



Comment Reference Number	Organisation/ Name	Summary of Comment	Council Response
254-001	Framptons	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. It also indicates that the Plan is not legally compliant because it is not accompanied by an adequate Sustainability Appraisal report and does not meet the Duty to Cooperate. Land south of Gipsy Lane, Nuneaton, should be removed from the Green Belt and designated as a housing allocation that is deliverable in the short term. A planning application on the site was refused solely on Green Belt grounds in January 2013. NBBC has not complied with the Duty to Cooperate given the need to resolve the housing market area's need in full. NBBC has acknowledged that sites will need to be released from the Green Belt, but has not undertaken a considered analysis of the relative merits of individual parcels of Green Belt to determine which sites should come forward. The representation provides a number of supporting documents to demonstrate why the land south of Gipsy Lane is suitable for release from the Green Belt. The Site should be allocated as a housing site under policy NB2 for approximately 130 dwellings.	Noted. The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area. This will be the subject of a further round of focused consultation. Should the Plan be altered then the Sustainability Appraisal will be updated accordingly.
255-001	Framptons	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. It also indicates that the Plan is not legally compliant because it is not accompanied by an adequate Sustainability Appraisal report and does not meet the Duty to Cooperate. The land south of Marston Jabbett Lane, Nuneaton, should be removed from the Green Belt and designated as a housing allocation that is deliverable in the short term. The land is suitable for development, potentially related to a new marina to be developed in conjunction with the Canal and Rivers Trust. NBBC has not complied with the Duty to Cooperate given the need to resolve the housing market area's need in full. NBBC has acknowledged that sites will need to be released from the Green Belt, but has not undertaken a considered analysis of the relative merits of individual parcels of Green Belt to determine which sites should come forward. The representation concludes that the site should be allocated as a housing site with associated marina under policy NB2 for approximately 130 dwellings.	Noted. The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area. This will be the subject of a further round of focused consultation. Should the Plan be altered then the Sustainability Appraisal will be updated accordingly.
261-001	Framptons	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. It also indicates that the Plan is not legally compliant because it is not accompanied by an adequate Sustainability Appraisal report and does not meet the Duty to Cooperate. NBBC has not complied with the Duty to Cooperate given the need to resolve the housing market area's need in full. It is disappointing that NBBC has not completed the review of their SHLAA using the sub-regional methodology agreed in June 2015. It is readily apparent that the evidence shows that there is some uncertainty about the ability of NBBC to meet the whole of the additional requirement that the evidence suggests should be allocated within the Borough. The NBBC Local Plan currently provides for 10,040 dwellings in the period 2011 - 2031. The evidence supporting the MoU suggests that this figure should be 14,060 dwellings or 703 p.a.	The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area. This will be the subject of a further round of focused consultation.
261-002	Framptons	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. It also indicates that the Plan is not legally compliant because it is not accompanied by an adequate Sustainability Appraisal report and does not meet the Duty to Cooperate. We wish to support the allocation of Strategic Housing Site Woodlands for 1223 dwellings. It is encouraging to see that finally the Borough accept that the Woodlands site although temporarily subject to Green Belt policy in the early 1980s, the site has never had full Green Belt status. We agree with NBBCs assessment that there has been no change in circumstances to justify exceptional circumstances. It is apparent that additional	The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire



