBBC recognise that the Duty to Co operate is an essential part of the process and will be working with other stakeholders to ensure this is carried out. The HEDNA data is awaited in order to finalise the numbers of residential units and employment required.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
					PPG. 1		
137.18	JC	FCC/Savills		DS1	<p>Part of this policy states that: "Development will need to address the prudent use/safeguarding of natural resources, adaptation to climate change and transition to a net zero carbon economy. This will include the planting of trees and orchards and sustaining and enhancing the historic environment."</p> <p>We question what the specific low and zero carbon requirements for development are? There is perhaps a need for a specific policy in relation to low and zero carbon requirements to ensure there is a suitable level of clarity. Reference to the requirement for planting of trees and orchards is also questionable. We are not clear what the Council's justification for requiring this planting is, and whether this requirement applies to all new development sites, regardless of size or scale.</p>		<p>The policy refers to open space, the NPPF para 131 states that should planning policies and decisions ensure: '...that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards)'. It is consider the policy is in accordance with the NPPF.</p> <p>Measures to adapt to climate change and deliver net zero are supported in many of the policies throughout the Plan.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.19	JC	FCC/Savills		H1	<p>A number of additional technical standards in relation to homes for older people and other specialised housing are mentioned in this policy. The PPG1 is clear that LPAs need to gather appropriate evidence to justify the use of such standards in their area. We are also concerned as to the status of the WCC Guidance referred to in the policy. We would suggest unless the requirements are to be tested to the same standards as the Borough Plan that it would not be appropriate to require it to be complied with.</p> <p>The last paragraph of the policy states that: "Housing is required to consider the fundamentals of climate change and achieving carbon neutral emissions by 2050 within their design." The Council should provide more detail on what this means in practice, and the specific criteria they require developments to meet in order to comply with this requirement.</p> <p>The supporting text of Policy H1 - In supporting text of policy H1, reference is made to "older people" and "people with a disability" and what is required for them. This is based on 2013 SHMA and the 2022 HEDNA, which itself is partly based on 2011 census data. It is therefore limited as to what the validity of the these documents are for drawing conclusions from in relation to the provision of housing for older people and people with a disability.</p>		<p>The HEDNA data will be used to determine the housing mix required at the strategic level. Individual applications will need to justify an alternative housing mix.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The evidence which supports the WCC Technical Guidance will need to be examined.</p>
137.20	JC	FCC/Savills		H2	<p>25% affordable housing is required, which is the same as the adopted plan. Latest viability work for currently adopted plan was undertaken in 2016, meaning that a revised viability assessment is required to be undertaken and consulted upon before this figure can be confirmed.</p>		<p>The Council has commissioned an updated viability assessment which will be used to inform the policy.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.21	JC	FCC/Savills		SA1	<p>A list of strategic sites should be included within this policy to make it clear of the sites which are classed as strategic. The Council should also clarify what viability testing has been undertaken to support the allocation of strategic policies.</p> <p>Criterion 1 We question what evidence base has been produced to justify the additional technical standards set out in criterion 1 of this policy. PPG1 is clear that LPAs need to gather appropriate evidence to justify the use of such standards in their area. This is further reinforced by footnote 49 to paragraph 130 f) of the NPPF which states that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties.</p> <p>Criterion 9 The requirement to retain ridge and furrow should only apply where it is of a value that it would be deemed reasonable to protect. Not all ridge and furrow is of a state that warrants protection, and such a blanket policy is not appropriate and should be proportionate to the state of the ridge and furrow that is present.</p> <p>Criterion 12 Further clarification is required regarding the wording of this criterion of the policy. It is unclear whether the requirement applies to outline applications only, or if reserved matters will also be considered. It would also be useful to understand what evidence would be deemed suitable by the Council in respect of this policy criterion. Not all landowners have aligned interests and so this policy potentially becomes a ransom to delivery of otherwise deliverable sites.</p> <p>Criterion 15 Point 15 looks for proposals to comply with the requirements of the relevant Concept Plan SPD and Design Code. We do not consider this requirement is appropriate as these documents are not being tested and examined as part of the Local Plan. We consider it would be more appropriate to make reference to the SPD and Design Codes as guidance rather than a requirement. Otherwise the SPD and Design Code should be the subject of wider public consultation form part of the Borough Plan evidence base.</p> <p>Viability The final paragraph of this policy states that if any requirements of this policy are considered unviable, then an independent viability assessment must be submitted with the planning application. We welcome consideration that all requirements are not always simultaneously viable on all sites. However, this policy would be better informed by a viability assessment undertaken by the Council in support of the Borough Plan review.</p>		<p>Section 8.0 Strategic Allocations of the BPR contains the details of the strategic sites.</p> <p>The Council has commissioned an updated viability assessment which will be used to inform the policy.</p> <p>The requirement to achieve optional space standards will be supported by evidence or be amended accordingly in the Publication version of the Borough Plan.</p> <p>The policy requirement to retain ridge and furrow applies where possible. It is considered the wording provides flexibility between sites.</p> <p>The intention of point 12 is that in the event of a part submission of a strategic site, the proposal will need to illustrate that the applicant has worked with owners of the other parts of the allocation. Some judgment will be required as to when it will be necessary to demonstrate cooperation between different sites.</p>

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.22	JC	FCC/Savills		SA Appraisal – Appendix C Site Appraisal Matrix	It would be useful to have a plan of submitted sites to provide a helpful spatial context. A number of the sites submitted have the same name and or similar names to each other, which makes precise identification of the sites in question extremely difficult. No conclusions are reached in this document. It is not clear what the respective scoring means for the consideration of the development potential of the site. We appreciate that summary of site's credentials is provided in the SHLAA, but it is not clear how the data set out in appendix C has influenced this. Not all categories that employment sites are assessed against appear relevant. This includes: Distance to doctors surgery , primary school, sports / recreation facilities etc. Employment is more related to distance to transport links, other similar uses for to build up an agglomeration and critical mass of skills & knowledge in a particular sector etc.		The plan of sites is available on the Council's consultation website. Employment sites will be assessed in the Council's updated HELAA which be support the publication version of the Plan.
137.23	JC	FCC/Savills		Sustainability Appraisal – Second Interim Report: Regulation 18	Bedworth Train station is a key sustainability feature which should also be included on the map. The proposed train stations at Galley Common / Stockingford should be highlighted on the map as proposed stations.		Figure 2.1 shows the plan area, rather than sustainable features to consider.
137.24	JC	FCC/Savills	9.4		We support the Council's approach to not setting out specific requirements for housing mix within the policy. However there should be more explicit reference to taking into account site specifics and providing a degree of flexibility in regards to the housing mix proposed. However we are concerned that the 2013 SHMA referenced in the current consultation document will be at least 10 years old upon adoption of the plan.		The mix will be provided using the most up to date HEDNA at the time of any formal planning application. Justification would need to be given with the planning application if the submitted plans differed from this mix. A new HEDNA has been carried out as part of the Review. However, this may need to be updated on an ongoing basis.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
137.25	JC	FCC/Savills		DS3	<p>It is not clear what is defined as zero carbon emissions, and why the Council is placing emphasis on delivery of tree and orchard planting, and whether this requirement will be applied to all new development.</p> <p>Nationally Described Space Standards, the PPG1 is clear that LPAs should take account of need, viability and timing of implementing such standards.</p> <p>The Future Homes Standard and the Future Buildings Standard is due to be implemented through Building Regulations from 2025 and there is no need for planning policies to repeat Building Regulation requirements.</p> <p>We question how this policy will be interpreted, and how the 'positive impact' will be determined. It is not clear how this is defined and what evidence base NBBC is relying to justify this requirement</p>		The evidence base is being updated in order to substantiate the Policies.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.35	JC	Arbury Estate/Savills	9.4		We support the Council's approach to not setting out specific requirements for housing mix within the policy. However there should be more explicit reference to taking into account site specifics and providing a degree of flexibility in regards to the housing mix proposed. However we are concerned that the 2013 SHMA referenced in the current consultation document will be at least 10 years old upon adoption of the plan.		The mix will be provided using the most up to date HEDNA at the time of any formal planning application. Justification would need to be given with the planning application if the submitted plans differed from this mix. A new HEDNA has been carried out as part of the Review. However, this may need to be updated on an ongoing basis.

Ref	Initials	Organisation	Paragraph	Policy	Comments	Suggested modifications	Officer Response
136.36	JC	Arbury Estate/Savills		DS3	<p>It is not clear what is defined as zero carbon emissions, and why the Council is placing emphasis on delivery of tree and orchard planting, and whether this requirement will be applied to all new development.</p> <p>Nationally Described Space Standards, the PPG1 is clear that LPAs should take account of need, viability and timing of implementing such standards.</p> <p>The Future Homes Standard and the Future Buildings Standard is due to be implemented through Building Regulations from 2025 and there is no need for planning policies to repeat Building Regulation requirements.</p> <p>We question how this policy will be interpreted, and how the 'positive impact' will be determined. It is not clear how this is defined and what evidence base NBBC is relying to justify this requirement</p>		The evidence base is being updated in order to substantiate the Policies.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
201.1	IJ	Ash Green Residents Association 2018	Sustainability Appraisal Report - Nuneaton and Bedworth Borough Plan – Issues and Options	Employment Land Uses Study, CWLEP, 2015		<p>This document recommends the employment use demands for the area, as well as identifying available sites to fulfil this demand. It considers the recommendations on both uses and available sites for development.</p> <p>EMP7 on Bowling Green Lane therefore requires the transport assessment relating to the site to be re-done to see if the site is viable or indeed needed.</p> <p>Up until now no employment interest or enquiries have come forward for this site.</p> <p>At the previous consultation the information given was that there would be no change of use within the time of the current plan, which was then up to 2031. Now apparently, part of the site can have a change of use for housing.</p> <p>One wonders then is there any point in these consultations as even a 5 year review, changes the previous endorsement of employment use to 2031.</p> <p>The evidence base for the site was also carried out prior to the development of housing in School Lane and at Hawkesbury and that has certainly increased traffic on School Lane and particularly the junction at Coventry Road/Bayton Road. In view of all recent applications for housing coming forward for example 445 houses on Hospital Lane and those 149 built or to be completed in Burbages Lane the Association is concerned with what else goes through, before residents are properly informed. If EMP7 has to have housing- and or employment - it would be good to know it will only be the 50 houses proposed and other factors such as safety and air quality of children and parents walking, or driving to and from Goodyers End Primary School are also fully considered. Up to date transport and air quality assessments need to be carried out in relation to this EMP 7 site</p> <p>Mature trees were cut down recently in Burbages Lane - ref. 039033 - and yet the application for another 10 dwellings only went on the Nuneaton and Bedworth planning site ref 039033 on 20 May 2022.</p>		<p>The Transport Assessment would only look at road safety and traffic rather than viability and is to be carried out for each of the allocated sites.</p> <p>Neighbouring residential properties are consulted when any planning applications are received. Application reference 039033 appears to have been received in May 2022. Trees do not necessarily require planning permission to be felled. Air Quality and Road safety will be considered as part of the Evidence bases required for the allocated sites.</p>

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.1	RM	Bedworth & District Horticultural Council		Paragraph 5	Policy NE2 – Open space and Allotment Strategy 2012-2022, 2017-2022	<p>Providing new allotments or improving existing allotments in order to enable communities to grow food where deficiencies exist, in line with standards set out in the Allotment Strategy. The allotment Strategy has never worked. The majority of objectives have never been achieved.</p> <p>The Allotment Strategy 2012 – 2022 & 2017 – 2022 has achieved nothing. In fact nothing has happened since 2015. Ten years on and the Technical Advisory Notices (T.A.N.'s) –have yet to materialise. Action Plan Establish 'Allotment Forum' meeting minimum twice per year. Only two ever held, last one in November 2015.</p> <p>(See also Internal Overview and Scrutiny Panel 23rd January 2020 Page 18 item 138) Review of provision of allotments within any area of the Bedworth, Exhall, Ash Green and Kersley sites earmarked for housing development on the adopted Nuneaton and Bedworth Borough Local Plan</p> <p>The panel requested that the Head of Planning confirm the following: whether two meetings a year are being held with Allotment Associations as detailed in the strategy NO whether allotment Associations receive the weekly planning lists. NO whether allotment information was included in welcome packs NO and if allotments count within biodiversity calculations. ?????????</p>	The New Allotment Strategy 2022 - 2032 must be workable and not full of objectives which will never be achieved. Councillors and Officers need to take ownership of this and not treat it as has been for the last 10 years. It has been an absolute disgrace the way all allotments have been ignored.	The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.2	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2022	1.0 and 1.1		<p>1.0 Vision Statement</p> <p>1.1 Vision Statement: - "Nuneaton & Bedworth Borough Council is committed to promoting healthy living through the development and management of allotment provision throughout the borough. Encouraging innovation and best practice where-ever possible, we will seek to maximise the participation of local residents, through the promotion of the benefits and enjoyment allotment gardening can bring."</p> <p>1.1 Vision Statement</p> <p>Nuneaton & Bedworth Borough council has done nothing to encourage innovation and best practise. It has been the Associations and their lead bodies that have done this.</p> <p>It has not sort to maximise participation, only offering lip service. A lot of this this is just fine words with little or no substance. Where is the proof that this has happened?</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.3	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2023	3.0 and 3.3		<p>3.0 Scope & Aims</p> <p>3.3 Types of Allotment There are 3 types of allotments: Now that the leases have been signed, this needs revision. This could have happened when the Review took place in 2017.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.4	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2024	3.4		<p>3.4 Aims of the Allotments Strategy In developing an Allotments Strategy for Nuneaton and Bedworth it is necessary to consider the allotment sites we have, what we need now and in the future and what we are going to do about any imbalance in supply and demand. In particular the aims of the strategy are to:</p> <ul style="list-style-type: none"> · Articulate the value of allotment cultivation. · Demonstrate how allotments can contribute to the needs of the community. · Propose ways to optimise the usability of allotments that exist. · Set out the legal framework for allotments. · Set out the policy context both nationally and locally. · Present the analysis of data gathered on supply, demand, quality of existing provision. · Identify if and where there is a need for new allotment sites. · Articulate the role of NBBC and Allotment Associations and plot holders in delivering the strategy and wider community benefits. · Provide evidence for securing investment from third parties including developers and charitable funders. <p>3.4 None of this appears to have been done so far. How will the aims be developed in the future?</p> <p>Need for new allotment site/s is a positive not identified if and where there is a need. Elsewhere in the document there are indication of area in the borough that are not currently meeting the needs of inhabitants by way of allotment provision.</p> <p>BOROUGH PLAN?</p> <p>NBBC has not promoted any positive role so far. Allotment Associations have done this with some exceptions.</p> <p>No support provided by NBBC with regards to investment in allotment sites.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.5	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2025	4.0 and 4.1		<p>4.0 The Value of Allotments</p> <p>4.1 Nuneaton & Bedworth Borough Council supports allotment gardening as a valuable recreational activity. However; the value of allotments is much wider than this. The Department of Communities and Local Government states that:</p> <p>“Allotments and community gardens are valuable green spaces that can help improve people’s quality of life by promoting healthy food, exercise and community interaction”.</p> <p>The benefits of allotments can be divided into six key areas;</p> <ul style="list-style-type: none"> · Health - physical exercise, combat obesity, through fresh fruit & vegetables mental health improvements and reduced stress. · Educational - Use by schools and for community skill sharing. · Social - Inclusion of people from different backgrounds, social, ethnic and those with disabilities. · Environment - habitat for wildlife, green links in towns, green lungs. · Celebrating Excellence - People can be acknowledged for achievement. · Money saving - Fresh low cost food - lower food miles, less packaging, less chemical use, encourages recycling and reuse. <p>4.1 How has this been promoted? NBBC has shown little support for allotment associations. Some Associations are becoming more involved with their community, others are still stuck in the past with the cloth cap mentality still very much in existence, with the frustrations that this brings to many of the membership who feel they are unable to move forward because of outdated management styles on their allotment. How is this being monitored?</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.6	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2026	4.2		<p>4.2 Physical health benefits: The health benefits of allotment gardening were recognised by the Government in its response to the Environment, Transport and Regional Affairs Committee's report The Future of Allotments The argument is made all the more compelling by government predictions about the growing problems for the health of the nation posed by obesity. There are well documented long-term health benefits resulting from a diet containing fresh fruit and vegetables. The impact of activity outdoors or 'green exercise' on both physical and mental health is of increasing interest to medical professionals and one of the most frequently cited benefits of allotment gardening is health improvement.</p> <p>4.2 How has this been promoted? There is little or no evidence of any promotion by the council . It is fully accepted by Association members that great benefits are to be had. Some Associations have members who still work their plots despite being into their 80's. Others are encouraging younger people by providing facilities for children to work their own small plots and hopefully who will want to stay involved as they grow up.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.7	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2027	4.3		<p>4.3 Mental health benefits: Allotments can provide opportunities for people with diagnosed learning difficulties and indeed a wider range of disadvantages such as the unemployed and those with undiagnosed mental health conditions, giving them a place to take exercise, to structure their day and encourage self-confidence. Research by the University of Essex has shown a "synergistic benefit" in adopting physical activities while being directly exposed to nature. There are important public and environmental health implications to green exercise, as a fitter and more emotionally content population costs the economy less.</p> <p>4.3 How has this been promoted? In short it has not. It is well known by the members of the allotments that they derive benefits from just being there and working their plots. Being out in the open, listening to what is going on around them, the birds, butterflies and other insects can promote a sense of wellbeing .</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.8	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2028	4.4		<p>4.4 Educational benefits: The benefits of the allotment site do not stop at the gates. Other Council areas such as the inner London boroughs, report that when allotments have strong links with their local community, both sides benefit. For example a small Allotment Site in Camberwell let a nearby primary school use a plot with their teacher. Both organisations considered that such relationships between allotment associations and local schools should become the norm. Mentoring of new gardeners by experienced plot holders is a valuable way to pass on knowledge and skills which can become a spring board for full time employment in horticulture and other sectors. Both Bristol and Bradford City Councils promote this aspect of developing individuals and not just the new tenants. Existing plot holders can also learn valuable teaching and presentation skills, which are transferable to the workplace.</p> <p>4.4 How has this been promoted? Once again it has not.</p> <p>Some Associations do work closely with local schools and nurseries. Most have in the past been involved with local schools and nurseries. There seems to be a reluctance in most schools these days to get involved with Allotments. A number of Associations have developed areas for the children only to find that due to changes in staff at the school, or a non-existent Health & Safety issue they are no longer prepared to come on site. Some schools would prefer that the Associations go and work at the school. In some cases this works, in most others it does not due to problems of access. With security being a priority at most schools access can be limited during school holidays, particularly the summer holiday when most of the produce on the site needs to be watered, weeded and harvested.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.9	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2029	4.5		<p>4.5 Social benefits: Perhaps the most valuable benefit allotments bring to a community is to bring together people with a shared interest, but who are from different cultural or social backgrounds and whose paths might never normally cross. People with special needs such as mental health issues and physical needs; access for vehicles, flexible layouts, variable height beds for crops etc. with access to helpful tenants nearby to help them, both physically or just with advice, report significant benefits from allotment gardening. Indeed the social benefits of an allotment need not be restricted to those who work the plots, providing a focal point that promotes understanding and integration within the wider community.</p> <p>4.5 All fine words with nothing to show in practical terms on the sites. considerable help in order to develop these facilities by a member of the Parks and Open Spaces team. This help and assistance appears to have not been offered to any other site in the Borough.</p> <p>Access Gates Some sites have very poor gates (some have even bought their own in the last few years).</p> <p>Boundary fences Many sites are vulnerable to intrusion as they fail to meet the minimum requirements laid down in the Strategy. Minimum height 1.8M.</p> <p>Warwickshire Police web site on allotment theft recommends 2.4m fence height https://www.warwickshire.police.uk/media/5852/Allotment-Theft-advice/large/Allotment_theft_advice.png</p> <p>Haulage ways; most of these are not suitable for use by people with wheelchairs or mobility scooters. Associations are therefore reluctant to throw there gates open to these people.</p> <p>Pathways ditto How has this been promoted? Sadly again it has not.</p> <p>The Strategy states :- People with special needs such as mental health issues and physical needs; access for vehicles; flexible layouts; variable height beds for crops etc. With access to helpful tenants nearby to help them, both physically or just with advice, report significant benefits from allotment gardening. Indeed the social benefits of an allotment need not be restricted to those who work those plots , providing a focal point that promotes understanding and integration within the wider community.</p> <p>All fine words with nothing to show in practical terms on the sites.</p> <p>Water Supplies; some sites do not have mains water on site. Those without have never been offered a supply.</p> <p>Toilets ; most sites have provided facilities themselves. Those with mains drainage have incorporated flush toilets, Those without have resorted to Composting Toilets.</p> <p>With an increasing number of females on sites it is crucial to have these facilities for them.</p> <p>It was said at one point that the council would have to provide toilets in order for them to meet European Legislation. Needless to say this never happened.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.10	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2030	4.6		<p>4.6 Environmental benefits - wildlife and biodiversity: Allotment sites can typically contain 30% or greater biodiversity value than an urban park and often are joined to other open spaces / green-spaces within the urban area, forming part of important wildlife corridors and refuges – the ‘Green Infrastructure’ of the Borough. Both as signatories to the West Midlands Biodiversity Pledge and to support delivery of Biodiversity Action Plan targets and objectives, NBBC is committed to seeking to retain and enhance biodiversity within allotment sites. At the general level these commitments can be translated by reflecting them in individual allotment leases and asking associations as a minimum to retain existing wildlife interest - but ideally also more positively working to enhance that interest and value. Several allotment associations in the Borough have utilised surplus land to create specific wildlife habitat / wildlife garden areas adding even further to the general value of the sites for wildlife such as Greenmoor Rd Allotments in Nuneaton & Mount Pleasant and Newdigate Allotments in Bedworth. The Borough can provide free ecological advice to support Associations and help advise on practical low or no cost ways for Associations to help local wildlife. In addition Associations can play a critical role encouraging wildlife friendly management as a whole across the site and can encourage individual tenants to adopt wildlife friendly approaches within their own plots. On occasion it may also be necessary / appropriate for Associations to create and adopt rules requiring certain approaches and to enforce those rules</p> <p>Some key opportunities for allotment sites and associations to pursue can be summarised as follows:</p> <ul style="list-style-type: none"> · By necessity to have minimum acceptable practices covered by rules and to enforce those rules if necessary – e.g. in regard to fires / composting etc. 		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						<ul style="list-style-type: none"> · To support and encourage wildlife friendly approaches to allotment gardening by tenants: <ul style="list-style-type: none"> o encouraging beneficial insects / species that consume crop pests and to act as pollinators e.g. through companion planting / pond and bog creation / bat and bird boxes / insect boxes / log and stone piles /wildflower and herb patches / retention and addition of hedges &ditches / tree planting & orchard creation if land available. o reducing / minimising pesticide / molluscicide usage of reducing peat usage · To encourage composting / recycling, organic approaches and avoiding /minimising fires · To deal with any surplus plots, communal areas and boundaries in the most wildlife friendly ways · To consider developing demonstration plots to promote some of the possible approaches · To look as an Association - on at least an annual basis - at existing wildlife habitat and value across the whole site, to retain existing value and to identify and where possible act on opportunities to enhance wildlife value (with advice -to whatever extent desired by the Association - from NBBC). A brief review could e.g. take the form of a standing item on the minutes AGM for Associations and the overall annual reporting on this standing item could be presented annually to the Scrutiny Panel of the Borough Council. 4.6 How has this been promoted? There is little or no evidence of any promotion by the council . The Borough has not provided free ecological advise to support Associations. Where are the minimum acceptable standards? Wildlife approaches not promoted at all. Have any surveys been carried out by NBBC to establish progress being made in these areas? NO Composting; What progress where? Surplus plots; how are these being managed? Where are the demonstration plots? There are none. Wildlife habitats; no support in the first ten years of the strategy. Annual Reporting; only one meeting in five years. Only two in ten. The majority of the proposals in this sections have never been promoted. That said a lot of Associations are carrying out this work despite there being no help or assistance being provided from NBBC. 		
202.11	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2031	4.7		<p>4.7 Celebrating Excellence: The pride many allotment holders take in their plots and the food they grow is immense and some achieve very high standards at shows.</p> <p>Others volunteer many hours of their time to delivering communal benefits for their immediate colleagues, the wider allotment community and society in general.</p> <p>Sharing their achievements with the community is a good reason for celebration which can inspire others and lead to greater community cohesion. Nuneaton and Bedworth has a history of such celebration, as is evidenced by the number of trophies currently held in the Mayor’s Parlour. The re-introduction of such competitions between individuals, allotment associations and the recognition of voluntary work, through the Nuneaton Allotment Federation & Bedworth &</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						District Horticultural Council should be encouraged. 4.7 Little or no progress in ten years.		
202.12	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2032	4.8		<p>4.8 Money Saving - a more sustainable food source: The original purpose of allotments, encapsulated in the General Enclosure Act 1845, was to provide a source of fresh fruit and vegetables for the "landless poor". Even now, the financial advantages of allotment gardening remain significant. People are also more and more concerned about the environmental impact of what they eat. 'The Validity of Food Miles as an Indicator of Sustainable Development' report, produced by DEFRA in 2005 put the environmental, social and economic cost of food transport at £9bn annually. Ten million tonnes of carbon dioxide were emitted in the UK in 2002 as a result of food transportation and it also accounts for a quarter of all HGV vehicle miles. Food packaging is also a major environmental issue. It is estimated that 100,000 tonnes of plastic bags are thrown away every year. UK households produce the equivalent of 245 jumbo jets a week in packaging waste.</p> <p>Allotment growing avoids the need to use packaging. The use of organic cultivation methods is increasing practised up by many plot holders. Composting on allotments is widely practised, and is a good alternative to bonfires. Reuse and recycling is part of the allotments tradition: old carpets used for mulching and old gutters and water tanks are used for collecting water. The scruffy appearance of some sites is the accepted price of innovation in recycling and reuse of materials.</p> <p>4.8 Again - not being promoted</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.13	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2033	4.9		<p>4.9 Key Considerations: The case for maintaining, promoting and protecting allotments is a strong one, on public health and environmental grounds as well a means of enhancing community cohesion. Any policy decision must have full regard to the very considerable benefits they bring to the individual and the wider community. The main issues arising are:</p> <ul style="list-style-type: none"> · Need to link to the health services to provide support for people for whom allotment growing would improve their health. · Schools could benefit from more formal access to allotments and be supported to have growing areas on schools premises. · Need to work with disability groups to identify how best to ensure provision is made for their needs. · Need to ensure people from ethnic groups are able to access allotments and consider celebrating their culture through food and growing. · Need to demonstrate the value to Allotment Associations of being more community facing. · Support provision of communal facilities on allotment sites or connections with nearby facilities. <p>Explore opportunities to develop local enterprises between Allotment Associations & Community Groups (Contributing excess stock to food banks, Café's, Kitchens etc.)</p> <ul style="list-style-type: none"> · Support allotment open days. · Identify sites with significant wildlife interest or potential and the contribution to biodiversity that plot holders can realistically be expected to make. · Provide guidance on best management practice for hedgerows, standard / pollard trees, set aside allotments, ditches, banks and compost heaps. · Consider whether cost is of more significance to some people than others. <p>4.9 None of these main issues have been addressed.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.14	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2034	5.0 - 5.4	Allotment Strategy 2012-2022, 2017-2034	<p>5.0 Legislation</p> <p>5.1 There has been a significant amount of legislation relating to allotments in the last century and as such this area of law can appear quite complicated. There are continuing calls for such legislation to be consolidated into a single new act, although this appears unlikely to become a political priority at present. Put simply, Local Authorities have a statutory duty to provide allotment land, both permanent (statutory) and temporary, where there is proven demand and they cannot dispose of statutory allotments without approval by the relevant Secretary of State.</p> <p>The main statutes known collectively as The Allotments Act's 1908~1950 are outlined below.</p> <p>5.2 Small Holdings & Allotments Act, 1908 repealed and consolidated previous legislation, establishing the framework for the modern allotments system. It principally dealt with the duties of allotment authorities to provide allotments for the 'labouring population' and compensation to tenants who had their tenancies terminated.</p> <p>5.3 Land Settlement (Facilities) Act, 1919 made a number of amendments to the 1908 Act, most notably abolishing the reference to 'labouring population' principally to assist returning WWI service personal.</p> <p>5.4 Allotments Act, 1922 provided improved security of tenure for allotment tenants, requiring specific periods of notice and compensation if necessary, based upon the value of the tenants crops. It also required most allotment authorities to appoint allotment committees.</p> <p>5.5 Allotments Act, 1925 required planning authorities to take specific account of allotment needs when preparing town planning schemes, a safeguard which disappeared with the Town & Country Planning Act 1947.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						<p>5.6 Small Holdings & Allotments Act, 1926 made minor amendments to previous acts, but was mainly concerned with Small Holdings.</p> <p>5.7 The Agricultural Land (Utilisation) Act, 1931 was passed at the time of the depression to encourage the provision of allotments for the unemployed. It is no longer actively used.</p> <p>5.8 Allotments Act, 1950 was passed as a consequence of the Allotments Advisory Committee report of 1949, although not all the recommendations were included in the eventual legislation. It extended the period of notice to tenants from six to twelve months, expiring during the winter period. It also dealt with matters relating to compensation due, both to the tenant upon being given notice to quit and the allotments authority, if the plot holder had allowed the plot to deteriorate.</p> <p>5.9 Other Legislation Whilst not specifically relating to allotments, other more recent legislation has had an impact, most notably the Local Government Act 1972, which removed the requirement upon local authorities to establish allotments committees. These include;</p> <ul style="list-style-type: none"> · Local Government Planning & Land Act 1980 · Local Government & Planning (Amendment) Act 1981 · Acquisition of Land Act 1981 · Town & Country Planning Act 1990 (as amended) · Local Government Act 1992 · Statute Law (Repeals) Act, 1993 <p>In 1998 the Government also introduced a requirement for local authorities to show what steps they had taken to promote allotments prior to requesting consent to dispose of them. This was because of concerns that local people might not be aware of a local authorities' duty to provide such facilities. The most recent statute to affect allotments is The Localism Act, 2012. This seeks to empower local communities to decide local requirements and priorities, rather than such matters being centrally driven and will have direct implications for allotment provision within Nuneaton and Bedworth. In 1998 the Government also introduced a requirement for local authorities to show what steps had been taken to promote allotments prior to requesting consent to dispose of them. No evidence that this has happened. The Localism Act 2012 What are the implications for allotment provision?</p>		

