

## Appendix C

### Sustainability Appraisal - Preferred Option Borough Plan (2013) - Consultation responses and NBBC response

Response Ref Number	Full Name of Respondent	Organisation	Please add your comment	Officer Response
661/7	A. Wintersgill	Trenport Investments	<p>1. Disagree with assessment of PDA3 (SHS1) as adversely affecting town centre vitality. Far from being a "dispersed" location, PDA3 (SHS1) is very well related to Nuneaton Town Centre, including via the safe off-road route of the Wembrook Trail. The proposed development would therefore support the town centre, rather than undermine its vitality and viability.</p> <p>2. Disagree with the assessment of PDA3 as not making efficient use of existing physical infrastructure or reducing the need to travel, especially by private car. Contrary to what is stated, SHS1 would comprise a "compact mixed use development", especially when considered in conjunction with the adjacent ECO2 (Bermuda Extension). The proposed development would therefore have a positive impact on this sustainability objective, rather than the adverse one stated.</p>	<p>1. To be reviewed.</p> <p>2. The modelling to inform the PO did not indicate a positive impact.</p>
59/4	AF Cook	N/A	Alliance Planning document is over 150 pages of disconnected tables. Suspect no human intellect actually considered this, as they appear to have been automatically filled in by a software program. How much did this cost, and how many man hours were spent walking around the Nuneaton area.	The length of the document reflects the amount of assessment undertaken.
675/2	D. Byles MP	Member of Parliament	Access to decent and affordable housing - the SA Report says Hospital Lane will provide such access and have an indirect positive effect. But this must be outweighed by the negatives of this development - loss of high quality agricultural land, poor access to existing employment, health and education facilities and the town	The evidence available does not indicate that the site is undeliverable or unviable.

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			<p>centre. This will lead to a heavier reliance on cars, which the Borough Plan intends to reduce. Flood risk, biodiversity, sports and cultural facilities - the SA Report says these will have short and medium term negative effects. It will take a long time until the development will have a neutral impact, i.e. back to where we are now. Flooding - houses in the area already have problems with flooding and are not supported by the Council. This development will cause more problems.</p> <p>How can this be taken forward when there are so many negatives and so few positives.</p>	
53/1	Jim Newton	Coventry City Council	<p>15. The Sustainability Appraisal of sites is incomplete, and it is not clear how decisions were made to allocate some of the sites and not others, when the SA/SEA results in some cases were the same.</p> <p>It therefore risks being not legally compliant.</p>	Further work is to be undertaken to explain how the SA informed decisions about site selection.
670/5	M. Ash	Natural England	<p>Natural England note the discrepancy between the number of Housing and Employment sites assessed in the Sustainability Appraisal, as illustrated in the maps in appendix C of the report, compared to those referred to in policy DEV3 and the Map on pg 15 of the Borough Plan Preferred Options. We consider that the preferred options selection should be assessed as part of the SA process and would reiterate the comments made above on the need to consider alternatives and justify the proposed approach, a requirement of the Strategic Environmental Assessment (SEA) Directive.</p>	Further work is to be undertaken to explain how the SA informed decisions about site selection.
356/1	Mr & Mrs Manns	n/a	<p>page 24 Sustainability Appraisal - re table 2 seeing whether objectives are compatible or not.</p>	No weight has been given to the criteria It is assumed that the comment relates

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			I can't see why they have put that objective 8 - create healthy and strong communities has no connection with Protect the Natural Environment - in fact the only connection Protecting the Natural Environment has with the Borough Plan Objectives is through 7. Address climate change. Should there not be stronger connections? There does not seem to be much weight attached to the importance of protecting the environment in proportion to the the other objectives. My worry is children these days are very techno oriented - there needs to be more importance attached to protecting the natural environment for them to become future farmers, bee keepers, food producers, tree surgeons, fishery managers. As it is, there doesn't seem to be a very sustainable future for feeding ourselves, or keeping healthy walking in the great outdoors.	to table 4. The compatibility between SA objectives and Borough Plan objectives will be reviewed.
356/1	Mr & Mrs Manns	n/a	In the Sustainability Appraisal it doesn't mention or reiterate that Baseline means 1.5% growth. I don't think I saw that 1.5% growth is based on the increase in employment land hectarage, e.g. it does not seem to explain what measure the growth is worked out from.	The baseline is not 1.5%.
612/55	Mr D Parker and Miss H Parker	N/A	<p><b>Economic Factors</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT MEET THE EMPLOYMENT NEEDS OF THE LOCAL</b></p>	See 53/1 These comments will be taken into account in the update of the SA.

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			<p><b>COMMUNITY?</b> NO. There is simply not enough land to be able to provide everyone with employment. People will still have travel out of the area to find employment that matches the skills they have.</p> <p><b>QUESTION: WILL IT HELP DIVERSIFY THE ECONOMY?</b> NOT NECESSARILY There is no consideration of the fact that the land itself is a major provider of employment. Farms all require additional workers, some at peak harvest times. Maintaining the land in the area is also a source of employment. Land designated for Conservation areas provides work for conservation workers. Wooded areas and small forests provide work for forestry workers and timber workers. Money can also be made from selling the wood from coppiced woods and forests. Employment is also provided for gamekeepers, who help to keep pest and vermin numbers under control.</p> <p><b>QUESTION: WILL IT ENHANCE THE VITALITY OF URBAN CENTRES?</b> This depends on the types of business that these employment sites attract. Sites which attract large HGVs, large numbers of tipper trucks, and attract a lot of traffic due to the nature of the business will not be popular, especially if they are close to residential areas, schools and hospitals.</p> <p><b>QUESTION: WILL IT ATTRACT SMALL</b></p>	

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			<p><b>BUSINESSES?</b> Small businesses may be attracted, if they can afford the business rates and rents charged by the Council. They may also be attracted if there are opportunities to expand should a small business become more successful and require more space.</p> <p><b>QUESTION: WILL IT ENSURE AN APPROPRIATE SUPPLY OF EMPLOYMENT SITES WITHIN THE BOROUGH TO SUPPORT SUSTAINABLE ECONOMIC DEVELOPMENT?</b> Not necessarily. There is a limit to the amount of land that can be supplied for employment. There is simply not enough land to go around. The Borough will still have a need for employed people to work outside the area.</p> <p><b>QUESTION: WILL IT PROVIDE EMPLOYMENT LAND NEAR TO THE POTENTIAL WORKFORCE?</b> Although employment land may be provided, it does not mean that it will attract a nearby potential workforce, especially if the skills this workforce has do not match the skills the businesses on this land require.</p> <p><b>QUESTION: WILL IT ENCOURAGE INVESTMENT TO DEVELOP DEPRIVED AREAS AND FOCUSING RESOURCES IN AREAS OF GREATEST NEED?</b> NOT NECESSARILY. The problem is that deprived areas and areas of greatest need tend to have the highest rates of low educational standards, skills and motivation.</p>	

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			<p>No business will invest in an area that is unlikely to meet its skills requirements or enable that business to make a profit. Businesses want to invest in areas which already have the skills base they need, as well as a highly-motivated workforce.</p> <p><b>QUESTION: WILL IT PROMOTE SUSTAINABLE TOURISM?</b> NO. Employment is not the only reason people visit the area. Attractive, unspoilt countryside, unusual/unique shops, theatres, cinemas are all reasons for attracting tourists. Tourists also want to be able to sit outside a restaurant/cafe when having a meal or drink. Strong arts culture and street entertainment also attract tourists. High quality and affordable hotel accommodation is essential in attracting tourists. Tourists are also attracted by a range of medium to high quality restaurants, cafes and bars.</p> <p><b>QUESTION: WILL IT IMPROVE THE ECONOMIC VITALITY OF THE TOWN CENTRES?</b> NOT NECESSARILY Providing jobs are not the only factors in improving the economic vitality of the town centres. The following factors are also important. 1. Wide variety of shops. 2. Street entertainment. 3. Attractive places to eat and drink. 4. Easily accessible public toilets, as well as plenty of them.</p>	

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			<p>5. No car parking charges.  6. Attractive seating areas.  7. Highly visible security.  8. Easy access for all to all shops and other service providers in the town centre.</p> <p><b>QUESTION: WILL IT MAINTAIN A BALANCED MIX OF DEVELOPMENT?</b>  NOT NECESSARILY  Whether the Borough Plan will be able to maintain a balanced mix of development is a difficult one to answer. No one can predict what the future will bring. The demands of employers may change over time, as may the types of employment available. Peoples' shopping habits may change over time. Already, more and more people are doing their shopping online, to save time and money.</p>	
612/45	Mr D Parker and Miss H Parker	N/A	<p><b>Social Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT INCREASE THE SUPPLY OF AFFORDABLE HOUSING?</b>  Although there may be a need to provide affordable housing, this also has its limits. Initially, the supply of affordable housing may increase. But, there is a limit to the amount of land that can be made available, so, preventing any further increases in supply. Couples who buy affordable homes may want the full market</p>	See 53/1 These comments will be taken into account in the update of the SA.

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			<p>price when the houses are sold. This may mean affordable houses no longer being affordable.</p> <p><b>QUESTION: WILL IT PROMOTE A RANGE OF HOUSING TYPES AND TENURE?</b> A DIFFICULT ONE TO ANSWER.</p> <p>Every single person living in the Borough will each have their own personal tastes when it comes to choosing somewhere to live. They will have their own aspirations and ideas. Although the Borough Plan may provide a range of housing and tenures, this may not suit everyone. After all, not everyone wants to live in a house that is the size of a rabbit hutch. For example:</p> <ul style="list-style-type: none"> <li>• A musician will want a property where he can practise, or invite like-minded friends for a musical get together.</li> <li>• A family will want a property that is suitable for children, and provides them with somewhere to play outside.</li> <li>• A sports enthusiast will want a property close to sports facilities.</li> </ul> <p>Not all single people can make do with a flat or one bedroom house if their lifestyle requires them to need more space.</p> <p><b>QUESTION: WILL IT REDUCE THE NUMBER OF UNFIT/NON-DECENT/EMPTY HOMES?</b> NO</p> <p>People who do not take pride in themselves or their surrounding areas will not necessarily change their attitudes. Children are no longer</p>	



