

Nuneaton and Bedworth Borough Council

Borough Plan 2011- 2031

Consultation Statement

June 2017

**Town and Country Planning (Local Planning) (England) Regulations
2012**

Regulation 22c



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1. Introduction

- 1.1 This statement sets out the details of the consultation process throughout all of the stages of preparing the plan, including who was consulted and when, what the main issues raised were, and how the document has been changed as a result of these comments.
- 1.2 This statement has been prepared to meet the requirements of Regulation 22 of the Town and Country Planning (Local Plan) (England) Regulations 2012. This requires a statement to be submitted to the Secretary of state setting out:
- (i) which bodies and persons the local planning authority invited to make representations under Regulation 18;
 - (ii) how those bodies and persons were invited to make representations under Regulation 18;
 - (iii) a summary of the main issues raised by the representations made pursuant to Regulation 18;
 - (iv) how any representations made pursuant to Regulation 18 have been taken into account ;
 - (v) if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - (vi) if no representations were made in Regulation 20, that no such representations were made.
- 1.3 This statement also demonstrates that consultation has been undertaken within the context of Paragraph 155 of the National Planning Policy Framework (NPPF) which states:

'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'

2. Borough Plan Context

- 2.1 The Nuneaton and Bedworth Borough Plan will play a key role in shaping the role of the Borough up to 2031. Once adopted, the Borough Plan will replace the Local Plan 2006. Figure 1 outlines the stages of preparing the Borough Plan and Table 1 shows which consultations are covered by the Town & Country Planning (Local Planning) (England) Regulations 2012.

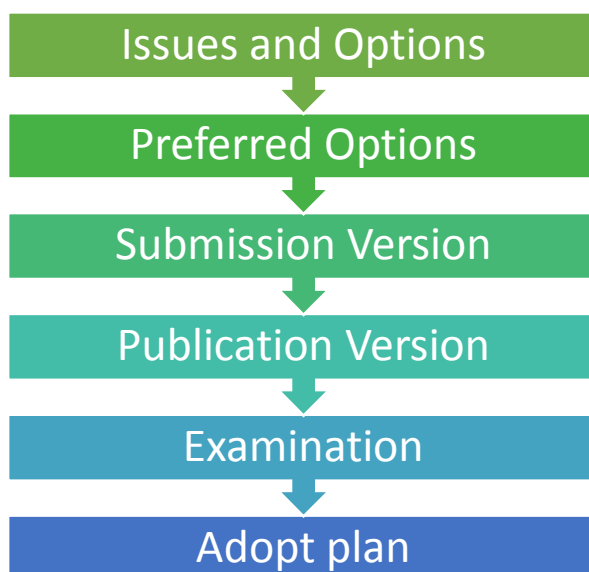


Figure 1. Stages of the Borough Plan

Table 1. Consultations covered by Regulations 18 and 19

Consultation Stage	Consultation Dates	Town & Country Planning (Local Planning) (England) Regulations 2012
Issues and Options	8 th June - 14 th August 2009	Regulation 18
Preferred Options	13 th July – 30 th August 2013	
Submission Version	26 th October – 18 th December 2015	
Publication Version	31 st January – 13 th March 2017	Regulations 19 & 20

Issues and Options – 2009

2.2 At this stage, the Council consulted on a document that outlined the issues facing the Borough and presented a range of options to address them. This included a broad range of locations for the direction of future growth.

2.3 The consultation period was originally planned to run from 8th June to 31st July 2009, however the deadline was extended to 14th August 2009 due to the high level of interest shown in the plan. The documents for consultation included the Core Strategy Issues and Options document, Sustainability Appraisal and Habitat Regulations Assessment.

2.4 An Issues and Options Response Document¹ is available on the Council’s website which provides further detail on the consultation process undertaken as well as the responses received.

¹ Nuneaton and Bedworth Borough Council Issues and Options 2009 Response Document, NBBC (2009)
Available at:

Preferred Options - 2013

- 2.5 The Preferred Options document set out the Council's preferred approach to addressing the strategic issues facing the Borough, including specific locations and sites to address the future development needs and planning policies.
- 2.6 The Preferred Options version of the plan was amended in response to a move from the new national government towards more localised approaches to planning and a reformed planning system. As part of this the West Midlands Regional Spatial Strategy was revoked and the council therefore reviewed its targets for housing and employment provision through the Preferred Options document.
- 2.7 The consultation period for the Preferred Options document ran from 13th July to 30th August 2013. The documents consulted on included the Borough Plan Preferred Options, Sustainability Appraisal, Infrastructure Delivery Plan and Habitat Regulations Assessment.
- 2.8 A consultation statement for the Preferred Options consultation is available on the Council's website², along with a document summarising the consultation responses³. These documents provide further detail on the consultation process and responses received.

Submission Version - 2015

- 2.9 The Submission version of the plan was updated to reflect the responses of the previous consultation, updated evidence base and changes in government guidance.
- 2.10 This consultation ran from 26th October to 18th December 2015. A consultation statement⁴ was prepared outlining how this consultation was undertaken and summarises the responses received as well as how the issues raised were addressed going forward in the Publication version of the plan.
- 2.11 The documents consulted on included the Borough Plan Submission document, Infrastructure Delivery Plan, Sustainability Appraisal and Habitat Regulations Assessment.

Publication Version - 2017

- 2.12 The Publication version of the plan has been updated to reflect the need to accommodate extra housing and employment need from neighbouring authorities under the Duty to Cooperate. It has also changed to reflect responses from the previous consultation, updated and additional evidence base documents and changes in government guidance.
- 2.13 The consultation period ran from 31st January to 13th March 2017. The documents consulted on included the Borough Plan Publication document, Infrastructure Delivery Plan and Sustainability Appraisal.

https://www.nuneatonandbedworth.gov.uk/downloads/file/289/issues_and_options_2009_response_document_2009

² Borough Plan Preferred Options: Consultation Statement, NBBC, 2017

³ Borough Plan Preferred Options: Summary of consultation responses, NBBC, 2017

⁴ Borough Plan – Submission Version (October 2015) Consultation Statement, NBBC, 2017. Available at https://www.nuneatonandbedworth.gov.uk/downloads/file/1799/c9_-_consultation_statement_borough_plan_submission_2015_2017

3. Statement of Community Involvement

- 3.1 The Statement of Community Involvement⁵ (SCI) was first adopted by the Council in 2006 and was updated in 2015 to reflect changes to planning regulations.
- 3.2 The SCI is a statutory document that formally sets out how the community and other stakeholders with an interest in the development of the Borough can engage with the planning system.
- 3.3 The Council has undertaken consultation on all versions of the Plan in accordance with the requirements set out in the SCI.
- 3.4 This has therefore ensured the public and relevant interested parties have had sufficient and equal opportunity to comment on the Plan at each stage of its development.