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.15	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2035	6.0 and 6.1.		<p>6.0 National Policy Context</p> <p>6.1 The Department for Communities & Local Government (DCLG) has acknowledged that allotments are valuable green spaces that can help improve people's quality of life by promoting healthy food, exercise and community interaction. The DCLG seeks to ensure that allotments are well managed, are considered as part of the overall green infrastructure and are only disposed of where there is no demand for them and established criteria have been met. It is committed to working with local authorities to promote best practice and ensure quality and appropriate availability now and for future generations. As part of this commitment DCLG has published two guidance documents; Space for Food Growing and Potential Funding for Community Green Spaces.</p> <p>6.1 The Department for Communities & Local Government (DCLG). It appears that NBBC has given little consideration that allotments are considered as part of the overall green infrastructure. When will NBBC advise Associations as to what is in the Potential Funding for Community Green Spaces, because it has failed to do so far.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.16	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2036	6.2		<p>6.2 National Planning Policy Framework: Adopted in March 2012, this initially caused some alarm amongst those more familiar with the previous, rather more prescriptive approach to planning at a national level. Documents such as Planning Policy Guidance Note's PPG 3 – Housing and PPG 17 – Sport, Open Space & Recreation, both of which were seen as providing protection for allotments have, along with over a thousand pages of national guidance been replaced by just fifty. There is only a single reference to allotments within the new framework, specifically excluding them from the definition of 'Previously Developed Land', although within the context of providing social, recreational & cultural facilities, allotments should be considered alongside references to wider public open space provision, detailed in chapter 8 – Promoting Healthy Communities. Seen as a key part of the effort to de-centralise government, DCLG Communities Minister Andrew Stunell explained that in the context of allotment provision the new framework will ensure, "Local communities will have the ability in the future to dictate what the local plan for them should be, and to set aside those allotments, and of course existing allotments are protected under legislation at the moment. 6.2 In the context of allotment provision the new framework will ensure, " Local communities will have the ability in the future to dictate what the local plan for them should be, and to set aside those allotments, and of course existing allotments are</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						protected under legislation at the moment” NBBC have not taken upon themselves to make any of this information available to Associations. There should be a system and process in place whereby any new legislation which may impact upon allotments is brought to the attention of the associations in a timely manner. The overarching associations would see it as NBBC responsibility to bring to their attention any changes in legislation and what its impacts may have on allotments. It has to be born in mind that not all Associations have people who are computer literate, some do not have web sites or even email contacts.		
202.17	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2037	6.3		<p>6.3 Local Government Association (LGA): The LGA have published two key documents relating to allotments. Growing in the Community: A Good Practice Guide for the Management of Allotments – 2nd Ed. was published in 2008 and identifies the main issues for allotments officers and societies, together with advice on how to overcome the challenges they are facing. In 2010 this was supplemented by a new on-line guide, A Place to Grow. The update seeks to address some of the problems that local authorities and devolved management allotment associations are facing as a consequence of the increased demand for allotments. Further advice is provided about issues such as managing waiting lists and non-cultivation, as well as information about how to design a new allotment site.</p> <p>6.3 Again none of this information has been made available to Allotment Associations.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.18	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2038	6.4		6.4 National Society of Allotments & Leisure Gardeners Ltd: 6.4 National Society Allotment & Leisure Gardens Ltd		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.19	RM	Bedworth & District Horticultural Council	7.1 Nuneaton & Bedworth Sustainable Community Plan	7.1		7.0 Local Policy Context 7.1 Nuneaton & Bedworth Sustainable Community Plan The Borough's Community Plan, entitled 'Shaping our Future' is the overarching strategy produced by the Local Strategic Partnership (LSP). It brings together organisations from the public, private, voluntary and community sectors to work together as a single group for the benefit of an area. Their key priorities include: · Improving the well-being of communities by helping people to work together, support and understand each other. · To make Nuneaton and Bedworth a safer place for everyone where day-to-day quality of life is not marred by the fear of crime. · To improve access to health care and improve life expectancy within the borough, by promoting more healthier and active lifestyles. · To have a high quality environment with increased biodiversity and a sustainable approach to waste and energy. · To improve the Boroughs transport infrastructure in order to provide easier access to key services and facilities. Having high quality accessible allotments can make a significant impact on the delivery of these key objectives. 7.1 Again another plan which has not been transmitted to the allotment community. When these plans are made available allotment associations should be given details and a link to find out how they will be affected. More words with nothing to show for them.		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.20	RM	Bedworth & District Horticultural Council	Nuneaton & Bedworth Borough Council Corporate Plan	7.2		<p>7.2 Nuneaton & Bedworth Borough Council Corporate Plan The Council's Corporate Plan has been refreshed and covers the period 2007-2021, to complement the sustainable community plan. The vision and corporate aim stated in the Corporate Plan is that: "By 2021, we shall achieve the greatest improvement in the quality of life and social justice in Warwickshire, providing value for money services in a safe and pleasant environment"</p> <p>Linking our Corporate Plan priorities to our allotment strategy: Key Aim 1: Improve the quality of life and social justice for residents so it is much closer to that enjoyed by the rest of Warwickshire. Response: We shall ensure that all residents have access to quality allotments and provide facilities that are inclusive for all to improve health and health inequalities.</p> <p>Key Aim 2: Work in partnership to reduce the level of crime and disorder so that the community is and feels safer. Response: We shall enable our partners to access facilities, activities and experiences to deal with anti-social behaviour.</p> <p>Key Aim 3: Provide a pleasant environment for those living, working and visiting the borough. Response: We shall, with our partners, continue to maintain and develop the allotments within the Borough to ensure the quality of these spaces and facilities is protected and enhanced. We shall report on these projects delivered by the Council, its partners and community groups.</p> <p>Key Aim 4: Provide quality services which represent value for money. Response: We will raise awareness of the services we deliver and how they may be accessed. We shall report on the success of these services, on the services/facilities/environmental improvements we are working to introduce and on the consultations/projects that will help reshape our future service delivery.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						<p>7.2 Once again a set of fine words which have little or no meaning to the average allotment plot holder. What if anything has been achieved? Where are we now in 2022?</p> <p>Has the Corporate Plan been linked to the Allotment Strategy? If so how?</p> <p>Key Aim 1: where are the quality allotments? Most association particularly those who are member of BDHC feel that they have not been treated fairly over many years.</p> <p>Key Aim 2. Whilst not directly under the control of the council, the fear of crime in the community is at an all-time high. A number of break ins have occurred on allotment sites, more in the last couple of years than in the ten years previous. The number of police personnel in the Bedworth area is at its lowest it has been for many years. This is not helped by a number of police staff who whilst on long term sick do not have their posts covered.</p> <p>Key Aim 3. We along with our partners , continue to maintain and develop the allotments within the Borough to ensure the quality of these spaces and facilities is protected and enhanced. Where are the reports to this effect? Just not true. NBBC have done nothing to 'maintain and develop the allotments within the Borough to ensure the quality of these spaces and facilities is protected and enhanced'.</p> <p>Key Aim 4. Provide quality services which represent value for money. None of this has been seen in the last ten years on allotments. Please provide details of where and how this has been achieved.</p>		
202.21	RM	Bedworth & District Horticultural Council	Borough Plan Preferred Option	7.3		<p>7.3 Nuneaton & Bedworth Borough Council Development Plan or Borough Plan, is an evidenced based document focusing on strategic planning issues. Therefore where there are strategic allotment issues, such as meeting needs, the Borough Plan will take account of this. The Planning Policy team are currently preparing the Preferred Option stage of the Plan which is due to go out for consultation in the early spring 2013. The Preferred Option will identify the preferred direction for growth as well as identifying a number of potential planning policies.</p> <p>7.3 The Planning Policy Team are currently preparing the Preferred option stage of the plan which is due to go out for consultation in early spring 2013.</p> <p>How many more years will go by before the impact of this development plan impact on allotments will be known?</p>		The Council's Parks and Open Space Team provide information for the Borough Plan on allotments. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.22	RM	Bedworth & District Horticultural Council	Nuneaton & Bedworth Open Space Strategy	7.4		<p>7.4 Nuneaton & Bedworth Open Space Strategy identifies 23 council owned sites across the borough, each of which form an integral part of the strategic network of green space. It states that these sites should meet the following criteria, to be detailed within the Allotments Strategy;</p> <ul style="list-style-type: none"> · Provided to a minimum standard. · Self-managed. · Provided in sufficient numbers across the borough. · Provided in the right locations. · Support of Management Groups. <p>7.4 What if any progress has been made towards the following:- Provision of a minimum standard Provision of sufficient numbers across the borough. Provision in the right locations. Support of management Groups. First impressions are that none of this has been achieved.</p>		The Council's Open Space Team deal with the Open space Strategy and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.23	RM	Bedworth & District Horticultural Council	Warwickshire Interim Health Inequalities Strategy 2013 – 2015	7.5		<p>7.5 Warwickshire Interim Health Inequalities Strategy 2013 – 2015 was adopted in May 2013 and sets out a 'Life course' approach to health which includes mobilising communities and working closely in partnership with all agencies involved in addressing health inequalities. It outlines aspirations for changing the social determinants of health and whilst it will be implemented countywide Nuneaton & Bedworth Borough Council will be working to identify their unique contribution to this locally.</p> <p>7.5 Nuneaton & Bedworth will be working to identify their unique contribution to this locally. What is this unique contribution ?</p>		Comments noted.
202.24	RM	Bedworth & District Horticultural Council	The First Joint Strategic Needs Assessment (JSNA)	7.6		<p>7.6 The First Joint Strategic Needs Assessment (JSNA) was published in 2008 and informs all strategic planning by all agencies in the future. It has been refreshed annually, with a mini JSNA produced specifically focusing on issues for Nuneaton and Bedworth. It is this that has guided the outcomes of an internal Elected Member Working Group action plan within Nuneaton and Bedworth Borough Council.</p> <p>7.6 Yet another one which has achieved nothing. The next JSNA did not take place until 2019 and allotments were not on the agenda.</p>		Comments noted.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.25	RM	Bedworth & District Horticultural Council	The Nuneaton & Bedworth Health Improvement and Wellbeing Partnership	7.7		<p>7.7 The Nuneaton & Bedworth Health Improvement and Wellbeing Partnership has recently been replaced with two 'Task and Finish' groups for Alcohol and Obesity. The latter has significant links to the development of healthy eating initiatives and 'grow your own' produce that can be nurtured within allotment sites.</p> <p>There is scope to develop this further by exploring links between Food Banks and Social Enterprises located in communities.</p> <p>7.7 Did the task and finish groups ever finish? Or were they even started?</p> <p>What have been the outputs ?</p>		The comment have been forwarded to the relevant team.
202.26	RM	Bedworth & District Horticultural Council	The Crime and Disorder Partnership Plan 2013- 2016	7.8		<p>7.8 The Crime and Disorder Partnership Plan 2013- 2016 seeks to address crime and anti-social behaviour. Within this Plan, there are close links to the Warwickshire Probation Trust and their Community Payback Scheme. There are opportunities within this scheme to explore joined up working with allotments to involve offenders in the development of local green areas, gardening schemes and other associated work.</p> <p>7.8 This is about the only one where there has been an action. An offer was made for Community Payback Teams to assist on allotment sites. After much consultation this was declined as there was a view that once having visited the sites in a supervised role, some of the individuals may return at a later date and remove items from the allotment sites.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.27	RM	Bedworth & District Horticultural Council	Environmental Sustainability Strategy	7.9		<p>7.9 Environmental Sustainability Strategy The aims and objectives contained within the Environmental Sustainability Strategy (ESS) will help Nuneaton and Bedworth Borough Council deliver its vision for 2021:</p> <p>Vision: By 2021 we shall achieve the greatest improvement in quality of life and social justice in Warwickshire, providing value for money services in a safe and pleasant environment. This vision is consistent with the Local Government Act (Section 2) which gives power to local authorities to do anything which they consider is likely to achieve any or all of the following objectives: -</p> <ul style="list-style-type: none"> · The promotion or improvement of the economic well-being of their area. · The promotion or improvement of the social well-being of their area. · The promotion or improvement of the environmental well-being of their area. <p>The ESS will address mainly environmental well-being in the area and in so doing will help to deliver the following Corporate Aim: 'To provide a pleasant environment for those living, working and visiting the Borough.'</p> <ul style="list-style-type: none"> · A green and clean environment · Leading in environmental issues addressing climate change and protection of the environment. <p>7.9 The pledge publicly commits NBBC to pursue best practise in respect of biodiversity (i.e. wildlife and wildlife habitats) in all of its strategies, plans and projects.</p> <p>Once again NBBC has failed to deliver on any of this. No requirements, information or guidance has been offered to allotment associations in this area. Fortunately most allotment associations do care about biodiversity and have gone ahead and carried out work to develop this on their allotment sites.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.28	RM	Bedworth & District Horticultural Council	West Midlands Biodiversity Pledge	7.10		<p>7.10 West Midlands Biodiversity Pledge N.B.B.C. are signatories to the West Midlands Biodiversity Pledge – a joint West Midlands Local Government Association (WMLGA) and West Midlands Biodiversity Partnership initiative.</p> <p>The pledge publicly commits NBBC to pursue best practice in respect of biodiversity (i.e. wildlife and wildlife habitats) in all of its strategies, plans and projects. This is a statutory duty placed anyway upon all local authorities by the 2006 Natural Environment and Rural Communities Act.</p> <p>The pledge also commits NBBC to protect and enhance biodiversity within all the local authority 'estate' (i.e. its land and property holdings).</p> <p>For both these reasons it is appropriate and desirable for NBBC to seek that all allotment sites / associations to make the most of opportunities to encourage and increase biodiversity and equally to prevent and avoid any activities damaging to biodiversity.</p> <p>7.10 NBBC is committed to support and pursue the achievements of the relevant BAP targets and objectives.</p> <p>What is in the plan/s? What has been achieved if anything? See comments in 7.9 Once again NBBC has failed to deliver on any of this. No requirements, information or guidance has been offered to allotment associations in this area.</p>		The Council's Parks and Open Space Team deal with biodiversity. The comments from this response have been passed to that Team.
202.29	RM	Bedworth & District Horticultural Council	Warwickshire, Coventry and Solihull Biodiversity Action PI	7.11		<p>7.11 Warwickshire, Coventry and Solihull Biodiversity Action Plan helps translate National Biodiversity Action Plans for threatened species and for key wildlife habitats into a local context. In urban areas the significant wildlife habitat value of allotments (existing and potential) is fully recognised (NSALG research shows allotments have up to 30% more wildlife diversity than a typical urban park). As a result the WCaS BAP includes a specific Allotments Biodiversity Action Plan seeking to retain and enhance the biodiversity value of allotment sites. As a partner in the Warwickshire Coventry and Solihull Biodiversity partnership N.B.B.C. is committed to support and pursue the achievement of the relevant BAP targets and objectives.</p> <p>7.11 NBBC is committed to support and pursue the achievements of the relevant BAP targets and objectives.</p> <p>What is in the plan/s? What has been achieved if anything? See comments in 7.10.</p> <p>Once again NBBC has failed to deliver on any of this. No requirements, information or guidance has been offered to allotment associations in this area.</p>		The Council's Parks and Open Space Team deal with biodiversity. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.30	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2050	8.0 and 8.1		<p>8.0 Audit of Allotment Provision</p> <p>8.1 The audit of allotment provision in Nuneaton and Bedworth can be divided into two distinct areas. The first concerns the quantity, location and capacity of allotment land within the borough. Are there sufficient sites/plots available and are they in suitable locations to meet both current and projected future demand? The second area looks at the quality of the sites that do exist. Are they well managed, secure, provided with appropriate amenities and are they accessible to all, including those with mixed abilities?</p> <p>8.1 The first concerns quantity . Are there sufficient sites. Are they in suitable locations to meet both current and projected future demands. The second area looks at quality of the sites that do exist. Are they well managed, secure, provided with appropriate amenities and are they accessible to all, including those with mixed abilities. The answer to these questions is almost certainly NO in most cases. It would be interesting to see what progress if any has been made, in the last ten years.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.31	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2051	8.2		8.2 No comments.		
202.32	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2052	8.3		<p>8.3 Quantity - The National Society of Allotment & Leisure Gardeners recommends a minimum standard of 20 plots per 1000 households. There were 54,327 residential properties and an estimated population of 125,400 within the borough of Nuneaton and Bedworth at the end of 2012.</p> <ul style="list-style-type: none"> · 20 - Number of plots per 1000 households. (Average 2.31 people per property.) <p>8.4 The Borough should therefore have a minimum of 31.51 Ha of allotment land, or · 290 – Standard size of a 'Full' allotment plot (250 Sq.m) + an allowance of 40 Sq.m per plot for paths (1.2m wide) & haulage ways (3.0m wide).</p> <ul style="list-style-type: none"> · 54,327 – Number of households in the Borough. · 20 x 290 x 54,327 = 315,097 Sq.m or 31.51 Hectares <p>8.3 Quantity</p> <p>8.3 Have the statistics changed? Most allotment association indicate that they have fewer vacancies these days. How many allotment plots are now needed? How will NBBC meet the need?</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.33	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2053	8.4		<p>8.4 The Borough should therefore have a minimum of 31.51 Ha of allotment land, or 8.6 plots / 0.25 Ha (inclusive of paths/haulage ways) per 1000 population.</p> <p>Allotment land provided solely by NBBC currently accounts for 31.61 Ha, rising to 36.30 Ha when the five privately owned sites within the borough are added. Whilst the Ansley village site accounts for 1.18 Ha, it lies outside the Borough boundary.</p> <p>The full extent of these sites needs to be treated with a degree of caution however. Based upon digital mapping, they take no account of features within sites that are unsuitable for allotment use and which cannot be economically remedied such as; prevailing ground conditions, boundary profile, topography etc. Therefore an allowance of 30 ~ 37 plots/hectare, (12 ~ 15 plots/acre is recommended by the NSALG) should be applied. It is estimated that the population of the Borough will grow to 135,600 by 2023, a further 10,200 people. As such there will be a need to retain/develop 87.7 plots or 2.54 Ha of allotment land to maintain minimum requirements.</p> <p>8.4 It is estimated that the population of the borough will grow to 135,600 by 2023, a further 10,200 people. As such there will be a need to retain/ develop 87.7 plots or 2.54 Ha of allotment land to maintain minimum requirements.</p> <p>As mentioned on the first page of this report, it appears that NBBC are looking to find additional plots on each site. This will not happen, some sites are very small anyway. Most others are already only offering half plots to new tenants. There is a limit to how many times this can happen. There are also areas of land on most sites that are not suitable of being used as a working plot. This is where sites have set up or are setting up sites of biodiversity.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.34	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2054	8.5		<p>8.5 Location –In addition to identifying the extent of each allotment site, the plans at appendix 1 also include a 1000m catchment area. Based upon data taken from the Open Space Strategy, this represents a 15 to 20 min walking time, also considered by the NSALG to be the maximum walking distance for a plot-holder wishing to take produce home. On this basis, a number of areas within the Borough are deficient in provision; Galley Common (Village), Bermuda (Village), Whitestone (East), Keresley (Village), Hawkesbury Junction and Bulkington. It also underlines the strategic importance of sites such as 'The Cabbage' in Stockingford, for which the surrounding urban development, not only serves to provide a significant catchment area, but also make it difficult to replace in the event of its loss.</p> <p>8.5 A number of areas in the Borough are deficient in provision; Galley Common, Bermuda, Whitestone, Keresley, Hawkesbury junction and Bulkington.</p> <p>What progress if any has been made for provision in these areas in the last ten years?</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.35	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2055	8.6		<p>8.6 Capacity – A survey of Allotment Association secretaries established how many plots their sites contained, the number of members, vacant plots or the number of people on a waiting list. (See table at appendix 2) The calculation of plot numbers is based upon a full plot being 250 Sq.m, with plots significantly smaller than this being counted simply as 'half-plots'. Across the borough however, there is a wide diversity of plot sizes, from 1/4 plots through to some that are over 11/2 time's standard size. This reflects both current local demand and also ensures allotment sites across the borough remain fit for purpose, as a tenant's work/life balance continually evolves.</p> <p>8.7 Quality – Over the years there has been much debate regarding the quality of allotment sites within the Borough and the issue of on-going maintenance responsibilities. However, it is clear that under the terms of the current leases and allotment legislation, there is very little duty or obligation placed on local authorities other than to provide the allotment land itself. A condition survey of NBBC allotment sites was undertaken in 2009. (See table at appendix 3) This identified both responsibility for boundaries, access points and haulage ways, onsite parking, communal buildings, toilets, water supplies etc. and assessed their condition on a scale of 1 ~10 using 'Green Flag' judging criteria.</p> <p>NBBC Has in the past carried out fencing, roadways and other works to its sites and acknowledges through the condition survey that others may need further maintenance work as and when self-governance /new leases are put in place. For example some allotment sites do not have running water supply on site and it is questionable whether this is acceptable in the 21st Century. However, such maintenance must be looked at in light of the current economic climate and on a site by site basis. Any work that remains outstanding therefore will need to be planned over a period of years from the adoption of this strategy. Each site will therefore develop a plan to identify maintenance requirements utilising our existing business case model. Such plans will be subject to five yearly (Quinquennial) reviews It should also be acknowledged that since the last audit of the allotment sites in 2009 many allotment associations have made improvements themselves for example, Greenmoor Road & Milford St. Allotment Association now has a water supply and have replaced their boundary fences and Newdigate Allotment Association have created an ability/sensory garden. Other sites too, have been successful in winning bids to improve security and reduce ASB from Community Safety funds. Through providing Allotment Associations with longer leases (25 yrs) it is envisaged that they will be better able to secure access to third party funding for specific projects, supported by NBBC and other key partners such as WCAVA.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.36	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2056	8.7		<p>8.7 This is a total red herring. Associations have been told all along that there is no money in the budget and there will be no money in the future. The minimum standards laid down by NBBC in the case of roadways, fencing and gates is not being met on a number of sites, and unless the associations can obtain funding (which it appears will be unlikely for areas such as gates and fencing) will continue to be at the mercy of the criminal element in society.</p> <p>It is understood that the example given of Greenmoor Road and Milford Street now having a water supply and boundary fence was funded in part if not completely by NBBC.</p> <p>A number of sites have sort funding to carry out improvements, but have been unsuccessful . No support has been received from NBBC or WCAVA in making bids .</p> <p>Please provide details of what support has been given and the outcomes.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.37	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2057	8.8		<p>8.8 Promotion - The promotion of allotments is something that is the Council's responsibility overall as part of complying with allotments legislation. One of the barriers to having an allotment routinely identified by people nationally is lack of information. There needs to be a clear simple process for getting a plot or onto a waiting list, signs at each site should give contacts and availability. NBBC is also currently improving its website with allotments being one of the first pilot areas for the Parks & Countryside Service. There should be a periodic review of the promotion of allotments to ensure that the Council is fulfilling its responsibilities.</p> <p>8.8 Please provide examples of what promotion has been carried out by NBBC with regards to allotments? As there is still a lack of information in this area. Most of the enquiries for BDHC sites come through its web site. When was the last periodic review carried out by NBBC to ensure it is fulfilling its responsibilities?</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.38	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2058	8.9		<p>8.9 Key Considerations -</p> <ul style="list-style-type: none"> · Whilst there seems to be an overall level of provision in line with NSALG recommendations, this is not evenly distributed. · There is continuing demand despite levels of provision meeting NSALG recommendations. · The Borough Plan must make provision where appropriate for new allotment sites. · New sites must be located close to residential areas. · Sustainability must be considered as sites develop. · Wildlife must be considered in maintenance regimes. · More appropriate facilities must be provided. · Promotion of allotments must be improved. <p>8.9 what progress has been made with these 8 key considerations?</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.39	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2059	9.0 and 9.1		<p>9.0 Consultation Review</p> <p>9.1 The Planning & Environment Overview & Scrutiny Panel – Allotment Working Group, heard evidence on six occasions from;</p> <ul style="list-style-type: none"> · Allotment Associations individually and through the Nuneaton Federation of Allotments and Bedworth & District Horticultural Council. · The National Society of Allotments & Leisure Gardeners. · Allotments & Gardens UK. · WCAVA. · People in Action. · Ingleby Foundation. · Transition Town. · Council Officers on issues relating to; legislation and legal matters, finance, planning policy and recreation. <p>Reference was also made to the 2009 Allotments Condition Survey, data on occupancy levels & waiting lists, provided by Association secretaries and feedback received from previous public consultation on the Open Space Strategy. It is worth noting that the process of developing this strategy has already had a positive impact on both the NFA & BDHC in terms of increasing interest from the various associations affiliated to them.</p> <p>However, there is currently little evidence available that would allow us to understand the extent of any ‘latent’ demand for allotments within the Borough. That is people who are unaware of the Councils obligation to provide allotment facilities, but who might wish to be considered for a plot or those who have declined to go on a waiting list, because they feel it will take too long to secure a plot on their chosen site. To address this shortfall it is proposed that a specific question on allotments is considered as part of the next ‘Tell Us’ survey of Borough residents.</p> <p>9.1 It is worth noting that the process of developing this strategy has already had a positive impact on both NFA and BDHC in terms of increasing interest from the various associations affiliated to them. At the time that the review was first started BDHC was about to fold due to lack of interest amongst its members, brought about in part by the then secretary not calling all members to each meeting, only a proportion. Members did not know what was happening from one meeting to the next. The then Chair had an elderly father who was seriously ill and his time was needed to look after him. The existing secretary decided to try and hold the Society to ransom and so was replaced. BDHC has been in existence for over 70 years and its early days had meetings attended by as many as a hundred people. It lost its way when the Annual Show started to have priority over everything else. When the new management team took over members were asked if they wanted to continue with the show, the answer to which was no. Since that time all meetings have been attended by the majority of member sites.</p> <p>What has NBBC done to understand the need for allotments in the</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						Borough? Have specific questions been asked of the public in relation to allotments? NO.		
202.40	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2060	9.2		<p>9.2 Key issues raised through the process included;</p> <ul style="list-style-type: none"> · Provision of new leases of at least 25 years duration was considered essential to enable associations to make funding bids to external bodies. · Wider concerns about security of tenure for some allotment associations. · Responsibilities – concerns about liabilities, particularly boundaries being passed to allotment associations. · Site security, both in terms of thefts from sites and petty vandalism. · Facilities – water supplies, haulage ways, gates and fencing, communal storage sheds/site office etc. · Toilet facilities – An issue made more apparent by the increasing numbers of women taking on plots. Composting toilets were considered the most effective way forward. · Access for all. · Future development and access to funding. · Working with the local community. <p>9.2 Key Issues raised through the process apart from the first one on</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						the list, the other eight issues appear to have not been addressed. Why not?		
202.41	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2061	10.0 to 10.3		<p>10.0 Developing A Standard</p> <p>10.1 This strategy has identified that strictly based upon quantity alone, the existing NBBC and private allotment sites within the Borough, can meet both current and projected demand over the next ten years. However, when proximity to a site based upon a 15 ~20 min walking time is taken into consideration, deficiencies are identified in; Galley Common (Village), Bermuda (Village), Whitestone (East), Keresley (Village), Hawkesbury Junction and Bulkington. It also underlines the strategic importance of some key sites.</p> <p>10.2 It is considered that for a site to be easily managed there needs to be at least 20 plots on a site or 5,800 Sq.m This does not mean that smaller sites are not viable, simply that they are a less efficient use of land, resources, such as utilities and it may be difficult to ensure a long term robust & sustainable management structure.</p> <p>10.3 Therefore, this strategy will adopt a standard of;</p> <ul style="list-style-type: none"> · Allotments being within 1000m of new homes. · The minimum size of any new allotment site to be 0.58 Ha · Where there is a deficiency, we will seek to provide new allotments through new residential development by; <ul style="list-style-type: none"> o Providing for allotments on strategic housing sites proposed in the Borough Plan. o Developments of more than 1000 dwellings will trigger the requirement for on-site provision. This will include sites where the overall capacity is over 1000 dwellings but smaller sites are being developed in phases. o Contributions by developers in lieu of on-site provision to be based upon the cost of laying out a 20 plot site, (0.58 Ha) inclusive of all services & facilities, but excluding the land cost. Expressed as a cost per dwelling this would be, £40.11 (2013). o We will therefore seek to include allotment provision as part of the 		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						<p>Community Infrastructure Levy.</p> <p>10.1 What if anything has been done to address the lack of allotments in Galley Common, Bermuda Village, Whitestone, Keresley village, Hawkesbury Junction and Bulkington? After ten years it appears to be nothing.</p> <p>10.2 It is considered that for a site to be easily managed there needs to be at least 20 plots on a site or 5,800 Sq.m This does not mean that smaller sites are not viable, simply that they are a less efficient use of land, resources, such as utilities and it may be difficult to ensure a long term robust & sustainable management structure.</p> <p>10.2 Has any progress been made finding any potential allotment sites in any other areas of the borough?</p> <p>10.3 Therefore, this strategy will adopt a standard of;</p> <ul style="list-style-type: none"> · Allotments being within 1000m of new homes. · The minimum size of any new allotment site to be 0.58 Ha · Where there is a deficiency, we will seek to provide new allotments through new residential development by; <ul style="list-style-type: none"> o Providing for allotments on strategic housing sites proposed in the Borough Plan. o Developments of more than 1000 dwellings will trigger the requirement for on-site provision. This will include sites where the overall capacity is over 1000 dwellings but smaller sites are being developed in phases. o Contributions by developers in lieu of on-site provision to be based upon the cost of laying out a 20 plot site, (0.58 Ha) inclusive of all services & facilities, but excluding the land cost. Expressed as a cost per dwelling this would be, £40.11 (2013). o We will therefore seek to include allotment provision as part of the Community Infrastructure Levy. <p>10.3 No mention here of anywhere else, of how many years lease will</p>		