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			<p>taught to respect each other and the area in which they live, either by the school or their parents. They will take this lack of respect into the areas where they will live themselves, and will see no reason to change.</p> <p><b>QUESTION: WILL IT REDUCE HOMELESSNESS?</b> NOT NECESSARILY. The only homeless people the Borough Plan may help are those who become homeless through no fault of their own. It will not help those people who intentionally make themselves homeless, because they choose to, or if their anti-social behaviour is such that it makes it difficult for them to find housing.</p> <p><b>QUESTION: WILL IT MAINTAIN AND ENHANCE EXISTING FACILITIES?</b> A DIFFICULT ONE TO ANSWER.</p> <p>Whether the Borough Plan will maintain and enhance the existing facilities is difficult to answer. The factors that affect this question depend on:</p> <ol style="list-style-type: none"> <li>1. Whether the Council will be able to afford the maintenance and enhancement of the existing facilities.</li> <li>2. Whether people will appreciate the maintenance and the enhancement of existing facilities.</li> <li>3. Whether people can afford to contribute to the maintenance and enhancement of existing facilities.</li> </ol>	

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			<p><b>QUESTION: WILL IT PUT UNACCEPTABLE PRESSURE ON EXISTING SERVICES AND COMMUNITY FACILITIES?</b> YES.</p> <p>The existing services that we have are already feeling the strain. It takes three weeks to see a doctor. The waiting time to see a consultant (when visiting the hospital as an outpatient) is getting longer. Traffic congestion is getting worse.</p> <p>Very often buses are so full that there is standing room only. Even for disabled people. The local centre shops are struggling to cope with an increasing number of customers. This is mainly due to the size of the shop, having sufficient staff, having sufficient car parking available, keeping prices down to a level that customers can afford, high business rates and rents.</p> <p><b>QUESTION: WILL IT IMPROVE ACCESS TO LOCAL SERVICES AND FACILITIES?</b> NOT NECESSARILY</p> <p>The amount of land available to improve existing services and facilities is limited. Shops are unable to expand due to lack of space. If local centre shops have to pay higher rates or rents than those in the town centre, then they will pass these charges on to customers. If these charges force local centre shops to charge</p>	

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			<p>higher prices than town centre shops, customers will naturally avoid these shops and use the ones in the town centre.</p> <p>Most housing estates have small side roads not served by public transport. This cuts off elderly and disabled people.</p> <p><b>QUESTION: WILL IT ENSURE THAT EDUCATION AND SKILLS INFRASTRUCTURE MEETS PROJECTED FUTURE DEMAND AND NEED?</b> NOT NECESSARILY</p> <p>It is the Department of Education that is responsible for ensuring that educational skills meet any future demand and need. Teachers also have a responsibility.</p> <p>The County Council is responsible for ensuring that the standards required to teach those skills are met. Employers have a duty to ensure that schools are kept up to date with the skills that they are looking for. Although Nuneaton and Bedworth Borough Council have a role in identifying which areas of the Borough require the most educational investment, it is not their responsibility to provide it. That is the responsibility of the County Council, and for the Government to provide or assist with the necessary funding.</p> <p>Teachers have a responsibility to ensure that they teach their pupils the skills they need to be able to find work. Parents have a responsibility</p>	

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			<p>to ensure that their children regularly attend school, assist with homework, and take an interest in their children's education.</p> <p>The Borough Plan will not necessarily ensure that education and skills infrastructure will meet any future demands and needs, whether projected or not. This is a collective responsibility, which has to be shared amongst schools, teachers, parents, councils and employers.</p> <p><b>QUESTION: WILL IT REDUCE INEQUALITIES IN EDUCATION AND SKILLS ACROSS THE BOROUGH?</b> NO</p> <p>There will always be inequalities in education and skills. That is the nature of any animal society.</p> <p>Certain sections of the human society, put very different views on education. The traditional working class areas of society tend to see education as very low profile. The ability to work and earn money is more important. They identify themselves with the traditional industries, such as manufacturing and mining, and tend to be unwilling or slow to change their ways.</p> <p>According to a recent conversation with an advisor from Action On Hearing Loss, schools are amongst the worst employers when it comes to employing disabled workers. Yet they should be leading role models. If a disabled child sees a disabled teacher, - and who both have the</p>	

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			<p>same disability, - teaching them in a school, that teacher is giving the child a role model. The disabled child can say to themselves, yes, there are job opportunities for me in the outside world. Disabled children are given the motivation and confidence to succeed in education if they are taught by disabled teachers, with similar disabilities.</p> <p>Most employers do not want to employ people with disabilities. They fear that it will cost them money to make any adaptations disabled people require to do their jobs. People who are sight or hearing impaired are seen as being a hazard in the workplace. They cannot see or hear fire alarms. Disabled people with mobility problems are seen as not being able to get out of a work place quick enough should a fire occur.</p> <p>Young people do not just need education and skills to get employment. They need work experience too. Social and outside interests are just as important. Young people need to have the discipline to be able to work in a workplace. The old traditional style of education was to a certain extent one of the best. Public and Grammar Schools helped people to work in politics and professional employment. They also provided people to work as personal assistants, secretaries, and those who wanted to set up a business.</p> <p>The Secondary Modern Schools provided the workforce for working in factories, shops, offices, quarries, mining and other manufacturing companies that needed a high-</p>	

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			<p>skilled workforce, but not necessarily highly-academic. The Special Schools also had a place. Disabled children had a place where they could go which did not demean them, or subject them to bullying from other children. Special Schools had the experience and facilities to enable disabled children to achieve their best.</p> <p><b>QUESTION: WILL IT SUPPORT PROVISION OF COMMUNICATION INFRASTRUCTURE, INCLUDING BROADBAND?</b> THIS IS A DIFFICULT ONE TO ANSWER</p> <p>The Borough Plan may help to support the provision of communication infrastructure and broadband through land allocation. However, there is no guarantee that residents and employers will be able to afford it. The Council will not be able to secure sufficient funds of its own to enable all of its residents and employers can access broadband and up to date Information Technology and Communication systems. There would have to be a certain amount of financial support from the Technology and Communication Systems Companies, and the Government.</p> <p><b>QUESTION: WILL IT PROMOTE THE REDUCTION OF CRIME RATES?</b> NO</p> <p>Crime rates can be manipulated. They do not always give the true rate of a crimes committed or reported. There will still be an element of the</p>	

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			<p>population who are too frightened to report a crime, or unwilling to report a crime.</p> <p><b>QUESTION: WILL IT ENCOURAGE THE ADOPTION OF PRINCIPLES TO 'DESIGN OUT' CRIME IN HOUSING AND EMPLOYMENT SITES?</b> NOT NECESSARILY.</p> <p>If a person is determined to commit a crime then they will do it. Many children are brought up with a life of crime. They learn from their parents how to commit crime. Low level crime is continually committed; of which the following are examples of low level crime.</p> <ul style="list-style-type: none"> <li>• Parents ignoring speed signs, whilst their children are in the car.</li> <li>• Smoking in no-smoking zones at hospitals, as currently the case at the George Eliot Hospital.</li> <li>• Swearing in public.</li> <li>• Not indicating when a vehicle is either moving off, or turning.</li> <li>• Lashing out if one person thinks that someone else has offended them.</li> <li>• Being drunk in public.</li> <li>• Openly taking drugs.</li> <li>• Fiddling the Benefits System.</li> <li>• Fiddling the Tax System.</li> <li>• Showing a blatant disregard for authority.</li> <li>• Using a mobile phone or other device at the same time as driving a car.</li> <li>• Displaying offence signs to other road users and pedestrians.</li> <li>• Vandalism.</li> <li>• Shop Lifting.</li> </ul>	

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			<p>• Pick Pocketing.</p> <p>If a child sees an adult getting away with a low-level offence, then they will try themselves. Children see it all the time when they watch television, films at a cinema, and dvds/videos. Soap Operas very often depict people shouting at each other, swearing at each other, hitting others, getting drunk, killing others or taking drugs. Children who have good reading skills may read about crimes being committed, and the perpetrators getting away with it.</p> <p><b>QUESTION: WILL IT REDUCE POVERTY AND EXCLUSION IN THOSE AREAS MOST EFFECTED?</b> THIS DEPENDS ON HOW YOU DEFINE POVERTY AND EXCLUSION.</p> <p>Poverty is defined in two ways:</p> <ol style="list-style-type: none"> <li>1. Those who do not have enough to eat, have no home, no job, on a low income, and living below the poverty line.</li> <li>2. Those who see themselves as poor because they do not have a television, computer, latest technology, washing machine, dishwasher, or the latest fashion in relation to home furnishings and clothing.</li> </ol> <p>The Borough Plan will not reduce poverty amongst those who see themselves as poor because they do not own, or cannot afford to buy material goods. They will always be a certain element of society that will feel excluded,</p>	



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			<p>no matter how you try to help it.</p> <p>There will always be a certain element of society who will struggle to keep themselves above the poverty line. Even if you provided people with a home and a job, that does not mean to say that they will be able to afford food and the means to heat their homes. Although the Borough Plan may decrease the numbers of people below the poverty line, it cannot afford financially, to help everyone.</p> <p><b>QUESTION: WILL IT ENSURE THAT FACILITIES AND LOCATIONS FOR CULTURAL ACTIVITIES ARE PROTECTED AND PROVIDED?</b> NOT NECESSARILY.</p> <p>Money is required to run these facilities and locations; this is limited. Arts education and culture is not top priority in terms of economic growth. The current level of cultural activities in the Borough is poor. There is nowhere for those who play instruments to be able to get together with others unless they have reached a certain standard. Many residents in the Borough cannot afford to pay for cultural activities.</p> <p>Most residents who live in the Borough will see facilities for cultural activities being of low priority. More important areas are social services, education, employment and the health services. This is despite the fact that the Arts are a major employer. There are children who would love to learn to</p>	

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			<p>play a musical instrument. It teaches them to learn to play as part of a group. It improves their concentration and helps children to do better at school. Learning to play an instrument enables children to socialise with others, and to gain confidence in playing in front of an audience. But, there are many children who will never experience this. Why? Because:</p> <ul style="list-style-type: none"> <li>• Parents cannot afford to pay for lessons.</li> <li>• Children who live in a Council property are not permitted to practise due to Council regulations on disturbing neighbours, which means they have nowhere to practise.</li> <li>• Playing an instrument or taking part in any other arts activity is deemed to be less important than getting a job or doing well at school, despite the fact that they complement education and employment skills.</li> </ul> <p><b>QUESTION: WILL IT PROTECT AND CREATE HIGH QUALITY OR VALUED RECREATIONAL SPACES AND AVOID EROSION OF RECREATIONAL FUNCTION?</b> NO</p> <p>This is determined by the level of finance available. It is also determined by the level of priority given by residents and employers. If it is determined that providing somewhere to live is more urgent than providing recreational services, that is where the priority will be. Think of the number of school playing fields that have been sold for development. Recreational spaces which are developed for housing and employment will make more money</p>	