		<p>land could be included within the allocation south of Woodlands Lane as shown on the attached plan. The proposed allocation excludes 3 parcels of land that are controlled by A R cartwright Ltd which have been promoted in previous SHLAA exercises. We request that this additional land be added to the allocation. The concern is raised that the proposed identification of allocations in Policy NB2 is too vague. It is not sufficient for the policy to refer to Strategic Housing and Employment Sites being supplemented by Masterplan documents in the form of SPDs. No guidance is provided as to the likely scale of obligations and policy burdens that may affect site deliverability. As a minimum a criteria based policy for the strategic site allocations should be provided even if this requires the subsequent preparation of a masterplan for the site. The principal landowners at Woodlands have agreed to collaborate with each other to assist the Council in formulating such a policy. Support is given to HSG4 but this is qualified by reference to the need for additional work to be undertaken to enhance the supporting evidence base and the for allocation to be extended as shown on the attached plan.</p>	<p>Housing Market Area. This will be the subject of a further round of focused consultation. The requirements for the delivery of each site will be reviewed, and further details provided where necessary.</p>
264-001	Savills	<p>The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. It also considers that the Plan is not legally compliant because it has not been identified in the current Local Development Scheme, it is not accompanied by an adequate Sustainability Appraisal and has not fulfilled the Duty to Cooperate. Arbury Estate supports the Plan and its allocations wholeheartedly but expresses some concern about the Plan’s inadequacies that must be corrected and can be corrected at the next stage of the Plan’s progress towards submission for Examination by an independent Inspector. More land will need to be found for housing and employment purposes than shown in the current version of the Plan. The Estate has the capacity and ability to provide further land for this purpose and in a sustainable manner. Unfortunately, we must express the view that the Plan is likely not to be legally compliant in its current form due to the fact that it does not deal with the agreed extent of unmet housing need for Coventry and for which Nuneaton and Bedworth Borough Council must make provision in this Plan. There is also a need to reconsider the spatial strategy for the housing allocations accordingly. The Estate has provided a critique of the highways and transport evidence supporting the Plan and concludes that both in terms of the allocations affecting the Estate and the additional allocations suggested, these can be accessed in an appropriate manner using the existing infrastructure available. However, the Estate is willing to enter into discussions should there be a need for further strategic road additions to the Plan. The Estate has also provided a Landscape and Green Belt study which provides evidence that further allocations are possible within the Estate boundary and remain within the good landscape and Green Belt principles. In respect of the Council’s Sustainability Appraisal we consider that it contains a number of biases which offer lesser scores on the sustainability of the Plan than is actually the case. However, fatally, the SA does not address the proper scale of development required as it does not analyse the additional unmet housing need requirement. However, these issues can be addressed with a suitably corrected SA in time for the next round of public consultation. Unfortunately we consider that the Plan is not legally compliant under the duty to co-operate nor sound at present but that by including the additional allocations that we suggest and holding a further round of public consultations on the basis of the adjusted Plan, we believe this can go some way towards creating a legally compliant and sound plan. With the benefit of the Council having published the latest version of the Plan since that time, it is clear that the Estate is in a prime position to assist the Borough Council to develop a sound Plan. The Estate has shown from its previous submission to the Borough Council that it has the capacity to put forward strategic urban extension land in a sustainable manner that can assist in providing around 3400 dwellings. The quality of the environment envisaged by the Estate and the surroundings that it can offer will be</p>	<p>Various submission documents noted and will be reviewed by the Council. The LDS as published in September 2015 did include reference to the Borough Plan and timescales for production. The LDS will be updated in due course. The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. These findings may lead to the allocation of additional land. This will be subject to a further round of focussed consultation. The Council is in ongoing discussions with relevant highways authorities to consider requirements for highway improvements associated with the Plan. The evidence supplied will be further considered as part of this process. The Landscape and Green Belt study will be reviewed alongside the work the Council are undertaking to consider total capacity and the unmet needs of the Coventry. The Sustainability Appraisal is considered robust and has comprehensively considered the sustainability of the Plan throughout its production. The Sustainability Appraisal will be reviewed and updated if necessary in due course to reflect any changes made to the Plan. In relation to vehicular access to site allocations, the requirements for the delivery of each site will be reviewed, and further details provided where necessary in the policy and or on the Proposals Map. It is noted that the proposed development is likely to require significant new highway infrastructure in order to be sustainable. It is</p>