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						<p>be offered to these site. Suspect that this has not even been given any consideration.</p> <p>10.4 For existing allotment sites it intended to work towards a minimum standard during the life of this strategy. New sites shall meet these standards as a minimum;</p> <ul style="list-style-type: none"> · Access Gates – Vehicle Pedestrian <ul style="list-style-type: none"> o Minimum width - 3.0m 1.5m o Minimum height - 1.8m 1.8m o Construction – Metal Metal · Boundary Fences - (Where existing boundaries are deemed by the supervising officer to be accessible.) <ul style="list-style-type: none"> o Minimum height – 1.8m o Construction – 50 x 50 x 3mm weld-mesh on 12.5 or 25m rolls fixed onto 1800 x 50 x 50 x 5mm angle iron fence posts. · Haulage Ways - <ul style="list-style-type: none"> o Minimum width – 3.0m o Construction – Crushed stone or similar approved retained by PCC edging. · Pathways - <ul style="list-style-type: none"> o Minimum width – 1.2m o Construction – Grass. · Water Supply – <ul style="list-style-type: none"> o 30mm metered supply with auto-fill water-troughs at not more than 50m intervals. · Toilets – <ul style="list-style-type: none"> o Type – Composting: male and female, inc. disabled access. · Communal Store – <ul style="list-style-type: none"> o Type – Steel container for storing machinery, fuel, chemicals securely. <p>10.4 Total Farce . Very few of the existing sites meet anywhere near these standards. How much of this has been provided by NBBC over the last 20 years?</p> <p>The only reason anything has been done is because potentially there may have been safety issues, otherwise the work would not have been carried out. i.e. new gates on Bulkington Road Bedworth.</p>		
202.42	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2062	10.5		<p>10.5 In addition to these requirements, on those sites with more than 50 plots the provision of a secure communal site office/store will be encouraged, subject to the Association securing the necessary external funding and any necessary planning consents.</p> <p>10.5 Subject to the Association securing the necessary external funding and any necessary planning consents. This says it all;. NBBC have no interest in helping any of the allotment sites.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.43	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2063	11.0 and 11.1		<p>11.0 Financial & Resource Implications</p> <p>11.1 Leases – The Legal team are currently finalising a new draft lease, based upon a 25 year term in order to permit Allotment Associations the opportunity to access external funding, such leases being registered. However in certain instances where NBBC already lease the land from a third party, any new lease with the Allotment Association must preserve the existing date of determination. (See appendix 5)</p> <p>11.1 This is still about as clear as mud to some associations.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.
202.44	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2064	11.2		<p>11.2 Service Level Agreement – As part of the implementation of this strategy the NFA, BDHC & Bulkington will make an annual report to Planning & Environment Overview & Scrutiny Panel, updating members on levels of occupancy, waiting lists, developments on allotment sites and levels of engagement with the surrounding community, schools etc. This in turn will contribute towards demonstrating how health and well-being matters are being addressed throughout the Borough.</p> <p>11.2 Where is the Agreement? There has been nothing in writing to provide Associations with any guidance as to what is required of them. Once again most of this work has been sponsored by the relevant lead Associations. Reports have been submitted in the last two years, and with the confusion and lack of progress some Associations have still to submit anything. No assistance whatsoever has been provided to assist associations with gaining help and assistance to allow them to work with the local communities. It is very doubtful that all associations could do this legally as they do not have the full range of documents to support such work.</p> <p>NBBC has done nothing to monitor this important area of compliance.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

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202.45	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2065	11.3		<p>11.3 Development of Technical Advisory Notices – It is intended to develop these within the first year of the adoption of this strategy, each being approved by the portfolio holder with responsibility for allotments and initially reviewed annually to ensure they reflect current best practice.</p> <p>11.3 This area has been probably the most controversial of issues during the ongoing discussions.</p> <p>It is intended to develop these within the first year of the adoption of this strategy. So where are they, each time it is brought up at committee meetings there is a different reason as to why they do not exist.</p> <p>It was said that this would be a joint effort involving NBBC, NFA, BDHC and Bulkington. Meetings were held in the early days between NFA & BDHC. Nothing has happened now for a number of years.</p> <p>BDHC has developed its own web site to which a series of documents from one of the associations has been uploaded, these can be downloaded, copied and pasted into the individual associations format and adopted by them at their AGM.</p> <p>None of this has been assisted by NBBC.</p> <p>11.3 NBBC Sites - Budget Proposals – To address the requirements of the standard for existing allotment sites, a number of options are available;</p> <ul style="list-style-type: none"> · Based upon a revised & up-dated condition survey for NBBC sites, develop a programme of capital works, to be approved separately by the Corporate Asset Management Team & delivered entirely by The Council over a five year period. · Identify a percentage of the above programme that would be made available as match funding for bids developed by the Allotment Associations, with additional support. · Retain the status quo – Current revenue budget, £12,970* 		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

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						<p>administered directly by NBBC to address planned & ad-hoc maintenance works. (*2013/14 budget.)</p> <ul style="list-style-type: none"> · Split existing budget 60:40 <p>Allotment Strategy 2012~2022 Date: 4 July 2013 Page 34</p> <ul style="list-style-type: none"> o £7.97k* to continue to be utilised for addressing outstanding/on-going maintenance activities, either on a planned/ad-hoc basis, administered directly by NBBC, or in the form of an annual grant to each 'NBBC' Allotment Association. The level of each grant to be determined using a simple formula, based upon the number of plots each site has, which is then weighted according to levels of occupancy and numbers on waiting lists. (It is estimated that there are 1059 'NBBC' plots or £7.53 per plot based upon the current budget. Some minimum level may be necessary to ensure sums due to smaller sites are viable. Details of subsequent expenditure to be provided as part of the Service Level Agreement through NFA's, BDHC's & Bulkington's annual report to Planning & Environment Overview & Scrutiny Panel. o £5k* to be made available for sites to submit bids for specific projects i.e.provision of re-placement access gates or fencing, toilets, or as match funding for external bids for larger projects, such site huts. (Max. award £2.5k, typical award £1.5k). <ul style="list-style-type: none"> · Administer entire budget as an annual grant to each allotment association using the formula above, but at the rate of £12.25 per plot. <p>11.3 Why was this put into the strategy when there was never any intention of providing any funding for allotments. Even less visible is the support that was to be provided to Associations by organisations funded by the County and Borough Councils who were to give guidance and assistance in how to get funding from external providers.</p>		
202.46	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2066	12.0 and 12.1		<p>12.0 A Policy for Allotments</p> <p>12.1 NBBC recognises that the provision of allotments for residents is an important contributor to the well-being of the community. Growing fruit, vegetables and flowers on allotment sites provides an important opportunity for community interaction, for physical activity, healthy eating and recycling. NBBC will adopted a standard of 13.34 Sq.m of allotment land per dwelling which it will seek to provide and will require to be provided on new developments of 1000 houses or more.</p> <p>12.1 NBBC will adopt a standard of 13.34Sq. Of allotment land per dwelling which it will seek to provide and will require to be provided on new developments of 1000 houses or more.</p> <p>This will never happen and is a classic get out clause.</p> <p>There will never be any developments of 1000 houses or more. Whilst overall development may be in this magnitude, It appears that the developments are being authorised for much smaller number of houses therefore there is not the need for allotments.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.47	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2067	12.2		<p>12.2 Actions - The Council will seek to:</p> <ul style="list-style-type: none"> · Monitor any unmet demand for allotments in relation to the adopted standard. <p>Where is the evidence that this has been done?</p> <ul style="list-style-type: none"> · Investigate possible solutions to any unmet demand and promote the provision of new allotment sites where they are needed. <p>How much progress has been made in the provision of additional allotments?</p> <ul style="list-style-type: none"> · Support the improvement of existing allotment sites to enable more people to share the benefits of allotments and skills with a particular emphasis on food growing both on allotments and in containers. <p>Yet again fine words with no substance or outcomes. What has NBBC done so far to meet this objective?</p> <ul style="list-style-type: none"> · Encourage the adoption of organic and sustainable cultivation methods on allotments. <p>Another are where no progress has been made. What has NBBC done to meet this?</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.48	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2068	12.3		<p>12.3 Outcomes - Through so doing The Council aims to:</p> <ul style="list-style-type: none"> · Increase the numbers and diversity of people growing their own food <p>Provide information as to how in the last ten years NBBC has achieved this.</p> <ul style="list-style-type: none"> · Increase levels of consumption of fresh fruit and vegetables across the community, with special emphasis in Super Output Areas (SOA's). Again, provide information as to how in the last ten years NBBC has achieved this. <p>It is doubtful many associations even know whether they are in a Super Output Area (SOA).</p> <ul style="list-style-type: none"> · Contribute to raising physical activity levels especially among older people. <p>Another area where there has been zero contribution by the council.</p> <ul style="list-style-type: none"> · Provide opportunities for social interaction and community integration. <p>When and where has this been provided by NBBC?</p> <ul style="list-style-type: none"> · Contribute to environmental improvements and use of sustainable growing methods <p>How, when and where has this been done?</p> <ul style="list-style-type: none"> · Raise skill and knowledge levels of horticulture and cultivation. <p>Yet another area where absolutely nothing has been done in the last ten years by the council.</p> <ul style="list-style-type: none"> · Improve the health of the community. <p>More empty words.</p> <ul style="list-style-type: none"> · Support the development of horticultural knowledge. <p>Another area where absolutely nothing has been done in the last ten years by the council.</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Document name	Paragraph	Policy	Comments	Suggested modifications	Officer Response
202.49	RM	Bedworth & District Horticultural Council	Allotment Strategy 2012-2022 and 2017-2069	13.1 and 13.2.		<p>13.1 ?</p> <p>13.2 The NFA, BDHC & Bulkington will make an annual report to Planning & Environment Overview & Scrutiny Panel, updating members on levels of occupancy, waiting lists, developments on allotment sites and levels of engagement with the surrounding community, schools etc. This in turn will contribute towards demonstrating how health and well-being matters are being addressed throughout the Borough.</p> <p>13.2 How does the council enforce this if / when an association decides that they are going to resign from one of the above header groups?</p> <p>13.2 This allotments strategy will be reviewed at five year intervals (A Quinquennial Review) at which time the infrastructure audit and assessment of levels of provision will be updated. The vision, policies and standards will be amended as necessary.</p> <p>Before this is carried out can reference be made to the 'Plain English Campaign'</p> <p>Conclusion: This strategy appears to have been designed to confuse most of the readers. Its size and contents have little or no relevance to most people engaged in allotment sites.</p> <p>The revised version needs to be to the point and in plain English. Moreover it needs to be relevant and the actions in it to take place.</p> <p>This Strategy has said much and achieved little.</p> <p>'Should be realistic! Not idealistic waffle'</p>		The Council's Parks and Open Space Team deal with allotments and are currently carrying out a new Allotment Strategy. The comments from this response have been passed to that Team.

Ref	Initials	Organisation	Page no.	Paragraph	Policy	Comments	Suggested modifications	Officer Response
301.1	DB	NBBC	90-92	8.112, 8.113	SEA-6	<p>The inclusion of SEA-6 (formerly EMP7) should have the evidence base updated and the inclusion of the site as a preferred option site should be reconsidered.</p> <p>In particular, the Transport modelling report referred to in para 8.113 is dated 2017 and relies on evidence gathered prior to that date. Since the adoption of the Borough Plan in 2018, large scale housing development has taken place nearby at Hawkesbury and School Lane, Both of these developments have added to the traffic levels using School Lane and the junction at Coventry Road/School Lane. The proposed development at SEA-6 proposes to utilise School Lane as the access primary route for HGV's (referred to in para 8.112) but the mitigation proposals associated with the preferred option do not address the issue of capacity of School Lane and the junction of School Lane and Coventry Road.</p> <p>School Lane already suffers from serious peak time congestion issues. For most of its length there is only a pavement on one side of the road and in parts it is narrow. There has been a number of accidents on School Lane and there are issues with parking between the junction of Exhall Green and the Coventry Road junction due to a shortage of parking for the Red Kangaroo trampoline park that's popular with families. Warwickshire County Council traffic safety team is currently developing a traffic calming and management plan for the School Lane area that will impact on the suitability of the road for increased numbers of HGV vehicles and this is at odds with the use of the SEA-6 as an employment site,</p>	<p>Given that the use of Bowling Green Lane and Vicarage Lane as primary access routes of the site is deemed unsuitable because of the proximity of local schools, I do not consider that any improvement to School Lane makes the use of that road as a primary access route to the site is viable, The site should be removed from the preferred options until a revised evidence base has been provided.</p>	<p>A new STA will be carried out for all of the sites and the response from this will determine whether any sites are removed.</p>

302.1	LC	NBBC		6.1, 7.0 - 7.7	DS1 and DS2	<p>I completely agree with the map and am pleased to see both the Woodlands and East Bulkington removed from the emerging plan and returned to rural land statement. I would however have preferred to see us making a case that there are exceptional circumstances and that this land should not have been removed from the Green belt in the first instance.</p> <p>I completely agree with Ds1 and Ds2, no modifications are required.</p>	<p>As per the previous box I would like to see the land mentioned returned to the greenbelt to offer it further protection in the future from developers and future Labour Councils who care little for the views of residents. I would still like to see the New SoS written to and asked for a further moratorium while this plan is reviewed in light of the Coventry numbers now being shown to be based on an additional 40,000 non-existent residents. This has skewed our plan and it hardly seems right or proper that we are having additional development foisted on the Borough due to inaccuracies from Coventry City Councils local plan.</p>	<p>Consideration will be given to refer the land back to Green Belt. The emerging HEDNA will be used to look at Housing need which will include any cross boundary Duty to Co-Operate.</p>
303.1	KE	NBBC			Removal of HSG-4	<p>I wish to place on the record about my support for the removal of policy HSG4 Bedworth Woodland from the Local Plan. This decision makes complete sense and I hope the new Local Plan can be adopted without the Woodland being included.</p> <p>To be blunt, there is simply no point in including the Woodlands within the Local Plan on the grounds that the site would never deliver housing. Therefore, towards the end of this Plans lifespan the plan would never deliver a five year housing land supply. Why wouldn't it be deliverable? Because no developer on the land is going to cough up millions towards a new access road onto the A444, which is a condition imposed by Government Inspector Spence.</p>	<p>In order to make this Plan more sound and compliant, I believe the Planning Department must give consideration to extending the Green Belt boundary to include all agricultural land on the Bedworth Woodlands. Firstly the existing agricultural land is an enormous benefit to the local economy and would score high in terms of usage. Second, as the Council's own Ecology contractor "ECUS" has confirmed, the land in question maintains some of Warwickshires' last remaining ridge and furrow. Finally, the grounds to remove the Woodlands Green Belt status originally was unsound. The previous Labour Council took the decision on political grounds rather than using genuine evidence. If the Woodlands Green Belt boundary is extended this will give the area more protection against inappropriate housing development should we have a situation towards the end of the Local Plans life span where we fall below a five years housing land supply. A planning specialist from the House of Commons Library has confirmed to me that legislation does allow for Green Belt boundary extensions on land that was once Green Belt but had its status removed.</p>	<p>Consideration will be given to refer the land back to Green Belt.</p>