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			<p>for the Council, and in turn the Government, as their levels of income will rise due to more Council tax being collected.</p> <p><b>QUESTION: WILL IT REQUIRE GOOD URBAN DESIGN TO CREATE ATTRACTIVE, HIGH QUALITY ENVIRONMENTS WHERE PEOPLE WILL CHOOSE TO LIVE, WORK AND INVEST?</b> THIS IS A DIFFICULT ONE TO ANSWER</p> <p>Most people are probably satisfied with the areas in which they live. The majority of these areas do not really need any major development to improve them. All that is required in these areas are that:</p> <ul style="list-style-type: none"> <li>• They are regularly kept clean and tidy.</li> <li>• Are safe and secure. The people who live in these areas take more pride in the appearance of their areas. This can be achieved by regular maintenance of their homes and gardens, making visitors to these areas feel welcome.</li> <li>• Traffic congestion is kept to a minimum.</li> <li>• That local services are within easy reach, and that the local shops are able to charge lower prices than those in the town centre.</li> <li>• There are opportunities for sport, music, drama, art, dance and other leisure activities.</li> </ul> <p><b>QUESTION: WILL IT PROMOTE DESIGN THAT ENHANCES TOWNSCAPES AND STREETSCAPES?</b> THIS IS A DIFFICULT ONE TO ANSWER.</p>	

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			<p>Although the Borough Plan may initially promote design that provides enhancement for townscapes and streetscapes, whether the local people appreciate it, is another matter. If people are not encouraged to take pride in themselves, they certainly will not take a pride in looking after their towns and streets.</p> <p><b>QUESTION: WILL IT IMPROVE THE QUALITY OF THE BUILT ENVIRONMENT THROUGH HIGH STANDARDS OF SUSTAINABLE DESIGN AND CONSTRUCTION OF NEW AND EXISTING BUILDINGS?</b> THIS IS A DIFFICULT ONE TO ANSWER.</p> <p>We thought that the building standards, were already laid down in law. That not even a Council can change them. They can only ensure that these building standards are met.</p>	
612/46	Mr D Parker and Miss H Parker	N/A	<p><b>Biodiversity Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT IMPROVE THE LANDSCAPE AND ECOLOGICAL QUALITY OF THE COUNTRYSIDE?</b> NO.</p> <p>The Wildlife that live in the areas to be developed will either be destroyed or move into</p>	See 53/1 These comments will be taken into account in the update of the SA.

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			<p>people's gardens. This will cause conflict amongst gardeners who wish to grow fruit and vegetables. Therefore, the Borough Plan will have a negative effect on the landscape and ecological quality of the Countryside. The Borough Plan will have the opposite effect. It will lessen the landscape and ecological quality of the countryside.</p> <p><b>QUESTION: WILL IT PROTECT AND ENHANCE SPECIES, HABITATS AND SITES AT RISK?</b> NO</p> <p>The land of England belongs either to the Crown or the Church. No Council can fully protect the species and habitats and sites at risk. For example, if the Government of the day decide that Ensors Pool provided excellent development potential, the Council would not be able to do anything about. Similarly, in Bedworth, The Woodlands and The Nook are all potential development sites due to their proximity to Coventry. A developer could buy this land and build on it. As the Government is all in favour of building more houses, then the Council would have a difficult time trying to persuade the Government that the natural environment of the Woodlands and the Nook is more important than housing.</p> <p><b>QUESTION: WILL IT PROTECT AND ENHANCE THE NATURAL ENVIRONMENT, WHETHER DESIGNATED OR NOT,</b></p>	

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			<p><b>INCLUDING HABITATS, SPECIES, LANDSCAPES AND CONTROLLED WATERS, PARTICULARLY MAINTAINING EUROPEAN SITES, SSSIs AND LNRs TO A FAVOURABLE STANDARD?</b> NO</p> <p>The same answer as above. No natural environment can be fully protected from development, as it all belongs to either the Crown or the Church.</p> <p><b>QUESTION: WILL IT SUPPORT DEVELOPMENT THAT INCORPORATES IMPROVEMENTS TO WILDLIFE HABITATS?</b> NO</p> <p>The Borough Plan puts improvements to wildlife habitats at the bottom of the pile. It will destroy habitats, and as a consequence destroy the wildlife that goes with it.</p> <p><b>QUESTION: WILL IT INCREASE ACCESS TO WOODLANDS, WILDLIFE AND GEOLOGICAL SITES AND GREEN SPACES PARTICULARLY NEAR URBAN AREAS?</b> NO</p> <p>If you reduce the existing areas of woodland and green spaces, then there will be less of it to be accessible to the public. Wildlife will have been driven out or destroyed.</p>	

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			<p>All of the public woodland in Weddington has been destroyed. The woodland in Caldecote is privately owned, it is part of Caldecote Hall. The public are prohibited from any of its grounds. The number of trees on the farmland in Weddington and Higham Lane have been considerably reduced. This has led to woodland birds, such as wood pigeons, being driven into peoples' gardens. Other woodland species have also been driven out:</p> <ul style="list-style-type: none"> <li>• Wood Mice</li> <li>• Shrews</li> <li>• Tree nesting birds</li> <li>• Sparrowhawks</li> <li>• Starlings</li> <li>• Bats (These used to nest in the Farmhouse Buildings on Higham Lane - now replaced with two new houses)</li> </ul> <p>House martins, swallows and swifts have all declined in this area. Hedges separating one field from another have also been removed.</p>	
612/47	Mr D Parker and Miss H Parker	N/A	<p><b>Population and Human Health Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT DIMINISH INEQUALITIES IN MORTALITY, HEALTH AND WELLBEING? THIS IS A DIFFICULT ONE TO ANSWER.</b></p> <p>You cannot force people to adopt a healthy lifestyle if they choose not to.</p>	<p>See 53/1 These comments will be taken into account in the update of the SA.</p>

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			<p>You cannot force people to exercise if they choose not to.</p> <p>You cannot force people to improve their well-being if they choose not to.</p> <p>Death is a natural part of life. It allows new life to be born. Nature keeps life under control by limiting its numbers. This is so that one species does not overrule or drive out other species. Nature curbs plant, animal, fish, bird, and insect numbers, through disease, and ensuring that only the fittest survive. The human species is the only one that tries to live forever. It is the only one that fights against nature's diseases. It is the only species that does not limit birth control, according to the environment it lives in. If nature does not want a baby to survive, then there must be a reason for it, no matter how unpleasant it is for the parents. In the natural world young animals die all the time. No effort is made to save their lives. The adults just learn to accept it as part of life.</p> <p>Forcing people to live as long as possible goes against the laws of nature.</p> <p><b>QUESTION: WILL PROVIDE AND IMPROVE ACCESS TO HEALTH AND SOCIAL CARE SERVICES?</b>  AGAIN, THIS IS A DIFFICULT ONE TO ANSWER.</p> <p>You cannot force people to accept health care</p>	



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			<p>and social care services.</p> <p><b>QUESTION: WILL IT PROMOTE HEALTHY LIFESTYLES AND OPPORTUNITIES FOR EXERCISE?</b> A DIFFICULT ONE TO ANSWER</p> <p>Although the Borough Plan may be seen to be promoting a healthy life, as well as opportunities for exercise, IT DOES NOT MEAN TO SAY THAT the public will adopt it.</p> <p><b>QUESTION: WILL IT PROMOTE OPPORTUNITIES TO PARTICIPATE IN SPORT?</b> A DIFFICULT ONE TO ANSWER</p> <p>Yes the Borough Plan will promote opportunities for sport participation, but you cannot force the local population to take part in sport if they choose not to.</p> <p><b>QUESTION: WILL IT PROTECT, PROVIDE AND ENHANCE THE PROVISION OF QUALITY OPEN SPACE?</b> NO Most of the existing woodland has already disappeared. As for protecting quality open space, all land is either the property of the Crown or the Church. Local protection, therefore is limited.</p>	

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			<p><b>QUESTION: WILL IT PREVENT NOISE AND LIGHT POLLUTION?</b> THIS IS A DIFFICULT ONE TO ANSWER</p> <p>Whether the Borough Plan will prevent noise and light pollution is dependent on the residents living in the areas being affected by the open space plans. More houses and employment development will naturally attract more light pollution.</p> <p>The proposal to designate land south of The Long Shoot and north of the railway as Green Belt will not work in terms of preventing noise and light pollution. It is too close to the A5. Also the grass verges and plants that border the A5 are covered in exhaust fumes. Dead badgers and rabbits are very often seen on the A5 between the Dodwells Roundabout and Woodford Lane.</p>	
612/48	Mr D Parker and Miss H Parker	N/A	<p><b>Soil Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT MINIMISE DEVELOPMENT ON GREENFIELD LAND?</b> NO</p> <p>There are no greenfield sites in the areas of Weddington, St.Nicolas Park, The Long Shoot, Higham Lane and the A5.</p>	See 53/1 These comments will be taken into account in the update of the SA.

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			<p>As the Council has already allowed development to take place on greenfield sites, they cannot turn down further applications. A developer will be able to challenge any decision on minimising development on greenfield sites.</p> <p><b>QUESTION: WILL IT REDUCE THE AMOUNT OF DERELICT, DEGRADED AND UNDERUSED LAND?</b></p> <p>It may do. It very much depends on the location of this land and the impact any development will have on the surrounding area.</p> <p><b>QUESTION: WILL IT REDUCE THE QUANTITY OF CONTAMINATED LAND IN THE BOROUGH?</b> DO NOT KNOW</p> <p><b>QUESTION: WILL IT RETAIN THE BEST QUALITY AGRICULTURAL LAND?</b> NO</p> <p>The areas of Weddington, The Long Shoot and Higham Lane contain some of the best agricultural land in the County. Should any development go ahead, this will all be lost forever. We are being continually told that, as a Country, as a whole, we should be more self-sufficient in producing our own food, and not reliant on imports.</p>	
612/49	Mr D Parker and	N/A		1. Noted.