4. Duty to Co-operate

- 4.1 The 'Duty to Co-operate' is set out in Section 110 of the Localism Act 2011 and applies to all Local Planning Authorities (LPAs), National Park Authorities and County Councils in England.
- 4.2 The Duty to Co-operate requires the Council to engage constructively, actively and on an on-going basis with neighbouring authorities and other statutory bodies on strategic cross boundary matters associated with Plan making.
- 4.3 In preparing the Local Plan, the Council has complied with the legal requirements of the Duty to Co-operate. A separate statement has been prepared detailing how the Council has fulfilled this obligation.

5. Borough Plan Consultation

(i) List of bodies and persons invited to make representations under regulation 18

- 5.1 A list of the bodies and organisations consulted for each of the stages of the Borough Plan is provided in Appendix A. This list is as set out in the Statement of Community Involvement.
- 5.2 In addition, all those who had registered on the Borough Plan consultation database were also informed ahead of each consultation period commencing and were invited to make their comments.
- 5.3 Anyone else wishing to comment on the Plan such as general members of the public and local businesses were able to do so either online or in written form, at each stage of consultation.

(ii) How those bodies and persons were invited to make representations under regulation 18

- 5.4 A range of methods were used by the council at each stage in the development of the plan in order to consult and engage with all consultees. The methods chosen were guided by the SCI. Table 1 in the SCI outlines the minimum requirements for

⁵ Statement of Community Involvement 2015, NBBC (2015) Available at https://www.nuneatonandbedworth.gov.uk/downloads/file/1723/aa1_-_statement_of_community_involvement_2015

consultation at each stage in the development of the plan. These requirements have been conformed to at each stage, as detailed in the table below along with the other consultation methods used. The consultation methods used for the Publication version have also been shown.

Method	Issues & Options	Preferred Options	Submission Version	Publication
Statutory Minimum Requirements				
Make documents available at the Town Hall and Bedworth Area Office	✓	✓	✓	✓
Write to statutory consultees	✓	✓	✓	✓
Make documents available on the Council's website	✓	✓	✓	✓
Additional consultation methods identified in the SCI				
Documents available in libraries/other information points	✓	✓	✓	✓
Write to non-statutory consultees	✓	✓	✓	✓
Issue press releases to the media	✓ - Articles printed in local newspapers/newsletters	✓ - Consultation advertised in local newspapers/newsletters		✓
Undertake surveys/questionnaires	✓ - A questionnaire format was used to collect responses to the plan	✓ - Preferred Options document included specific consultation questions		
Prepare leaflets/brochures	✓	✓	✓ - Article sent to all schools to be included within school newsletter	✓ - Consultation summary booklet produced

			- Notices within business newsletters	
Undertake roadshows/displays/exhibitions	✓ - drop in events	✓ - drop in events	✓ - drop in events	✓ - drop in events
Social media	✓ - 17 minute film posted on YouTube - Regular updates and latest news on council website/blog	✓ - YouTube video produced to give overview of the plan		✓ - drop in events advertised on social media
Digital media	✓ - Radio advert on Oak FM - 17 minute film posted on YouTube	✓ - Radio interview with council officer		✓ - adverts on Nuneaton News website
Focussed meetings with recognised groups	✓ - Community Forums in each of the seven localities - Meetings arranged with the following groups: ▪ Community involvement Forum ▪ Edward Street Day Care ▪ Galley Common Residents Association ▪ Medium and Small Businesses ▪ Nuneaton Civic Society ▪ The Local Strategic Partnership ▪ Warwickshire Ethnic Minority Forum	✓ - Presentations given to the following groups: ▪ Youth Forum ▪ CAVA Community Groups ▪ N&B Marketing and Investment Group ▪ N&B Business Network ▪ Bedworth and Bulkington Neighbourhood Watch ▪ Older Peoples Forum	✓ - Events were arranged with the following groups: ▪ Nuneaton Business Alliance ▪ Older Peoples Forum ▪ Kind Edward VI College Student Council ▪ Chamber of Commerce SFB	✓ - Event arranged with Chamber of Commerce

Utilisation of Council publications e.g. InTouch		✓ - Article in 'In-touch' advertising the consultation	✓ - Article in In-touch magazine sent to all households in the Borough	
Other methods used				
Posters/banners/A-boards across the borough		✓	✓	✓

Issues & Options

5.5 Responses to the Issues and Options document could be submitted by written responses or through filling out a questionnaire produced by the Council. The majority of the responses received were in the form of completed questionnaires, along with some written responses in the form of letters and emails.

Preferred Options

5.6 Responses to the Preferred Options consultation could be submitted either through written responses or through filling out the form produced by the Council. The response form allowed comments to be made on each of the documents, a particular section, policy or paragraph. The Preferred Options document also included specific consultation questions which could also be answered using the response form.

5.7 The response form also asked respondents to state whether they supported the part of the document they were commenting on, with the options of 'yes', 'no' and 'neutral'.

Submission Version

5.8 Written representations could be made in either paper or electronic form. The response form was available in both paper and electronic forms. The response form also allowed respondents to comment on whether they thought the Plan was legally compliant, sound and fulfilled the Duty to Cooperate.

(iii) Summary of the main issues raised by the representations made under regulation 18

Issues & Options

5.9 Over the 10 week consultation period, the council received 3,792 comments on the Issues and Options document from 676 respondents.