		<p>attractive to investors in providing housing for the elderly. The Estate contains a large proportion of the historic assets of the Borough and these present both a constraint and an opportunity. There is substantial scope for new development without impacting adversely on Arbury Hall, its Gardens or the listed buildings within the Estate. Moreover, new development offers the opportunity for providing resources to improve those assets and ensure their long term future. The Estate is about 23% of the size of the whole Borough and therefore simply in terms of scale alone, it is a major potential asset to its residents and businesses. The Proposals Map no longer includes indications of vehicular access and access roads as was the case in the earlier Preferred Options version. Our transport consultants have found no reference to this strategic road either from the Submission Plan or from the evidence material supplied. We have therefore assumed that this is no longer a proposal in the Plan. Unfortunately, the consequence is that the boundaries drawn on the Proposal Map for HSG2 no longer include a link from the site to a significant public highway. The Estate is of the view that the Proposals Map should be corrected at the earliest possible stage to include the land identified by the Estate in its "call for sites" submission of November 2015 which included Estate land with a boundary with Heath End Road. Further information is provided in the AECOM report in Appendix B. the evidence base does include a proposed route of the "Link Road" within the Strategic Modelling Report 2015 included within the evidence documents. The link road should also therefore, feature in the Infrastructure Delivery Plan. The Estate is one of the landowners within the HSG4 housing allocation shown on the Plan. We note that the supporting evidence does indicate how access is to be made to that allocation but that it is not in the form of a new link onto the A444, rather by a significant re-adjustment to the existing road network and junctions. In the interests of clarity and deliverability, we would recommend that the matter is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map. The Proposals Map also indicates the location of the Faultlands Farm employment allocation. The Estate is entirely in support. The representations made by Savills include a number of detailed appendices, including: Appendix B - Transportation and Highways - Critique of Supporting Evidence; Appendix C - Landscape & Green Belt - Critique of Supporting Evidence; Appendix D - OAN, 5-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.</p>	<p>accepted that this should be reflected in any future allocation and in the IDP, if necessary.</p>
267-02	Tetlow King Planning	<p>Flaws in the Sustainability Appraisal of the site at NB20 Hawkesbury Golf Course. The site scores the same as other sites which have been allocated, yet it has not been allocated. The site itself is within a sustainable location as is not a greenfield site. Transport Statement, Vision Document, Planning Evidence document and Landscape Report have also been submitted in support of development on this site.</p>	<p>The overarching aim of the site selection process was to identify sites in sustainable locations that will contribute towards meeting the Spatial Objectives of the Plan. For this reason, Green Belt land was assessed alongside other greenfield land as it was not known whether there would be sufficient capacity in sustainable locations on non-Green Belt greenfield land. It was recognised that exceptional circumstances are required to release Green Belt land for development, however, it was considered that, on certain sites within the Green Belt, these sites were subject to these exceptional circumstances. The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of</p>

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			additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area.
267-03	Tetlow King Planning	Four of the allocation sites are included in the Green Belt and only one is to be proposed to be released. Hawkesbury Golf Course has been ignored by the important evidence base document. Critically, the release of HSG2, HSG3 and HSG4 is not justified.	Comments noted. NBBC has produced a background paper in relation to the scale and location of growth included in the Plan. The Council has carefully considered the Green Belt through the site selection process. The Plan is supported by an extensive evidence base, including Sustainability Appraisal, which have informed the spatial growth strategy. The spatial growth strategy is considered to be the most appropriate for the Borough when assessed against other reasonable alternatives
754-01	Michele Kondakor	The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It does not take into consideration the responses of the previous Issues and Options Statement, especially with regard to housing numbers. There is not enough employment opportunities in the town to deal with the quantity of housing proposed. There are no methods of funding the infrastructure projects required - with a zero CIL rate for the residential developments in the Plan. The sustainability statement is not encouraging with most of the development in northern Nuneaton have already been given planning permission without the necessary mitigation improved. NB5 mentions that investment will be supported by SPG - this document should be available for consultation, the Town Centres Action Plan should also be available for commenting on as well as all other mentioned Supplementary Planning Documents or Guidance. There are too many parts to this Plan which are not evidence based.	NBBC consider that the Plan is in accordance with National Policy, as evidenced in the background papers provided. The scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. However, The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area. This will be the subject of a further round of focused consultation. The approach taken is for a balanced link between the amount of housing planned for and the amount of employment land that is allocated the economic land growth target. The approach also takes in to account the Sub-Regional Employment Land Study which recommends releasing land on a phased basis to assist with meeting Coventry and Warwickshire Strategic Economic Plan requirements. All SPGs are available on the Council's website. New developments will fund the infrastructure to support development through S106 planning obligations.
767-01	Peter Barber	The Plan is not sound, has not been accompanied by an adequate Sustainability Appraisal Report and does not comply with the necessary Acts. The infrastructure requirements for the proposed Woodlands Development are not enough. Development in the Woodlands area should not be permitted as it is in conflict with its area-character and thus the NPPF. Furthermore, there are too many dwellings proposed for the Borough. There needs to be a LDS available to the public, The Sustainability Report should be written by professional experts in their fields, the Habitats Regulations Assessment does not specifically mention the Woodlands Development, which is home to protected species. A Statement of Community Involvement should also be	Noted. The Council considers that the draft Plan meets the necessary tests of soundness, but will be reviewing all comments and if necessary amending the Plan prior to Submission. Any development proposals within the allocation will need to accord with other policies within the Plan and national planning policy, which provide strict development requirements, which include regard to the risk of