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	Miss H Parker		<p><b>Water Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT PROMOTE THE BALANCE BETWEEN WATER SUPPLY AND DEMAND?</b> NO</p> <p>More development of housing and employment sites will naturally increase the demand for more water. There is a limit to the amount of water that nature can give us or produce.</p> <p><b>QUESTION: WILL IT ENCOURAGE WATER EFFICIENCY AND CONSERVATION?</b> THIS IS A DIFFICULT ONE TO ANSWER</p> <p>Certain areas of society have no intention of conserving water. Nor are they interested in water efficiency. They will take what they want, regardless of what the impact will be if too much water is taken.</p> <p><b>QUESTION: WILL IT MINIMISE ADVERSE EFFECTS IN GROUND AND SURFACE WATER QUALITY?</b> DO NOT KNOW.</p> <p>The question is where will the watercourses empty their contents? Driveways that have</p>	<p>2. Noted. 3. Noted. 4. and 5. As part of the development process the Council will work with Severn Trent and the Environment Agency.</p> <p>The SA will be updated at the next stage of the Plan. It is anticipated that as more evidence emerges, the SA will provide more specific responses that will assist in reviewing the Plan.</p>

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			<p>been concreted or bricked over will naturally have surface water running into public drains. Or, they may have no way of draining at all. People wash their cars on driveways, spray weeds on driveways; the chemicals used, will naturally find their way into ground water and surface water systems.</p> <p>The quality of water depends on what comes out of the sky, and the chemicals the water companies use. Pollution from farmland and factories can also have an effect on water quality.</p> <p><b>QUESTION: WILL IT PROTECT AND ENHANCE THE QUALITY OF WATERCOURSES?</b> THIS IS A DIFFICULT ONE TO ANSWER The primary responsibility for drain, watercourse, and sewer repairs, should be with the water companies. The Council's responsibility is to ensure that any development does not impair the quality the watercourses.</p> <p><b>QUESTION: WILL IT AVOID DEVELOPMENTS IN AREAS BEING AT RISK FROM FLUVIAL, SEWER OR GROUNDWATER FLOODING?</b> NO.</p> <p>The Council have already given the go-ahead for some development to take place on flood plains, i.e. Weddington fields. They cannot therefore argue against any future development</p>	

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612/50	Mr D Parker and Miss H Parker	N/A	<p>on a flood plain.</p> <p><b>Air Quality</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT MAINTAIN AND IMPROVE LOCAL AIR QUALITY?</b> NO</p> <p>More development of any kind will naturally lead to an increase in air pollution.</p> <p><b>QUESTION: WILL IT REDUCE TRAFFIC CONGESTION AND IMPROVE ROAD SAFETY?</b> NO</p> <p>More development will lead to more vehicles on the road. YOU CANNOT CARRY THE WEEKS' SHOPPING ON A BIKE, OR A BUS. More vehicles on the road will NOT improve road safety.</p> <p><b>QUESTION: WILL IT REDUCE THE MOVEMENT OF GOODS BY ROAD/LORRY?</b> NO</p> <p>If anything, the movement of goods by road/lorry will increase.</p>	<p>See 53/1 These comments will be taken into account in the update of the SA.</p>

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			<p><b>QUESTION: WILL IT FOCUS THE DEVELOPMENT IN THE MAJOR URBAN AREAS?</b> IT MAY DO.</p> <p>However, the areas which have the highest unemployment rates should be the areas which get the most new development. People then would not need to travel so far to get to their place of work, shops or school.</p> <p><b>QUESTION: WILL IT PROMOTE COMPACT MIXED-USE DEVELOPMENTS WITH GOOD ACCESSIBILITY TO LOCAL FACILITIES AND SERVICES THAT REDUCE THE NEED TO TRAVEL?</b> DO NOT KNOW.</p> <p><b>QUESTION: WILL IT REDUCE THE NUMBER OF JOURNEYS MADE BY CAR?</b> NO</p> <p>When going to School, the safety of children is paramount. If parents think that the safest way to protect their children is to use the car then they will do.</p> <p>Some services such as the Hospital and District Centre shops are only accessible by car.</p> <p>Those who do the weekly shop at one of the major supermarkets will always try to use a car. Carrying heavy shopping on a bus or on foot is not feasible. It can also cause injury to joints.</p>	

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			<p>Disabled shoppers have no option but to use a car.</p> <p><b>QUESTION: WILL IT PROMOTE ALTERNATIVE, MORE SUSTAINABLE MODES OF TRANSPORT TO THE CAR (INCLUDING WALKING AND CYCLING) THROUGH LOCATION OF HOUSING AND EMPLOYMENT SITES, SERVICES AND FACILITIES, AND APPROPRIATE INFRASTRUCTURE FOR SUSTAINABLE MODES OF TRANSPORT?</b> A DIFFICULT ONE TO ANSWER</p> <p>People who do their weekly shop in a town centre supermarket, or need to carry heavy items/goods, will still need to use their car. Elderly and disabled people with mobility difficulties cannot be expected to walk or cycle into the town centre, or to the local and district centres.</p> <p>Densely populated housing estates cause problems for buses. Large normal-size buses cannot negotiate many of the small side roads. Bus companies are in the business to make money. They stick to the main routes, as they know they will make the most money.</p> <p>Many bus services are unreliable. Some do not stop at local services, even if they go past them, e.g. the No. 48 bus currently does not stop at the bus stop in Leicester Road by Etone School, even though it goes straight past.</p>	
612/51	Mr D Parker and	N/A		See 53/1



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	Miss H Parker		<p><b>Climatic Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT REDUCE OR MINIMISE GREENHOUSE GAS EMISSIONS? IT MAY DO.</b></p> <p>However, the costs involved in the reduction and minimisation of greenhouse gas emissions may prove to be too much, especially if there is very little reward.</p> <p>Man has only a small part to play in reducing or minimising greenhouse emissions. Nature plays the largest part, through volcanic eruptions and forest fires started by lightning.</p> <p><b>QUESTION: WILL IT INCREASE THE PROPORTION OF ENERGY GENERATED FROM RENEWABLE AND LOW CARBON SOURCES, INCLUDING BY MICRO-GENERATION, CHP, DISTRICT HEATING AND TRANSPORTATION? THIS IS A DIFFICULT ONE TO ANSWER</b></p> <p>The problem that may occur is that even housing, commercial and local industry are buildings that use the latest energy sources. Any savings that are made would be offset by increased vehicle usage. More development will naturally increase the number of vehicles on the</p>	<p>These comments will be taken into account in the update of the SA.</p>

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			<p>road. Cars will still be required to transport people to shops and services. Lorries and vans will still be required to deliver goods to the shops, services, local and district centres, and companies in the Borough.</p> <p><b>QUESTION: WILL IT CONTRIBUTE TO THE CREATION OF A LOW CARBON ECONOMY AND MINIMISE THE BOROUGH'S CONTRIBUTION TO THE CAUSES OF CLIMATE CHANGE BY REDUCING EMISSIONS OF GREENHOUSE GAS FROM TRANSPORT, DOMESTIC, COMMERCIAL AND INDUSTRIAL SOURCES?</b> A DIFFICULT ONE TO ANSWER.</p> <p>The Borough Plan may assist in contributing to a low carbon economy and minimise the causes of climate change. However, whether the Plan will actually succeed is dependent on the types of residents and companies that are attracted to the area.</p> <p><b>QUESTION: WILL IT PROMOTE THE ADOPTION OF CLIMATE CHANGE ADAPTATION AND CLIMATE PROOFING PRINCIPLES IN PLANNING AND DESIGN?</b> A DIFFICULT ONE TO ANSWER.</p> <p>If climate proofing principles in planning and design, are incorporated into housing, this may push up the prices of homes in the area. Developers and housebuilders will want to recoup some of the cost of incorporating these</p>	

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			<p>principles. They will put this cost into the prices of the houses they build. This may price first-time buyers out of the market.</p> <p>As for employment development sites, the Council and those who install climate proofing into buildings will also want to recoup some of their costs. This will be done by increasing business rates and rents.</p> <p>Energy Bills could also be higher.</p> <p>The Borough Plan may support the adoption of Climate Change Adaptation by making people aware of the options they have to reduce carbon emissions. This could be achieved through education and information leaflets.</p> <p>The problem is that the increasing reliance on technology, computers, washing machines, dishwashers, communication equipment and televisions will make the adoption of Climate Change Adaptation more difficult.</p>	
612/52	Mr D Parker and Miss H Parker	N/A	<p><b>Material Assets Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT REDUCE WASTE ARISING (HOUSEHOLD AND COMMERCIAL)?</b> THIS IS A DIFFICULT ONE TO ANSWER.</p>	See 53/1 These comments will be taken into account in the update of the SA.

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			<p>Traditionally all garden waste was burnt on site. Although there was a risk of carbon emissions, it was the only way of getting rid of diseased plants. Food waste was given to pigs to help farmers reduce their food costs.</p> <p>The more development there is, the more waste produced.</p> <p><b>QUESTION: WILL IT INCREASE RECYCLING AND COMPOSTING RATES AND ENCOURAGE EASILY ACCESSIBLE RECYCLING SYSTEMS?</b> A DIFFICULT ONE TO ANSWER.</p> <p>Initially it may increase the recycling and composting rates. There may be an increase in recycling systems that are more accessible, but this is not without risk. Recycling centres have been the subject of at least four large fires this year. The fumes released pollute the air, contaminate the land and cause health problems.</p> <p>Composting diseased garden waste runs the risk of passing disease into other areas, and there is no guarantee that people will change their recycling habits. Some simply cannot be bothered or do the work involved.</p> <p><b>QUESTION: WILL IT PROMOTE RE-USE OF RESOURCES?</b> NO</p>	

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			<p>The fact that the Council have chosen to develop new areas of land means that they themselves are not in favour of reusing existing resources. They, therefore, cannot be seen to promoting re-use of resources.</p> <p><b>QUESTION: WILL IT ENCOURAGE LAND USE AND DEVELOPMENT THAT OPTIMISES THE USE OF PREVIOUSLY DEVELOPED LAND AND BUILDINGS?</b> NO</p> <p>In allowing developers to build on Weddington fields, near to the church, the Council cannot claim to encourage the use of land that was previously developed. The Council have set a precedent in allowing developers to build on Weddington fields, and have therefore opened themselves up to being challenged in the courts and losing. Developers will be able to argue that as the Council have allowed Weddington fields to be developed, they cannot refuse to allow further development on other undeveloped sites.</p> <p><b>QUESTION: WILL IT FOCUS RETAIL AND OFFICE DEVELOPMENT IN TOWN CENTRES?</b> PROBABLY NOT.</p> <p>Retail and office developers will not be encouraged into town centres if the business rates and rents are too high. Or, if the car parking charges are too high to attract any</p>	