304.1	KK	NBBC		7.25 – 7.26	<p>The borough plan 2024 to 2039 target should be 350PA. See attached (below) cross cutting response to HEDNA Note on HENDA and Housing Target This is my initial response to the May 2022 Nuneaton & Bedworth Housing & Economic Development Needs Assessment. I have asked NBBC for the data which supports the assessment but the council has failed to provide the data behind the age profile and headship calculation. The NBBC HEDNA report therefore should be given no weight until this information is available. It is also essential to recognise that a housing need assessment for our borough needs to understand what has happen in the housing market area since 2011 and the economic imbalance between the North and South of the Coventry and Warwickshire sub-region. Nuneaton and Bedworth has suffered primarily from low household incomes and lower opportunities. Most of the population growth has come from inward internal migration. Detailed comments (by HEDNA section number) 1.4 The functional Housing Market Area (HMA) and Functional Economic Market Area (FEMA) for Nuneaton and Bedworth should include Hinckley, Coventry and North Warwickshire but exclude Stratford-on-Avon. There is a massive interaction between growth in Hinckley and Nuneaton. 2.19 “The earnings of those working in the Borough fall 23% below the sub-regional average”, The rest of the report ignores this. 4.2 “house prices in Nuneaton and Bedworth are around one third lower than the wider HMA”. This is key detail. High quality house building will focus on areas with higher house prices. Plans for higher targets are only viable if some of the infrastructure and affordable housing can be funded properly externally. 5 Demographic trends. The 2021 early release shows that the population of Coventry has been significantly over estimated by around 40,000 people. There has been a smaller over-estimate of populations in Warwickshire of around 8,600. For the Coventry and Warwickshire Housing market area the Mid-year population estimate will have been around 31,000 too high by 2021. It was clear as far back as 2013 that the population forecasts were deeply flawed as they did not take account of the growth of student numbers around</p>		<p>The Respondee was provided with a formal response from ICENI specifically related to the comments made. An updated HEDNA is due to be published shortly and will provide a sound basis to provide the number of housing and economic development proposed.</p>
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					<p>Coventry and displacement of people into Warwickshire. I have made this case in all the consultations and hearings for both our borough plan and that in Coventry. More recently we have had a vast array of diverse data showing the significant error in the Population of Coventry in the 25-34 year age range such as birth rates and vaccination take-up. My research was key in challenging the ONS mid-year estimates for Coventry and the review of their work by the statistics regulator in 2021.</p> <p>5.3 Age profile. The census shows we have 19.0% of borough population under 16 years old and 19.1% over 64.</p> <p>5.4 ONS Mid-Year Estimates (were wrong) The change in population between census in the borough has been approximately 8,791 people which is a 7.0% increase. I estimate there have been around 15,611 births and 12,456 deaths in the 10 years implying a net natural change of around 3,155 and in implied net migration into the borough of 5,636 people. The population change in Coventry was 8.9% and overall Warwickshire change was 9.4% lead by Rugby which rose by 14.4%. (note all these estimates will be improved when census data is released without rounding to nearest 100 and birth/death data releases aligned with timing of census)</p> <p>5.5 Accuracy of Population Estimates and Relationship with Coventry I have attached my slide pack for my Statistics Authority presentation. I and other campaigners have been demonstrated to be correct by the new census data. Remarkably a population estimate based on facebook users was more accurate than ONS MYE.</p> <p>5.8 Migration within region. The big growth area was Rugby which had more affordable housing and better rail services to London.</p> <p>5.10 growth in housing. The borough population grew 7.0% between censuses while number of households grew by 7.3%. The number of dwellings increased by 8%. The accelerated rate of housebuilding is reducing the number of suppressed households but increasing the number of empty homes since 2006.</p> <p>Projected Population Growth Over the decade 2011-2021 the population of the Borough grew by around 8,791 people (7%). Over that period we have increased the number of</p>		
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					<p>households by 7.3% and number of dwellings by 8% (just under 4000).</p> <p>I have created a crude black box model of the borough's male and female population to enable the population changes from 2011-2021 to be rolled forward to 2031 and beyond. The input data for changes over the decade clearly have considerable limitations due to the rounding of totals (to 100s) and the lack of single year age totals. It is also obvious that 2021 was not a typical year due to impact of the pandemic both supressing birth rate and reducing the number of students physically being at university addresses.</p> <p>My model takes the 2021 census population in 5 year age bands by sex and produces an estimated single year age band population alighted with single year age profile in Nuneaton and Bedworth PCN GP registrations. The model uses real birth and mortality data plus a modelled migration rate per age to roll forward the 2011 censes profile to a modelled 2021 population for each sex. The modelling of deaths is also only a crude approximation as data is mostly available in 5 year bands. We have the added issue of 2011 census having a 85+ age band to roll forward into 95+ band in 2021. I based death rates in model on 2016-20 mortality data in the 5 year age bands which includes around 9 months of the pandemic in the 10 year trend. The Microsoft excel solver function is then used to fine tune the migration coefficients to produce the minimum square error. This crude model cannot produce a perfect single year match. In real world the migration rate varies between years for each age and some of the inputs are in 5 year age bands or maligned by 3-9 months . However it is good enough to drive a model of birth rates and household headship numbers. In rolling the model forward from 2021 census year to 2041 the single year migration coefficients are fixed, birth rates are fixed at average birth rate in 5 year band for 2013-2019 and the fixed death rate. Figures 4 & 5 shows the modelled and census populations at 2021 in very good agreement. Figures 6 & 7 shows the 2021 census populations rolled forward to 2031.</p> <p>When we get single year data from the full census release we can better represent populations in the under than one year and 95+bands. That will have only tiny impact on housing requirements for 2021 to 2031.</p> <p>The model forecasts a population increase of 6,611</p>		
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					<p>people between 2021 and 2031. Between 2031 and 2041 the increase is predicted to be 4,818 as the number of people sadly dying increases as post war population ages.</p> <p>I then convert the population back into 5 year age bands and use ONS 2018 based headship rates to calculate expected number of households for each year. For 2021 that calculation gives 58,116 households compared to the census which gives 56,600. Part of the 1,516 difference will be due to around 900 people (source ONS: Care homes and estimating the self-funding population, England: 2021 to 2022) being in institutional settings who should not be included in headship calculation and the rest could be additional suppressed households given low incomes. Applying ONS 2018 based headship rate for 2031 gives us 61,615 households which is an increase of 3,499 extra households over 10 years. Rolling onto 2041 we get another 2,650 households as rate of population growth reduces. Over the proposed period of the plan 2024-39 the number of households increases by 4,467 which is 298 per year. We are currently building around 600 homes a year which will slow down as the backlog of building s and help to buy is cleared. I would propose the base level of long term housing demand is set at 298 a year with addition small provision made to reduce suppressed household creation. A rough borough plan target proposal assuming we build 600 a year 2022-2024 is to have 400 target for 2024-29, 350 for 2029-2034 and 300 target 2034-39 giving 1,800 homes before plan starts and then 5,250 over 15 years (see figure 9). That would over provide by 1,500 to assist with suppressed household formation. <i>The report also provided several graphs but these cannot be included with this spreadsheet.</i></p>		
304.2	KK	NBBC		7.23	Need changing requirement to 298 per year with uplift to 350.	Change to reflect my model of HEDNA	An updated HEDNA is due to be published shortly and will provide a sound basis to provide the number of housing and economic development proposed.
304.3	KK	NBBC		9.8	Table provided with estimates of demographic growth stating the over 85 population increase seems implausible. <i>This table could not be replicated into this spreadsheet.</i>		An updated HEDNA is due to be published shortly.

304.4	KK	NBBC		15.37 onwards	BE2	<p>This section is over a decade out of date and need total re-write.</p> <p>Over the last 12 years solar and storage technology has become significantly cheaper and should be installed at every opportunity. The policy should be that roofs are fitted with solar wherever possible. Ground and water source heat pumps should be supported.</p> <p>The latest World Health Organisation pollution limits should be considered when bio-mass combustion is proposed and this should be avoided in the urban area.</p> <p>Wind power should be supported where there is suitable wind resources outside the urban areas. Hydro-power, compressed gas, gravity storage and aqueducts should be supported in suitable locations. Passive solar design also needs to consider shading to prevent buildings over heating in summer.</p>		<p>The Borough Plan Review is fully supportive of renewable energy. A Viability Assessment is currently being carried out to assess how far this can be provided within Policy. Once this has been provided the Policy wording can then be readdressed.</p>
304.5	KK	NBBC			DS1		<p>You need to insert policies on Net zero development like the ones in the Warwick Plans.</p>	<p>The Borough Plan Review is fully supportive of achieving net zero carbon development. A Viability Assessment is currently being carried out to assess how far this can be provided within Policy. Once this has been provided the Policy wording can then be readdressed.</p>
304.6	KK	NBBC			DS3	<p>Need policy reworking to include proper net zero plan like Warwick</p>	<p>Add NZC1 onwards Must have no gas boilers or gas supply. Mandate solar on all suitable roof spaces up to the maximum electrical load of the building</p>	<p>The Borough Plan Review is fully supportive of achieving net zero carbon development. A Viability Assessment is currently being carried out to assess how far this can be provided within Policy. Once this has been provided the Policy wording can then be readdressed.</p>
304.7	KK	NBBC		DC4	DS4	<p>The HEDNA is wrong, we need 298 homes per year plus some catch-up</p>	<p>The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2024 and 2039:</p> <ul style="list-style-type: none"> • 5,250 homes based on 350 dwellings per annum 	<p>The Respondee was provided with a formal response from ICENI specifically related to the comments made. An updated HEDNA is due to be published shortly and will provide a sound basis to provide the number of housing and economic development proposed.</p>

304.8	KK	NBBC			DS4	The employment land takes no account of how tight the boundary of NBBC is and developments off A5 by MIRA and Dodwells which may provide employment actually on the boundary of the borough. Need to take of MIRA south and A5 near Dodwells from requirement.	The employment land takes no account of how tight the boundary of NBBC is and developments off A5 by MIRA and Dodwells which may provide employment actually on the boundary of the borough. Need to take of MIRA south and A5 near Dodwells from requirement. Lower employment land by developments on boundary.	The development referred to is within another Local Authority and therefore cannot be considered under the requirements for NBBC.
304.9	KK	NBBC			DS5	We do not need or have infrastructure for all this development. Remove SHA-1, SHA-4, NSHA-7 ,14 and 18 from DS5	We do not need or have infrastructure for all this development. Remove SHA-1, SHA-4, NSHA-7 ,14 and 18 from DS5	The HEDNA will provide the amount of Housing and employment required. The STA will look at highways implications. The IDP will be updated as part of the review.
304.10	KK	NBBC			H2	Policy H2 is unsound as it prevents viable developments of 11-13 homes as they the requirement for 2 affordable homes kicks in above 10 market homes. To build 10 market homes a developer builds 10 homes, to build 11 market homes they need to build 13 homes. This abrupt step means opportunities are wasted. Recommend that policy is changed so that one affordable home is provided for the 10th market home and the second for the 12th market home. Reference to First homes should be removed as this flawed project is unlikely to last until 2039.	As comments.	The outcome for the number of affordable homes would be the same. First Homes is the current mechanism provided by Government and therefore must be referred to.
304.11	KK	NBBC			NE4	We need to add to this policy something to reduce water course downstream of developments being silted up with runoff from the ground when they strip the surface of crops. This has been a problem in Change Brook by Clay Avenue and in the River Anker itself.	Add paragraph on silt prevention and silt traps.	This is considered a reasonable request and is similar to that requested by Severn Trent Water.
304.12	KK	NBBC			NE5	Add protection for significant groups of mature trees. A good example is tree group G8 on to farm which can currently be seen from considerable distance but NBBC is refusing to protect with a TPO.	As comments.	As part of any application a full Tree Assessment will be required and the assessment will need to fully justify any tree removal.

304.13	KK	NBBC			SEA-6	Delete allocation. Failing that 1) Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path. 2) Require LTN1.20 cycle link to Bedworth and Coventry Arena stations	As comments.	Any requirements for speed restrictions will be requested by WCC Highways once the STA and Road Safety Audits are carried out. WCC Highways and Sustainable Transport Teams will be consulted and any updates to the IDP will be added.
304.14	KK	NBBC			SHA-1	We need this allocation removing. If that does not happen then we need its scale reducing, trees at G8 and W1 protecting and proposed planning changed to insist that an entrance on Weddington side of Nuneaton station with bus interchange and drop-off parking, there is no need for a primary school on the site as Lower Farm and Calender farm are two form entry . The sports funding need to stay local and exclude things in Bedworth. Need instead to support provision for onsite running and bus link to Pingles. We need real modal shift for the whole of the North East of Nuneaton and not expand the general highway network capacity. What is needed is the northern spine road which must come with segregated cycle path and 20 MPH limit on all other estate roads.	Remove allocation and policy. Failing that modify as per comments.	The site has already been granted consent subject to the signing of a S106 agreement. The requirement for the level of schools has been provided by WCC Education. The link road is due to be delivered during the development and provides spaces for bus stops and cycle link.
304.15	KK	NBBC			SHA-2	Set an estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path. Provide funding for re-opening Stockingford Station and Bus connection to Bermuda park Station.	Set an estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path. Provide funding for re-opening Stockingford Station and Bus connection to Bermuda park Station.	Any requirements for speed restrictions will be requested by WCC Highways once the STA and Road Safety Audits are carried out. WCC Highways and Sustainable Transport Teams will be consulted and any updates to the IDP will be added.

304.16	KK	NBBC			SHA-3	Set an estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path. Provide funding for re-opening Stockingford Station to reduce mitigate on Abbey Green AQMA. Provide fully segregated LTN1/20 cycle path to proposed path crossing the green area off Corporation Street.	Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path. Provide funding for re-opening Stockingford Station to reduce mitigate on Abbey Green AQMA. Provide fully segregated LTN1/20 cycle path to proposed path crossing the green area off Corporation Street.	Any requirements for speed restrictions will be requested by WCC Highways once the STA and Road Safety Audits are carried out. WCC Highways and Sustainable Transport Teams will be consulted and any updates to the IDP will be added. Native Woodland is supported and is stated within other Policies.
304.17	KK	NBBC			SHA-4	Delete allocation. Failing that 1) Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path. 2) Provide 20% of the site as native woodland. 3) Provide an LTN1/20 standard cycle route to either Bedworth or Coventry Arena station.	As per comments.	Any requirements for speed restrictions will be requested by WCC Highways once the STA and Road Safety Audits are carried out. WCC Highways and Sustainable Transport Teams will be consulted and any updates to the IDP will be added.
304.18	KK	NBBC			SHA-5	Delete allocation. Failing that 1) Set a estate wide 20 mph limit except where there is fully segregated LTN1/20 cycle path. 2) Modify 12 to require cycle link to Bedworth to be fully funded and to LTN1/20 standard. Must be complete before occupation of 174th home	As per comments.	Any requirements for speed restrictions will be requested by WCC Highways once the STA and Road Safety Audits are carried out. WCC Highways and Sustainable Transport Teams will be consulted and any updates to the IDP will be added.
304.19	KK	NBBC				Powerpoint presentation provided in reference to 'Problems with Coventry and Warwickshire population modelling'. <i>This could not be added to the spreadsheet.</i>		

305.1	CT	MP - House of Commons			Removal of HSG-4	<p>To whom it may concern</p> <p>I am commenting on the Borough Plan review in my capacity as Member of Parliament for Bedworth. I have been contacting the Nuneaton and Bedworth Borough Council since the proposals for the Borough Plan were released in 2015, raising the issues of the housing numbers accepted from Coventry City Council as I believed them to be greatly exaggerated. Over this time, I have written several times to the Government, the Office of National statistics, Mayors and the CPRE, as well as contacting the previous administration pre-2021 asking for the amount of houses to be built in the borough to be reduced. I have regularly raised that the knock on effect of this over-estimation is that we could also see an extra 4,000 homes being built in the Nuneaton and Bedworth area as well as affecting the local plans of a number of other Warwickshire authorities.</p> <p>Whilst I appreciate that there is a need for new housing, I am sure you will agree that allocations need to be based on sound information and be served by the appropriate amount of services and amenities. In doing this, you can ensure that a more accurate local plan will be delivered for Nuneaton and Bedworth, with more realistic targets being set and infrastructure provided which makes it sustainable.</p> <p>In view of this I am very pleased to see, as are the many residents that I have spoken to, that the new</p>		<p>The new Plan has taken a brownfield site first approach within its main principles and HSG-4 is currently proposed to be removed.</p>
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					<p>administration has decided to review the Borough Plan and consult on removing some of the sites, in particular HSG4. I wholly back this decision and would like to support the decision to exclude the Woodlands so preventing future development. The site on the Woodlands has been controversial from its inclusion as it was used as an electioneering tool with the promise that the land would be put into Greenbelt via an extension, thus ignoring the Full Council resolution made in 2012. I understand that the land does not meet the criteria for adding to the Greenbelt but it does contain medieval ridge and furrow which should be protected as the Planning Inspector stated in his examination of the Plan.</p> <p>The Woodland is a large area of green land used by the community as a recreational facility and is prone to flooding. Woodlands Lane has been regularly closed to vehicles and pedestrians as well as sandbags being distributed to households after moderate to heavy rain, which would only increase with any further development. By developing this land, the inability to absorb floodwater will increase the risk of both new and existing homes being flooded.</p> <p>Additionally, the road through the area would struggle to hold the increase in traffic with any further development as it seems to be at capacity at this time. The right decision is to remove the Woodlands from the plan due to the promise not to, as well as it being included initially without a right to consult.</p> <p>Although I am happy with the option to remove HSG4, I am still frustrated with the decision to remove so much land from Greenbelt in the Bedworth area. The Greenbelt is being diminished, destroying the buffer between Bedworth and Coventry. It will also affect the biodiversity of the town with the removal of protected tree species such as Oaks, Silver Birches and Maple trees as well as rare species of woodpeckers. Please consider the points made when assessing if the need for houses on Greenbelt sites is worth more than ensuring that existing Brownfield sites are developed first. So, I would like to reiterate my request from all of my previous submissions regarding the Plan to ensure that Brownfield sites are given priority over the development of the Greenbelt sites to protect the environment and the buffer between the conurbations of Bedworth and Coventry. Clarification is also needed to ensure that all</p>		
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						<p>proposed developments will have access to quality services and health provision to ensure that the increase in residents can access them as well as not making the existing user's experiences of services suffer.</p> <p>I trust that you will consider the points made in my submission and look forward to hearing of the outcomes in due course.</p>		
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Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
401	JA	7.63-7.72	HSG5	I object outright on the new planning of the above due to the overwhelming loads on the sewerage system, I am concerned that it will be under severe pressure due to the proposed number of units being built.	Keep the land as is	Severn Trent will be consulted at the application stage to ensure that the sewerage system can cope with the development.
402	BA	7.21 and 7.39	DS4 and DS5	<p>Paragraph 7.21 Strategic Policy DS4 – Overall development needs The Housing & Economic Development Needs Assessment Final Report dated May 2022 suggests a lower Dwellings per Annum is required than detailed in the Borough Plan Review: 5.24 There is evidently some uncertainty related to population trends in Coventry, and in Nuneaton and Bedworth. Using the evidence currently available indicates that population growth can be expected to be stronger than shown in either the 2014- or 2018-based SNPP. Icen consider that the most 34 appropriate approach based on the current evidence is to use the Alternative Population Projection developed, and apply the 2014-based headship rates to this. This approach generates average annual household growth of 524 dpa. This reduced DPA would result in a reduction in the requirement of 1,830 for the period of 2024 to 2039.</p> <p>Paragraph 7.39 Policy DS5 – Residential allocations The Borough Plan Review stated that: 7.10 On that basis, it is considered that urban capacity should be a key focus for the borough plan review to investigate potential sites suitable for residential development within the urban areas. This is to help minimise release of greenfield sites as far as possible and drive the ‘brownfield first’ approach as set out in national policy guidance. The proposed residential allocations includes several greenfield sites including agricultural land including Hospital Lane, therefore it is not clear that the Council have fully adopted the policy as stated above and investigated all brownfield sites sufficiently at the detriment of greenfield sites. At a time when the UK’s food security strategy is under review, it seems unwise to reduce the availability of agricultural land such as on Hospital Lane. The Non-strategic site list does not include all the planned house building within the Borough such as the developments at Astley Fields (169 properties in first phase) and Sketchley Gardens (70 properties in first phase).</p>		<p>The justification for the council's approach is outlined in the Borough Plan Review.</p> <p>The council have followed the brownfield first policy, however there are not sufficient brownfield sites to meet the borough's needs.</p> <p>All planned housebuilding is not included in the non-strategic sites.</p>

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403.	JB		SEA-2	<p>I do not consider the Borough Plan Review Preferred Options document to be sound because there are inconsistencies between policies and with national policy. For example, in the NPPF it says,</p> <p>‘109. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.’</p> <p>Regarding this, Policy HS1 (ensuring the delivery of infrastructure) states,</p> <p>‘Development needs to consider the cumulative impacts to existing infrastructure and for any potential large scale transport facilities required for the wider economy (including adequate overnight lorry parking.)’</p> <p>However, there appears to be no specific policy on how the provision of overnight parking facilities within the NBBC administrative area will be delivered. Neither are there dedicated sections within the policies for strategic employment allocations to ensure that there is sufficient onsite lorry parking and overnight parking facilities. To avoid inconsistencies, there should</p>	<p>Form of Development An additional item should be added to the ‘form of development’ section to ensure that there are overnight lorry parking facilities provided onsite and sufficient lorry parking to cater for the anticipated use. Being near to the M6 J3 and the A444, Longford already experiences problems with HGV’s using residential streets for stacking and as alternative routes when there are issues on the strategic road network. The SEA-2 – Wilson’s Lane policy should address these issues so as not to cause a nuisance to residents living in Longford. Would it also be possible to set a maximum floorspace for the policy to ensure that plans for it are sustainable and able to deliver enough onsite parking to cater for anticipated use including overnight lorry parking facilities?</p> <p>A second item should be added to the ‘form of development’ section to ensure that an onsite pick-up and drop-off zone is provided. The B8 element of the site is likely to be running 24-hour 365 days-a-year (including bank holidays); therefore, it is essential that residents within Woodshire’s Green are not disturbed by employees being picked up or dropped off via cars, taxis and minibuses. There should be an onsite parking area available for vehicles to wait for employees who are finishing a shift.</p> <p>A third item should require facilities for cyclists such as a secure all-weather bike storage area, showers, toilets and lockers.</p>	<p>Policy HS1 sets out that overnight lorry parking will be considered, it does not state that it is necessary.</p> <p>SEA-2 did qualify for exceptional circumstances to be removed from the Green Belt, as this was endorsed by a Planning Inspector appointed by the government.</p> <p>Planning legislation and policy has moved on significantly from 1988, therefore the letter from the Department of the Environment is not necessarily relevant anymore.</p> <p>We have not set a maximum floorspace, however the development will not be permitted unless there is sufficient onsite parking.</p> <p>The bus infrastructure requirements of SEA-2 are consistent with national policy, and are not discriminatory against people with disabilities.</p> <p>Every issue does not have to be covered in the Borough Plan; some</p>

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				<p>be a policy which specifically sets out minimum standards for employment or mixed-use sites especially those which include elements of B2, B8 and sui generis such as scrap yards. The requirement for onsite overnight lorry parking facilities needs to be reiterated within individual policies for strategic employment allocations, such as SEA-2 – Wilson’s Lane. Other examples are provided within the following section.</p> <p>I believe the policy and SPD for SEA-2 – Wilson’s Lane encourages applications to be submitted which would be unsustainable. The evidence of this is clear from the number of alterations to an original illustrative masterplan an applicant has submitted for an outline application for this site (037237) and conditions required within the agenda for the Planning Applications Committee meeting on 24th May 2022. The policy needs to be written in a way that protects the site from overdevelopment, prevents harm to residents’ health and wellbeing and ensures what is delivered is sustainable. It is important that policies and SPDs are written in such manner that officers and planning application committees can adhere to them. This would make the planning process more efficient and reduce the time taken for an application to reach the planning application committee stage.</p> <p>A better mix of land uses would provide an opportunity to deliver biodiversity net gain; for example, parts of the site could be used</p>	<p>‘5....developer contribution to secure provision of bus infrastructure at prominent locations to the employment site.’</p> <p>This part of the sentence in item 5 should be removed from the policy. An onsite bus terminus is essential if this strategic allocation is to provide sustainable modes of transport. An updated version of the following sentence from the Borough Plan should also be reinstated,</p> <p>‘6. Developer contribution to secure provision of bus infrastructure at prominent locations within the employment site in order to complement the point above.’</p> <p>Apart from the stop at Oban Road, there are no appropriate locations to install bus shelters or lay-bys within the residential area of Woodshire’s Green. In Wilson’s Lane and Woodshire’s Road, the pavements are not wide enough for large numbers of employees to alight from a bus or to contain large queues of employees waiting to catch one at the end of a shift. Encouraging bus users to go off-site to catch a bus would create a road safety issue within the area especially at the top of Wilson’s Lane and on the Bedworth Road/Longford Road (B4113).</p>	<p>issues can be determined at the application stage.</p>

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				<p>as a biodiversity offsetting receptor site, carbon offsetting, increasing flood storage capacity, improving water quality, etc. A section of the site was originally historic parkland (part of the Moathouse’s pleasure grounds) and should be managed as wood pasture (see Bug Life’s fact sheets). Hedgerows and ditches still follow the field layouts indicated in the OS Six Inch, 1888-1913 map and so should be retained especially as there are no equivalent sites within Longford and Foleshill which have these features intact.</p> <p>Within the NPPF, it says,</p> <p>‘32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)’</p> <p>However, I do not believe that the mitigation hierarchy, as outlined in the BSI Standards document ‘BS 42020:2013 Biodiversity — Code of practice for planning and development’ and CIRIA’s document ‘Biodiversity net gain. Good practice</p>	<p>otherwise they may park-up within the residential area impeding the flow of traffic and creating a nuisance for residents.</p> <p>Furthermore, Coventry City Council and Longford Ward residents should be consulted on any impacts to their bus services. At times of shift changes, the Wilson’s Lane site could create issues for people who use local bus services to go to and from work or school especially if buses were to become so overcrowded that residents might not be able to board them. When making arrangements for bus services, it is important to be aware that there is a low bridge on Woodshire’s Road, which prevents the use of double-deckers (to avoid bridge strike), and that there is a barrier across Rowley’s Green Lane, which has a weak bridge over the River Sowe, to stop it from being used as a through road.</p> <p>In terms of the Equality Act 2010, should the bus services not cater for all employees including those with reduced mobility or a disability? For those working late-night or early morning shifts would it not be safer for them to be waiting for their buses where there is security, shelters and access to toilets? Surely, an on- bus terminus should be provided to fulfil the requirements of the act.</p> <p>According to the NPPF, planning policies should,</p>	

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				<p>principles for development A practical guide’, has been followed effectively and this has exposed the SEA-2 – Wilson’s Lane site, its neighbouring local wildlife sites and the River Sowe’s blue corridor to the risk of biodiversity net loss and the removal of locally important features such as hedgerows. This site does not qualify for ‘exceptional circumstances’ as there are other more sustainable locations within Coventry & Warwickshire that could be used to deliver B8. NBBC should be following the UK’s good practice principles for biodiversity net gain (BNG) and should ensure that it avoids ‘pitfalls when quantifying losses and gains in biodiversity, such as:</p> <ul style="list-style-type: none"> • focusing on numbers to only outweigh losses of biodiversity with gains without generating any meaningful benefits • missing opportunities to benefit key species that are affected by a project but not directly accounted for within a biodiversity metric • showing a quantified net gain in biodiversity but the project causes a critical loss of, for example, ecological connectivity, a rare habitat, green space or some other key feature • replacing highly valuable features with features of lower ecological value, or replacing locally important features with features further away • causing negative social impacts, eg when people negatively affected by a project’s impact on biodiversity are not the same as those benefitting from the net gains in biodiversity.’ 	<p>‘...provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.’</p> <p>Furthermore, ‘in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that,</p> <ul style="list-style-type: none"> a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.’ <p>‘Applications for development should:</p> <ul style="list-style-type: none"> a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and 	