5.10 Overall, 63% of the comments received were in overall support of the Issues and Options document, with 10% of these strongly agreeing. The majority of responses were commenting on the spatial options and key issues sections. The future growth section, although receiving the least number of responses, had nearly all of the responses in disagreement with its content.

5.11 There was high disagreement with the amount of future growth proposed in the document and this was viewed as being imposed on the Borough.

5.12 General concerns raised were over loss of Green Belt land and increases in traffic as a result of development, along with concerns in loss of the character of the town centre and a danger of merging with Coventry. Support was shown for the principle of spreading development evenly throughout the borough, with spatial option 5 receiving the most support.

5.13 Further detail on the responses received are set out in the Issues and Options Response Document⁶.

Section	Main Issues Raised
Key Issues	<ul style="list-style-type: none"> • Majority agree/strongly agree • Particular support for leisure and recreation, and transport issues
Future Growth	<ul style="list-style-type: none"> • Majority disagree/strongly disagree • Concerns raised over large amounts of housing imposed on the borough and effects this may have on overcrowding, traffic, schools, doctors and other infrastructure • Concern over loss of green belt land and harm to the environment • Concern over lack of jobs to support level of growth proposed
Spatial Vision	<ul style="list-style-type: none"> • Majority agree/strongly agree • Support for references to landscape, biodiversity, connectivity and local distinctiveness • Concern over ability for the vision to be delivered and effects of it on infrastructure • Concern that views of residents are not taken into account
Strategic Objectives	<ul style="list-style-type: none"> • Majority agree/strongly agree • Concern that objectives are too wide ranging to be successfully delivered and should be more focussed • Suggested that more focus should be on educational and infrastructure issues • Concern over unequal focus between Nuneaton and Bedworth • Most support for objectives relating to infrastructure, environment, sustainability and healthy communities
Spatial Options	
	<ul style="list-style-type: none"> • Overall agreement with spatial options put forward • Most support for approach using small urban extensions and sequential approach • Least support for development to north and east of Nuneaton and support for directing growth to Bedworth • Option 5 received the most support (approach using small urban extensions)

Preferred Options

5.14 In total, 2067 comments were received on the preferred options document, 46 on the sustainability appraisal, 61 on the IDP and 8 on the HRA.

5.15 The section of the document to receive the most responses was the section on the development strategy, with over 400 comments being made on this section. In comparison, approximately 100 comments were received on the sections for consultation

⁶ Nuneaton and Bedworth Borough Council Issues and Options 2009 Response Document, NBBC (2009)
Available at:

https://www.nuneatonandbedworth.gov.uk/downloads/file/289/issues_and_options_2009_response_document_2009

process, economy, infrastructure, housing and natural and built environment. All other sections of the document received approximately 50 comments for each section.

5.16 Responses were also made on each locality in the borough. The localities receiving the most responses were Bedworth North & West and Wedding & St Nicholas. In contrast, very few responses were received on Bede & Poplar and Camp Hill & Galley Common.

5.17 The majority of comments disagreed with the content of the section they were commenting on, with the exceptions of the economy, infrastructure, housing and natural and built environment sections which received more support and neutral opinions.

5.18 The main issues raised for each section are outlined below. Comments were also received on the consultation process and the document as a whole.

Section	Main Issues Raised
Consultation Process	<ul style="list-style-type: none"> • Consultation wasn't publicised well enough and poorly timed in the summer holidays • Document difficult to read • Response form difficult to fill out • Hard to find information on the website • Maps too small to see properly within the document
Preferred Options Document	
Whole Document	<ul style="list-style-type: none"> • General concern about increased traffic due to housing proposed • Unequal distribution of housing – too much in North of Nuneaton and lack of development in Bedworth • Concern over provision of schooling to accommodate extra housing • Questions over where housing targets had come from • Concern over use of greenfield, Green Belt and agricultural land
Introduction	<ul style="list-style-type: none"> • Need to perform Duty to Co-operate highlighted • Suggested removal of reference to West Midlands Regional Strategy in the Plan as now revoked
Spatial Portrait	<ul style="list-style-type: none"> • Concern over traffic and air pollution
Key Issues	<ul style="list-style-type: none"> • Issue of large numbers of residents commuting out of the Borough for work needs to be addressed • Affordable housing provision is needed
Vision and objectives	<ul style="list-style-type: none"> • Strong opposition to proposed 7,900 houses and concern over capacity of roads to cope with the increased traffic and view that there will not be enough jobs to support residents • Suggestion from Canal and River Trust to use canal side areas to create new homes/businesses which could use canal system for walking/cycling to reduce congestion and pollution and improve health
Development Strategy	<ul style="list-style-type: none"> • Strong opposition to 7,900 figure with concerns they are unrealistic and questioned where they had come from, although also support for a higher housing target • Suggested that housing figures be re-assessed when new SHMA released • Opposition to use of Oxford Economics rather than ONS figures • Lack of belief that 1.5% economic growth target could be met

	<ul style="list-style-type: none"> • Concern that not enough jobs would be created and that issue of out commuting for work would not be addressed • Support for DEV2 policy • Opposition to DEV4 policy and phasing of housing delivery to link with employment delivery, an approach considered unsound • Views that too much focus on Nuneaton and not enough on Bedworth, although also support for this approach • Mostly opposition but some support to building on Green Belt • Disagreement with proposals to provide more retail space and support to provide more residential use in the town centres • General concern over capacity of road infrastructure
Economy	<ul style="list-style-type: none"> • Objection to restriction of B8 uses • Views that more retail facilities are not needed and there are too many pound shops and charity shops in Nuneaton town centre • Need for leisure facilities and restaurants in Nuneaton town centre • Suggestion to locate residential uses in town centres
Infrastructure	<ul style="list-style-type: none"> • Support for walking and cycling routes proposed to be created/improved, with links to employment sites desired most • Support to create a walking/cycling route along A444 to link Bermuda Business Park and Nuneaton town centre • Suggestions to restrict fast food outlets, alcohol stores and gambling outlets • Suggestion to focus on woodland as well as open spaces • Desire for a bridge to create new entrance to Nuneaton train station on northeast side • Concerns over capacity of road network and opposition to eastern relief road proposal • Concerns over air quality • Concerns over provision of schools and GPs to support extra housing
Housing	<ul style="list-style-type: none"> • Majority of responses concerned with provision of housing for older people due to ageing population • Support for homes for older people to be located in and around town centres • Support for provision of affordable housing but also concern that it could reduce viability of sites and reduce money available for infrastructure provision
Climate Change	<ul style="list-style-type: none"> • General concern that climate change policies could impact viability of delivering sites • Objections to installing district heating systems for sites over 1,000 dwellings due to increased cost of development • Concerns that buildings standards were too high as they were above standard building regulations requirements • Suggestion to use trees to mitigate flood issues • View that small wind turbines are ineffective
Natural and Built Environment	<ul style="list-style-type: none"> • Concern over effectiveness of biodiversity offsetting • Opposition to use of Green Belt and greenfield land for development • Woodland Trust response highlighted the need to protect ancient woodland • Coal mining authority advise to carry out land stability checks on development sites where necessary, due to mining history of the area