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			<p>customers.</p> <p><b>QUESTION: WILL IT ENCOURAGE HOUSING DEVELOPMENT WHICH MAKES MORE EFFICIENT USE OF LAND AND SEEK GREATER INTENSITY OF DEVELOPMENT AT PLACES WITH GOOD PUBLIC TRANSPORT ACCESSIBILITY?</b> NO</p> <p>House builders and developers are in the business to make money. They will have no interest in where the development takes place.</p> <p><b>QUESTION: WILL IT ENCOURAGE MAXIMUM EFFICIENCY AND APPROPRIATE USE OF MATERIALS, PARTICULARLY FROM LOCAL AND REGIONAL SOURCES?</b> DOUBTFUL</p> <p>House builders and developers will seek materials for the best possible price, and the cheapest to them. Countries such as China and India are the cheapest source of materials. Countries such as Germany produce better quality white goods, e.g. washing machines, dishwashers, vacuum cleaners, etc.</p> <p><b>QUESTION: WILL IT REQUIRE NEW DEVELOPMENTS TO INCORPORATE RENEWABLE, SECONDARY OR SUSTAINABILITY SOURCED LOCAL MATERIALS IN BUILDINGS AND</b></p>	

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			<p><b>INFRASTRUCTURE?</b> NOT NECESSARILY.</p> <p>The question should be: "How is the Council going to enforce any regulation for new developments to incorporate renewable, secondary or sustainably sourced local materials?</p> <p>What are the costs? Could the Council afford any costs in enforcing these regulations?</p> <p><b>QUESTION: WILL IT SAFEGUARD RESERVES OF EXPLOITABLE MINERALS FROM STERILISATION BY OTHER DEVELOPMENT?</b> NO</p> <p>The waste will have to go somewhere.</p> <p><b>QUESTION: WILL IT ENCOURAGE LOCAL SOURCING OF FOOD, GOODS AND MATERIALS?</b> NO</p> <p>The sourcing of local food will be impossible, as all the food growing areas of the Borough will have been put forward for development. The potential source of producing wood for commercial and private use will also have been lost to development. Materials will still have to be brought in from outside the area. The amount of land that is required to produce these materials will be lost to development.</p>	

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612/53	Mr D Parker and Miss H Parker	N/A	<p><b>Cultural Heritage Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p> <p><b>QUESTION: WILL IT PROTECT AND ENHANCE SITES, FEATURES AND AREAS OF HISTORICAL, ARCHAEOLOGICAL AND CULTURAL SITES?</b></p> <p>NO</p> <p>It is impossible to protect sites of Historical or Archaeological interest. The land on which the sites are situated is owned either by the Crown or the Church. In some cases, developers.</p> <p>The Crown and the Church have the ultimate say as to whether sites should be protected or developed. Any sites owned by the County Council or Local Council could be transferred to the National Trust or English Heritage. This would give important sites a greater level of protection at a local level.</p> <p>Sites of Cultural value also cannot be fully protected if the land on which they are situated is owned by the Crown, the Church or developers.</p> <p>If the Council have been unable to protect/save important buildings in the past, they are unlikely to be able to do so now.</p>	<p>See 53/1</p> <p>These comments will be taken into account in the update of the SA.</p>



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			<p>The following is a list of buildings that have been lost:</p> <p>The Fox and Crane - now so derelict that it cannot be saved.  Weddington Hall  Attleborough Hall  Camp Hill Hall  The Newdigate Arms Hotel  Caldecote Hall - now in private hands.  Co-op Hall  Ritz Cinema  The Kingsholme Arms  The Cock and Bear Pub</p> <p>The loss of these buildings not only changes the character of an area, but also reduces opportunities for employment and leisure.</p> <p><b>QUESTION: WILL IT IMPROVE ACCESS TO BUILDINGS OF HISTORICAL/CULTURAL VALUE?</b>  NO</p> <p>Most of the land on which these buildings are situated is privately owned. Access is not guaranteed and can be refused.</p>	
612/54	Mr D Parker and Miss H Parker	N/A	<p><b>Landscape Objectives</b></p> <p>The response is based on using the SA questions to answer the SA Objectives. It does not comment on how the SA has been applied to the allocations or policies, etc.</p>	<p>See 53/1  These comments will be taken into account in the update of the SA.</p>

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			<p><b>QUESTION: WILL IT ENHANCE AND MANAGE THE CHARACTER AND APPEARANCE OF THE BOROUGH'S LANDSCAPES, MAINTAINING AND STRENGTHENING LOCAL DISTINCTIVENESS AND SENSE OF PLACE?</b> A DIFFICULT ONE TO ANSWER.</p> <p>The Borough Plan may be seen to be enhancing and maintaining the character and appearance of the Borough's Landscapes. In reality it is the local residents and businesses that determine the character and appearance of the areas in which they live and work.</p> <p>It is the type of resident and businesses an area attracts that gives the area its sense of place and local distinctiveness.</p> <p><b>QUESTION: WILL IT PROTECT AND ENHANCE THE CHARACTER AND SETTINGS OF THE TOWNS AND VILLAGE?</b> NO</p> <p>The scale of the proposed housing development in Weddington, Higham Lane, St. Nicolas Park and The Long Shoot is too ambitious and too large. These areas will lose their character and sense of place. The distinction between town, village and new development will also be lost.</p> <p>The opportunities for conservation and food production will be lost. St. Nicolas Park Estate can never be called a village. It does not have a common. The Church and Church Hall are too</p>	

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			far away. You now have to cross major roads to get to them.	
348/1	Mrs Pat Tranter	n/a	<p>The removal of the above land status is not documented in the Borough Plan. Furthermore the land is referred to as 'Green Field' in many of the supporting Plan documents. This phrase draws opinion away from the fact that it is Green Belt. The access to this land and other features within Green Belt land and Government regulations are already in place. What are the exceptional circumstances that exist that are enabling this status to be removed?</p> <p>Paragraph 1.7.6</p> <p>You state the area has higher health issues and less or no vehicles per house, poor public transport links, yet propose to remove this WIDELY used area.</p> <p>Many local people are able to aid their physical and mental health by walking here without any transport costs and enjoy the flora and fauna. It is also an introduction to children where families who cannot afford outings to a natural countryside environment that is EASILY accessible, to enhance their learning and enjoy the flora and fauna. Parks are an entirely separate type of amenity. It is the natural land and its changes over the seasons that is at risk here and we strongly wish to keep</p>	<p>If there are any incorrect references in the Plan these will be corrected, there was no intention to mislead.</p> <p>It is expected that not all of the site allocations will be subject to development. Appropriate green spaces will be incorporated into the design of proposals.</p>
323/4	Mrs. J. Boyd	N/A	<p>In particular the plan to build on Green Belt in Gipsy Lane. The Sustainability Appraisal has stated several areas of uncertainty over compatibility with urban design, water, soil quality, air quality, waste, crime reduction, energy and protection of the natural environment.</p> <p>The reports commissioned by the council does</p>	<p>As the SA develops a large number of the uncertainties will be resolved as further information will be available. These scores will assist in improving the Plan, in line with the SA process. For site allocation comments see response SHS1 in Locality 1 Abbey and Wembrook.</p>

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			<p>not reflect the 'vision' for Nuneaton and Bedworth. The report does not confirm that any development will be of high quality design, does not confirm safer communities and does not confirm that the best of the past will be conserved with enhanced biodiversity, local landscapes and improvements to the natural environment.</p> <p>I strongly object to proposals to build on Green Belt as this would make areas that were attractive to former purchasers less attractive. It would destroy the ecosystems currently in place and lead to the loss of many protected species. I am particularly opposed to development in Gipsy Lane on a working farm. The country has become reliant upon importing food and it has been well documented that to improve sustainability, farmland should be protected and assisted to produce food rather than becoming reliant upon imports.</p>	
559	R Baker & D Baker	Bedworth Heath Action Group	<p><b>Economic Benefits of Agricultural Land</b> The SA fails to assess the economic loss of the agricultural land within SHS3, which does not conform with the NPPF, which states that LPAs should take account of the economic benefits of the best and most versatile agricultural land (§ 112).</p> <p>BHAG state that the land is grade 3a and therefore should be assessed for its economic benefits.</p> <p><b>Town Centres</b> BHAG point out that the SA's appraisal of SHS3 indicates it will have a negative impact on</p>	The SA will be updated as the Plan progresses, any inaccuracies will be rectified. From a historical perspective, English Heritage will assist in determining appropriate scoring. In addition, a historic site assessment study is being undertaken, and this will feed into the SA.

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			Bedworth Town Centre (BTC) and thereby undermine BTC, and divert much of the area's economy away from BTC.	
559	R Baker & D Baker	Bedworth Heath Action Group	<p><b>Affordable Housing</b>  A large amount of affordable housing (AH) will not help social issues in this area, as there is no supporting infrastructure in the area to serve them. For example, there is only one GP practice, one pharmacy (over a mile away), no dentist and no proper library.</p> <p>Vulnerable people will not have access to employment opportunities and services.</p> <p>There is no capacity for the infrastructure to cope with additional housing/people. The Plan proposes that 35% of the strategic sites will be for infrastructure. This is an insufficient percentage to make the necessary improvements.</p> <p>Past large scale development has not provided any infrastructure, resulting in residents' children not getting places at local schools, and the need to travel to Camp Hill for medical care. Vulnerable people, again, will suffer due to a lack of supporting infrastructure, particularly as the site is in a remote location.</p> <p>Consequently, BHAG disagree with the double positive accorded to AH.</p> <p><b>Ensure Easy and Equitable Access</b>  The SA states that the site will have a significant adverse effect on this sustainability objective,</p>	<p>See 53/1  These comments will be taken into account in the update of the SA.</p>

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			<p>which BHAG is inclined to agree, although it also has some additional concerns.</p> <p>The remoteness of the site will prove to be a disadvantage as access to services and facilities, and employment opportunities, are practically nonexistent. Consequently, BHAG consider the medium and long term SA ratings overly optimistic.</p> <p><b>Reduce Crime and the Fear of Crime</b> BHAG disagree with the SA assessment. The appraisal should be negative. There is nothing in the Plan that indicates there will be any mitigation of the risk of crime, except for CCTV.</p> <p>BHAG state that the development will be extremely high density and of poor quality. In an area of low employment and educational access, this will create a negative impact on crime and fear of crime.</p> <p><b>Address Poverty and Disadvantage</b> BHAG state that the development will be extremely high density and of poor quality. In an area of low employment and educational access, this will create a negative impact on crime and fear of crime.</p> <p>BHAG state that the lack of supporting infrastructure will create a negative effect on the disadvantaged, as there will be a lack of opportunities to access local employment, further education, health care and social</p>	