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				<p>It is essential that any biodiversity offsetting is used to restore the Sowe Valley corridor, whether in Coventry or Bedworth. It should not be used to improve other watercourses within the River Trent CFMP.</p> <p>As we are now in the transition period for when BNG becomes obligatory (November 2023), it is reassuring to see that NBBC is starting to embed 10% BNG within the Borough plans policies in preparation for the requirements laid out within the Environment Act 2021. However, it would be useful to include a reference to the expectation of delivering 10% BNG within the policy for SEA-2 – Wilson’s Lane itself.</p> <p>Regarding SEA-2 – Wilson’s Lane, it does not appear as if the Department of the Environment letter dated 21 December 1988 (APP/W3710/A/88/087112) was considered during the inspection of the Borough Plan. Now that the Borough Plan is under review, this should be rectified. Within the letter the following was stated,</p> <p>‘5. such landscaped areas shall include a buffer zone of a width of at least 100m from the rear faces of the dwellings lying towards the east of the site.’ ‘The Inspector recommended that appeal (A) be allowed subject to conditions covering the matters outlined at para 173 of his report, and that appeal (B) be dismissed.’</p> <p>‘4. With the principle of the development of this area so clearly established through the approved Structure Plan, the Secretary of State has carefully considered the merits of each of the two appeal sites. He agrees with the Inspector that although the</p>	<p>second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;</p> <p>b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;</p> <p>c) create places that are safe, secure and attractive—which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;’</p> <p>Due to the addition of an option to ‘secure provision of bus infrastructure at prominent locations to the employment site’ i.e., off-site, Policy SEA-2– Wilsons Lane is not consistent with national policy and may even be discriminatory.</p> <p>‘7...or a financial contribution towards the upgrading of local play/sports facilities.’</p> <p>This part of the sentence in item 7 should be removed from the policy. The need for an onsite play facility has been established during consultation for the current outline planning application for this site (037237). There are no play facilities within the required distances and there are also barriers to access (river, canal, railway, A444, B4113 corridor, M6). In the agenda for the Planning Applications Committee meeting on 24th May 2022, it says,</p>	

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				<p>Hanson land does offer some advantages to developers which are not so apparent in the Gallagher land, its development would have a much greater impact upon the local environment than would its rival scheme. He accepts the Inspector's conclusions that in land use terms the Gallagher proposal is to be preferred and that it accords more closely with the objectives of the approved Structure Plan.</p> <p>5. Therefore, for the reasons given, the Secretary of State accepts the Inspector's recommendation that appeal (B) by Messrs J and R Hanson be dismissed but that the appeal (A) by Gallagher Estates Limited be allowed, subject to certain conditions. He has considered the Inspector's suggestion that the conditions should exclude the requirement for a 100m landscape buffer zone at the east of the site but the Secretary of State takes the view that this would provide an important environmental safeguard for local residents on that boundary of the site. He has therefore retained the relevant condition which in any case has been agreed between the parties.'</p> <p>It would seem odd that the 'local environment' was given more protection and 'local residents' afforded greater safeguards over 30 years ago by a Secretary of State than the SEA-2 – Wilson's Lane policy does now especially with the challenges we are now facing, such as the biodiversity crisis and the impacts of climate change.</p> <p>I do not believe that there has been effective joint working on cross-boundary strategic matters either. The SEA-2 – Wilson's Lane and the SHA-6 – Land at former Hawkesbury Golf Course</p>	<p>'At the request of both Councils a young children's play areas has been included as part of the scheme as the distance to existing facilities is too far as to be considered acceptable.'</p> <p>In addition, a playing field and/or MUGA should also be provided onsite for older children. They currently play ball games and ride their bikes within Old Farm Lane but once there is through traffic to the southern housing element it will be too dangerous for them to do this.</p> <p>'15. Scale and massing of building form around eastern edge of site should be reduced due to proximity to residential properties.'</p> <p>The addition of this sentence in item 15 is welcome and the premise of it should be retained. However, it should be strengthened to include a requirement for a daylight and sunlight assessment and references to building height as has been done for Policy SEA-3 – Prologis extension,</p> <p>'10. Building height to be restricted to 15 m to ridge closest to the western boundary.'</p> <p>Should residents in Woodshire's Green not have the same protections as those living near the Prologis site? Surely, there should not be inconsistencies between policies like this.</p>	

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				<p>policies create cross-boundary issues which have not been addressed effectively e.g., mitigating impacts on air quality along the B4113-B4119 corridor, ensuring that HGV's use advisory routes, supporting nature recovery and safeguarding Longford and Exhall's ecological networks so that there is no biodiversity net loss in the area and improving water quality and flood storage capacity within the River Sowe's catchment.</p> <p>In general, some of the Borough Plan's policies appear to be inconsistent in their approach and are not ambitious enough in tackling issues such as nature recovery and biodiversity net gain, adaptation and mitigation for climate change, air quality and food security. It is important that the content within policies for strategic allocations is consistent and reflects the other policies within the Borough Plan. As the final version of the Borough Plan might be in place until 2039, it is essential that it addresses these issues robustly; otherwise, it may become outdated within a very short length of time.</p> <p>It is worth looking at what Councils are doing in other parts of the country and seeing whether NBBC could be more aspirational in its approach to these issues e.g., Oxford City Council's air quality projects (see link). There are other suggestions for further reading throughout this document.</p>	<p>Policy SA1 – Development principles on strategic sites refers to the positioning of service bays and parking which should be kept.</p> <p>'14. Service bays on employment sites adjacent to housing will need to have loading areas set away from residential properties or any other sensitive noise receptors and car parks at least 50m from residential properties.'</p> <p>However, this is reiterated in Policy SEA-3, '11. Loading area to be positioned so as to not face onto residential properties and car parking spaces to be at least 50m away from neighbouring residential properties.'</p> <p>On the same lines, could a similar item be added to SEA-2 – Wilson's Lane?</p> <p>The need for 'all parking, loading bays, manoeuvring and dock areas' to be located 'on the opposite side of the proposed buildings to residential properties' has had to be established during the consultation process for an outline planning application for the site (037237). In the agenda for the Planning Applications Committee meeting on 24th May 2022, it says, '38. For the submission of the Reserved Matters, the employment area will need to demonstrate that all parking, loading bays, manoeuvring and dock areas are on the opposite side of the proposed buildings to residential properties.'</p>	

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					<p>To avoid inconsistencies in the future, there should be a policy which specifically sets out minimum standards for mixed-use sites or sites which are adjacent to existing Crowds travelling through the area for either late night or early morning shifts are likely to cause a noise nuisance for residents. It is also common for distribution centres to provide private bus services for their employees; therefore, there should be a bus terminus available for private buses to use so that they can wait onsite, residential areas especially those which include elements of B2, B8 and sui generis such as scrap yards. This would also streamline the planning process as applicants would be aware of these requirements when drawing up their illustrative masterplans and would take them into account when preparing for pre-application consultations. In the meantime, the SEA-2 Policy for Wilson’s Lane should be updated to include the protections outlined in the conditions.</p> <p>There should also be references to the positioning of fuel storage, external plant/equipment and additional openings in the elevations or roofs as there are health and safety and noise nuisance implications to these. After the recent fire at Prologis, it is clear that public health and the environment should be given higher priority when creating policies for mixed-use sites involving B2, B8 and scrap yards (sui generis).</p> <p>For example, the need for external storage (including fuel storage) to be positioned away from residential properties has been established during the consultation process for an outline planning application for the site (037237). In the agenda for the Planning Applications Committee meeting on 24th May 2022, it says,</p> <p>‘40. There shall be no external storage (including fuel storage) associated with the employment units to be situated between the employment buildings and residential properties.’</p> <p>Furthermore, the Government is undertaking an in-depth technical review of current building regulations and associated guidance for fire safety. Currently, buildings with a floorspace of 20,000sqm or less and a height of 18m or less do not require sprinklers.</p> <p>Therefore, until building regulations are updated, it is essential that a sufficient landscape buffer zone is maintained between B8 units and residential dwellings. It is impossible to know what might be stored for ‘speculative’ sites and ownership of premises can change overtime anyway. Without knowing what could be stored onsite, it is important that protective measures are put in place. Regarding fire safety, there should be item added to the ‘form of development’ section to include a reference to</p>	

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					<p>access for emergency vehicles. The need for an emergency access has been established during the consultation process for an outline planning application for the site (037237). In the agenda for the Planning Applications Committee meeting on 24th May 2022, it says,</p> <p>‘30. No employment unit shall be occupied until the emergency link connecting the employment site to Wilsons Lane has been completed. (NB. Access to Wilsons Lane is shown on plan: SK_T_026 (P8) Combined Pedestrian / Cycle Path & Emergency Access off Wilsons Lane.’</p> <p>Surely all policies for strategic allocations should have a reference to emergency vehicle access especially as the NPPF states, ‘applications for development should allow for...access by service and emergency vehicles.’</p> <p>There should be an additional item added to the ‘form of development’ section referring to increasing the flood storage capacity to protect residential properties downstream of the site (Rowley’s Green Lane). The need for this was recently established during the consultation process for an outline planning application (037237) for the site. In the agenda for the Planning Applications Committee meeting on 24th May 2022, it says, ‘During the application process whilst the Environment Agency maintained a no objection subject to conditions, they requested that the site provided a betterment for flood relief downstream by providing additional rainwater storage. WCC Flood Risk Management also requested this betterment, and which is consistent with Borough Plan Policy NE4 as well as CCC policies.’ The River Sowe is a tributary of the River Avon and forms part of the River Severn Catchment. Its source is within Bedworth and the river flows through Exhall before crossing the administrative boundary into Coventry. Breach Brook is a tributary of the River Sowe, which flows from Corley through Ash Green and into Exhall, forming a confluence on the other side of the A444 before the River Sowe enters SEA-2 – Wilson’s Lane. The river then flows along the boundary of the site into Sowe Meadow LWS before crossing Rowley’s Green Lane in Longford. However, existing NBBC policies appear to have a focus on the River Trent CFMP and there is a danger that the River Severn CFMP is not given enough weight in decision-making processes when looking at issues such as flood risk, flood storage capacity, impacts of climate change, ecological networks and water quality. In fact, residents in Longford had to campaign (going to the local press on occasions) to get the issue of flooding in Rowley’s Green Lane to be considered by NBBC. If policies are not updated to include the River Severn CFMP this issue is likely to be repeated in the future.</p>	

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					<p>'19. Provide an appropriate landscape treatment to the eastern boundary of the site with a mix of open ground, shrubs and trees in order to provide a mix of open and filtered views westwards across the River Sowe valley.'</p> <p>Item 19 should be strengthened by referring to a landscape buffer zone along the eastern boundary, stating minimum distances between industrial buildings and neighbouring residential properties and including requirements for an acoustic bund, acoustic fencing, thicket planting and woodland edge planting. The approach described within the documentation for a recent planning application (NBB, 038023) for EMP3 Prologis Extension should be applied as a minimum standard for all mixed-use sites and industrial sites adjacent to existing residential properties:</p> <ul style="list-style-type: none"> • a landscaped acoustic bund • 2m acoustic fencing on top of the bund • woodland edge and thicket planting • an outer core area which is 52-53m away from residents' back gardens • 10m height and restrictions in the outer core area • 18m tall buildings 95-98m away from the façade/rear wall of resident's properties (inner core area) <p>'8.94...The development of the site is expected to contribute financially towards road improvement schemes in the Bedworth area as set out in the transport modelling report via planning obligation.'</p> <p>This should include road improvement schemes within the Longford Ward as the site is located on the administrative border with Coventry and most of the cumulative impact will be on roads within this ward. As it is a highways authority, Coventry City Council should be consulted on any schemes which could have impact on Coventry and its roads. In the policy for SEA-6 – Bowling Green Lane, it refers to an HGV routing strategy, 'The developer will be expected to submit for agreement an HGV routing strategy which will show HGVs accessing/egressing the site from the School Lane direction and avoiding the local schools on Bowling Green Lane, Ash Green Lane and Wheelwright Lane.)'</p> <p>Should all strategic allocations involving B8 not require an HGV routing strategy? Why are schools in some areas considered but not others? What protections will be put in place along the Bedworth Road-Longford Road-Foleshill Road corridor (B4113-B4119), Windmill Road and</p>	

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					<p>Alderman’s Green Road? All these roads are on walk routes to schools and nurseries but are not being protected in the same way because they are in Coventry. Should there not be a duty of care for all children?</p> <p>According to the NPPF, ‘Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non- strategic policies that are needed...Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries...Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere...In order to demonstrate effective and on-going joint working, strategic policy- making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.’</p> <p>There should be an equivalent item in the SEA-2 – Wilson’s Lane policy which refers to the avoidance of local walk routes to schools within Coventry on the B4113-B4119 corridor, Windmill Road and Alderman’s Green Road. This should also reference Coventry’s AQMA as an additional reason for ensuring that HGVs do not use these roads.</p> <p>Furthermore, there should be a reference to Wilson’s Lane and Rowley’s Green Lane being on a walk and cycle route to the Coventry Building Society Arena, the weak bridge across the River Sowe on Rowley’s Green Lane and the low bridge on Woodshire’s Road as reasons why a TRO is required for restricting HGV access to Wilson’s Lane.</p> <p>The prevention of the use of onsite employment parking areas (which should include lorry parking) for visitor parking during CBS Arena matchdays or major events has also been established during the consultation process for an outline planning application (037237) for the site; therefore, this</p>	

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					<p>should also be included within the SEA-2 – Wilson’s Lane policy.</p> <p>‘41. The employment site shall not be used for matchday, or event parking associated with the adjacent arena, currently known as the Coventry Building Society Arena</p> <p>Within the policy for SEA-1 – Faultlands, it states,</p> <p>‘A proportionate financial contribution towards delivery of an area-wide green infrastructure supplementary planning document (or equivalent), that promotes species movement along identified green corridors.’</p> <p>‘Development should be set back from the northern boundary of the site to allow for a landscape buffer and ecological mitigation for Griff Hollows local wildlife site.’</p> <p>There should be equivalent items within the SEA-2 – Wilson’s Lane policy to acknowledge the importance of the River Sowe as a blue corridor and to ensure that there are landscape buffers and ecological mitigations for the Sowe Meadow LWS and the River Sowe (along the southern and western boundaries of the site) as they are part of a wider ecological network. ‘18. Maintain an appropriate landscape buffer to western and northern boundaries.’</p> <p>This item should be amended to acknowledge that this part of the employment site is within the Bug Life’s B-line. Therefore, reference to the creation of meadow (including floodplain meadow) with an appropriate biodiversity enhancement management plan to support pollinators should be added.</p> <p>There should also be a policy for the removal and use of soil. Parts of the site SEA-2 –Wilson’s Lane site have been managed as pasture over a prolonged period and it has kept its Medieval ridge and furrow features. It is possible that they may have originally contained areas of ancient meadow and that the soil in those locations may have retained a seed bank which is lying dormant. Areas of pasture retaining ridge and furrow features should, therefore, not be built on and instead should be restored as wildflower meadows (see link to Oxford City Council’s webpage on ‘harnessing ancient</p>	

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					<p>flower power to help wildlife and tackle climate change’). The policy should also refer to the Government’s code of practice for the sustainable use of soils on construction sites (see link).</p> <p>In a similar way, historic maps should be used to identify ghost ponds. If possible, they should be restored using the sediment from their original location (see link for research paper on this topic). Historic maps should also be reviewed for locations where there were once trees as it is possible that they may be suitable for woodland regeneration.</p> <p>It is reassuring to see that Policy SA1 – Development principles on strategic sites refers to the following,</p> <p>‘6. Areas of high distinctiveness (value 6) should be retained and enhanced along with other habitat retention, creation and enhancement required to achieve a minimum of 10% net biodiversity gain. Existing high quality biodiversity features must be retained and enhanced, including financial contributions for long term management.’</p> <p>However, there should be an additional item added which reiterates expectations of 10% BNG for SEA-2 – Wilson’s Lane. This site has the potential to deliver a mosaic of onsite habitats which would support nature recovery and build-in resilience within the wider ecological network. With the right mix of land uses and carefully considered layout, improvements onsite should easily be able to deliver 10% BNG.</p> <p>I recommend that NBBC looks at the standards of ‘Building with Nature’ (BwN, see link) to see if they could support the delivery of high-quality green infrastructure. ‘Strategic policy documentation, such as Local Plans and SPDs, can be strengthened by integrating the BwN Standards wording or content; and policy documents can also achieve a BwN Policy Award.’</p>	

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
403.2	JB	13.46	NE4	<p>I believe that the Borough Plan Review Preferred Options document is unsound because it does not accommodate unmet need from neighbouring areas; neither is it consistent with achieving sustainable development. Furthermore, it has not been based on effective joint working on cross-boundary strategic matters.</p> <p>The River Sowe is a tributary of the River Avon and forms part of the River Severn Catchment. Its source is within Bedworth and the river flows through Exhall before crossing the administrative boundary into Coventry. Breach Brook is a tributary of the River Sowe, which flows from Corley through Ash Green and into Exhall, forming a confluence on the other side of the A444 before the River Sowe enters SEA-2 – Wilson’s Lane. The river then flows along the boundary of the site into Sowe Meadow LWS before crossing Rowley’s Green Lane in Longford.</p> <p>The Borough Plan has, so far, focused on the River Trent CFMP. The River Severn CFMP was not given enough consideration during the inspection of the Borough Plan and as a result has had an impact on the decision-making processes when looking at issues such as flood risk, flood storage, impacts of climate change, ecological networks, nature recovery and water quality within Exhall and Longford.</p> <p>The map below is a section of the River Severn CFMP which clearly shows that part of the NBBC’s administrative area is included.</p> <p>In fact, residents in Longford have had to campaign (going to the local press on occasions) to get the issue of flooding in Rowley’s Green Lane to be considered by NBBC during the planning process. If policies are not updated to include the River Sowe and the River Severn CFMP, this issue is likely to be repeated in the future. It is important that NBBC policies accommodate Coventry’s unmet need for the provision of flood storage and that NBBC works more closely with Coventry City Council’s LLFA to deliver ‘Policy Option 5’ and make sites such as SEA-2 – Wilson’s Lane sustainable.</p>	<p>‘13.46 Nuneaton and Bedworth Borough Council lies in the River Trent Catchment Flood Management Plan (CFMP), Upper Soar and Upper Anker sub-region where policy option 4 has been allocated . Policy 4 requires further action to sustain the current level of flood risk into the future (responding to the potential increases in risk from urban development, land use change and climate change). ‘Policy NE4 – Managing flood risk and water quality’ aims to support this aim of the River Trent CFMP by effective management of future development.’</p> <p>Paragraph 13.46 should also reference the River Severn Catchment Flood Management Plan (CFMP) regarding the River Sowe and its tributaries. It should also refer to Sub Area 5 (Telford, Black Country, Bromsgrove, Kidderminster and Coventry Cluster) and its Policy Option 5.</p>	<p>Unmet need concerns residential and employment provision, not flood storage.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
403.3	JB	13.46	HS5	<p>I believe that the Borough Plan Review Preferred Options document is unsound because it does not accommodate unmet need from neighbouring areas; neither is it consistent with achieving sustainable development. Furthermore, it has not been based on effective joint working on cross-boundary strategic matters.</p> <p>When referencing AQMA's, the Borough Plan should also mention Coventry's AQMA as its policies can have an impact on Coventry's air quality and so the health and well-being of its residents. In particular, NBBC should look carefully at land use especially if it is likely to introduce B8 into locations which could increase traffic levels along the B4113-B4119 corridor within Coventry.</p>	<p>'12.51 Health and well-being are key issues at the national and local level...mental health, dementia and cardiovascular disease are all particular health concerns for the borough. Health is not simply about access to medical facilities; it is also about lifestyle...'</p> <p>This paragraph should refer to the impacts of poor air quality on health and quote WHO's latest guidelines and interim targets. Policies should be careful to not to focus solely on access to services or 'lifestyle' when there are other important factors such as substandard housing and poor air quality. For example, 'emerging evidence supports a link between environmental factors-including air pollution and chemical exposures, climate, and the built environment-and severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) transmission and coronavirus disease 2019 (COVID-19) susceptibility and severity. Climate, air pollution, and the built environment have long been recognized to influence viral respiratory infections, and studies have established similar associations with COVID-19 outcomes.'</p> <p>Residents do not have a choice about the air they breathe especially if they are on low incomes and live in built-up areas. Although, the legal</p>	Noted

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
					<p>requirements have not changed yet; it is likely that that they will be updated at some point to reflect the WHO guidelines and interim targets.</p> <p>This policy should also outline how NBBC will improve air quality for its residents and those living near to its administrative border within Coventry's AQMA e.g., Longford's residents.</p>	

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
403.4	JB		SA1	<p>I believe that the Borough Plan Review Preferred Options document is unsound because it does not address national policy (NPPF) regarding overnight lorry parking or ensure that proposals for new or expanded distribution centres (B8) have sufficient lorry parking to cater for their anticipated use. There are other issues regarding HGV routes, employment parking and facilities for sustainable forms of transport. For a strategic employment allocation to be sustainable, it must show that it can provide the level of parking and facilities required to cater for the floorspace being proposed.</p> <p>Ideally, there should be a separate policy dealing with the issues that HGVs create.</p> <p>On their website, Warwickshire County Council state the following, ‘Warwickshire has a number of distribution centres, manufacturing and industrial estates which are serviced by Heavy Goods Vehicles (HGVs). HGVs are therefore prevalent on the county’s road network which results in a number of concerns being raised by local residents.’ ‘We have produced a lorry map which has been distributed to haulage companies and relevant associations. The map shows the most suitable routes around Warwickshire, the main industrial areas, refuelling stops, parking areas and services stations, all of which are suitable for heavy goods.’</p> <p>It is clear that there are issues with HGVs across Coventry and Warwickshire. Therefore, it would be useful for NBBC’s policies to link in with</p>	<p>Policy SA1 – Development principles on strategic sites needs additional items to mitigate issues often created by B8:</p> <ul style="list-style-type: none"> • Employment sites will need to demonstrate how the development will deliver the provision of overnight lorry facilities and sufficient lorry parking to cater for their anticipated use. • Employment sites will need to demonstrate how the development will deliver secure car, motorbike and cycle parking and any related facilities such as lockers, showers, etc. • Employment sites will need to show how HGVs will access/egress the site by submitting an HGV routing strategy. The HGV routing strategy will need to demonstrate how walk and cycle routes to schools will be avoided. • Employment sites will need to demonstrate how the development will deliver bus infrastructure to support anticipated use and how it will address the needs of people with disabilities and reduced mobility. • Employment sites will need to demonstrate how the development will cater for 	<p>We have responded to the comments on HGVs in a previous officer response.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
				<p>WCC's 'lorry map' and that HGV routing strategies are required for sites with elements of B2 and B8.</p>	<p>pick-up and drop-off of employees to reduce the risk of causing a nuisance to nearby residents.</p> <ul style="list-style-type: none"> • Employment sites will need to demonstrate how the development will incorporate an access road for emergency vehicles. <p>For strategic employment sites, would it be possible to set a maximum floorspace to ensure that they are sustainable and able to deliver enough onsite parking to cater for anticipated use including overnight lorry parking facilities?</p>	
403.5	JB		NE3	<p>I believe that the Borough Plan Review Preferred Options document is unsound because it does not refer to Natural England's standing advice for the natural environment and protected species.</p>	<p>The wording could be amended to include a version of the following:</p> <p>Development must meet the requirements set out within Natural England's standing advice for protected species and the natural environment. Where Government guidance is changed or superseded, the appropriate replacement standing advice will be used. Advice must always be sought from a qualified ecologist.</p> <p>Along with looking at the standards of Building with Nature, I recommend that NBBC refers to the book Designing for Biodiversity A Technical Guide for New and Existing Buildings by Kelly Gunnell, Brian Murphy and Carol Williams when considering policies for sustainable building and biodiversity.</p>	<p>The Borough Plan is not unsound because it does not refer to standing advice from Natural England.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
403.6	JB		NE1	<p>I believe that the Borough Plan Review Preferred Options document is unsound because it is not based on effective joint working on cross-boundary strategic matters and is inconsistent with achieving sustainable development.</p> <p>There are no references to the River Sowe within this policy. Yet, its source is within Bedworth and the river flows through Exhall before crossing the administrative boundary into Coventry. Breach Brook is a tributary of the River Sowe, which flows from Corley through Ash Green and into Exhall, forming a confluence on the other side of the A444 before the River Sowe enters SEA-2 – Wilson’s Lane. The river then flows along the boundary of the site into Sowe Meadow LWS before crossing Rowley’s Green Lane in Longford.</p> <p>A gallery on Flickr shows the route from the source all the way into Longford Park and beyond. This shows that it has potential for restoration and providing a walk route from the source all the way into Coventry, extending the existing Sowe Valley Walks. It also illustrates its importance within Longford and Exhall’s ecological network.</p>	<p>There should be an equivalent item for restoring Bedworth and Coventry’s relationship with its river valley corridor landscapes. It could include:</p> <ul style="list-style-type: none"> • Improve the River Sowe for people and wildlife by upgrading public rights of way and links to the river in order to give access for walking and cycling. • Improving and restoring wildlife habitats along the River Sowe and incorporating the use of wildlife buffers for ecology including protected species. <p>The following section should also be amended as it is too restrictive,</p> <p>‘4. Create spaces for people in town centres and microclimates to adapt to climate change by:</p> <p>a. Planting trees within Nuneaton and Bedworth town centres to create urban cooling as well as visual connections to green spaces.’</p> <p>Consider using the phrases ‘built-up areas’ or ‘urban areas’ rather than ‘town centres’. It is important that all locations at risk to the heat island effect are considered and that measures are put in place to prevent it.</p> <p>When looking at the use of trees, I recommend referring to the resources provided by The Trees and Design Action Group (TDAG, see link). They look at all aspects such as climate change, air quality, green infrastructure, etc. Conflicting advice can sometimes be an issue. For example, Secured by Design recommend the following in their ‘Homes 2019 SBD Development Guide’,</p>	<p>Not making specific reference to the river Sowe does not mean that effective joint working on cross-boundary strategic matters has not taken place, nor does it mean that the plan will not deliver sustainable development.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
					<p>‘8.15 Think carefully when selecting tree species to be used adjacent to a footpath or verge, and consider their whole-life growth characteristics. Many trees will grow tall, dense canopies as they reach maturity. If unmaintained, this broad canopy will spread many metres from the trunk of the tree, and over- hang paths and may create difficulties in maintaining a clear, accessible route, in addition to creating a sense of enclosure for path users. Routes with overhanging branches can also be a particular issue for people with sight loss. A large canopy may also block natural light and restrict the effectiveness of street lighting.</p> <p>8.16 Trees with slender or fastigate forms naturally grow a narrow, tall canopy, and are less likely to over-hang paths regardless of their maturity. Similarly, pleached trees have been trained to produce a narrow canopy above a very straight, clear stem.</p> <p>A variety of species are available with similar growth forms, which provide height and structure without the issue associated with large canopies.’</p> <p>However, regarding adaptation for climate change, the use of slender or fastigate forms of trees would give little benefit in terms of providing a canopy for shade. In the wrong location, a dense tree canopy risks trapping more polluted air at street level.</p> <p>Sometimes relatively short-lived trees are used in planting schemes which may create issues in the longer-term when they need to be replaced.</p> <p>As well as protecting our existing veteran and ancient trees, how does NBBC ensure that that we continue to create a similar legacy for the future? Are we planting the right species and providing enough opportunities for newly planted whips to become the next generation of veteran and ancient trees? I believe all strategic allocations should incorporate space for planting some of the larger native tree species in the hope that they become our next generation of veteran and ancient trees. Would it be possible for NBBC to consider having an urban forest strategy?</p>	