Localities	
Abbey and Wembrook	<ul style="list-style-type: none"> • Proposal for relief road considered dangerous • Concern over congestion, pollution and noise at Golf Drive and Gipsy Lane, along with road accidents on Gipsy Lane • Issues raised with flooding at land off Gipsy Lane • Opposition to building on agricultural land • Suggested that SHS1 should be integrated with the canal to link up to walking/cycling routes
Arbury and Stockingford	<ul style="list-style-type: none"> • Concern over congestion, particularly at Heath End Road • Opposition to plans for housing and relief roads on Arbury land • Strong opposition to relief road as would result in Walsingham Drive becoming a through road for high volumes of traffic • Concern over impacts on house values • Concern raised by English Heritage over impact on listed buildings at Arbury and wider setting • Suggestion to create a wildlife buffer between new and existing developments, which could also provide a new cycle route • Concerns over impact to wildlife and habitat • Opposition to building on Green Belt • Suggestion to locate new housing next to A444
Bede and Poplar	<ul style="list-style-type: none"> • No major comments except requests to build in this area
Bedworth North and West	<ul style="list-style-type: none"> • Opposition to SHS3 • Concern over impacts to wildlife and traffic • Concern over lack of GPs and schools to cope with extra residents, as well as lack of jobs • Opposition to use of Green Belt and agricultural land and loss of walking routes across the fields • Highlighted that the site did not score as well in the SA, only scored well on ability to deliver affordable housing • Concern over flood risk in the area • Fears over affordable housing causing social problems in the area • Disagreement with travel time figures used in the plan
Camp Hill and Galley Common	<ul style="list-style-type: none"> • No major comments except requests to build in this area
Weddington and St.Nicholas	<ul style="list-style-type: none"> • Concerns over increased congestion and recommendations to improve A5 • Particular concerns for Leicester Road Bridge/Leicester Road Gyrotory capacity for extra vehicles • Concerns over impacts to wildlife and air quality • Opposition to building on agricultural land • Concern over lack of GPs and schools to cope with increased population
Whitestone and Bulkington	<ul style="list-style-type: none"> • Majority of comments concerned with eastern relief road and increased congestion at Golf Drive, Lutterworth Road and Bulkington Lane, along with increased noise • Concerns also raised over supporting services, impacts on nature and increased flood risk
Sustainability Appraisal	
<ul style="list-style-type: none"> • Concern raised over lack of work on the historic environment 	

<ul style="list-style-type: none"> Suggestion to set out restrictions of development where Local Wildlife Sites and potential Local Wildlife Sites are located
Infrastructure Delivery Plan
<ul style="list-style-type: none"> Highways Agency requested more information of the effects of the Strategic Housing Sites on the strategic road network National Grid highlighted restrictions of building under overhead power lines in relation to SHS3 NHS England Property Services highlighted need for 11 GPs to accommodate extra housing with expansion of services in Abbey & Wembrook, Bede & Poplar, Bedworth North and West, as well as a new facility to serve SHS4
Habitat Regulations Assessment
<ul style="list-style-type: none"> Concern from Natural England over hydrological impacts of building near Ensor's Pool and noted that groundwater may also contribute to pool's water content Distance of Borough boundary from River Mease miscalculated and concern from Natural England that it could therefore be affected by development

Submission Version

5.19 In total, 477 representations were received from 203 respondents, with 32% of these being made in relation to NB2 – Scale and Location of Growth, with many others being indirectly associated with this policy.

5.20 The main and recurring issues raised by respondents are outlined below.

Policy/Topic	Detail
Consultation Method	The method of consultation has been confusing and response forms are difficult to fill out
NB2 – Scale and Location of Growth	Scale of proposed housing does not meet OAHN and unmet housing needs arising from Coventry
NB2 – Scale and Location of Growth	Objection to the allocation HSG4 (Woodlands) due to concerns with flooding
NB2 – Scale and Location of Growth	Objection to the allocation HSG1 (North of Nuneaton due to concerns with infrastructure)
NB2 – Scale and Location of Growth	Objection to allocation of greenfield sites
NB2 – Scale and Location of Growth	Not enough detail provided on how sites will be brought forward (in particular the infrastructure provision)
NB3 – Settlement Hierarchy and Roles	Bulkington and lower tier settlements other than Nuneaton and Bedworth should accommodate some of the strategic housing needs of the Borough
NB5 – Nature of Employment Growth	Historical provision of employment has not met targets so the proposed growth is unlikely to be met
NB6 – Nature of Town Centre Growth	There is no evidence to support a retail-led centre, town centres should be redeveloped for non-A class uses
NB7 – Hierarchy of Centres	Additional urban extensions should be allowed to provide greater flexibility for windfall sites
NB8 – Range and Mix of Housing	Designing to Lifetime Homes should be a requirement
NB8 – Range and Mix of Housing	More flexibility should be given for the mix of housing provided to respond to local circumstances

NB9 – Affordable Housing	Policy should be amended to account for the proposed changes to the NPPF
NB10 – Gypsies and Travellers	The number of pitches required is an overestimation
NB12 – Strategic Accessibility and Sustainable Transport	Objection to the impact the proposed development will have on congestion on the Borough
NB13 – Telecommunications	New policy is required to include the provision of high quality broadband
NB21 – Managing Flood Risk and Water Quality	More management of catchment areas is required
NB22 – Renewable and Low Carbon Energy	Policy needs updating to be in accordance with the Deregulation Bill 2015
NB23 – Sustainable Design and Construction	The policy should be reworded to be more flexible
NB25 – Landscape Character	Landscape policies contradict allocations in the Green Belt

5.21 This consultation asked respondents to comment on whether they considered the plan sound, legally compliant and compliant with Duty to Cooperate. Table 3 provides a summary of these responses (however these are broken down per comment rather than per respondent).