		<p>published. More specifically to the site allocation at Bedworth Woodlands - this should not be included in the Plan - this site should be included in the Green Belt, the proposed development on this site would also cause traffic congestion and would be at risk of flooding on both the site and an increase of flooding elsewhere.</p>	<p>flooding. Policy NB11 of the Borough Plan relates to 'Ensuring the Delivery of Infrastructure Provision' and makes clear that the provision of new infrastructure is a pre-requisite of development. This is supplemented by the Infrastructure Delivery Plan. The Council has undertaken public consultation on the Borough Plan in accordance with the published Statement of Community Involvement. The Council will be producing a Consultation Statement demonstrating how the consultation has been undertaken and how this has informed the production of the Plan in accordance with the Regulations. An LDS can also be found on the Council's website and was updated in January 2016. The Council has carefully considered the spatial strategy for growth taking into account the evidence base, including extensive Sustainability Appraisal and a large number of factors. Based on the evidence, the Council considers that growth is being planned in the most sustainable and appropriate locations.</p>
768-01	Clare Riaz	<p>The Plan is not sound, has not been accompanied by an adequate Sustainability Appraisal Report and does not comply with the necessary Acts. The infrastructure requirements for the proposed Woodlands Development are not enough. Development in the Woodlands area should not be permitted as it is in conflict with its area-character and thus the NPPF. Furthermore, there are too many dwellings proposed for the Borough. There needs to be a LDS available to the public, The Sustainability Report should be written by professional experts in their fields, the Habitats Regulations Assessment does not specifically mention the Woodlands Development, which is home to protected species. A Statement of Community Involvement should also be published. More specifically to the site allocation at Bedworth Woodlands - this should not be included in the Plan - this site should be included in the Green Belt, the proposed development on this site would also cause traffic congestion and would be at risk of flooding on both the site and an increase of flooding elsewhere.</p>	<p>Noted. The Council considers that the draft Plan meets the necessary tests of soundness, but will be reviewing all comments and if necessary amending the Plan prior to Submission. Any development proposals within the allocation will need to accord with other policies within the Plan and national planning policy, which provide strict development requirements, which include regard to the risk of flooding. Policy NB11 of the Borough Plan relates to 'Ensuring the Delivery of Infrastructure Provision' and makes clear that the provision of new infrastructure is a pre-requisite of development. This is supplemented by the Infrastructure Delivery Plan. The Council has undertaken public consultation on the Borough Plan in accordance with the published Statement of Community Involvement. The Council will be producing a Consultation Statement demonstrating how the consultation has been undertaken and how this has informed the production of the Plan in accordance with the Regulations. An LDS can also be found on the Council's website and was updated in January 2016. The Council has carefully considered the spatial strategy for growth taking into account the evidence base, including extensive Sustainability Appraisal and a large number of factors. Based on the evidence, the Council</p>

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			considers that growth is being planned in the most sustainable and appropriate locations.
769-01	J Gray	The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it does not in accompanied by an adequate Sustainability Appraisal Report. The infrastructure offered is inadequate - the infrastructure requirements are far in excess of what is described (esp. in relation to Woodlands Development). The housing deliverability is very unlikely. No more greenfield land should be lost in this borough to housing. The plan is not realistically deliverable with insufficient demand for housing to meet the Plan's future development projections. Furthermore, there are insufficient jobs available.	Noted. The Council considers the Plan has been prepared correctly and is consistent with national policy. The Council have publish the LDS in 2015 in line with their progress and the LDS has subsequently been updated in January 2016. The Plan is accompanied by a Sustainability Appraisal Report as part of the evidence base. Housing requirements have been informed by the Strategic Housing Land Availability Assessment and the Strategic Housing Market Assessment. However, the Council is currently undertaking further work to the SHLAA to understand the total capacity of the Borough including any additional housing need from Coventry, as is required by national regulations.
771-01	Patrick Murfin	The Plan is not sound, has not been accompanied by an adequate Sustainability Appraisal Report and does not comply with the necessary Acts. The infrastructure requirements for the proposed Woodlands Development are not enough. Development in the Woodlands area should not be permitted as it is in conflict with its area-character and thus the NPPF. Furthermore, there are too many dwellings proposed for the Borough. There needs to be a LDS available to the public, The Sustainability Report should be written by professional experts in their fields, the Habitats Regulations Assessment does not specifically mention the Woodlands Development, which is home to protected species. A Statement of Community Involvement should also be published. More specifically to the site allocation at Bedworth Woodlands - this should not be included in the Plan - this site should be included in the Green Belt, the proposed development on this site would also cause traffic congestion and would be at risk of flooding on both the site and an increase of flooding elsewhere.	Noted. The Council considers that the draft Plan meets the necessary tests of soundness, but will be reviewing all comments and if necessary amending the Plan prior to Submission. Any development proposals within the allocation will need to accord with other policies within the Plan and national planning policy, which provide strict development requirements, which include regard to the risk of flooding. Policy NB11 of the Borough Plan relates to 'Ensuring the Delivery of Infrastructure Provision' and makes clear that the provision of new infrastructure is a pre-requisite of development. This is supplemented by the Infrastructure Delivery Plan. The Council has undertaken public consultation on the Borough Plan in accordance with the published Statement of Community Involvement. The Council will be producing a Consultation Statement demonstrating how the consultation has been undertaken and how this has informed the production of the Plan in accordance with the Regulations. An LDS can also be found on the Council's website and was updated in January 2016. The Council has carefully considered the spatial strategy for growth taking into account the evidence base, including extensive Sustainability Appraisal and a large number of factors. Based on the evidence, the Council considers that growth is being planned in the most sustainable and appropriate locations.