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			<p>services due to poor public transport.</p> <p>This is likely to cause a new area of high deprivation, ensuring a negative impact on the area and occupants.</p> <p><b>Improve Participation in Cultural, Sport and Recreational Activities</b>            BHAG state that some local schools have a history of precluding the use of its facilities to the general public, owing to insurance and security reasons. BHAG also disagree that the site offers opportunities to integrate GI, sport and recreation facilities, etc. With a figure of 35% of the total site dedicated to infrastructure, including roads, schools, retail amongst others, there will be practically no space left over for such uses.</p> <p>Therefore the neutral appraisal in the SA report should consider the above, which will likely result in a negative impact.</p> <p><b>Encourage Development That Promotes Local Distinctiveness and a Sense of Place</b>            Putting a large development in a location that does not have the infrastructure to support it does not "help to create and promote local distinctiveness and a sense of place". In fact it makes it worse, as one of the main distinctive features of the site is the fact that Hospital Lane and the footpaths lead directly through the site providing access to the GB / countryside. The fields themselves are important to the</p>	

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			<p>community as they create a sense of place.</p> <p>The high density, poor quality housing in a remote area will have a negative effect on local distinctiveness and sense of place.</p>	
559	R Baker & D Baker	Bedworth Heath Action Group	<p>The analysis does not include any details on the requirement set out elsewhere in the Borough Plan: to protect ancient hedgerows and trees which have been in place since 1850. The 1840 Tithing Map demonstrates that the hedgerows across the proposed area of development were in place at that time and therefore require protection.</p> <p>Developing the site will not increase access to existing green spaces and wider countryside. Indeed the exact opposite will happen, and when considering that only 35% of the site is given over for infrastructure, there will be very little left over for any habitat creation that species could call home.</p> <p>Consequently, the impact will be adversely negative rather than neutral, as the SA indicates.</p>	<p>The PO SA informed the development of the Preferred Options. At that stage no policies had formally been agreed. Consequently this version of the SA in its assessment of strategic sites cannot take into account the wider Borough Plan requirements, however the next version of the SA will be able to take account of the proposed policies. Importantly the role of the SA is to inform the development of policies. The evidence that informed the SA did not indicate that a negative score in relation to biodiversity was required. However, we will take account of the comments as part of the pre-submission SA.</p>
559	R Baker & D Baker	Bedworth Heath Action Group	<p>BHAG state that developing the site will be at the cost of human health. Destroying the visual amenity of this GB site will discourage walkers and joggers.</p> <p>Whilst stated in the SA, new facilities are not set out in the Borough Plan, and so will not happen and, as already mentioned, access to health care is poor.</p>	<p>Facilities to support development will be identified and delivered through the IDP.</p>
559	R Baker & D Baker	Bedworth Heath Action Group	<p>BHAG point out that the SA appraisal comment</p>	<p>It is understood that the agricultural land</p>



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	Baker	Group	<p>states that the PDA will have an adverse effect on the SA objective. However, BHAG have issue with the appraisal comment "none of the site is defined as high quality agricultural land". BHAG point out that the land is Grade 3 agricultural land and the fact that it produces a range of crops, such as oil seed and rape seed, indicates it is Grade 3a. This puts the land in the top third of all agricultural land and therefore requires NBBC to select land with poorer agricultural quality, in line with the NPPF (§112).</p> <p>Consequently, BHAG state that the site is unsuitable due to it being high quality agricultural land.</p>	<p>classification is grade 4 and partly urban.</p> <p>Any discrepancies between the tables and summary for PDA7 regarding classification will be investigated. Appropriate action will be undertaken to reflect the outcome.</p> <p>The purpose of the SA is to identify the potential impacts of the proposals, which will assist in identifying any mitigation measures that may be required if the site is taken forward for development.</p>
559	R Baker & D Baker	Bedworth Heath Action Group	<p>Even though the SA Report states that the primary risk of flooding is from surface water flows, which the EA confirm there are no features, BHAG have several concerns in relation to flooding of the site.</p> <p>On the northern edge of the site there is a large pond, built as part of the Cardigan Road development, which explains why there are currently no surface water features on the site.</p> <p>BHAG state that there has been long standing flood issues on this site which have been reported numerous times over the last 20 years, and any remedial work carried out has been unsuccessful.</p> <ol style="list-style-type: none"> <li>1. Flooding occurs near footpath B8 and spills onto, and erodes, the carrigeway</li> <li>2. Flooding occurs near footpath B9, with run-off coming out of the manhole, flooding the</li> </ol>	<p>The SA was informed by the evidence available in the SFRA. If any additional flood related evidence is undertaken to inform the BP, the SA will take that into account. A developer would be required to prepare a site specific flood risk assessment as part of a planning application.</p>

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			pavement and courses down Goodyers Lane 3. Flooding has eroded the road surface (photos are provided) 4. Drainage cannot cope with run-off	
559	R Baker & D Baker	Bedworth Heath Action Group	<p><b>Increase the Use of Public Transport, Cycling and Walking</b> BHAG point out that the SA appraisal comment states that the PDA will have a slight adverse impact on the sustainability objective, due to its remote location and likelihood that it will discourage a modal shift away from the car.</p> <p>BHAG, however, consider that there will be a significant adverse impact on the sustainability objective. The remote location coupled with poor public transportation will positively encourage car use, resulting in an increase in air pollution on top of what is already produced by traffic on the M6. Other issues as a result of an increase in car use include traffic fatalities along Hospital Lane and Smorral Lane.</p> <p><b>Ensure Development is Primarily Located in Urban Areas</b> The SA Report is correct on this. It is a poor location for housing development.</p>	The comments will be investigated further.
559	R Baker & D Baker	Bedworth Heath Action Group	<p><b>Minimise the Borough's Contribution to the Causes of Climate Change</b> BHAG state that due to the site's remote location it will result in the need to travel to retail, employment and healthcare, which will have a significant, rather than slight, negative effect on the sustainability objective</p>	The comments will be investigated further.
559	R Baker & D	Bedworth Heath Action	<b>Ensure the Prudent Use of Resources</b>	The objective relates to the use of PDL,

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	Baker	Group	<p><b>Including PDL</b> BHAG point out that the SA comments state that "The PDA comprises greenfield development and thus will have an adverse effect on the prudent use of resources, principally, the use of PDL". BHAG feel that this is somewhat of an understatement as it is not only greenfield but it is also GB land, which has a specific purpose of preventing such development, as proposed, on it. BHAG further comment that developing the site will result in a significant adverse impact on this sustainability objective.</p> <p>BHAG make reference to the NPPF, principally §79 and 80, and consider the proposed allocation of the site directly contravenes the NPPF.</p>	<p>it is not about greenfield/ Green Belt development. The NPPF identifies that the preparation of the Plan provides an appropriate time to review the Green Belt.</p>
559	R Baker & D Baker	Bedworth Heath Action Group	<p>BHAG state that the SA comment on this objective is insufficient and point out that within the Strategic Housing Site Selection Paper, the Archaeological Potential is Medium/High.</p> <p>BHAG quote §129 of the NPPF, which refers to LPAs identifying and assessing the significance of any heritage assets that may be affected by a development proposal.</p> <p>BHAG make reference to the site being close to the original Bede Village settlement, from which Bedworth (originally Bedesworth) got its name. The site is also close to the remains of the Smercote Parva Village.</p> <p>Consequently BHAG feel that the SA Report should mark this objective as a negative.</p>	<p>Noted, an updated SA will take place as part of the Pre-Submission stage. Assuming this site goes forward the assessment against this criteria will be reviewed</p>
559	R Baker & D	Bedworth Heath Action	BHAG state that development will not have a	The SA has been informed by the

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	Baker	Group	<p>neutral or positive impact on the landscape. It is untrue to consider a high density housing estate to be a positive landscape effect, particularly as it is undeveloped and is GB.</p> <p>BHAG disagree with the SA comment in reference to Hospital Lane separating the site from the GB / countryside, and feel that the description of the site is set within the wrong context.</p> <p>BHAG say the site is part of a sizable area of GB, which Hospital Lane happens to run through, and does not separate this area from the rest of the GB. Hospital Lane has been in this location for over 170 years and, as such, predates the GB. By running through the GB, Hospital Lane and its associated footpaths provide the only significant access to the GB in the area.</p> <p>The development of the site, furthermore, will damage the openness of Hospital Lane, resulting in no significant views to the east or west, leaving a solitary view over the field to the northwest (provides photos of views).</p>	<p>landscape character assessment. The designation of the site currently as Green Belt is a separate matter.</p>
676/7	R. Torkildsen	English Heritage	<p>It is not evident from the Sustainability Appraisal report (Alliance Planning February 2013) that the significant environmental effects of the historic environment concerns have been understood and assessed in accordance with guidance on the preparation of SEA to comply with the EU SEA Directive. The report appears not to have applied any evidence to be able to reasonably answer the explicit SEA question "Will it protect and enhance sites, features and</p>	<p>Further work is being undertaken on the historic environment evidence base, this will inform the pre-submission SA work.</p>

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			<p>areas of historical, archaeological and cultural value".</p> <p>Recent guidance on the consideration of the historic environment when preparing such development plans is available to inform your next iteration of the SEA report. <a href="http://www.english-heritage.org.uk/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/">www.english-heritage.org.uk/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/</a></p>	
133/14	Richard Wheat	Warwickshire Wildlife Trust	<p>Adjacent to the main area of Paradise LWS (LWSs are core areas for nature conservation, which underpin local ecological networks and make a significant contribution towards both national and local biodiversity targets and objectives. We believe that the value/importance of these features, and the level of protection assigned to them in Paragraph 113 of the NPPF, must therefore be upheld during the selection of preferred site allocations so that the identified development needs of the district can be fulfilled without any net loss or degradation of county important wildlife assets.</p> <p>Principally, impacts on Local Sites should be avoided in the first instance and so we look to the Local Authority to select sites that are situated away from, or can clearly demonstrate no significant effects on, a LWS. However, where justified, sites that are inclusive of or are adjacent to a LWS should be reviewed to ensure that the development capacities or densities proposed are reflective of the constraints posed by the size and extent of the LWS and its location within the site. In accordance with the mitigation hierarchy detailed in paragraph 118 of the NPPF, a review of the development capacity</p>	<p>The selection of the strategic sites took into account the presence of local wildlife sites and the density/capacity of the site takes this into account. Further work is being undertaken on biodiversity. This will inform whether any mitigation is required.</p>