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
403.7	JB			<p>I believe that the Borough Plan Review Preferred Options document is unsound because, regarding the mixed-use allocation SEA-2 – Wilson’s Lane (EMP2), its Sustainability Appraisal (Second Interim Report: Regulation 18 June 2022) does not accommodate unmet need from neighbouring areas; neither is it consistent with achieving sustainable development. Furthermore, it has not been based on effective joint working on cross-boundary strategic matters. There appears to be no references to the River Sowe and the Severn CFMP, Sowe Meadow Local Wildlife Site (LWS), the adjacent residential area of Woodshire’s Green, traffic issues along the B4113-B4119 or Coventry’s AQMA. Neither does it mention the presence of Medieval ridge and furrow, hedgerows or that part site is on a Buglife’s B-line and was once historic parkland associated with the Moathouse.</p>	<p>‘Similarly, the employment sites EHX13 and EMP2 are not expected to have direct impacts on the Bedworth Slough’s LNR as they are 3km and 2km away, respectively, and separated by major highways and existing development.’</p> <p>Although there may be major highways and existing development between EMP2 and the Bedworth Slough’s LNR are they not linked together through the River Sowe? I believe the Sustainability Appraisal needs to be rewritten taking the River Sowe and the Severn CFMP into account. It also needs to highlight the connection between the Bedworth Slough’s LNR and the River Sowe’s course through to EMP2 and beyond.</p> <p>‘Site, EMP2, a large 18 ha site allocated mainly for employment with some residential use is at the urban fringe of the settlement comprising open fields intercepted by the M6 and A444 and large warehouse developments visible to the south west of site. Whilst development here would alter the semi-rural/ open character of the site the landscape is rendered somewhat less sensitive due to the major highway infrastructure and the adjacent warehouse development. The landscape has been</p>	<p>This comment has been responded to through another officer response.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
					<p>assessed as having few attractive features/ views and as having moderate-high capacity to accommodate employment and residential use. This site is already allocated in the adopted Plan for employment.'</p> <p>Why does this paragraph not mention the residential area of Woodshire's Green to the east of the site? Why is there no reference to the River Sowe and Sowe Meadow Local Wildlife Site? Why has traffic issues along the B4113-B4119 and Coventry's AQMA not been referred to? It also fails to mention the site's Medieval ridge and furrow, hedgerows and that part of the site is on the Buglife's B-line and was once historic parkland associated with the Moathouse which are all important local landscape features.</p> <p>Allowing some release for residential development is likely to have a less negative effect upon landscape character given that it would be less intrusive in terms of traffic and scale of buildings.'</p> <p>I believe that the proposed mix of land uses for this site needs to be reviewed. For example, it would be an ideal biodiversity offsetting receptor site. However, I would agree that residential development would be far less intrusive than B8 in terms of traffic and scale of buildings. A mixed-use development which was predominantly housing would be able to accommodate the site's constraints more easily and so be able to deliver 10% biodiversity net gain (BNR) onsite. The current EMP2 Wilson's Lane Policy and SPD has encouraged proposals which would be unsustainable, enabling biodiversity net loss within an important ecological network. Furthermore, the issue of overnight lorry parking facilities has not been addressed so far. Other uses on the site should also be considered which have benefits for nature recovery and tackling the issues of climate change e.g., carbon-offsetting, flood storage, solar farm, etc.</p>	
404	DB			<p>The removal of HSG4 from the Borough Plan reasons: 1) The cost of the infrastructure to support the planned housing development on HSG4 will be unsustainable due to costs. 2) The development is not needed based on the statement on the NBBC website: the 5 year housing supply is on track. 3) The Woodlands floods on a regular basis. A housing development will impact this problem which will affect local nature reserves.</p>	<p>I believe the Wooldands HSG4 should be removed from Borough Plan and placed in Green Belt status to protect: 1) Infrastructure, 2) Flooding, 3) Protect nature reserve, 4) Wildlife, 5) Protect several oak trees, 6) The Borough Plan is supposed to protect green spaces. 7) Coventry CC local planning figures are flawed. They do not require Warwickshire land for development.</p>	<p>1) Our viability study shows that the infrastructure is deliverable. 2) Noted. 3) Our Strategic Flood Risk Assessment has shown that the site can be developed without affecting local nature reserves.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
5	A/SC			We support the removal of HSG4, Woodlands development, from the Borough Plan. The plan is not positively prepared, justified or necessary. Main reasons for removal, 1) Road access, causing congestion (narrow roads), 2) The need for new housing in Bedworth has been over estimated, greatly.		Noted
406	DC	7.63-7.72	HSG5	The plan is not sound. It does not support local road infrastructure, it is building on valuable arable land, when there are many brownfield sites available. There is no local school extra provision for this particular site. There is no evidence that there is a need for the extra houses within the local population. The land belongs to the people of Bedworth who were not consulted regarding this. It is a loss of fields that are used regularly by the local population. There have been many residential developments within a 3 mile radius of this area we have had enough development already to justify another one.	Consult the people of Bedworth who have a vested interest in this. Show evidence that the increasing population justifies the need for the build. Stop the development.	<p>The plan supports local road infrastructure, as it is accompanied by a Strategic Transport Assessment, which sets out required infrastructure improvements as part of the developments.</p> <p>There aren't many brownfield sites available, as we have assessed all brownfield sites submitted to us for development, and we have allocated all sites that are appropriate.</p> <p>There is extra school provision for this site, as is set out in the Borough Plan.</p> <p>There is robust evidence to show that there is a need for extra houses within the population, which is set out in the Housing and Economic Development Needs Assessment.</p> <p>The land belongs to private landowners, who put the land forward for development.</p> <p>The people of Bedworth have been consulted multiple times on this proposal.</p>
407.1	KD			To many developments going ahead smorrol lane area as loads of fields and wildlife habitats being destroyed also bulkington griff area Whitestone exhale hawksbury village when you go out now every corner you turn is been destroyed or is going to be destroyed the environment is suffering trees wildflowers are being lost at a alarming rate all we will have to see here is concrete jungle traffic is getting worse in bulkington there is only one doctors and one dentist not enough police to cover areas	Stop destroying the green fields at this alarming rate it is soul destroying	Noted

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
407.2	KD	7.63-7.72	HSG5	There is new developments going up every corner you turn the air quality is getting worse traffic is bad already and will get a lot worst nowhere for wildlife and wildlife habitats to flourish and survive the are replaced by green deserts for people but not for wildlife life there are woodpecker owls various birds of prey insects are been destroyed you hardly see any now small deer live and also it is farming land the infrastructure is at breaking point not enough doctors dentist no countryside to walk into you keep on about climate change and the environment but are quite happy to make profit from turning the green fields into concrete jungle		Our Air Quality Assessment shows that air quality will not deteriorate as a result of the Borough Plan, whilst our Strategic Transport Assessment shows that any increase in traffic will be acceptable.
408	MD			The removal of HSG4 Bedworth Woodlands from The Borough Plan "sound". The site is not sustainable there will be traffic chaos and until such time that the A444 is improved this should not be re visited. It would result in loss of landscape and biodiversity - great crested newts are thriving in the local area. The area is a huge flood plane and regularly floods more housing = worse flooding. There are no public transport links out of Woodlands and the roads are not suitable for HGVs. The area should be returned to Green Belt.		<p>The site would not cause traffic chaos, as the impact has been assessed as acceptable within our Strategic Transport Assessment.</p> <p>There would not be an overall loss in biodiversity, as the Borough Plan requires biodiversity offsetting for developments.</p> <p>Our Strategic Flood Risk Assessment shows that flooding will not be worse once new developments are completed.</p> <p>Public transport improvements for the Woodlands site are set out in the adopted Borough Plan.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
409	C/AD			<p>Very little seems to have changed since the last consultation. It was clear that your representatives were not up to date with progress, different people giving different replies to the same question. On one information board you claim that no green belt areas are included in the plan but this is only because many areas were "quietly" removed from green belt, without consultation.</p> <p>The Hospital Lane part of this plan includes land left to the people of Bedworth in Nicolas Chamberlaines will. How is it possible to sell this land without public consultation? The Trust Governors do not appear to have taken the views of the people in their quest for profit.</p> <p>The Hospital Lane land has been farmed for well over 50 years to our knowledge, yielding good crops every year. The Government is now realising that there is a need for agricultural land to grow our own food and not rely on imports so the site should continue to be used for farming.</p> <p>These fields have been a lifeline for locals, especially during the covid lockdowns. They are used daily by dog walkers and people enjoying the scenery. Walking through a housing estate is no way comparable. This development will be ruining the living environment of many of the locals. Ancient trees and hedgerows need to be preserved, along with public footpaths. A tree survey on site is essential. Wildlife is abundant in this area. Muntjacs and birds of prey are just a couple of the rarer residents.</p> <p>New houses should not be built close to existing dwellings. A buffer zone with trees and hedges could soften the blow.</p> <p>According to the plans put forward by Richborough Estates, all traffic will enter and exit via Hospital Lane. This has a high probability of causing long delays on Hospital Lane and also on entering Goodyers End Lane. Many children use the fields to access local schools. A huge increase in traffic will put their safety at risk and also affect air quality.</p> <p>There is no infrastructure to support this development. We were told that infrastructure always comes after the housing. So we have to put up with the pain of traffic jams, lack of doctors, schools, etc. prior to anything being done. This is not what we could call planning.</p> <p>We do not consider the plan to be 'sound'. Brownfield sites should be considered before others - e.g. Daw Mill Colliery site. Many other sites which are not farming land or recreation should be considered.</p>		<p>No areas were quietly removed from the Green Belt without consultation, as all sites removed from the Green Belt as part of the plan were subject to several consultations, in addition to being referred to in several articles in the Nuneaton Telegraph.</p> <p>Ancient trees and hedgerows will be preserved where possible, whilst all public footpaths will be preserved.</p> <p>A tree survey would be undertaken at the planning application stage.</p> <p>There is not a high probability of long delays on Hospital Lane, as a Strategic Transport Assessment was carried out for the Borough Plan, which shows that the impact on traffic will be acceptable.</p> <p>Warwickshire County Council will assess the safety of roads as part of any planning application.</p> <p>There are various pieces of infrastructure that will support the development, as set out in the Borough Plan. Traffic, doctor services and schools will be unaffected, as developments have trigger points at which they have to deliver the infrastructure, which ensures infrastructure is in place to support the community in an appropriate timescale.</p> <p>Brownfield sites have been considered before greenfield sites, however Daw Mill Colliery is not within the borough, so we cannot allocate land for housing outside the borough.</p>

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
410	VD			<p>I attended the meeting at Goodyear's End School last Tuesday evening, to look at the borough plan. I understand this has now been taken out of the plan.</p> <p>If this is considered again in the future, I urge the planners to consider the impact this Development will have in this area i.e.</p> <ol style="list-style-type: none"> 1. Traffic on Heath Road is saturated during the day, more development will increase traffic substantially. 2. I have lived in this part of Bedworth for over 60 years, this year I have seen a great increase in the birds in my garden. This is due to the birds losing their natural habitats, i.e. the hedgerows and grass areas. 3. During Covid it has been proved that WE NEED green areas for our mental wellbeing. This development will reduce these green areas for our residents. 4. I have noticed in recent years, particularly on the Woodlands Park, developers build houses very close together, with very small gardens, many are three storey, so householders have very little privacy, therefore these green fields, in and around The Nook are a 'life saver' for many. <p>As I am in my 80's, have no family or grandchildren in this area, this development will have little impact on me, BUT I am looking out for future generations.</p>		Noted
411	EE			<p>The removal of HSG4 Bedworth, Woodlands is justified and correct. For years the whole area is prone to flooding and the building of more houses would just increase the flooding. The infrastructure does not cope as it is, the increased in housing can only make matter's worse. It should not have been in the plan in the first place</p>		Noted
412	RF			<ol style="list-style-type: none"> 1. Happy with the Woodlands development has been removed from the plan and remains greenbelt. 2. Concern that Industrial development has been introduced in Bowling Green Lane close to Goodyers End School and existing housing. This will cause major problems with access and traffic congestion. In addition pavement in Bowling Green Lane is extremely narrow and non existent on one side of the road and would cause risk to pedestrians using it. 3. Developments in Bowling Green Lane and Hospital Lane are on agricultural land which one would think is important during this period of time when the country has to grow more to feed itself. In addition extra housing places extra demand on services and nothing has been said regarding doctors, schools etc. 4. The development on the Bedworth Rugby Ground off Smarts Road apparently is not in the strategic plan. This is now an eyesore and if there is no intention to progress using this site it should be returned to recreational use for the benefit of the local community. 	Address points 2-4 above.	<ol style="list-style-type: none"> 1) The Woodlands is not in the Green Belt. 2) Transport improvements will be carried out along Bowling Green Lane as a result of the development. 3) The policy for Hospital Lane specifically sets out that it is required to delivery an on-site GP surgery or financial contribution to a new or expanded GP surgery in the western Bedworth area. Additionally, the Borough Plan sets out that the site must allocate land on site for the expansion of Newdigate Primary School to increase capacity to a 2 form entry school, as well as requiring financial contributions towards secondary level education to expand existing secondary provision in the area to an additional 3.5 form entry. 4) The former Bedworth Rugby

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
						Ground already has planning permission, therefore we do not need to plan for it.
413	SF	8.0	Strategic Allocations	I strongly support the removal of HSG4 Bedworth Woodlands as a site identified for housing development and consider its removal to be entirely justified. The site was always unsuitable for development and should not have been included in the previous version of the Borough Plan. The primary reason for its unsuitability is that the existing road network (Woodlands Lane / Woodlands Road / Newtown Road / Heath Road) is already unable to cope with the traffic from; a) existing housing developments and b) 'rat run' traffic that uses the above named roads as a route from the Stockingford / Hartshill side of Nuneaton into Coventry. Additionally the proposed site and road network floods on a regular basis to the extent that roads (particularly Woodlands Lane) can be closed for several days by flooding. Additional housing would only exacerbate the current flooding situation and nothing in the previous Plan offered any serious mitigation of the flooding occurrences.	In order to deter developers from making speculative applications, the Borough Plan should include a statement of a presumption against development in areas not specifically identified for development within the Plan.	The site was suitable for development, as was judged as such by an independent Planning Inspector appointed on behalf of the government. Improvements to the road network would have enabled the development, whilst a Strategic Flood Risk Assessment was carried out, which showed the site could be brought forward without a negative effect on flooding issues.

Ref	Initials	Paragraph	Policy	Comments	Suggested modifications	Officer Response
414	KG			<p>The alternative Borough Plan with the removal of policy HSG4 Woodlands from the strategic site allocations. This development is not required and would put too much pressure on the existing infrastructure and established ecology and wildlife that exists at the site, as well as severely increasing pollution (air, light, noise). This green space is a vital source for health and well-being of the local population of the Woodlands and Bedworth.</p>	<p>The removal of HSG4 Woodlands from the plan and turned into greenbelt to protect this green space and wildlife rich area from future development,</p>	<p>HSG4 would not put too much pressure on existing infrastructure and ecology, as the policy ensures infrastructure would be provided, and ecology would be protected.</p> <p>Pollution would not be severely increased, as an Air Quality Assessment was undertaken which showed that air pollution would not increase as a result of the development, whilst light and noise pollution would be considered at the planning application stage.</p>
415	AG			<p>Housing provision within bulkington will change the character of the village and the nature of the dwellings from a village to a town ! The infrastructure is not in place to support such expansion on this large scale. Schools , Doctors , Police, water pressure & WiFi signals, Parking in the village. The, proposed sites have been allocated with housing numbers without using traditional brown fill sites first 1) The former New Inn site Nuneaton road / wolvey road junction. 2) poppies club new street bulkington 3) a dwelling is being built opposite the church on school road. If all these sites were taken into consideration first and allocated within the housing numbers required as the strategy seeks to deliver a brownfield first approach before vital farming land where crops are grown at present and green fields are lost forever. HSG8 west of bulkington Habitats - nature present within the green pasture land allocated. a) Newts b) Owl's nest d) Foxes E) Bats Access to HSG8 Original access to HSG8 was from Coventry Road with 2 access points to the development. This is how the original plan was consulted on. Access via Benn Road /Leyland road is not viable due to 1) demolishing an already established dwelling 2)an already established estate with the allocated number of houses that filters onto a main road. The volume of traffic from additional houses and access from Coventry road for unlimited traffic numbers to use as a cut through would exceed statutory numbers .3) narrow road via Benn road already difficult to navigate with cars parked/ vans. Services- Poor water pressure in the area and Wifi signals. Flooding - in winter</p>	<p>1) Reassessment of Housing numbers required ,not taking allocations from other authorities. Take into consideration the housing needs of the villagers & types of houses / bungalows required. 2) Detailed wildlife reports. 3) Access points on all developments. Traffic calming measures traffic lights 4) infrastructure enhancement provision first for existing villagers before overloading an already struggling system. 5) flooding defences</p>	<p>Infrastructure will be provided as part of the development.</p> <p>Brownfield sites were selected before greenfield sites.</p> <p>The sites mentioned would not deliver the required housing figures.</p> <p>The housing numbers have been reassessed, and exclude allocations for overspill from neighbouring authorities. The housing needs of those living in Bulkington have been considered.</p>

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416	LG			<p>I agree with the proposals put forward by Craig Tracey in his letter to residents living in the Woodlands area, that the proposed development to the north of The Nook, should not be included in the Borough Plan. Mr Tracey sets out his believe, that with all the current proposals for new housing in Bedworth, and in view of the suggestion that Coventry "has got its figures wrong on the number of new homes it needs", there is sufficient cause to drop the Woodlands development from the Borough Plan.</p> <p>The Woodlands development would be on green fields, which are now right on the boundary of Bedworth, and are currently enjoyed by local residents of all ages. The land is very prone to flooding, and if anyone from the council took the trouble to actually walk across the fields (there are public footpaths), they would see the variety of flora and fauna there. Local infrastructure would not cope with the large Woodlands Development. We would need new doctors, dentists, schools, roads, public transport etc. The Woodlands area is simply not suitable for a large development.</p>	There is already a smaller development proposed by A R Cartwright Builders (MacArthur Gardens) off Woodlands Road, and this will more than fill the available capacity for local infrastructure on Woodlands Road and the routes leading to it.	<p>The council have put forward that the Woodlands site is removed from the plan.</p> <p>Local infrastructure has been planned for in the adopted Borough Plan which sets out that the site must deliver an on-site GP surgery or financial contribution to a new or expanded GP surgery in the western Bedworth area. The plan also requires a new 1 form entry primary school as well as a financial contribution towards secondary level education in order to expand existing secondary provision in the area to an additional 3.5 form entry. Additionally, the development would be required to make transport improvements/upgrades along Woodlands Lane, Woodlands Road, Bedworth Lane, Newtown Road, Heath Lane and surrounding streets as a result of the development. In relation to public transport, the development would be required to provide on-site bus infrastructure and a contribution to the secure diversion of frequent local bus services in order to access the strategic housing site.</p>
417	KH			<p>I find the removal of HSG4 Bedworth Woodlands from the Borough Plan to be justified and a sound suggestion. I have always thought it was wrong to nominate this area for building houses on in the first place. The plan should require a slip road to the A444 to be built and the cost of that would make the plan unsustainable. It is a known fact that this whole area is prone to flooding and the building of more houses would just increase the flooding. Removing it from the plan will save local ecology and biodiversity and it should never have been included into the plan in the first place.</p>		<p>The plan does require a slip road onto the A444, and the cost was considered to be viable by our independent viability consultants.</p> <p>We had a Strategic Flood Risk Assessment undertaken, which stated that the development would not increase flooding.</p>

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418	KH			<p>I am writing to you regarding the above planned development, there are several reasons as to why it shouldn't go ahead.</p> <p>Firstly, there are already developments on the go that are within a few miles radius of Hospital Lane. There is one by the Hungry Horse on Wheelwright Lane, another near the junction of School Lane and Coventry Road. There is another at the bottom of Smarts Road on the old rugby club land, there is also the extending of the Eliot Garden's estate up on Astley Lane. All these alone will put a strain on existing infrastructure without adding the extra houses on Hospital Lane.</p> <p>Further the planned house's and industrial estate planned for between Bowling Green Lane and Goodyers End Lane would only be a few hundred metres from the Hospital Lane site. This would likely cause a problem for traffic due to large number of vehicles, which will in turn increase pollution.</p> <p>Secondly there would be a need to increase school places and medical facilities such as doctors surgeries, dentists are hospital beds to cope with increase in the population. The roads would need to be improved to take extra traffic. The sewers and water supply would also need upgrading.</p> <p>Thirdly, the field's are being used for growing crops which as we are being told we need so the country can be more self reliant. You can't grow crops if you have buildings on the field's, also would be damaging to the local wildlife, no plant's mean no insects which in turn mean no bird's or small animals that feed on them. The trees and hedges provide a habitat that supports the wildlife, if they go then we lose them. The field's also act as a soakaway, if there is a period of heavy rain then the field's soak it up and prevents any flooding of house's nearby.</p> <p>The field's are also a place where people can walk their dog's safely. When so much has been said about the affect green area's can have on your mental health then it makes sense to keep as much as possible without building on them.</p> <p>Lastly, I believe there was a government review into planned development two or three years ago for this area and it said that there should be no development as the infrastructure was not strong enough to support it, the infrastructure hasn't improved in this time, the only difference is more buildings going up.</p> <p>Whilst I appreciate the need for housing I don't feel that Hospital Lane would be a good place for them.</p>		<p>The existing development in addition to those proposed are necessary to deliver sufficient housing for the borough.</p> <p>The development at Bowling Green Lane is not anticipated to cause traffic problems, as we have had a Strategic Transport Assessment undertaken, which states that the impact on traffic will be acceptable. Additionally, we have had an Air Quality Assessment undertaken, which shows that air pollution will not increase as a result of the developments proposed in the Borough Plan.</p> <p>Requirements are set out in the policy for the site to meet schooling and medical needs, as well as road improvements. Sewerage and water supply will be dealt with at the planning application stage.</p> <p>A government review has not taken place which has said no development should take place at Hospital Lane due to infrastructure not being strong enough to support it.</p>

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419	IH			<p>No sound plan to combat local flooding. This area already suffers from insufficient soak away areas, drainage areas and vegetation. The extra hard standing would only create further issues.</p> <p>Woodlands Lane exit at Heath Road junction already suffers with the excess morning cut through traffic. The width of the lane struggles with standing traffic that backs up to a parked vehicle area. Adding more vehicles from a new estate would only make matters worse and heighten the air pollution in the area.</p> <p>The cost of a new link road to access the estate from the A444 would be financially excessive as it would not benefit any existing houses in the area and could add to the cutthrough traffic problems to/from Nuneaton.</p>		<p>There is a sound plan to deal with local flooding, as a Strategic Flood Risk Assessment was carried out to inform the Borough Plan.</p> <p>A Strategic Transport Assessment was carried out to inform the Borough Plan, which ensured measures were set out in the Borough Plan which would deal with road issues. An Air Quality Assessment was also carried out, which showed that there would be no increase in air pollution as a result of the developments within the Borough Plan.</p> <p>The slip road onto the A444 was deemed to be financially viable by our viability consultants, and it would have benefitted existing houses, as well as new houses.</p>
420	AH			<p>Following on from my objections previously to this proposal I am reiterating my decision then.</p>	<p>We have so many building sites now in our borough that we will be more and more congested.</p> <p>Bedworth Woodlands in my view is a local treasure which needs to be protected for the sake of future generations. The abundance of wildlife and natural habitat would be destroyed.</p> <p>My mum who is now 92 was born in the Woodlands and since then the area changed dramatically. However the fields still remain and it needs to be kept that way.</p>	Noted