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775-01	Micheal Dixon	The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it is not accompanied by an adequate Sustainability Appraisal Report. The current infrastructure offered is inadequate and is unable to support the existing area.	Noted. The Council considers the Plan has been prepared correctly and is consistent with national policy. The Council have published the LDS in 2015 in line with their progress and the LDS has subsequently updated in January 2016. The Plan is accompanied by a Sustainability Appraisal Report as part of its background papers published in 2015. The Council is currently undertaking further work to the SHLAA to understand the total capacity of the Borough to accommodate the needs from Coventry.
776-01	Mr Barson	The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it is not accompanied by an adequate Sustainability Appraisal Report. The infrastructure offered is inadequate - the infrastructure requirements are far in excess of what is described (esp. in relation to Woodlands Development). The housing deliverability is very unlikely.	Noted. The Council considers that the draft Plan is legally compliant and meets the necessary tests of soundness, but will be reviewing all comments and if necessary amending the Plan prior to Submission. The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area. This will be the subject of a further round of focused consultation.
778-01	David Parr	Land at Phoenix Way/Wilsons Lane should not be developed. The site is important in providing separation between the settlements of Coventry and Bedworth. This land fulfils the requirements of Policy NB25 - Landscape Character and, as such, should not be developed. The Council's current method for calculating the need for employment land is flawed as it is based on indirect projections. The Council has oversupplied the need for employment land by 20ha (which is nearly equivalent to the size of this site). Furthermore, it is also of note that, Section 3.4 states that the Borough has over 100 ha of derelict land.	The Plan is supported by an extensive evidence base, including Sustainability Appraisal, which have informed the spatial growth strategy. The spatial growth strategy is considered to be the most appropriate for the Borough when assessed against other reasonable alternatives. NBBC has produced a background paper in relation to the scale and location of growth included in the Plan.
779-01	Kerry Orton	The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it does not in accompanied by an adequate Sustainability Appraisal Report. there is no evidence that Nuneaton should be accepting more than their share of housing. There is no evidence to support their quantity of housing. Evidence to support any proposals should be clear and up to date, however, in this case, out of date data has been used. The plan outlines no support networks for the proposed developments (which includes infrastructure). Traffic modelling should be used taking into account any proposals. There are no cross-boundary strategic objectives or an economic development plan for the Borough to state where the employment will be for the occupiers of the new dwellings.	Policy NB2 identifies a number of sites for allocation. Policy NB11 together with the Infrastructure Delivery Plan identifies the infrastructure requirements associated with the Plan. The requirements for the delivery of each site will be reviewed, and further details provided where necessary. The scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough.
1010-002	Coventry City Council	We are of the view that the Borough Council have sought to satisfy the legal responsibilities under the Duty to Cooperate. We welcome the use of the most up to date SHMA work that has been developed for the HMA to help inform the Boroughs Objectively Assessed Need for Housing. Furthermore we support Para 5.8 of the Borough Plan (alongside other references in	Comments from Coventry City Council noted. Further proactive dialogue will be welcomed in relation to the MoU and associated issues. The Council is currently undertaking further work to update