	Sound	Legally Compliant	Duty to Cooperate
Yes	90	37	96
No	188	296	181
No answer	199	144	200
Total	477	477	477

5.22 Summaries of all comments received are available in the separate Submission Version Consultation Statement document.⁷

(iv) How the representations made under regulation 18 have been taken into account

5.23 All comments received at each consultation were given due consideration as the plan progressed and were used to inform the document as it progressed to the next stage.

Issues & Options

5.24 The response to the main issues raised from the Issues and Options consultation are outlined below.

Main Issues Raised	Response/Changes Made
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⁷ Borough Plan – Submission Version (October 2015) Consultation Statement, NBBC, 2017. Available at https://www.nuneatonandbedworth.gov.uk/downloads/file/1549/consultation_statement_2015

Lack of infrastructure to support proposed housing (including traffic, schools, doctors)	<ul style="list-style-type: none"> • Section 7 of the preferred options document included four policies (INF1 – INF4) to address supporting infrastructure across the Borough • An IDP was introduced for the Preferred Options consultation to address the delivery of supporting infrastructure • The IDP also helped to demonstrate the deliverability of the vision of the plan
Loss of Green Belt Land and effects on the environment	<ul style="list-style-type: none"> • Policy DEV5 - Green Belt was put into the Preferred Options document to protect remaining Green Belt land in the Borough • The SHLAA process highlighted that the required growth could not be accommodated solely within the existing urban area • Sections 9 and 10 of the Preferred Options document introduced policies to address the effects of development on climate change and the natural and built environment
Lack of jobs to support proposed housing	<ul style="list-style-type: none"> • Section 6 of the Preferred Options document addressed issues regarding employment and economy
<p>Spatial Strategy:</p> <ul style="list-style-type: none"> • Support for small urban extension approach • Concern over unequal focus between Nuneaton and Bedworth 	<ul style="list-style-type: none"> • The sites proposed in the Preferred Options document aimed to direct development to existing urban areas in the first instance, with the remaining growth located on greenfield land • The sites proposed are located across the whole of the Borough • It was determined that larger strategic urban extensions would be more suitable than smaller urban extensions due to deliverability of supporting infrastructure
Concern that objectives are too wide ranging to be successfully delivered and should be more focussed	<ul style="list-style-type: none"> • Each section of the Preferred Options document outlines which objectives it seeks to deliver • Delivery mechanisms have been introduced to demonstrate how the policy will be delivered
Concern that views of residents are not taken into account	<ul style="list-style-type: none"> • All responses received during the consultation process are reviewed and incorporated into the changes made to the Plan where appropriate

Preferred Options

5.25 The response to the main issues raised from the Preferred Options consultation are outlined below. These changes were incorporated into the Borough Plan Submission document.

5.26 A full breakdown of the individual comments received and council response are available on the council's website, broken down into individual sections of the plan⁸.

Main Issues Raised	Response/Changes Made
Consultation Process	Concerns raised with consultation process were noted for consideration during the next consultation phase
Concerns over traffic and air pollution associated with proposed growth	An updated STA was completed in 2015 which assessed the proposed sites and informed the Submission version of the plan Policy NB12 requires proposals to demonstrate that they will not impact on AQMAs
Concerns over provision of schools and GPs to support development	The IDP was updated to reflect changes to the Plan and the supporting infrastructure required
Spatial pattern of development: Concerns over unequal distribution of housing between Nuneaton and Bedworth	The sites proposed are located across the whole of the Borough
Proposed Development: Opposition to housing figures and requests for more information on how these figures are reached Removal of references to RSS Opposition to approach of phasing housing delivery to link with employment delivery	References to RSS were removed and proposed housing figures taken forward to submission version were based on the SHMA objectively assessed need The requirement to phase delivery of housing with delivery of employment land was removed from the submission plan document
Jobs and Economy: <ul style="list-style-type: none"> • Concern of not enough jobs being created to support proposed housing and address issue of out commuting • Objection to restriction of B8 uses 	Updated evidence has been used to revise the employment allocation requirements in the submission version plan The restriction on B8 uses was removed from the submission version plan
Concern over use of greenfield, Green Belt and agricultural land	The SHLAA determined that the growth could not be met solely using land in the existing urban area, and therefore some greenfield / Green Belt land will need to be developed to meet the required need
Need for affordable housing	Policy NB9 in the submission version sets out the requirements for affordable housing, using evidence from the SHMA
Suggestion from Canal and River Trust to use canal side areas for new development	The Green Infrastructure policy (NB15) in the Submission version sets out opportunities to enhance the canal network and its linkages to walking/cycling routes

⁸ Preferred Options Officer Responses (2015) Available at: https://www.nuneatonandbedworth.gov.uk/downloads/download/93/borough_plan_preferred_options_-_officer_responses_to_consultation_comments_2015