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421	IH	7.63 to 7.7	HSG5	<p>The proposal for the building of 398 dwellings on the fields of Hospital Lane is absolutely unsound.</p> <p>The fields on which it is proposed to build regularly flood during winter, despite the drainage being assisted by the vast amount of mature trees and vegetation. If the land was subsequently built upon, there would not be sufficient drainage and any houses built would be at risk. This is unethical.</p> <p>The land in question was left for the benefit and good of the people of Nuneaton and Bedworth under the Chamberlaine Trust. There has been NO consultation with those people who benefit from the fields in relation to the sale of these fields and we believe there is a conflict of interest in that a member of the Chamberlaine Trust is also a Labour Counsellor who would be set to benefit from any monies received.</p> <p>The current crisis in the NHS in relation to mental health means that green spaces, such as these, are crucial to reducing the pressure on the NHS due to the recognised and proven improvement to those with mental health issues having access to green, open space where exercise can be taken. These fields are used by hundreds of locals for such purposes. There is no other suitable area accessible by foot for similar use.</p> <p>The proposed building would severely impact on the properties on Moat Farm Drive, with proposals to build right up to the edge of Moat Farm Drive, causing disruption of both noise and pollution to the existing residents, alongside significant devaluation of their properties. This is in direct contravention of paragraph 7.25 of the Borough Plan.</p> <p>Paragraph 7.23 states that discussion and consideration should be given to the education requirements and engage in conversation with the local schools. Expansion of Newdigate School is already</p>	<p>Taking into consideration of the above, we seek to have the plan revoked entirely. It is environmentally and strategically unsound.</p> <p>If however a complete rejection of the proposal is denied, serious consideration is demanded for a significant reduction in proposed number of properties to a maximum of 150 houses, to be built in the central fields, leaving a larger boundary of fields to those living in existing properties in the surrounding areas. This would reduce the financial detriment to existing property values, the mental and physical well-being of local residents and have a lesser environmental impact on the flora and fauna found in those fields. No properties should be built at all within the fields which have a direct boundary on an existing residential road.</p> <p>Should planning proceed, financial compensation will be sought specifically from the residents of Moat Farm Drive for the significant devaluation of their homes and the environmental and pollution impact (including noise) for those who live in an already economically challenged area.</p> <p>A revised plan would also need to include new schools to accommodate the growing number of children who are already unable to secure a school space in a well performing school in their local area and any future needs, not 'expansion' to schools which are unable to do so and would become unmanageable. Addition GP and dental surgery would need to be guaranteed to accommodate and ensure</p>	<p>The building of 398 dwellings at Hospital Lane was proven sound by an independent Planning Inspector appointed by the government.</p> <p>A Strategic Flood Risk Assessment was carried out, which showed that houses would not be put at an unacceptable risk of flooding.</p> <p>Additional space for the expansion of Newdigate School is required through the Borough Plan. There will also be provision for secondary school children as the Borough Plan states that financial contributions must be made towards secondary level education to expand existing secondary provision in the area to an additional 3.5 form entry.</p> <p>The Borough Plan specifically makes provision for GP surgeries, and will prevent further strain on local GP surgeries, as the plan requires an on-site GP surgery or financial contribution to a new or expanded GP surgery in the western Bedworth area.</p>

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				<p>planned to cope with current over subscription and there is no additional space for this to be further increased should this plan be passed. Equally, from a secondary education basis, Ash Green School, identified as the suitable senior school is significantly over subscribed, with no space for further expansion.</p> <p>This proposal of AT LEAST 398 dwellings, could see an addition minimum of 400 children to be accommodated with no provision available to those in the existing housing. This proposal would see further strain on already challenged schools and put the local youth in the area at further disadvantage than they already are. It is acknowledged in the Borough Plan that people in this area are already at a significant disadvantage yet this proposal would see this deteriorate further. There is no consideration or reality being considered in this proposal for local residents and their families. From other resource perspectives, the local GP surgeries and dental surgeries are all over subscribed with inability to obtain an appointment even in emergencies. Further strain onto an already critical state of local NHS provisions would be the result if this proposal was passed. There is no provision in plans which have been seen for GP/Dental surgeries.</p> <p>Paragraph 7.71 relates to the access to the proposed housing site from Hospital Lane. This is currently a National speed limit road in places, and barely able to manage the traffic it currently incurs. The road is sadly a proven death trap, with mortalities having been experienced. The road is categorically unsuitable to sustain a further potential 900 cars. In addition, a significant number of school students use this route daily to get to school; such a development of this proposed size would place these young people at significant risk. This would also see a detrimental impact of the noise and pollution for those already residents on the boundaries of the proposed site.</p>	<p>local people's well-being and health are catered for, especially given the Borough Plan states already there is lower life expectancy in the area.</p>	<p>The Strategic Transport Assessment we had carried out proved that Hospital Lane is suitable to take the increased traffic as a result of the development. Additionally, the safety of the road will be assessed at the planning application stage.</p> <p>The plan was judged to be environmentally and strategically sound by an independent Planning Inspector appointed by the government.</p> <p>If any homes were devalued as a result of the new development, financial compensation would not be possible, as this is not permitted in law.</p>

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422	TH			<p>Policy – ds7 Green Belt, Hs1 ensuring the delivery of infrastructure, NE3 biodiversity and geodiversity, Ne4 flood risk, BE4 valuing and conserving our historic environment</p> <p>I am very pleased to see that the formerly proposed development of the Woodlands site has now been removed from the strategic site allocations; it does not feature in the ‘Borough Plan Review - preferred options’ document: Borough Plan Review - Preferred Options - FINAL 09.06.2022.pdf (amazonaws.com)</p> <p>I am writing in support of the Woodlands being removed from the Borough Plan permanently and any possibility of development in this area being completely ruled out.</p> <p>If any proposed developments of the Woodlands site (formerly HSG4) were attempted to be reinstated in the Borough Plan then the plan would not be ‘sound’, it would fail the duty to consult, and it would not meet legal requirements. I will take these points in turn, with reference to points set out in the preferred options document.</p> <p>Soundness</p> <p>As you will know, according to paragraph 182 of the National Planning Policy Framework, there are four elements to ‘soundness’. To be sound a Local Plan must be:</p> <ul style="list-style-type: none"> ● Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; ● Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; ● Effective – the plan should be deliverable over its period and 		<p>Comments and support for the removal of HSG4 Woodlands noted.</p> <p>The Council is working with neighbouring authorities and relevant bodies as part of its Duty to Cooperate. A Duty to Cooperate Statement will be published alongside the Publication Version of the Plan.</p>

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				<p>based on effective joint working on cross-boundary strategic priorities; and</p> <ul style="list-style-type: none"> ● Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>If the Woodlands were to be included in a proposed development, then this would fail to meet the soundness criteria for several reasons:</p> <p>1. Overcrowding According to the Borough Plan itself Nuneaton and Bedworth is the ‘smallest in size, at 7,895 hectares’ of all the boroughs in Warwickshire ‘but has the third largest population at 130’373’ (para 2.1). The building of new houses on the Woodlands would overcrowd the borough further, and the packing of too many houses into too small a space is a result that should be avoided. In relation to soundness, the risk of overcrowding the local area makes the plan lack in justification, effectiveness and consistency with national policy.</p> <p>2. Deprivation The Borough Plan damningly notes at 2.13 that ‘Nuneaton and Bedworth has the highest level of deprivation across Warwickshire...’ The building of new houses without planning for any more local jobs is likely to increase these levels of deprivation, an approach that is clearly unsound in every sense. Also, the national house building policy is focused on getting houses for local people and helping young people onto the</p>		

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				<p>housing ladder. Due to the levels of deprivation in Nuneaton and Bedworth, few local people would be able to afford any houses intended to be built rendering the whole project pointless. Likewise, under the heading, 'Issues facing the local community', the Borough Plan itself identifies as issues the facts that 'the population and number of households is growing and this is projected to continue' (paa 3.4) and the lack of local jobs generally. It is clear that any plans to build extra houses on the Woodlands while not providing any more local jobs would exacerbate the problems the Borough Plan itself identifies and is thus highly unsound.</p> <p>3. Lack of infrastructure There is a lack of infrastructure to support any proposed housing (especially on the Woodlands), in terms of roads, schools, GPs and other matters. No effective means of addressing these have ever been identified.</p> <p>Para 3.4 also acknowledges that 'Traffic congestion is high across the Borough and Nuneaton has experienced the highest rate of traffic growth across Warwickshire'. If any new houses were built on the Woodlands, this would lead to a large increase in other cars using the local roads which are not equipped for this. This would substantially increase the already significant tailbacks that form at rush hours, particularly at the Silver Birch Heath Road junction and the Heath Road into Newtown Road (near to Heather Drive). Causing these severe practical problems shows the plans are unjustified.</p> <p>It is unclear whether any proposed building at the Woodlands would be backed up by appropriate infrastructure. Previous versions of the borough plan (before the Woodlands site was rightly removed from the proposed development) suggested a</p>		

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				<p>lack of effectiveness to plan and a lack of positive preparation here. Currently the Bedworth Health centre and the Woodlands Surgery are oversubscribed (It is impossible to get appointments) and under pressure, as are local schools. These problems would only be exacerbated by any new houses in this area.</p> <p>As the Borough Plan itself notes 'Development will be required to provide infrastructure appropriate to the scale and context of the site in order to mitigate any impacts of the development'.</p> <p>Nothing along these lines have ever been identified in relation to the Woodlands.</p> <p>4. The risk of flooding</p> <p>The Borough Plan notes that 'Extreme weather events, such as those experienced in Warwickshire in 1998, 1999, 2005, 2007, 2008 and 2012, are becoming more frequent' (3.6). This can be backed up by strong anecdotal evidence from many residents. In particular the Woodlands site (previously considered for development now rightly removed) is a well-known flood plain. Whenever there is excessive rainfall these fields are badly flooded to the point of being totally inaccessible for several days. Any suggestion of building on floodplains would be ineffective and unjustified and would also suggest a lack of understanding by those in charge of the proposed development of the nature of the area on which they wish to build.</p> <p>In other developments there are some suggestions on how problems of flooding can be dealt with, but we never saw any such mitigation plans for the Woodlands, displaying a lack of positive preparation. This lack of a plan to deal with flooding on the Woodlands site was remarkable given that one body of floodwater is so well established it forms a visible body of water on relevant maps.</p>		

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				<p>Any proposed developments on the Woodlands floodplain would contradict a number of other provisions included in the most recent version of the Borough Plan:</p> <ul style="list-style-type: none"> - 'Objective 8 4.3 To address climate change and encourage sustainability in all new development' - 'Policy NE4 – Managing Flood Risk and Water Quality 'New development should be prioritised to areas of lowest flood risk and must not increase flood risk elsewhere. This should consider the risk from all sources including fluvial, surface water and groundwater flood risk, making use of the Strategic Flood Risk Assessments (both Level 1 and Level 2) available public mapping such as the Flood Map for Planning and the Flood Risk from Surface Water map and historic flood information (which is available from the LLFA & other partners). Flood risk should be considered proportionately for all development. A site-specific Flood Risk Assessment will be required to support planning applications for large developments or those in areas at risk of flooding, in order to demonstrate that the risk both within the site and to surrounding / downstream sites is not increased - '13.53 In accordance with the NPPF and the Flood and Water Management Act 2010, Sustainable Drainage Systems (SuDS) are required to be implemented at all scales of development' - (para 13.42) 'The NPPF promotes a sequential approach to identifying new land for development. This ensures that flood risk to people and property is avoided by selecting land at least risk of flooding from rivers and other sources. Site layout and design are recognised as ways to influence the risk and impact of flooding and to provide resilience for climate change'. <p>It is welcome that the Borough Plan repeatedly acknowledges the</p>		

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				<p>risk of building on land known to flood. Any proposals to develop on the Woodlands would completely undermine these concerns however; any local resident will attest that the Woodlands floods badly and regularly. In respect of flooding, any proposal to build on the Woodlands is highly irresponsible, violates all the tenets of soundness, in particular the lack of positive preparation. Moreover, although referenced and stated to be important throughout, the Sustainable urban Drainage System does not seem to be set out in detail. It is unclear how this would relate to any of the proposed developments, in particular the Woodlands, this having been rightly removed from the development plans. This is a further indicator of unsoundness.</p> <p>It is also worth noting that a previous version of this borough plan noted that the Woodlands, among other sites, could not be screened out for possible hydrological linkages (see the previous version of the Borough Plan submitted June 2017 - Nuneaton and Bedworth Borough Council Habitats Regulations) and any intention to push ahead with the development in spite of this point would be highly unsound, particularly in that it lack positive preparation.</p> <p>4. The destruction of greenbelt fields and related habitats It is national policy to protect the greenbelt. This is referenced in the Borough Plan itself: 'Nationally, the government attaches great importance to the greenbelt' (para 7.49). The Borough Plan also acknowledges 'Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt... The Borough contains large amounts of Green Belt land, most of which is located to the south of Nuneaton and also surrounds the main areas of Bedworth, Bulkington and Ash Green' (para 7.48). The Woodlands is so named because of its historic green fields</p>		

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				<p>and ancient trees and hedgerows that stand in stark contrast to the urban sprawl in surrounding areas.</p> <p>Development on greenbelt land may be permitted in some cases (set out in paragraph 7.56) but none of these apply here in relation to the Woodlands. In respect of previous Borough Plans where the Woodlands was included, no attempt was made to explain how these possible exceptions apply.</p> <p>Likewise any development on the greenbelt must, according to the Borough Plan, 'retain and enhance landscapes, provide visual amenity and biodiversity, or to improve damaged or derelict land'. Here any potential developments on the Woodlands site would have the very opposite effect and is therefore clearly unsound.</p> <p>Regarding habitats, it is clearly desirable, both as a matter of national policy and generally, to safeguard the multiple ecosystems and habitats that would be destroyed if development of the Woodlands site was allowed to go ahead. The Woodlands site borders the Nook (a designated local wildlife site) and the Woodlands generally is very notable for the vast array of wildlife to which it provides a home. Many horses and cows are also domesticated on this site as any local resident will attest.</p> <p>The Borough Plan also notes that 'Any proposed development in Green Belt will need to maintain openness and demonstrate compensatory improvements to the environmental quality and accessibility of the land'. Any proposed development of the Woodlands would utterly contradict this as it would destroy one of the last remaining green spaces in Bedworth.</p> <p>Likewise, Policy NE5 discusses landscape character. It is stated that 'Major development proposals must demonstrate how they will conserve, enhance, restore or create a sense of place and</p>		

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				<p>respond positively to the landscape setting in which the development proposal is located'. Any proposed development of the Woodlands would need to show this, and it seems impossible to do.</p> <p>The current version of the Borough Plan notes that it is important 'to ensure the Green Belt across the borough continues to serve its fundamental aim and purpose, and maintains its essential characteristics, it will be protected by restricting development except where very special circumstances can be demonstrated'. Again, the purpose and nature of the Woodlands Greenbelt would be destroyed by any proposed development and the extremely high bar of 'very special circumstances' cannot be demonstrated here.</p> <p>For the avoidance of doubt, the Woodlands site formerly considered for development does fall within the Green Belt and has been long established as doing so. (A legitimate expectation has also been created here). This point can be proven in court if necessary.</p> <p>Please also note policy Ne5 where the borough plan itself notes 'Major development proposals must demonstrate how they will conserve, enhance, restore or create a sense of place, as well as respond positively to the landscape setting in which the development proposal is located... Major development proposals must demonstrate that they are in balance with the setting of the local landscape, respect the key characteristics and distinctiveness of that landscape, and in particular show how the proposal will: 1. Conserve or enhance important landmark views. Natural environment 2. Conserve, enhance or create boundary features and field patterns including ridge and furrow topography. 3. Conserve and where necessary enhance the</p>		

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				<p>strength of character and landscape condition’ In short, any proposed development must do as much as possible to conserve the current natural beauty of a site. The woodlands is very notable for its natural beauty, rows of ancient oak trees dividing fields, bright meadows, babbling brooks and an array of flora and fauna. We never saw any explanation of how this would all be preserved on the occasion of a possible development. It seems impossible to do so given the unique features and natural beauty of the Woodlands site. As such the only possible conclusion is to keep the Woodlands site outside of the proposed development.</p> <p>5. Possibility of contaminated land Policy BE1 provides that ‘development proposals on or adjacent to land which may have been subject to contamination and/or land instability will need to demonstrate:</p> <ul style="list-style-type: none"> • That measures can be taken to effectively mitigate the impacts of land contamination and instability on public health, environmental quality, the built environment and general amenity. • That the development site is or will be made suitable for the proposed final use and will need to provide, as a minimum, the following documents with the planning application (often referred to as a Preliminary Risk Assessment and/or Desk Study): <ul style="list-style-type: none"> n Detailed site history identifying contaminative uses and land instability. n The nature and extent of the contamination, land instability and the hazards and risks posed. <p>The Woodlands is adjacent to an old coal mine and thus these very important contamination tests should be done for reasons of public health and the avoidance of serious civil or criminal liability, if any developments were proposed here. These essential steps do not seem to have been taken thus far, certainly not with the appropriate thoroughness, and no acceptable answers or proposals have been produced. This once again shows a lack of positive preparation and that any potential developments here cannot possibly be effective or justified.</p> <p>In conclusion, it is clearly undesirable to tear up some of Bedworth’s last green fields, fell historic trees and obliterate habitats. Many children and families enjoy walks across the Woodlands and these fields and well established public footpaths are a genuine cornerstone of people’s physical and mental health and wellbeing. In these climate change times we should be seeking to maintain our green fields, trees and habitats rather than tearing them down. As noted, it is very welcome that these and other points appear to be being considered now, resulting in the removal of the woodlands site from the current version of the Borough Plan. However, any attempt to reinstate developments plans here would cause major issues for the reasons set out and would completely undermine the intentions set out in the Borough Plan itself. It is not possible for any development of the</p>		

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				<p>Woodlands site to be 'sound'.</p> <p>Local plan does not comply with duty to cooperate</p> <p>In addition to clearly being unsound for the reasons set out in detail above, the Borough Plan in general (in respect of all the proposed sites) also does not comply with the duty to cooperate. Part 2 of the Planning and Compulsory Purchase Act 2004 (as amended by s110 Localism Act 2011) requires the LPA to engage 'constructively, actively and on an ongoing basis'. The duty to cooperate has not been complied with in this case. There is very limited mention of the duty to cooperate in the Borough Plan and related documents and equally there is limited information about occasions on which the LPA have engaged with the relevant other persons. There appears to have been no attempt by the LPA to have satisfied themselves publicly (in the Borough Plan) that the duty to cooperate has been met, an action that would have been desirable for reasons of transparency. As such it seems likely that the duty to co-operate has not been met here.</p> <p>The deliberate lack of engagement with residents, discussed further below, displays the LPA has a poor record for consulting and cooperating with others, and this seems likely to be the case in respect of the duty to cooperate as well.</p> <p>It is also worth noting that the duty is, in full, a 'duty to cooperate in relation to sustainable development' and that paragraphs 14 and 15 of the NPPF indicates that there is a presumption in favour of sustainable development. However as the case of Bakermill Estates Trust [2016] EWHC 3028 held, the NPPF does not contain a general presumption in favour of sustainable development, each case must be considered on its own merits. Due to the evident unsoundness of the various plans here (most notable in respect of a hypothetical development of the woodlands) and the probable lack of compliance with the duty to co-operate this Borough Plan is patently lacking in any merits at all and this is only more pronounced in respect of any proposed development of the Woodlands.</p> <p>As noted, it is very welcome that the Woodlands Site has now been removed from the Borough Plan. However, we are only aware of this due to our MP and there is nothing in the Borough Plan itself on it. There is no specific invitation for views on the formerly designated Woodlands site itself. This is highly undesirable as it appears to be a deliberate attempt to discourage consultation responses on the Woodlands themselves. It is very unclear on the face of it what is happening with the Woodlands as per the latest Borough Plan. The duty to cooperate has therefore clearly not been met here.</p> <p>Furthermore it seems unlikely that any potential development of the woodlands is 'sustainable' in any case, so there should be no presumption in favour of it. A key tenet of sustainable development is promoting environmental prosperity for the future. Destroying habitats, trees and green fields in favour of overcrowding an already deprived area that lacks key</p>		

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				<p>infrastructure to support the new houses is clearly not sustainable. As this version of the Borough Plan does not include the Woodlands site, there is no explanation of how it could be considered sustainable.</p> <p>The Suitability Appraisal Report contains several of the Local Planning Authorities aim, all of which would fail in relation to the Woodlands. The LPA means to:</p> <ul style="list-style-type: none"> • ‘Increase accessibility to key services and sustainable transport’ <p>nAs noted this plan would cripple the local road network and decrease accessibility to services because of the increased number of residents.</p> <ul style="list-style-type: none"> • ‘Enhance maintain and protect natural habitats and sensitive landscapes’ <p>n Once again this aim is utterly contradicted by the nature of the plan which would tear up the landscapes and destroy habitats.</p> <ul style="list-style-type: none"> • ‘Ensure development is... resistant to flood risk’ Again this has not been done. Any development on the Woodlands would be servely at risk of flooding. <p>Plan is not legally compliant Finally this Borough Plan in general is not legally compliant. S19 of the PCPA 2004 sets out matters to which the LPA must have regard to when doing the borough plan. One is complying with the statement of community involvement (s19(3)). It is unclear where this statement of community involvement is for this updated Borough Plan. One may not exist. Therefore the plan is not legally compliant.</p> <p>Moreover, as all interested residents will attest to, there has been very little consultation here, with very few short in duration drop-in sessions planned that are hard for people to attend. Throughout the process the council has displayed a determination not to engage properly with the community. Generally, they do not reply to letters or emails expressing concerns. At the consultations, representatives proved unwilling or unable to answer concerns residents raised specifically in relation to habitat and greenbelt destruction, flooding and lack of infrastructure for the development. In addition to the breach of their legal duties by not consulting properly, the general conduct of the LPA and its representatives throughout the process inspires no confidence that this plan is practically deliverable or that it will be effective.</p> <p>Please also note that as you will appreciate the Woodlands having now been removed from the Borough Plan limits the ability of people to effectively engage in respect of these former plans. To the extent that development here has not 100% been ruled out, then any potential development is to an even greater extent unsound, failing in the duty to co-operate and not legally compliant.</p> <p>As you will also appreciate that the Woodlands having been</p>		

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				<p>removed from the Borough Plan creates a legitimate expectation that no development will go forward in that area, creating an ever-stronger legal right (a judicial review challenge) to prevent any change of policy in this area in the future.</p> <p>Further points – other proposed developments</p> <p>Although the majority of my response is focused on the importance of making sure the Woodlands site stays free of development, I also have severe concerns about some of the other proposed developments. Particularly the hospital lane proposed development where the points re overcrowding and lack of infrastructure apply very strongly also. This plan is clearly unsound due to these points. The points regarding tree and habitat destruction are also relevant here. Therefore, this element of the plan is also not sound, the duty to co-operate has not been met, and it is not legally compliant.</p>		
423	JJ			<p>Future development of the Borough Plan should take into account the current economic crisis. In particular, access for growing of produce using allotments would be a useful addition. Surely, the existing green belt could be used for such purposes, in particular where the edge of the current boundaries are made up of parks or other land parcels controlled by the council. Small allotments of 5 to 10 acres would be most beneficial.</p> <p>At the end of Mill Lane, Bulkington, such a case exists. (See Land registry Ref. WK307061 totalling 4.37 hectares).</p>		Noted

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424	AK			The decision to remove HSG4 is justified. 1 - Huge cost implications for link road onto A444. 2 - Traffic congestion at peak times would cause traffic issues. 3 - Extra vehicle pollution. 4 - Create more flooding in the area. 5 - Saving local ecology and biodiversity. 6 - Should never have been included in the Borough Plan initially.	<p>Our viability consultants deemed the cost of a slip road onto the A444 as viable.</p> <p>Traffic at peak times would only increase to a level deemed acceptable by the Highways team at Warwickshire County Council.</p> <p>Air pollution in the borough will not increase overall as a result of developments set out in the Borough Plan.</p> <p>A Strategic Flood Risk Assessment was undertaken for the Borough Plan, which showed that any flooding problems in the area could be mitigated against.</p>	
425	MK	7.23 and others	DS4 and others	<p>Housing numbers</p> <p>I do not believe that the housing numbers are correct. The requirements quoted are too high. The census figures from 2021 census that were recently released show that Coventry population is considerably lower than that used in the calculations. There is no additional demand from Coventry 'overspill' that needs to be accommodated by the Borough. Many people move to N&B simply because the house prices are lower than other areas, not because they particularly want to be in N&B so using the numbers of people who have come is not as result of demand for houses in N&B but simply because that is where houses that they can afford have been built. It is incorrect to use that number as an indicator of how many need to be built here. If those same homes had been built in Coventry they would have been sold just the same as it is nearer to where many people work. The appeal of N&B is because they are market towns (not a city). The numbers being discussed are ridiculous. We are losing all the reasons that it is attractive – countryside, small communities that are easy to get between etc.</p> <p>There needs to be a Brownfield first approach that has been lacking. There should be a moratorium on new applications until all brownfield sites have been developed and until a significant proportion of those with permission have actually been built. It is crazy that we have so many part built sites at one time. If the need is 435 as stated in DS4, 7.23 which seems a sensible number, why are thousands being built at once?</p> <p>There is a mis-match between the amount of housing being provided and the amount of jobs available in the Borough which is resulting in an unsustainable situation where too many people are having to commute, leading to congestion and saturated road</p>		<p>The Housing and Economic Development Needs Assessment sets out the housing numbers required, which is carried out by consultants who specialise in this field.</p> <p>We have taken a brownfield first approach.</p> <p>It is not legally possible to have a moratorium on new applications until all brownfield sites have been development, and until a significant proportion of those with permission have been built.</p> <p>More housing is being built per year than 435, as we are working on a stepped trajectory, so as the Borough Plan is from 2011-2031, and we didn't have the strategic allocations in place until 2019, more houses need to be delivered each year from 2019, to deliver those that are strategic sites which weren't available before the plan was adopted.</p> <p>Sufficient employment land has</p>