		<p>the plan and supporting information) that recognises that Coventry “are unlikely to be able to meet the objectively assessed need for the city within their boundaries and so some redistribution within the HMA is likely to ensure housing needs are met”. We would clarify however, that this is not a case of such an event being “unlikely”, it is an accepted fact that has been communicated by the city for some time, and indeed recognised by the Borough Council on a number of occasions: • Coventry City Council was a signatory to the ‘Strategic Policy Framework for the West Midlands Metropolitan Area’ published March 2012 – which highlighted that the Cities of Coventry and Birmingham would not be able to meet their full needs within their own boundaries. • The city further communicated this fact in response to the Borough Council’s Preferred Options consultation (August 2013).</p> <ul style="list-style-type: none"> • Recommendation 2 of a report presented to the Shadow Economic Prosperity Board (sEPB) (21st November 2014) made specific “recognition that Coventry City will not be able to accommodate the housing levels indicated in the Joint SHMA”. This report was endorsed by Nuneaton and Bedworth at this meeting. • The sEPB report was subsequently endorsed by Nuneaton and Bedworth Borough Council at the meeting of its Cabinet on the 4th February 2015. It is clear therefore that the Borough Council have been aware of the housing need issues originating from the city for some time; however this plan does not make any positive attempts to help meet that need or justify that it cannot be accommodated. The way the plan is presented therefore fails to recognise recent issues which have arisen within the HMA (ref recent recommendations and issues raised by the Inspectors of the Warwick and Stratford Local Plans) whilst also explicitly recognising (at Para 5.8 for example) that the evidence base which informs the plan is incomplete and out of date. This relates most importantly to the SHLAA and the housing capacity of the Borough. As such, the plan has not been positively prepared. This creates real risks for other strategic aspects of the plan, most notably around infrastructure and potentially the Duty to Cooperate. It also creates issues around the testing of reasonable alternatives in terms of housing capacity and strategic sites. It cannot be confirmed with any degree of confidence therefore that the Sustainability Appraisal is complete and robust. We would however welcome the opportunity to continue working positively and proactively with the Borough Council to rectify the issues with the plan as it is currently presented. We also highlight the recent Memorandum of Understanding which was presented to the Shadow Economic Prosperity Board in September 2015, which proposed a robust and justified methodology for redistributing the City’s unmet housing need. This MoU was agreed by the 5 other authorities and we would encourage NBBC to review their decision not to sign up to this agreement once the SHLAA update is complete. 	<p>the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional housing needs from Coventry. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area. This will be the subject of a further round of focused consultation.</p>
1017-001	<p>Warwick District Council, on behalf of Coventry City Council, North Warwickshire Borough Council, Rugby Borough Council,</p>	<p>This is joint response to your Submission Draft Borough Plan consultation on behalf of the following Councils: • Coventry City Council • North Warwickshire Borough Council • Rugby Borough Council • Stratford-on-Avon District Council • Warwick District Council • Warwickshire County Council. This representation focuses specifically on the Duty to Cooperate and housing needs. The six Councils that are party to representation reserve the right to make further individual representations in addition to this one. This response has been prepared collaboratively by the 6 Councils list above. This has included consultation with political leaders/portfolio holders and with the exception of Coventry City Council, can be read as the formal position of each of the Councils. In Coventry’s case, this letter currently represents an officer view. However, a report to formally endorse the letter will be considered by the Council’s Cabinet on 12th January 2016. The Councils are satisfied that the legal responsibilities of the Duty to Cooperate have been met by NBBC. However, the Councils would clarify that Coventry’s ability to meet its objectively assessed need within the city boundary should not be described as “unlikely”.</p>	<p>The joint response from Coventry City Council, North Warwickshire Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council, and Warwickshire County Council is acknowledged. NBBC welcomes the confirmation that the Duty to Cooperate has been met, but acknowledged that further work is required to ensure that the unmet needs of the housing area are fully considered in the production of the Borough Plan. The Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment using an agreed sub regional methodology to understand the total capacity of the</p>