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			<p>or density at a proposed site must also take account of any mitigation needed to safeguard an LWS within the proposals. This may include making provision for any extensions, buffers and ecological connectivity needed to conserve the feature in the long-term.</p> <p>The Trust is concerned to note that some but not all of the site descriptions in section 11 identify the presence of a LWS within or adjacent to a preferred site allocation. These allocations will therefore need to be updated to ensure that the presence and extent of the LWS is reflected in the capacity and density of development and in the green infrastructure proposals for the site. In this instance, we look to the local authority to apply the mitigation and enhancement principles, described for sites where LWS have already been identified, to all preferred sites listed in the table above. We believe that this, together with a robust policy for the protection of nonstatutory wildlife sites within the Borough Plan, will ensure that the value of LWSs is adequately upheld within all preferred site allocations.)</p> <p>It is recommended:</p> <p>Clearly indicate the presence of a Local Wildlife Site within or adjacent to all preferred site allocations to ensure that all constraints to development are identified.</p> <ul style="list-style-type: none"> <li>- Ensure that the allocation of preferred sites, and the proposed development densities within these sites, reflect the presence of a LWS and the mitigation requirements to safeguard the site</li> </ul>	

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			within the long-term	
133/15	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is inclusive of Seeswood Pool LWS (LWSs are core areas for nature conservation, which underpin local ecological networks and make a significant contribution towards both national and local biodiversity targets and objectives). We believe that the value/importance of these features, and the level of protection assigned to them in Paragraph 113 of the NPPF, must therefore be upheld during the selection of preferred site allocations, so that the identified development needs of the district can be fulfilled without any net loss or degradation of county important wildlife assets.</p> <p>Principally, impacts on Local Sites should be avoided in the first instance, and so we look to the Local Authority to select sites that are situated away from, or can clearly demonstrate no significant effects on, a LWS. However, where justified, sites that are inclusive of or are adjacent to a LWS should be reviewed to ensure that the development capacities or densities proposed are reflective of the constraints posed by the size and extent of the LWS, and its location within the site. In accordance with the mitigation hierarchy detailed in paragraph 118 of the NPPF, a review of the development capacity or density at a proposed site must also take account of any mitigation needed to safeguard an LWS within the proposals. This may include making provision for any extensions, buffers and ecological connectivity needed to conserve the feature in the long-term.</p> <p>The Trust is concerned to note that some but</p>	See 133/14

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			<p>not all of the site descriptions in section 11, identify the presence of a LWS within or adjacent to a preferred site allocation. These allocations will therefore need to be updated to ensure that the presence and extent of the LWS is reflected in the capacity and density of development, and in the green infrastructure proposals for the site. In this instance, we look to the local authority to apply the mitigation and enhancement principles, described for sites where LWS have already been identified, to all preferred sites listed in the table above. We believe that this, together with a robust policy for the protection of non-statutory wildlife sites within the Borough Plan, will ensure that the value of LWSs is adequately upheld within all preferred site allocations.</p> <p>It is recommended:</p> <p>Clearly indicate the presence of a Local Wildlife Site within or adjacent to all preferred site allocations, to ensure that all constraints to development are identified.</p> <ul style="list-style-type: none"> <li>- Ensure that the allocation of preferred sites, and the proposed development densities within these sites, reflect the presence of a LWS and the mitigation requirements to safeguard the site within the long-term</li> </ul>	
133/16	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is adjacent to Houldsworth Crescent and Homefire Plant LWS (LWSs are core areas for nature conservation, which underpin local ecological networks and make a significant contribution towards both national and local biodiversity targets and objectives). We believe that the value/importance of these features, and</p>	See 133/14



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			<p>the level of protection assigned to them in Paragraph 113 of the NPPF, must therefore be upheld during the selection of preferred site allocations, so that the identified development needs of the district can be fulfilled without any net loss or degradation of county important wildlife assets.</p> <p>Principally, impacts on Local Sites should be avoided in the first instance, and so we look to the Local Authority to select sites that are situated away from, or can clearly demonstrate no significant effects on, a LWS. However, where justified, sites that are inclusive of or are adjacent to a LWS should be reviewed to ensure that the development capacities or densities proposed are reflective of the constraints posed by the size and extent of the LWS, and its location within the site. In accordance with the mitigation hierarchy detailed in paragraph 118 of the NPPF, a review of the development capacity or density at a proposed site must also take account of any mitigation needed to safeguard an LWS within the proposals. This may include making provision for any extensions, buffers and ecological connectivity needed to conserve the feature in the long-term.</p> <p>The Trust is concerned to note that some but not all of the site descriptions in section 11, identify the presence of a LWS within or adjacent to a preferred site allocation. These allocations will therefore need to be updated to ensure that the presence and extent of the LWS is reflected in the capacity and density of development, and in the green infrastructure</p>	

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			<p>proposals for the site. In this instance, we look to the local authority to apply the mitigation and enhancement principles, described for sites where LWS have already been identified, to all preferred sites listed in the table above. We believe that this, together with a robust policy for the protection of non-statutory wildlife sites within the Borough Plan, will ensure that the value of LWSs is adequately upheld within all preferred site allocations.</p> <p>It is recommended:</p> <p>Clearly indicate the presence of a Local Wildlife Site within or adjacent to all preferred site allocations, to ensure that all constraints to development are identified.</p> <ul style="list-style-type: none"> <li>- Ensure that the allocation of preferred sites, and the proposed development densities within these sites, reflect the presence of a LWS and the mitigation requirements to safeguard the site within the long-term</li> </ul>	
133/17	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is inclusive of Bedworth Woodlands Flash Meadows LWS (LWSs are core areas for nature conservation, which underpin local ecological networks and make a significant contribution towards both national and local biodiversity targets and objectives). We believe that the value/importance of these features, and the level of protection assigned to them in Paragraph 113 of the NPPF, must therefore be upheld during the selection of preferred site allocations, so that the identified development needs of the district can be fulfilled without any net loss or degradation of county important wildlife assets.</p>	See 133/14

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			<p>Principally, impacts on Local Sites should be avoided in the first instance, and so we look to the Local Authority to select sites that are situated away from, or can clearly demonstrate no significant effects on, a LWS. However, where justified, sites that are inclusive of or are adjacent to a LWS should be reviewed to ensure that the development capacities or densities proposed are reflective of the constraints posed by the size and extent of the LWS, and its location within the site. In accordance with the mitigation hierarchy detailed in paragraph 118 of the NPPF, a review of the development capacity or density at a proposed site must also take account of any mitigation needed to safeguard an LWS within the proposals. This may include making provision for any extensions, buffers and ecological connectivity needed to conserve the feature in the long-term.</p> <p>The Trust is concerned to note that some but not all of the site descriptions in section 11, identify the presence of a LWS within or adjacent to a preferred site allocation. These allocations will therefore need to be updated to ensure that the presence and extent of the LWS is reflected in the capacity and density of development, and in the green infrastructure proposals for the site. In this instance, we look to the local authority to apply the mitigation and enhancement principles, described for sites where LWS have already been identified, to all preferred sites listed in the table above. We believe that this, together with a robust policy for the protection of non-statutory</p>	

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			<p>wildlife sites within the Borough Plan, will ensure that the value of LWSs is adequately upheld within all preferred site allocations.</p> <p>It is recommended:</p> <p>Clearly indicate the presence of a Local Wildlife Site within or adjacent to all preferred site allocations, to ensure that all constraints to development are identified.</p> <ul style="list-style-type: none"> <li>- Ensure that the allocation of preferred sites, and the proposed development densities within these sites, reflect the presence of a LWS and the mitigation requirements to safeguard the site within the long-term</li> </ul>	
133/18	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is inclusive of Bayton Lakes LWS (LWSs are core areas for nature conservation, which underpin local ecological networks and make a significant contribution towards both national and local biodiversity targets and objectives). We believe that the value/importance of these features, and the level of protection assigned to them in Paragraph 113 of the NPPF, must therefore be upheld during the selection of preferred site allocations, so that the identified development needs of the district can be fulfilled without any net loss or degradation of county important wildlife assets.</p> <p>Principally, impacts on Local Sites should be avoided in the first instance, and so we look to the Local Authority to select sites that are situated away from, or can clearly demonstrate no significant effects on, a LWS. However, where justified, sites that are inclusive of or are adjacent to a LWS should be reviewed to ensure</p>	See 133/14

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			<p>that the development capacities or densities proposed are reflective of the constraints posed by the size and extent of the LWS, and its location within the site. In accordance with the mitigation hierarchy detailed in paragraph 118 of the NPPF, a review of the development capacity or density at a proposed site must also take account of any mitigation needed to safeguard an LWS within the proposals. This may include making provision for any extensions, buffers and ecological connectivity needed to conserve the feature in the long-term.</p> <p>The Trust is concerned to note that some but not all of the site descriptions in section 11, identify the presence of a LWS within or adjacent to a preferred site allocation. These allocations will therefore need to be updated to ensure that the presence and extent of the LWS is reflected in the capacity and density of development, and in the green infrastructure proposals for the site. In this instance, we look to the local authority to apply the mitigation and enhancement principles, described for sites where LWS have already been identified, to all preferred sites listed in the table above. We believe that this, together with a robust policy for the protection of non-statutory wildlife sites within the Borough Plan, will ensure that the value of LWSs is adequately upheld within all preferred site allocations.</p> <p>It is recommended:</p> <p>Clearly indicate the presence of a Local Wildlife Site within or adjacent to all preferred site</p>	

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			<p>allocations, to ensure that all constraints to development are identified.</p> <p>- Ensure that the allocation of preferred sites, and the proposed development densities within these sites, reflect the presence of a LWS and the mitigation requirements to safeguard the site within the long-term</p>	
133/19	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is adjacent to Coventry Wood LWS (LWSs are core areas for nature conservation, which underpin local ecological networks and make a significant contribution towards both national and local biodiversity targets and objectives). We believe that the value/importance of these features, and the level of protection assigned to them in Paragraph 113 of the NPPF, must therefore be upheld during the selection of preferred site allocations, so that the identified development needs of the district can be fulfilled without any net loss or degradation of county important wildlife assets.</p> <p>Principally, impacts on Local Sites should be avoided in the first instance, and so we look to the Local Authority to select sites that are situated away from, or can clearly demonstrate no significant effects on, a LWS. However, where justified, sites that are inclusive of or are adjacent to a LWS should be reviewed to ensure that the development capacities or densities proposed are reflective of the constraints posed by the size and extent of the LWS, and its location within the site. In accordance with the mitigation hierarchy detailed in paragraph 118 of the NPPF, a review of the development capacity or density at a proposed site must also take account of any mitigation needed to safeguard</p>	See 133/14