Opposition to need for more retail provision but support for more leisure and restaurant facilities in Nuneaton town centre	A revised retail and leisure study was used to update forecasts for retail provision across the Borough. The new forecasts whilst still aspirational are more realistic, accounting for current economic conditions
Suggestion to restrict fast food outlets, alcohol stores and gambling outlets	Policy NB17 – Health, in the Submission version plan, sets out a restrictive policy for fast food outlets
Suggestion to locate residential uses in town centres	Whilst the benefits of locating residential uses in the town centre are recognised, there are currently no opportunities to allocate land in the town centre for residential use
Support for improvements to walking and cycling routes, particularly to link to employment sites	The Green Infrastructure policy (NB15) in the Submission version sets out opportunities to enhance the walking/cycling route network across the Borough
Suggestion to focus on woodland as well as open space	The importance of woodland is recognised in the Green Infrastructure and Biodiversity (NB15) and Geodiversity (NB19) policies in the Submission version
Concern over provision of housing for older people	Policy NB8 in the Submission version of the plan sets out the requirement for housing for older people
Objections to installing district heating systems for sites over 1,000 dwellings due to increased cost of development	This requirement was removed from the Submission version of the plan and instead encouraged as an option for developers
General concern that climate change policies could impact viability of delivering sites, including building standards required	A viability assessment was done in 2014 to assess if the policies in the plan were deliverable and viable. The plan was updated according to the results of this study
Concern over effectiveness of biodiversity offsetting	The biodiversity offsetting approach has been developed in consultation with Warwickshire County Council. Further information on how biodiversity will be implemented within the sub-region is published in the Sub-Regional Green Infrastructure Study 2013
Concern for a variety of impacts in localities resulting from development including: traffic, noise, air quality, nature, flood risk, schools, GPs	All proposed sites have been assessed for their suitability on a wide range of issues including flood risk, ecology, infrastructure deliverability, landscape capacity and transport. Some studies have been updated to inform the Submission Plan. The results of this have shown the selected sites to be suitable. Specific mitigations required have also been identified such as improvements to the road network
Sustainability Appraisal	Concerns raised were considered in the SA update for the Submission version
Infrastructure Delivery Plan	Concerns raised were considered in the IDP update for the Submission version
Habitat Regulations Assessment	Concerns raised were considered in the HRA update for the Submission version

Submission Version

5.27 The main changes made to the plan and incorporated into the Publication version of the Plan as a result of the representations received are outlined in the table below. A number of other minor amendments were also made.

5.28 The Council response to each individual comment is also available in the Submission version consultation statement⁹.

Section of the plan	Response/Changes made
NB2 – Scale and Location of Growth	Further information has been added to both the Plan and supporting evidence base to provide more information on the housing allocation process
NB8 and NB9 – Range and Mix of Housing, Affordable Housing	References to the SHMA requirements have been moved from the policy to the supporting text to ensure the policy will remain flexible throughout the Plan period
NB9 – Affordable Housing	This policy has been updated to reflect the introduction of the starter homes scheme
NB12 – Strategic Accessibility and Sustainable Transport	Revisions have been made to the policy regarding requirements for proposals relating to highways impacts. Further information on the 15% modal shift has been provided in the supporting text. An update to the transport assessment regarding the impact of the proposed development has also been undertaken
NB13 – Telecommunications	Additional information and requirements have been added in relation to broadband provision
NB22 and NB23 – Renewable and Low Carbon Energy, Sustainable Design and Construction	Policies have been amended in line with current national policy
New policy on Green Belt	A new policy has been added with regards to development in the Green Belt
Site specific policies	Site specific policies have been added into the Plan to provide more detailed information on each site, including the infrastructure requirements for each site to be delivered
Viability	Further work has been done to assess the viability of the strategic sites
Sustainability Appraisal (SA)	Further work has been done to update the SA of the Plan

(v) Regulations 19 & 20 representations

5.29 Regulations 19 and 20 relate to representations received on the version of the plan which the council propose to submit to the Secretary of State, in this case the Publication Version of the Borough Plan.

⁹ Borough Plan – Submission Version (October 2015) Consultation Statement, NBBC, 2017. Available at https://www.nuneatonandbedworth.gov.uk/downloads/file/1549/consultation_statement_2015

Number of representations received

5.30 In total, 1705 representations were received from 751 individual respondents. A total of 3212 signatures to group representations/petitions were also received.

Representations were received from individuals, organisations, agents acting on behalf of landowners/developers, statutory consultees, local action groups and other interested parties. The breakdown of respondents is shown below:

Type of respondent	Number of submissions received
Individuals (Written submissions received from local residents/interested organisations/other individuals)	637
Agents (Written submissions received from agents on behalf of land owners/developers/interested organisations)	59
Statutory Consultees	31
Groups (Written submissions made on behalf of a local action group)	24
Total	751
Signatures on local action group representations/petitions	3212
Total	3963

5.31 Representations were received from the following agencies and organisations:

National Organisations and Agencies
Highways England
Historic England
Health and Safety Executive
The Coal Authority
Home Builders Federation
The National Federations of Gypsy Liaison Groups
Warwickshire Wildlife Trust
Woodlands Trust
Canal and River Trust
Inland Waterways Association
Equality and Human Rights Commission
Local Organisations and Agencies
Warwickshire Police and West Mercia Police
Coventry and Warwickshire Local Enterprise Partnership
Bedworth and District Horticultural Council
CPRE Warwickshire
George Elliot Hospital NHS Trust
George Elliot Fellowship
The Bedworth Society
Local Authorities
Warwick District Council (joint response on behalf of Warwick District Council, Rugby Borough Council, North Warwickshire Borough Council and Stratford on Avon District Council)
Warwickshire County Council Public Health and NHS
Warwickshire North CCG
Warwickshire County Council
Coventry City Council
Rugby Borough Council

Hinckley and Bosworth Borough Council
Local Action Groups
Arbury View Estate
Bedworth & Exhall Development Land Action Meeting (BEDLAM)
Bedworth Heath Action Group
Bramcote Close Residents
Bulkington Residents Voice
Bulkington Village Centre
Councillor Booklet Response (including booklets prepared by: Kyle Evans, Pete Gilbert (Policy HSG5), Seb Gran & Pete Gilbert, Bhagwant Pandher, Pete Gilbert (Policy DS5))
Friends of the Nook
Goodyers End Primary School
Juliet Close Resident Group
Residents of Ash Green
Whitestone Residents Action Group
Woodlands Action Group

5.32 Representations were received in the form of both paper hard copies and electronic submissions. Some respondents had used the response form provided by the Council whilst others included written responses.