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				<p>networks which in turn lead to air pollution and poor air quality, leading to poorer health outcomes. The time people have to spend travelling, impacts quality of life and also leads to poorer health outcomes.</p> <p>Policy DS7 – Green Belt There must be no encroachment on the Green Belt. It is there for a reason. The Sustainability Appraisal (SA) backs this up by saying that there should be ‘optimum use of previously developed land’.</p> <p>Policy NE1 The needs of green corridors, existing waterways etc must be primary in planning applications. Currently they always appear to be an afterthought. The SA says that we must ‘protect and enhance the quality of watercourses’. The policies in the Plan mention buffer zones for ancient woodland, plantation woodland and hedgerows. There should be specific buffer zones for development near watercourses to protect them.</p> <p>Policy NE3 biodiversity It must be clear in the Plan that there should be at least a 10% gain in biodiversity on new developments, taken from it’s original condition prior to any clearance. It should not be permitted to have biodiversity offsetting elsewhere. The Borough is a small area and there are very few places left to create offsetting. The biodiversity is something that contributes to people’s health and well-being and so needs to be where the residents can actually see it. There is absolutely no reason that a large development site cannot provide the biodiversity on site. If you have a blank page, you just put a few less houses on the site so that you can provide the necessary habitat for biodiversity. There seems to be nothing</p>		<p>been allocated through the Borough Plan.</p> <p>There is a requirement for a specific buffer zone for development near watercourses, at Policy NE4.</p> <p>The plan sets out a requirement for new development to provide electric vehicle charging points.</p>

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				<p>in the Borough Plan that states that we need to maintain enough land for growing food (not gardens/allotments) but actual farming. The current cost of living crisis and the difficulties as a result of Brexit means that we need to be producing more food locally and yet there is a total lack of mention of the need for food security. It's no good people having a roof over their heads, if they do not have food to eat.</p> <p>HS5 – Health This needs to be the top priority in planning. Everything else can follow. Needs much greater emphasis.</p> <p>BE2, BE3 We need to have climate change reduction measures as a much higher priority.</p> <p>All new homes must have solar panels as a default as well as optimum orientation for solar gain. This must be enforced. The cost as part of construction is minimal and the positive effects are long-term both on a population level and on an individual level, helping to reduce fuel poverty. Homes must be built with features to allow for easy cooling for the increasing amount of seriously hot days as well as being cheap and easy to heat in cold spells. Building in energy efficiency for all new homes is a win-win situation and will help to 'level up'. EV charging points should be default on all new homes, for EV bikes as well as cars. This entails designs to allow that.</p> <p>Implementation of measures to deliver higher levels of walking and cycling should be put as a requirement at the beginning of construction of any new developments so that good habits are available for people from day one of living on a new site. This will help with climate change and air quality as well as being much better at building communities – it's much easier to stop and chat or simply say 'hello' when walking or cycling. It also allows greater independence and safe movement for those who do not drive.</p> <p>All new streets should be tree-lined (NPPF July 2021) and we need large scale tree planting, focussing on green corridors.</p> <p>TC1,2,3 -Town Centres Town centres need to be people focussed, encouraging walking and cycling and plenty of greenery and places where people can simply sit and watch the world go by. We must not have town centres as simply a built environment, which would be poor for mental and physical health.</p> <p>In terms of strategic sites, there is no space to have more development North of Nuneaton - one of the suggested options. Every bit already has permission or a planning application. Also the road infrastructure cannot take it. See the response from Highways England to the Issues and Options consultation. 'First it should be noted that the A5/A47 'The Longshoot' junction & the A5/A47/B4666 'Dodwells' roundabout are operationally constrained and any development greater than that in the adopted Local Plans cannot be accommodated'.</p> <p>Employment Areas</p>		

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				<p>Must have access to public transport and SAFE active travel. See response to previous consultation from Warwickshire Public Health but this also ties in with climate change reduction measures.</p>		
426	JL			<ol style="list-style-type: none"> 1. The removal of HSG4 from the plan is sound. 2. The environmental impact would have been terrible for the area. 3. Flooding in the area and beyond like at the slough would have become a common occurrence. 4. The road network in the local area would just not have coped. 	<p>The council should carry on doing the right thing and get the Woodlands put back into the Greenbelt where it used to be and where it deserves to be.</p>	<p>The environmental impact on the area would have been acceptable, as assessed in the Sustainability Appraisal, which accompanied the Borough Plan.</p> <p>Flooding could be mitigated against on the site, as is set out in our Strategic Flood Risk Assessment.</p> <p>Our Strategic Transport Assessment showed that the roads in the local area could cope with the increase in traffic.</p> <p>The Woodlands has never been in the Green Belt, and would not meet the criteria to receive such a designation.</p>

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427	KM			<p>The removal of HSG4 from the plan and the reasons policy DS5 – Residential allocations is sound are</p> <p>1,A week or so ago the office for national statistics released updated population figures for Coventry. These updated figures proved beyond doubt that Coventry City Councils local plan figures used were flawed, these flawed figures which resulted in NBBC taking extra developments to the value of 4020 dwellings through a memorandum of understanding of flawed unmet need. This should result in the 4020 of unmet need taken from Coventry's local plan that haven't been granted planning permission being erased from NBBC's local plan like HGG4.</p> <p>2,The site is completely unsustainable due to its spiralling costs, which could have doubled since the inspectors report in 2019. The inspector clearly had trouble with the site which resulted in many stipulations and main modifications regards the A444 North slip road and the amount of houses on the site that could be built before the North slip was built (170 dwellings) out of 689, which is now reduced to 680 due to 9 being granted permission in woodlands road .</p> <p>3,It would result in the loss of valuable rare Arden landscape and ruin local ecology and biodiversity and in general well used green space, adding to climate change.</p> <p>4,It would result in the bad local flooding situation getting worse and affect the river Sowe levels thus affecting two local nature reserves at the Nook and slough .</p> <p>5,It would create traffic chaos in the building of and completion in woodlands lane, woodlands road and both phases of newtown and heath road respectively .</p> <p>6,It should also be looked into by the planning team at NBBC into returning the site HSG4 to the green belt, as a boundary extension to existing green belt which the site borders to give the area protection for residents living in fear of a concrete future .</p>		<p>The Borough Plan Review: Preferred Options does not allocate land for overspill from any other local authorities.</p> <p>The Strategic Flood Risk Assessment stated that the development would not cause an unacceptable risk from flooding.</p> <p>The Strategic Transport Assessment showed that once completed, the traffic in the area would be at acceptable levels.</p> <p>The Woodlands has never been Green Belt, and does not meet the criteria to be designated as such.</p>

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428	J/TM			<p>Firstly we have a significant concern about the increasing level of flooding in the area of the proposed development. There has been an issue with flooding during the time that we have lived here but it is important to note that this is increasing in frequency, significance and duration. The extent of flooding is evident on Woodlands Lane through to Woodlands Road, in the field where the development is proposed and the field opposite. After heavy rain, the road is significantly under water.</p> <p>Surface water in the field is evident following even the smallest rain shower and remains so even after several dry days.</p> <p>There then remains substantial concentrations of mud on the road which is a safety hazard and increases the risks of skidding for cars, cyclists and slipping for pedestrians.</p> <p>The land currently offers some advantage of being a sponge for rainwater, if developed this would be lost. Changing soft standing to hard standing surfaces and raising the ground as stated will serve to force the water towards the residential site (Dove Close - south) and onto the road (Woodlands Lane - east). We note that this is recorded in the Flood Risk Assessment document as a medium/high risk (75% risk).</p> <p>There are two such areas of this risk in the borough and the proposed development will be on one of them. We ask that consideration be taken, of the implications of and who would be culpable, that even with measures put in place, the flooding increases. Both the existing pond and the new attenuation pond have the potential of overflowing and thus flooding the area of</p>		<p>The Strategic Flood Risk Assessment carried out for the Borough Plan stated that it is appropriate to develop the site, as mitigation measures can be put in place to ensure flooding does not cause an unacceptable risk to existing and future households.</p> <p>Climate change effects have been included in the Strategic Flood Risk Assessment.</p> <p>The current road infrastructure is not intended to support increased traffic, as various infrastructure improvements will be required alongside development of the site.</p> <p>The Strategic Transport Assessment includes consideration of the number of cars during peak times, and pre-dates 2021, so the data was not affected by Covid.</p> <p>Transport improvements/upgrades will take place as part of the site's development.</p> <p>The Borough Plan requires the</p>

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				<p>the nearby residences and the substation. Climate change must be taken into consideration. Calculations for surface water discharge do not take account of increasing strength and frequency of very heavy rainfall in the coming years and the consequences of that. The residents of Dove Close already suffer from significant moisture in our gardens. We have concerns about the impact of the proposed development on our properties in terms of drainage as well as ground stability.</p> <p>The existing roads are already highly congested around early morning and early evening which coincides with school and work travel. There are also many vehicles that use Woodlands Lane, Woodlands Road and Newtown Road as a thoroughfare from Astley, Nuneaton and Meriden etc. Consequently the traffic building up during those times is considerable, with wait times to join Heath Road being up to twenty minutes. The current infrastructure is not suitable to support an increased influx of traffic. It would be important to note that the data from the traffic survey did not account for numbers of cars during the peak times, only their speed and also that during most of 2021, travel was limited due to working from home Covid. As we return to increased travel, the traffic from the proposed traffic flow would only serve to augment the current traffic issue / wait time at the New Town / Heath Road junction. Furthermore, Woodlands Lane is a narrow poorly lit lane with poor sight lines. There are also two blind bends. We understand that there has been some consideration of the speed notifications, however this still does not take into account that the very tight bend in Woodlands Lane can be treacherous and the entrance to the proposed development is very close to this. There are frequent large vehicles that travel this route which already present a very real safety hazard.</p> <p>It is noted that public transport is an amenity on Heath Road, yet it is not an amenity on Woodlands Lane. The development is thus isolated and forms of transport would need to be cars, taxis, motor bikes and bicycles thus adding to the current traffic volume concern. Footpaths along Woodlands Lane are not continuous, they end at the junction of Dove Close and Woodlands Lane. They are used by residents of Dove Close, Woodlands Lane and Woodlands Road. They are narrow and often restricted by mud and detritus from the rain and inclement weather. Whilst it is a route for cyclists, there are no other special considerations for them and a cycling journey can be hazardous.</p> <p>Using the field for development would fundamentally change the use of the land by the community from green open space to one of residential. Currently, the land supports varied wildlife, the 2007 ecological survey on this site identified newts and protected species. It is a logical extension of the green network serving as a</p>		<p>provision of on-site bus infrastructure and a contribution to the secure diversion of frequent local bus services.</p> <p>The five year land supply is made up of developments including the site, therefore if the site is not developed, it would reduce the five year land supply.</p>

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				<p>wildlife corridor and its loss would impact on their numbers.</p> <p>The plan for the development is not in The Borough Plan and consequently should not even be considered because of this. We are aware of the Concept Plan for the Woodlands (HSG4) in which the proposed field does not feature.</p> <p>There is also a five year land supply which is current so again the development should not be considered because of this.</p> <p>We trust that the above objections will be taken fully into account in determining this application and we ask to be informed of the councils decision in writing.</p>		
429	TM			<p>I would like to agree the proposal to remove HSG4 from the 'Borough Plan'. The reasons are as follows: Currently there is a significant problem with flooding in this area, and this will be exacerbated by the development. The infrastructure of roads in the area is not sufficient to support extra housing. The loss of important flora and fauna in the area, which has historical and ecological value.</p>		<p>Flooding would not be exacerbated by the development, as we had a Strategic Flood Risk Assessment conducted, which found that development of the site would be acceptable in terms of its effects on the risk of flooding.</p> <p>The existing roads are not intended to be sufficient to support the extra housing, which is why the Borough Plan contains requirements for infrastructure improvements to roads in the area.</p>
430	SN			<p>I feel that the original Borough plan which included the HSG4 Woodlands area was unjust and the new proposals to remove this area as a site for redevelopment is justified. This area is an area of outstanding Biodiversity which cannot be replaced. In a country that is supposedly promoting ecological policies around the world we still seem to ignore our own needs.</p>	Removal of the HSG4 woodlands area from the plan.	<p>The inclusion of HSG4 Woodlands in the Borough Plan was deemed justified by an independent Planning Inspector appointed by the government.</p> <p>The plan does not need to be modified to remove HSG4 Woodlands, as it the site is not included in the Borough Plan Review: Preferred Options.</p>

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431	KO			<p>We are being asked for our opinions on this plan - as we have previously and it's not made a single bit of difference!</p> <p>Landowners will put their land up for development, you will snap their hands off and then developers will develop exactly how they wish - it's never been any different.</p> <p>No regard will be made for the provision of our local road network, local services such as doctors or schools.</p> <p>No plan should be adopted without the provisions in place FIRST.</p> <p>The town simply cannot cope with anymore housing or development in the Weddington area with a SINGLE entry point to the town, The other side of town will not be able to cope once the developments planned for Arbury are in place (only to leave town via the Bermuda Bridge, not go in the opposite direction).</p> <p>Proper foresight needs to used prior to agreeing ANY further development.</p>	<p>No development on greenbelt land until all brownfield sites have been used.</p> <p>No accepting overspill from neighbouring authorities which means development of our greenbelt and green spaces.</p> <p>Renovation of derelict buildings / or redevelopment of those sites first before MORE green space is taken away.</p> <p>Infrastructure in place BEFORE any further development is planned.</p> <p>Safety of pedestrians and health of residents in regards to emissions from standing vehicles should be a major concern due to lack of proper infrastructure/road network.</p> <p>Provision of ample parking on developments so avoid accidents (most houses need at least 2/3 parking spaces), ample parking for industrial developments too.</p> <p>Better walking / more walking routes.</p> <p>The list could go on, but residents historically feel like they're never listened to anyway.</p>	<p>Regard has been had to the local road network and local services such as doctors and schools, as we had a Strategic Transport Assessment carried out to support the Borough Plan, which sets out infrastructure requirements related to the road network in the borough, whilst in relation to doctors and schools, the plan clearly sets out the need for these facilities, and the locations / financial contributions required to deliver them.</p> <p>Infrastructure needs to be delivered at pre-determined trigger points, when the facilities are needed.</p> <p>The Strategic Transport Assessment shows that all of the development in the Borough Plan will have an acceptable impact on the roads in the borough.</p> <p>All appropriate brownfield sites have been allocated for development.</p> <p>No overspill has been included in the housing figures.</p> <p>The council do not own all derelict buildings in the borough, and therefore cannot ensure they are redeveloped before greenfield sites need to be developed.</p> <p>Our Parking Standards Supplementary Planning Document sets out the parking standards for all new developments.</p>

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432	LP			<p>I am broadly supportive of the latest borough plan, provided HSG4 is totally removed and I sincerely thank NBBC for revisiting this, as the woodlands area should never have been in the borough plan in the first place. The area floods significantly - residents have been supplying NBBC with pertinent images and evidence of the flooding for years, to my knowledge.</p> <p>The flooding is so significant that Warwickshire County Council local flood Authority has objected to a recent proposed development, adjacent to Dove Close. I submit that it is not just woodlands Lane that floods, but the whole area, including all the fields to the side of woodlands lane and woodlands Road.</p> <p>There is no better proof of this, than a field situated between houses 198-206 woodlands Road. This has a permanent large 'lake' within it, now host to herons, swans, geese and ducks. Anyone not knowing the area could be forgiven for thinking that this is actually a lake, however it is not. It is simply a farmers field which cannot take any more water and does not drain away. This field is currently included in the HSG4 plan.</p> <p>A neighbour at 2, Dove Close, is a retired civil engineer. So concerned about the severe flooding on woodlands Lane, he provided a detailed report to Craig Tracy on the subject in 2016, having walked the water course across Bedworth. In short, Roger Foster advises as follows: If NBBC were to sanction any building of houses on the woodlands Lane or the wider HSG4 area, due to the current water table and additional associated concrete, the new development would cause flooding in the Bedworth area, because there is simply nowhere for excess water to drain / soak</p>	<p>1) Removal of HSG4 Bedworth Woodlands from the Borough Plan.</p> <p>2) Instigate the commission of Bedworth Woodlands into Green Belt.</p>	<p>The Woodlands was approved for residential development by an independent Planning Inspector appointed by the government. A Strategic Flood Risk Assessment was undertaken for the Borough Plan, which showed that the risk of flooding on the site following development would not be unacceptable, and there would be space for excess water to drain / soak away, and this was accepted by the Planning Inspector. NBBC did not volunteer to deliver houses for Coventry's housing need; it was a requirement in order to get approval for the Borough Plan. It has not been proven that Coventry's housing numbers were overestimated, and therefore the figures cannot be immediately disregarded. The estimation for Coventry's housing figures was based on a specific statistical methodology, which is now being reviewed.</p> <p>The Woodlands has been considered for building in the past, including when the development at Dove Close was approved in the</p>

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				<p>away. Whilst I am not qualified to say this myself, I have had numerous conversations with Roger Foster on this subject and he would be in a position to provide you with this information directly.</p> <p>There is a suggestion that Bedworth, like any other town, needs additional housing. What needs to be seriously questioned are the number of new houses and how the total figure was arrived at. The biggest question has to do with the strange arrangement of NBBC 'volunteering' to take on some of Coventry's allocation. I understand that Coventry overestimated their required numbers and therefore the numbers we took for them, should be disregarded immediately, with robust measures implemented to ensure this never happens again.</p> <p>NBBC, in their own leaflet, say greenfield sites must not be prioritised. This would also appear to be the view for the current government and I have lost count of the number of times, this has been raised by hopeful candidates in the current leadership campaign on TV.</p> <p>The woodlands (and the name is a clue) should therefore never be considered for building whilst other areas, particularly brownfield sites, exist within the borough.</p> <p>The woodlands is the last green area in Bedworth, where people can get away and be at one with nature.</p> <p>We have enjoyed this for many years, walking our dogs and bird watching and have encountered many people over recent years, during covid and the cost of living crisis, seeking sanctuary in this green space, to protect and support their mental health and wellbeing. This area is home to a vast variety of wildlife species, including deer, muntjacs, rabbits, birds of prey, herons, swans, geese, ducks and great crested newts, to name but a few.</p> <p>I have already stated, I understand that some new housing is possibly required in the borough. A number of areas of Bedworth are already overrun with vehicles and thousands of new houses, conservatively with 2 cars each, will not help the situation and the current infrastructure cannot support the volume increase.</p> <p>A good example would be cars spilling out from the HSG4 area onto the already gridlocked woodlands Road, at peak times, such as the school run.</p> <p>I understand that slip roads up to the A444 by pass are a non-starter, due to the excessive construction costs.</p> <p>Personally, once the new Borough Plan is adopted, with HSG4</p>		<p>middle portion of the area, and it is only fair that the rest of The Woodlands is similarly considered for its suitability for residential development.</p> <p>There are various public rights of way outside of The Woodlands for residents to use in order to access green areas and enjoy nature.</p> <p>There is a clear need for at least 9,690 houses in the borough up to 2039.</p> <p>All new developments are only approved once Warwickshire County Council's Highways team have assessed the proposal, and deemed the impact on transport to be acceptable.</p> <p>The slip road onto the A444 from the proposed Woodlands development is viable, as has been set out by the consultants we used to produce our Viability Assessment for the Borough Plan. The Woodlands cannot be placed in the Green Belt, as it does not meet the criteria to be designated as such.</p> <p>HSG4 Bedworth Woodlands cannot be removed from the Borough Plan Review: Preferred Options, as it is not contained in the document.</p>

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				<p>removed, we would respectfully request that moves are made to put the woodlands into greenbelt, as we were promised it would be, many years ago, by a previous administration.</p> <p>We have the right to live a peaceful and undisturbed life, having moved to woodlands Lane for just that reason, and these building considerations every couple of years, do nothing for our mental health and wellbeing.</p>		
433	LR			<p>The removal of HSG4 from the plan and the reasons policy DS5 is sound are:</p> <p>Building in the area would make the flood situation even worse and would potentially have a negative impact on local nature reserves.</p> <p>It would add to climate change.</p> <p>It would add strain on the roads in the area and make the traffic situation even worse.</p>	Add HSG4 Bedworth Woodlands to the green belt.	<p>We had a Strategic Flood Risk Assessment undertaken for the Borough Plan, which showed that development on the site would not create an unacceptable risk of flooding.</p> <p>A Strategic Transport Assessment was undertaken to support the Borough Plan, which set out measures required to ensure the impact of the development on the road network would be acceptable.</p> <p>Bedworth Woodlands cannot be added to the Green Belt, as it does not meet the criteria to be designated as such.</p>

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434	DR	7.0		<p>Overall I have no reason to believe the Borough Plan Review Preferred Option document to be unsound, though a word of caution may be appropriate given that preliminary evidence from the 2021 Census suggests that earlier household projections in some areas may have been exaggerated.</p> <p>I welcome the removal of HSG4 from the revised Plan; indeed, in my submission it should not have been included in the earlier Plan.</p> <p>It's inclusion appeared to be in breach of the 'Managing Flood Risks' guidelines which advises that 'New Development' should be prioritised to areas of lowest flood risk and must not increase flood risk elsewhere. From my experience as a resident of Dove Close for 11 years I can readily affirm that HSG4 could not be categorised as an area of low flood risk.</p> <p>The other principal objection to HSG4 was the adverse effect the increased traffic would have on the poorly maintained narrow roads (Woodlands Road, Woodlands Lane, Bedworth Lane) with consequent queues and delays. I have seen no evidence of the willingness of the Highways Authority or others to upgrade these roads to accommodate the inevitable increased traffic. Again, another reason why I support the removal of HSG4 from the Local Plan.</p>		<p>Household projections have not been exaggerated, however the methodology used to make the projections is currently being reviewed.</p> <p>HSG4 complies with "Policy NE4 - Managing flood risk and water quality", as although HSG4 may not have the lowest flood risk, development has been prioritised to areas of lowest flood risk.</p> <p>The highways authority have produced evidence of their willingness to upgrade the roads, including Woodlands Road, Woodlands Lane and Bedworth Lane, as set out in the HSG4 policy within the Borough Plan.</p>

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435	SS			The plans do not meet the infrastructure to support the new builds. There are insufficient roads to support the many cars already on the roads in Bedworth. To support builds you require sufficient green space. The NBBC are already building on football pitch at Miners Welfare, no longer use Marston Lane, Collycroft, only 1 at Bulkington and Heckley. Insufficient changing facilities. New builds should provide allotments, no new/additional allotment space has been created.		<p>The Borough Plan sets out the requirements necessary to meet the infrastructure needs to support the new builds.</p> <p>The Strategic Transport Assessment sets out that a new on-slip is required onto the A444 in order to support the development of the Woodlands, and is a requirement of the development of the site.</p> <p>Green space will need to be delivered as set out in a concept plan in order for there to be sufficient green space for new residents.</p> <p>New/additional allotment space will need to be provided at various development sites in order to meet the requirements of the Borough Plan, however new/additional allotment space is not necessary at the Woodlands site.</p>
436	VS	7.63-7.72	HSG5	Greenbelt, heavy flooding, no supporting infrastructure	Cease project	Noted
437	WT			Given that we have already seen houses built on School Lane and Hawkesbury SHA6 with more proposed off Hospital Lane, SHA4, surely we do not need more development in this area?	We need to protect as much agricultural land and green spaces as possible. The war in Ukraine has highlighted the need for this country to be more self-sufficient in food production. How can we do that if we are build on so much of our agricultural land? The pandemic showed the importance of green spaces for people's health and wellbeing. The current heatwave also reminds us all that we need to take global warming seriously and green spaces should be protected at all costs.	<p>We do need more development in this area in order to meet the housing needs of the borough.</p> <p>Nearly half of the borough is within the Green Belt, therefore there is a substantial amount of land available for agricultural use.</p>

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438	RT			<p>Supporting decision of removal of HSG4 from Borough Plan and Reasons</p> <ol style="list-style-type: none"> 1. Increased financial cost to adapt/build new road structures within the area of the woodlands. For example, high cost to build slip road from A444 into the HSG4 plan. This money could be re directed to support local health initiatives or support networks within the Nuneaton and Bedworth Borough. 2. Increased traffic flow causing an increase in levels of harmful gases for residents and wider communities with a direct impact on wildlife. Resulting in negative impact on NHS services in the local/surrounding areas. 3. Increased risk of already prone flood area within the Woodlands area with the potential of encroaching on major risk factor of High Voltage substation within vicinity of HSG4 Plan 4. Loss of valuable green spaces and loss of wildlife/biodiversity within the woodlands area 		<p>Money required for road improvements could not be re-directed, as the money is only provided for the infrastructure required as a result of the development.</p> <p>The Air Quality Assessment carried out for the Borough Plan shows that air quality will not worsen as a result of all of the developments proposed in the Borough Plan.</p>
439	MW	8	SHA-4	<p>I have concerns over the number of dwellings allocated to the Hospital Lane site SHA-4 given its remoteness from the town centre and its lack of public transport. Hospital Lane is designated a country lane where the site is which has a national speed limit. There have been numerous RTAs including fatalities along that stretch and the potential increase in traffic volume would only add to this.</p>	<p>Reduce the number of dwellings so as to help with traffic management. This will also allow for more open space without over urbanizing a rural area.</p>	<p>Hospital Lane is a 9 minute drive from Bedworth Town Centre, therefore it is not remote from the town centre. Public transport will be improved for SHA-4, as is set out in the Borough Plan, which states that the site must deliver provision of on-site bus infrastructure and contribution to secure diversion of frequent bus services.</p>
440	LW	7.40	DS5	<p>The allocations of some of the non-strategic sites will lead to 'town cramming', developing many areas of open land which are important to the character of the immediate area. This includes EXH1 and 2; BED3 and 6; CAM1; GAL7; POP2 and 4; KIN2; and WEM1.</p>	<p>Allocate land on the edge of the larger settlements including Bulkington (notwithstanding that the land is allocated Green Belt).</p>	<p>Land has been allocated on the edge of the larger settlements, including Bulkington.</p>