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			<p>an LWS within the proposals. This may include making provision for any extensions, buffers and ecological connectivity needed to conserve the feature in the long-term.</p> <p>The Trust is concerned to note that some but not all of the site descriptions in section 11, identify the presence of a LWS within or adjacent to a preferred site allocation. These allocations will therefore need to be updated to ensure that the presence and extent of the LWS is reflected in the capacity and density of development, and in the green infrastructure proposals for the site. In this instance, we look to the local authority to apply the mitigation and enhancement principles, described for sites where LWS have already been identified, to all preferred sites listed in the table above. We believe that this, together with a robust policy for the protection of non-statutory wildlife sites within the Borough Plan, will ensure that the value of LWSs is adequately upheld within all preferred site allocations.</p> <p>It is recommended:</p> <p>Clearly indicate the presence of a Local Wildlife Site within or adjacent to all preferred site allocations, to ensure that all constraints to development are identified.</p> <ul style="list-style-type: none"> <li>- Ensure that the allocation of preferred sites, and the proposed development densities within these sites, reflect the presence of a LWS and the mitigation requirements to safeguard the site within the long-term</li> </ul>	
133/20	Richard Wheat	Warwickshire Wildlife Trust	Site is adjacent to Seeswood and Seeswood	It is considered that pLWS should not

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			<p>Pool pLWS (Potential Local Wildlife Sites are sites that, from initial survey or historical records, are considered to be of county importance for nature conservation, but have yet to be fully surveyed and assessed against the Warwickshire, Coventry and Solihull LWS Criteria Assessment. Any site listed as a pLWS should therefore be treated as a LWS when reviewing all preferred and alternative site allocations unless survey and assessment against the standardised criteria suggests otherwise).</p> <p>As detailed above, the presence of LWSs could influence the type or density of development that could be achieved in each preferred site location. It is therefore important that the status of all pLWSs are determined from the outset, as this will provide sufficient justification for conserving the site and/or amending site densities, wherever necessary, so that its protection remains robust if challenged by development interests. In this respect, the evidence base for the Borough Plan should be updated to ensure that all pLWSs within the preferred and alternative site allocations outlined above are surveyed and assessed against the LWS Criteria Assessment.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Update evidence base to include a LWS survey and criteria assessment of pLWSs</li> <li>- If this pLWS fulfills LWS criteria, the site should be indicated as a LWS in the relevant site allocation, so that all constraints and/or</li> </ul>	<p>have the same level of protection until it has been proven that they should be designated as such. Consider amending policy to require developers to undertake an independent assessment of pLWS and wider ecological matters.</p>



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			mitigation requirements for development are identified	
133/21	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is situated adjacent to Moat House pLWS (Potential Local Wildlife Sites are sites that, from initial survey or historical records, are considered to be of county importance for nature conservation, but have yet to be fully surveyed and assessed against the Warwickshire, Coventry and Solihull LWS Criteria Assessment. Any site listed as a pLWS should therefore be treated as a LWS when reviewing all preferred and alternative site allocations unless survey and assessment against the standardised criteria suggests otherwise).</p> <p>As detailed above, the presence of LWSs could influence the type or density of development that could be achieved in each preferred site location. It is therefore important that the status of all pLWSs are determined from the outset, as this will provide sufficient justification for conserving the site and/or amending site densities, wherever necessary, so that its protection remains robust if challenged by development interests. In this respect, the evidence base for the Borough Plan should be updated to ensure that all pLWSs within the preferred and alternative site allocations outlined above are surveyed and assessed against the LWS Criteria Assessment.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Update evidence base to include a LWS survey and criteria assessment of pLWSs</li> <li>- If this pLWS fulfills LWS criteria, the site should</li> </ul>	See 133/20

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			be indicated as a LWS in the relevant site allocation, so that all constraints and/or mitigation requirements for development are identified	
133/22	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is inclusive of Sandcroft Farm and Greenwood Farm deferred pLWS (Potential Local Wildlife Sites are sites that, from initial survey or historical records, are considered to be of county importance for nature conservation, but have yet to be fully surveyed and assessed against the Warwickshire, Coventry and Solihull LWS Criteria Assessment. Any site listed as a pLWS should therefore be treated as a LWS when reviewing all preferred and alternative site allocations unless survey and assessment against the standardised criteria suggests otherwise).</p> <p>As detailed above, the presence of LWSs could influence the type or density of development that could be achieved in each preferred site location. It is therefore important that the status of all pLWSs are determined from the outset, as this will provide sufficient justification for conserving the site and/or amending site densities, wherever necessary, so that its protection remains robust if challenged by development interests. In this respect, the evidence base for the Borough Plan should be updated to ensure that all pLWSs within the preferred and alternative site allocations outlined above are surveyed and assessed against the LWS Criteria Assessment.</p> <p>Recommendations:</p>	See 133/20

Response Ref Number	Full Name of Respondent	Organisation	Please add your comment	Officer Response
			<p>- Update evidence base to include a LWS survey and criteria assessment of pLWSs  - If this pLWS fulfills LWS criteria, the site should be indicated as a LWS in the relevant site allocation, so that all constraints and/or mitigation requirements for development are identified</p>	
133/23	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is inclusive of St. George's Way South pLWS (Potential Local Wildlife Sites are sites that, from initial survey or historical records, are considered to be of county importance for nature conservation, but have yet to be fully surveyed and assessed against the Warwickshire, Coventry and Solihull LWS Criteria Assessment. Any site listed as a pLWS should therefore be treated as a LWS when reviewing all preferred and alternative site allocations unless survey and assessment against the standardised criteria suggests otherwise).</p> <p>As detailed above, the presence of LWSs could influence the type or density of development that could be achieved in each preferred site location. It is therefore important that the status of all pLWSs are determined from the outset, as this will provide sufficient justification for conserving the site and/or amending site densities, wherever necessary, so that its protection remains robust if challenged by development interests. In this respect, the evidence base for the Borough Plan should be updated to ensure that all pLWSs within the preferred and alternative site allocations outlined above are surveyed and assessed against the LWS Criteria Assessment.</p>	See 133/20

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			<p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Update evidence base to include a LWS survey and criteria assessment of pLWSs</li> <li>- If this pLWS fulfills LWS criteria, the site should be indicated as a LWS in the relevant site allocation, so that all constraints and/or mitigation requirements for development are identified</li> </ul>	
133/24	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is inclusive of Charity Spinney Meadows pLWS, the River Sowe pLWS and the Nook pLWS (Potential Local Wildlife Sites are sites that, from initial survey or historical records, are considered to be of county importance for nature conservation, but have yet to be fully surveyed and assessed against the Warwickshire, Coventry and Solihull LWS Criteria Assessment. Any site listed as a pLWS should therefore be treated as a LWS when reviewing all preferred and alternative site allocations unless survey and assessment against the standardised criteria suggests otherwise).</p> <p>As detailed above, the presence of LWSs could influence the type or density of development that could be achieved in each preferred site location. It is therefore important that the status of all pLWSs are determined from the outset, as this will provide sufficient justification for conserving the site and/or amending site densities, wherever necessary, so that its protection remains robust if challenged by development interests. In this respect, the evidence base for the Borough Plan should be updated to ensure that all pLWSs within the preferred and alternative site allocations outlined</p>	See 133/20

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			<p>above are surveyed and assessed against the LWS Criteria Assessment.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Update evidence base to include a LWS survey and criteria assessment of pLWSs</li> <li>- If this pLWS fulfills LWS criteria, the site should be indicated as a LWS in the relevant site allocation, so that all constraints and/or mitigation requirements for development are identified</li> </ul>	
133/25	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is inclusive of Wilsons Lane pLWS (Potential Local Wildlife Sites are sites that, from initial survey or historical records, are considered to be of county importance for nature conservation, but have yet to be fully surveyed and assessed against the Warwickshire, Coventry and Solihull LWS Criteria Assessment. Any site listed as a pLWS should therefore be treated as a LWS when reviewing all preferred and alternative site allocations unless survey and assessment against the standardised criteria suggests otherwise).</p> <p>As detailed above, the presence of LWSs could influence the type or density of development that could be achieved in each preferred site location. It is therefore important that the status of all pLWSs are determined from the outset, as this will provide sufficient justification for conserving the site and/or amending site densities, wherever necessary, so that its protection remains robust if challenged by development interests. In this respect, the evidence base for the Borough Plan should be</p>	See 133/20

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			<p>updated to ensure that all pLWSs within the preferred and alternative site allocations outlined above are surveyed and assessed against the LWS Criteria Assessment.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Update evidence base to include a LWS survey and criteria assessment of pLWSs</li> <li>- If this pLWS fulfills LWS criteria, the site should be indicated as a LWS in the relevant site allocation, so that all constraints and/or mitigation requirements for development are identified</li> </ul>	
133/26	Richard Wheat	Warwickshire Wildlife Trust	<p>Site is adjacent to the Coventry Canal pLWS (Potential Local Wildlife Sites are sites that, from initial survey or historical records, are considered to be of county importance for nature conservation, but have yet to be fully surveyed and assessed against the Warwickshire, Coventry and Solihull LWS Criteria Assessment. Any site listed as a pLWS should therefore be treated as a LWS when reviewing all preferred and alternative site allocations unless survey and assessment against the standardised criteria suggests otherwise).</p> <p>As detailed above, the presence of LWSs could influence the type or density of development that could be achieved in each preferred site location. It is therefore important that the status of all pLWSs are determined from the outset, as this will provide sufficient justification for conserving the site and/or amending site densities, wherever necessary, so that its protection remains robust if challenged by</p>	See 133/20

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			<p>development interests. In this respect, the evidence base for the Borough Plan should be updated to ensure that all pLWSs within the preferred and alternative site allocations outlined above are surveyed and assessed against the LWS Criteria Assessment.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Update evidence base to include a LWS survey and criteria assessment of pLWSs</li> <li>- If this pLWS fulfills LWS criteria, the site should be indicated as a LWS in the relevant site allocation, so that all constraints and/or mitigation requirements for development are identified</li> </ul>	
133/27	Richard Wheat	Warwickshire Wildlife Trust	<p>Sustainability Appraisal identifies 'negative' short term or 'neutral' long term effects on biodiversity for almost all the preferred site allocations in the Borough Plan. It will be necessary to demonstrate how the Local Plan will achieve the net gain for biodiversity outlined in the NPPF principles:</p> <ul style="list-style-type: none"> <li>- 'minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'</li> <li>- 'set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'</li> </ul> <p>Whilst we recognise that some preferred site allocations with strategic green infrastructure</p>	<p>Policy ENV1 identifies a mechanism for ensuring a net gain in biodiversity which will be delivered on site and off site.</p>

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			<p>proposals could support and enhance local ecological networks in part, this alone will not be enough to reverse the more or less negative trend identified in the SA. We believe that this can only be achieved if the remaining sites also make a proportionate contribution to establishing a coherent and resilient ecological network for the Borough.</p>	