5.33 Submissions from local action groups included a set of comments from the group as a whole, along with a list of signatories of the group. Some of those who signed the group representation also provided their own individual comments.

5.34 Late responses were received from the following statutory consultees which meant they could not be considered duly made: Sport England, Network Rail, Natural England, Environment Agency Coventry and Warwickshire Chamber of Commerce.

Summary of main issues raised in representations

5.35 The main issues raised are summarised below:

Policy/Topic/Document	Main Issues Raised
Consultation Process	<ul style="list-style-type: none"> - the Council have undertaken insufficient consultation with the public and the consultation period has been too short - representation form is not easy to understand or fill out - consultation period did not give sufficient time for public to take in changes from previous version of the plan - the aims of the SCI have not been met and poor inclusion of the community and their views
Duty to Cooperate	<ul style="list-style-type: none"> - the Duty to Cooperate has not been met because the Council did not sign the Memorandum of Understanding and there is now no strategy in place to meet Coventry's unmet housing needs
Whole Plan Document	<ul style="list-style-type: none"> - infrastructure requirements are not adequate to effectively address impacts from increased traffic and air pollution - no provision of land for burials - concern over loss of agricultural land, green belt and merging of settlements - the plan should cover 15 years post adoption - policies in submission version (2015) are considered more effective at meeting needs of borough

	<ul style="list-style-type: none"> - Brexit will reduce population growth so will not need to provide so many houses
Policy BE3 Sustainable Design and Construction	<ul style="list-style-type: none"> - policy conflicts with deregulation bill 2015 and imposes technical standards already covered through building regulations - the detail to be set out in an SPD will not be subject to the same process as a Local Plan - there is insufficient evidence to support the requirements of this policy
Policy DS1 Presumption in Favour of Sustainable Development	<ul style="list-style-type: none"> - this policy is unnecessary
Policy DS2 Settlement Hierarchy and Roles	<ul style="list-style-type: none"> - approach to settlement hierarchy is supported to provide development proportionately to settlements - policy fails to acknowledge other sustainable locations - more housing should be focussed around Bedworth considering its proximity to Coventry's boundary - policy does not mention the proximity of north Nuneaton to the A5, only acknowledged in supporting text
Policy DS3 Development Principles	<ul style="list-style-type: none"> - unclear of the term 'all development must be sustainable' - requirement to support development where there is a positive impact on amenity goes beyond that required in the NPPF
Policy DS4 Overall Development Needs	<ul style="list-style-type: none"> - policy is not positively worded, implying that the overall requirement is a maximum or ceiling - failure to meet Duty to Cooperate due to not signing Memorandum of Understanding, also not sound and legally compliant as not accommodating unmet need from Coventry and Warwickshire - evidence base to produce the OAN does not provide a full and objective assessment of housing need within wider housing market area - undersupply of housing is more of a problem than realised by the Council due to housing demand from Birmingham - amount of housing proposed is unjustified and excessive and not considered right that NBBC with the smallest area of land should be asked to take such a high level of housing
Policy DS5 Residential Allocations	<ul style="list-style-type: none"> - only brownfield sites should be developed with no green belt land developed - NPPF is clear that green belt boundaries should only be amended in exceptional circumstances - concern over loss of buffer between settlements - insufficient evidence to demonstrate that Council has explored all opportunities to accommodate shortfall in housing - no flexibility if identified sites do not come forward and no additional buffer to allow choice and competition in the market - the plan is unsound and not legally compliant as it does not meet full OAN of the HMA - housing figures should be a minimum rather than ceiling number - concern over impact of development on traffic

	<ul style="list-style-type: none"> - some sites recommended to be released in Green Belt Review (2015) including parcel BE4 have not been released and some sites are proposed to be released which the study recommends to retain. Sites are therefore allocated contrary to evidence - Impact on canal corridor from HSG3, HSG11, NUN015, NUN174, NUN242 and NUN323 - some sites could accommodate more housing/be extended to accommodate additional housing including HSG1, HSG2, HSG3, HSG4, HSG9, HSG11, NUN286, NUN317 - additional sites promoted for allocation
Policy DS6 Employment Allocations	<ul style="list-style-type: none"> - concern that recent economic forecasts have not been tested in context of housing modelling and therefore may be insufficient dwellings and infrastructure to support economic and business needs - EMP1, EMP4 and EMP5 may impact the canal corridor - lack of balance between new jobs and homes - no exceptional circumstances shown to take employment land out of green belt
Policy DS7 Green Belt	<ul style="list-style-type: none"> - scale of loss of green belt is unjustified and contrary to national policy - not enough land has been released from the greenbelt to meet OAN for housing and employment
Policy E1 Nature of Employment Growth	<ul style="list-style-type: none"> - the wording of this policy needs to be more flexible to allow for future changes
Policy E2 Existing Employment Estates	<ul style="list-style-type: none"> - a policy which encourages and promotes the loss of existing employment land should not be included
Policy EMP7 Bowling Green Lane	<ul style="list-style-type: none"> - further increase in industrial traffic will have impacts on traffic, noise and pollution - infrastructural improvements to support development are not adequate - no consultation/liaison with small businesses in the area - loss of greenbelt to industrial use is not supported - impacts on biodiversity
Policy H1 Range and Mix of Housing	<ul style="list-style-type: none"> - policy should be flexible and should allow housing mix to be determined on a site by site basis depending on needs arising and the mix in the immediate area, as opposed to a blanket requirement - concern that as there is no requirement to review SHMA the policy may become out of date
Policy H2 Affordable Housing	<ul style="list-style-type: none"> - Policy wording should allow provision to be negotiated with regards to economic viability, market conditions and other infrastructure requirements - Policy wording should allow flexibility in size and types of affordable housing onsite with requirements in SHMA the starting point - policy should account for range of affordable housing products available and how this may change over time with government policy
Policy HS1 Ensuring the Delivery of Infrastructure	<ul style="list-style-type: none"> - lack of specific information in the policy and Infrastructure Delivery Plan