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	<p>Stratford-on-Avon District Council, Warwick District Council and Warwickshire Country Council</p>	<p>Instead, it is an accepted fact that is recognised by all the Councils in Coventry and Warwickshire, including Nuneaton and Bedworth Borough Council. all the other Councils in Warwickshire (with the support of City Council) have taken proactive steps to address Coventry’s unmet housing need, including agreeing a Memorandum of Understanding (MoU) and working towards Local Plan/Core Strategy proposals which seek to provide for the shortfall. Despite clear evidence of unmet need arising in Coventry, the Borough Plan only provides for Nuneaton and Bedworth’s objectively assessed housing need and does not make any tangible attempts to address needs arising from outside the Borough nor does it provide clear up to date evidence to demonstrate that it cannot be accommodated. Instead it suggests a further round of “focused consultation” may be required subject to the completion of further work on the Borough’s Strategic Housing Land Availability Assessment (SHLAA). It explicitly recognises (at Para 5.8 for example) that the evidence base which informs the Plan is incomplete and out of date. This relates most importantly to the SHLAA and the housing capacity of the Borough. This not only raises significant questions regarding the Plan’s housing requirement, but also creates real risks for other strategic aspects of the plan, most notably around infrastructure and potentially the Duty to Cooperate. It also creates issues around the testing of reasonable alternatives in terms of housing capacity and strategic sites. It cannot be confirmed with any degree of confidence therefore that the Sustainability Appraisal is complete and robust. We also highlight the recent Memorandum of Understanding which was presented to the Shadow Economic Prosperity Board in September 2015. This MoU has been agreed by The Councils and we would encourage the Borough Council to review its current position with regard to the MoU once the SHLAA update is complete. The Councils understand that the lack of an up to date SHLAA is the reason why Nuneaton and Bedworth Borough Council has been unable to agree to the MoU at this stage. However we are disappointed that The Borough Council has chosen to publish the Plan in advance of completing such a fundamental part of your evidence base, particularly when the implications of the SHLAA are potentially so far-reaching. The Councils would welcome the opportunity to continue working positively and proactively with the Borough Council to rectify the issues with the Plan. However at this point in time The Councils have no option but to object to the proposed housing requirement put forward in the Borough Plan on the basis that it is unsound for following reasons: The housing requirements does not provide for the unmet housing need arising in Coventry. To address Coventry's unmet need, NBBCs housing requirement is 14,060 dwellings over the Plan period; The Plan is not based on up to date evidence in relation to the SHLAA; NBBC will need to continue to engage constructively with the Councils to ensure the outcomes of the Duty to Cooperate are effective. The Councils reserve the right to provide further comments on specific policies and supporting text before the Plan is submitted for examination.</p>	<p>Borough to accommodate additional housing needs from Coventry. The Borough Council will review its current position with regard to the MoU once the SHLAA update is complete. The findings of this work may lead to the allocation of additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area. This will be the subject of a further round of focused consultation. NBBC looks forward to further ongoing constructive dialogue with all the respective Councils as part of the ongoing Duty to Cooperate process.</p>
<p>3007-02</p>	<p>Mr and Mrs Boyd</p>	<p>The Sustainability Appraisal is not objective and is not in accordance with the NPPF. The document does not fully focus on the negative and adverse impact of building on Gipsy Lane in terms of flood risk, adverse impact on the town centre and loss of biodiversity. Further negative impacts are included fully in the response.</p>	<p>Noted. The Council considers that the draft Plan and its supporting documents meet the necessary tests of soundness and are in line with all necessary national policy and guidance, but will be reviewing all comments and if necessary amending the Plan prior to Submission.</p>
<p>3500-02</p>	<p>Marion Welton</p>	<p>No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.</p>	<p>NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations</p>

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3501-02	John A Patrick	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3502-02	Mr and Mrs Moss	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3503-02	Gerry Cullen	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3504-02	Mr Griffin	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.

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3505-02	Mr M Shaw	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3506-02	Betty and Jenny Croshaw	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3507-02	Mr C Blake	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3508-02	Mr and Mrs Brodie	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3509-02	Paul Mckenna	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations

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3510-02	Keith and Alison Jones	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3511-02	Mr John Alderdice	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3512-02	Mr and Mrs Fenton	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3512-02	Reginald Cole	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.

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3514-02	Sarah Jackson	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3515-02	Lynn Fisher	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3516-02	Mrs B A Lennon	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3517-02	Mr and Mrs Quintanilla	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3518-02	Mr and Mrs Johnson	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations

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3519-02	Mr Z Nemeth	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3520-02	Anne O'Malley	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3521-02	Diane Burne	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3522-02	Christopher Penn	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.

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3523-02	Winifred Marshall	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3524-02	Marta Pieniazek-Niwinska and Krystian Niwinska	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3525-02	Julia Marshall	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3526-02	Ken and Gaynor Marshall	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3527-02	Clive Wager	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations

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3528-02	Sarah Wager	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
3529-02	Luke Wager	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4001-01	Joy and Roger Gear-Evans	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4002-02	Emma Ashton and Richard Troman	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.