Policy HS5 Health	- requirement for Health Impact Assessment for development that meets or exceeds the EIA screening thresholds is not justified
Policy HSG1 North of Nuneaton	- the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG2 Arbury	- the CCG has identified that primary medical care capacity will not be sufficient - the exceptional circumstances to justify release of greenbelt land have not been met - this site could provide more than 1525 dwellings and the requirements for this site should be reviewed to ensure they do not affect viability
Policy HSG3 Gipsy Lane	- objection to use of greenbelt land and no brownfield land allocated, and concern over loss of good farmland - insufficient infrastructure and no consideration of issues regarding traffic, environment, recreation and community facilities including schools and doctors - the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG4 Woodlands	- concern over flood risk - concern over impact on traffic and pollution - loss of greenbelt and countryside land that is actively used by local residents - the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG5 Hospital Lane	- loss of agricultural land and greenbelt - concern over impacts on traffic, biodiversity, flood risk - insufficient infrastructure proposed - the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG6 School Lane	- no exceptional circumstances to release this site from green belt - less demand for housing in the borough than suggested in OAN - concerns of impacts on flood risk, traffic, road safety and health implications - impacts to site of being so close to M6 motorway for residents of the site due to noise and air pollution - impacts on schools, doctors, wildlife - the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG7 East of Bulkington	- inclusion of this site at this stage has not allowed sufficient time for meaningful public consultation - loss of green belt and agricultural land - investment should be given to preparing existing brownfield land/derelict land, of which over 3000ha has been identified - proposed access through Bramcote Close and Lancing Road is inadequate for development of 195 homes - concerns over capacity of infrastructure and services - impacts on wildlife - the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG8 West of Bulkington	- no exceptional circumstances for release of site from green belt

	<ul style="list-style-type: none"> - current land is farmed and is productive - impacts on biodiversity - no consideration given to rural village setting - development would result in some areas being land locked - the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG9 Golf Drive	<ul style="list-style-type: none"> - this policy received the highest proportion of comments (14%) with more also indirectly associated with this policy - no consideration of traffic and air quality problems and community facilities which are already under strain - objections to use of greenbelt, farm land and open space - there are reasonable alternatives to the allocation of HSG9 and evidence used to remove this site from the green belt is not proportionate - objections to the inclusion of Leyburn Close as an access road - the CCG has identified that primary medical care capacity will not be sufficient
Policy HSG10 Attleborough Fields	<ul style="list-style-type: none"> - no consideration of problems with traffic, environment, recreation and community facilities such as schools and doctors - objection to loss of green belt over use of brownfield land
Policy SA1 Development Principles of Strategic Sites	<ul style="list-style-type: none"> - this policy is not needed as it is dealt with in the site specific policies - this policy should apply to both strategic and non-strategic sites
Policy TC1 Town Centre Requirements	<ul style="list-style-type: none"> - Concern that the Town Centre requirements only talk about office/retail/cafes/restaurants/bars whereas there should be a wider mix of uses in the town centre

5.36 Respondents were also asked to state whether they thought the Borough Plan is sound, legally compliant and complies with the Duty to Cooperate. The below table summarises these responses (per individual respondent):

	Sound	Legally Compliant	Compliant with the Duty to Cooperate
Yes	22	84	71
No	621	511	523
N/A	108	156	157
Total	751	751	751

5.37 Any issues or changes raised by the representations received which the Council believe should be incorporated into the plan will be recommended to the Inspector as minor modifications when submitted for examination.

Appendix A - List of bodies and persons invited to make representations under regulation 18

DUTY TO COOPERATE BODIES

- Highways England
- Homes and Communities Agency
- Severn Trent Water
- Environment Agency
- Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- Civil Aviation Authority
- Clinical commissioning group established under section 14D of the National Health Service Act 2006
- National Health Service Commissioning Board
- Office of Rail Regulation
- Each Integrated Transport Authority
- The Highways Authority
- Local Enterprise Partnership
- Local Nature Partnership

SPECIFIC CONSULTATION BODIES

- Coal Authority
- Environment Agency
- Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- Network Rail
- Highways England
- A 'relevant' authority in or adjoining the LPA (including Parish Councils and Police Authorities)
- Electronic communications code systems operators
- Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section
- Electricity providers
- Gas providers
- Sewerage undertakers
- Water undertakers
- Homes and Communities Agency

GENERAL CONSULTATION BODIES

- Voluntary bodies some or all of whose activities benefit any part of the authority's area
- Bodies which represent the interests of different racial, ethnic or national

- groups in the authority's area
- Bodies which represent the interests of different religious groups in the authority's area
- Bodies which represent the interests of disabled persons in the authority's area
- Bodies which represent the interests of persons carrying on business in the authority's area

OTHER CONSULTEES

- Age UK
- Airport Operators
- British Geological Survey
- Canal and River Trust, canal owners and navigation authorities
- Centre for Ecology and Hydrology
- Chambers of Commerce, Local CBI and local branches of Institute of Directors
- Chemical Business Association
- Civil Aviation Authority
- Coal Authority
- Design Council
- Crown Estate Office
- Diocesan Board of Finance
- Disabled Persons Transport Advisory Committee
- Electricity, Gas, and Telecommunications Undertakers, and the National Grid Company
- Environmental groups at national, regional and local level, including: Council for the Protection of Rural England; Friends of the Earth; Royal Society for the Protection of Birds; Wildlife Trusts
- Equality and Human Rights Commission
- Fire and Rescue Services
- Forestry Commission
- Freight Transport Association
- Gypsy Council
- Health and Safety Executive
- Homes and Communities Agency
- Education Funding Agency
- Fields in Trust
- Local Agenda 21 including: Civic Societies; Community Groups; Local Transport Authorities; Local Transport Operators; Local Race Equality Councils and other local equality groups
- Local Land Drainage Authority
- Network Rail
- Passenger Transport Authorities/Executives
- Planning Aid
- Police Architectural Liaison Officers / Crime Prevention Design Advisors
- Post Office Property Holdings

- Rail Companies and the Rail Freight Group
- Road Haulage Association
- Skills Funding Agency
- Sport England
- The Gypsy and Traveller Law Reform Coalition
- The Home Builders Federation
- Water Companies
- Women's National Commission
- 20
- Woodland Trust