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4003-02	Lee Nolan	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4004-02	David and Marit Rouse	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4005-02	Mr Ian Ferguson	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4006-02	Marinne and Paul Galley	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published. This is not democracy.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4007-02	Martin Thay	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations

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4008-02	Mr and Mrs Claybrook	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4009-02	Keith Brooks	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4010-02	Michael Gladwin	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4011-02	Robert Leonard	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.

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4012-02	Mr and Mrs A Rickets	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4013-02	Mr Shingara Singh Tut	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4014-02	Malcolm Sidney Golding	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4015-02	Mrs. D.J. Campbell	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4016-02	Pegley	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations

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			Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4017-02	Mr and Mrs Wake	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4018-02	Sheila Collard	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4019-02	Mr and Mrs B S Taylor	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4020-02	JM and PM Williams	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.

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4021-02	N Pateman	No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be addressed and a Statement of Community Involvement need to be published.	NBBC produced a LDS in 2015, which can be found on the website. This document was updated on the 28th of January, 2016. The Plan was also subject to an extensive Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment, all of which are in line with all available guidance and national policy requirements. A full report and methodological structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
5001-02	D Baker	Objection relates to Hospital Lane allocation ref. HSG5. Comment refers to comments made at previous stages of the Local Plan process. Comment is summarised as follows: 1) The site was included in the later stages of the decision making process, despite not meeting stage 1 criteria. 2) The site selection for stage 1 did not include the Green Belt status. 3) The consideration of the travel distances were incorrect. 4) The site was listed as being grade 4 land. However, Defra categorise the land as being grade 3. Other sites were discounted for being grade 3 land. 5) The site scored one of the lowest scores in the sustainability assessment and yet was selected as being sustainable. 6) The site assessment considered the site to be of low value due to its irregular shape, something typical for the history of the area. 7) The site assessment noted the location abutting the urban fringe. This is typical for Green Belt and has resulted in the assessment of the site being incorrect. 8) The site does not support the local centres of Nuneaton and Bedworth. 9) The development of the site would reduce public access to the Green Belt, contrary to the NPPF. 10) The air quality of area was not assessed. 11) The area has a history of flooding. 12) The proposed employment areas at Prologis Park and Bayton Road are not accessible enough to provide real employment opportunities. 13) Access to local health services in the area is poor. 14) There is a lack of capacity in local schools and a history of underdelivery of new schools in other developments.	The comments are noted. The Council considers that the draft Plan and its supporting documents meet the necessary tests of soundness and are in line with all relevant national policy and guidance, but will be reviewing all comments and if necessary amending the Plan prior to Submission. It is acknowledged that the land will result in the loss of Green Belt and agricultural land. Defra Agricultural Land Classification Map for west Midlands shows the land as predominantly urban, abutting grade 3 – moderate to good. Clarification would be beneficial. Any development of strategic sites shall be required to undertake a flood risk assessment. It is noted that Green Belt and the wider landscape should be protected. However, the SHMA sets out a need for new housing in the Borough. Policy NB2 directs almost 3,000 dwellings to the existing urban areas of the Borough. However, there is insufficient 'brownfield' land available in the Borough to further accommodate needs. It is therefore necessary to allocate development on greenfield sites. Any new development will be required to provide infrastructure contributions as reasonably necessary. This is provided for in NB11.
6001-01	Natural England	With regard to Ensor's Pool SAC surveys of the pool (most recently in Sept 2015) have failed to find the white clawed crayfish for which the site is designated as an SAC. Based on the evidence Natural England has concluded therefore that the population of native white-clawed crayfish is no longer present. Natural England and the authority have agreed to work together, recording progress in the form of a 'statement of common ground'. We therefore propose to provide a separate response to the HRA as part of the statement. Natural England notes that the Sustainability Appraisal concludes that a number of site allocations will result to the loss of productive land quality soils to development, leading to the conclusion of a significant adverse effect and a negative residual cumulative effect. We advise the authority on the following issues in relation to soils: Housing allocation SH4 includes areas of land classified as Best Most Versatile Land. NE advises the Authority to ensure information on agricultural land classification is adequately referenced in the evidence base to support	The comments are noted and the Council will take these comments on board prior to the submission of this Plan.

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		the recommendation of housing allocations and to ensure the Local Plan is fully NPPF compliant. The representation also includes comments in relation to the Gypsy and Traveller DPD and the CIL draft charging schedule.	
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