

Nuneaton and Bedworth Borough Council

Borough Plan – Submission Version (October 2015)

Consultation Statement

Contents

1. Introduction	3
2. Context	3
3. Consultation Methods	4
4. Who was consulted?	5
5. Consultation Responses	6
6. Petitions	7
7. Main issues raised	7
8. How the issues have been addressed.....	8
9. Statement of Community Involvement.....	9
10. Duty to Cooperate.....	10
11. Conclusion	10
Appendix A – List of Bodies Consulted (as set out in SCI)	11
Appendix B – Consultation Response Form.....	14
Appendix C – Map of Consultation Event Locations	19
Appendix D – Consultation Responses Spreadsheet	20

List of Figures

Figure 1. Stages of the Borough Plan	3
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List of Tables

Table 1. Consultation Events.....	5
Table 2. Main Issues raised during consultation.....	8
Table 3. Responses on soundness, legal compliance and Duty to Co-operate	8
Table 4. Main changes made to the plan.....	9

1. Introduction

- 1.1 The purpose of this document is to set out how Nuneaton and Bedworth Borough Council has undertaken consultation in relation to the submission version of the Borough Plan and how the outcome of this has been taken into account going forward.
- 1.2 In order to fulfil regulations 19 and 20 of the Town and Country Planning Act, the Council must produce a statement which sets out how the consultation was undertaken and the outcomes that resulted from the consultation responses received.
- 1.3 This statement also demonstrates how consultation has been undertaken within the context of Paragraph 155 of the National Planning Policy Framework (NPPF) which states:

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

2. Context

- 2.1 The Submission Version of the Borough Plan sets out the proposed development and policies for the period up to 2031. This version of the Plan took into considerations from the Preferred Options stage of consultation. Figure 1 outlines the stages of the Borough Plan and the stage at which this consultation period occurred.

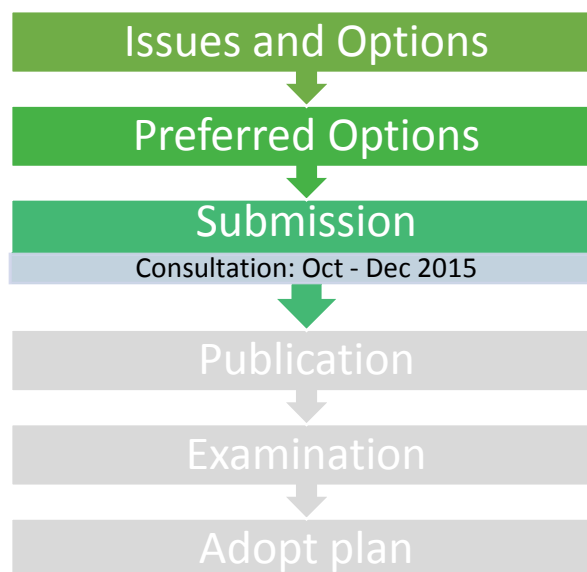


Figure 1. Stages of the Borough Plan

3. Consultation Methods

3.1 In December 2015, the Council undertook a period of consultation for the submission version of the Borough Plan. The consultation period ran for eight weeks from 26th October to 18th December 2015.

3.2 In order to promote the consultation period and associated events to the wider public, a variety of techniques were used:

- Copies of all documents and supporting evidence base was made available on the website and/or as paper copies (available in the Town Hall)
- Consultation email/letters sent to all addresses on the consultation database (approx.920)
- Information points at all staffed libraries in the Borough (Camp Hill, Nuneaton, Stockingford, Bedworth, Bulkington, Keresley)
- Drop in sessions (see Table 1)
- Events with specific groups (see Table 1)
- Advertising:
 - Community Centre noticeboards/local shops
 - Camp Hill CHESS centre
 - Bulkington Village Centre
 - Wembrook Community Centre
 - Bermuda Phoenix Centre
 - Stockingford Community Centre
 - Old School Community Centre (Exhall)
 - Bedworth Heath Community Centre
 - Newtown Centre
 - Keresley Community Centre
 - One Stop/Post Office (Weddington Road Shop)
 - Spar/Post Office (Lutterworth Road)
 - Posters in Nuneaton and Bedworth town centres (JCDecaux)
 - Posters in Harefield Road and Ropewalk car parks
 - Banners and A-boards at Sports Centres (Etone, Pingles, Jubilee, Bedworth Leisure Centre)
 - Noticeboard in Nuneaton bus station
 - Road side advertising banners along A444/Riversley Park
 - Posters & plasma screen in Town Hall and Bedworth office reception areas
 - Article sent to all schools to be included within school newsletters
 - Notices within business newsletters (Chamber of Commerce, Invest in Warwickshire, Info2Grow, Federation of Small Businesses)
 - Article in In-Touch magazine sent to all households within the Borough

3.3 During the consultation period, a number of drop in events were also held where members of the public could attend to get more information and also ask planning officers any questions they had on the Borough Plan and its proposals.

3.4 Events were also arranged with specific groups which included a presentation on the key points of the Borough Plan proposals. Table 1 shows the details of all of the consultation events held.

Venue	Ward	Date
Drop in Sessions		
Nuneaton Academy	Arbury & Stockingford	2.11.15
CHESS Centre, Camp Hill	Camp Hill & Galley Common	4.11.15
Ropewalk Shopping Centre	Abbey & Wembrook	7.11.15
Bedworth Heath Community Centre	Bedworth North & West	9.11.15
Chetwynd Junior School	Whitestone & Bulkington	11.11.15
St James Church Hall, Weddington	Weddington & St.Nicolas	24.11.15
Exhall Old School Community Centre	Bede & Poplar	2.12.15
Events with Specific Groups		
Nuneaton Business Alliance	N/A	3.11.15
Older Peoples Forum	N/A	17.11.15
King Edward VI College Student Council	N/A	25.11.15
Chamber of Commerce SFB	N/A	9.12.15

Table 1. Consultation Events

3.5 Formal comment on the Borough Plan could be made through written representations, in either paper or electronic form. The response form produced allowed comments to be made on any part of the Plan and also allowed respondents to comment on whether they thought the Plan was legally compliant, sound and fulfilled the Duty to Cooperate.

4. Who was consulted?

4.1 A list of the bodies and organisations consulted is provided in Appendix A. This list is as set out in the Statement of Community Involvement.

4.2 In addition, all those who had registered on the consultation database were also informed of the consultation period commencing and were invited to make their comment using the response form.

4.3 Anyone else wishing to comment on the Plan such as general members of the public and local businesses were able to do so either online or in written form.

5. Consultation Responses

5.1 Written representations were received by the Council both in paper and electronic formats. Some responses had used the Councils standard response form and others had submitted a written response.

5.2 A total of 477 representations were received from 203 respondents.

5.3 Representations were received from the following agencies and organisations:

National Organisations and Agencies:

- Environment Agency
- Highways England
- Historic England
- Health and Safety Executive
- Natural England
- The Coal Authority
- Home Builders Federation
- The National Federation of Gypsy Liaison Groups
- Woodlands Trust
- Inland Waterways Association

Local Organisations and Agencies:

- Coventry and Warwickshire Growth Hub
- George Elliot Hospital NHS Trust
- Warwickshire Police and West Mercia Police
- George Elliot Fellowship Response
- The Bedworth Society
- CPRE Warwickshire

5.4 Representations were received from the following neighbouring local authorities as well as the County Council:

- Warwick District Council (out of behalf of Coventry City Council, North Warwickshire Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council and Warwickshire County Council)
- Warwick District Council
- Warwickshire County Council (Transport and Highways, Economic Growth, Development and Resources)
- Coventry City Council
- Rugby Borough Council
- Hinckley and Bosworth Borough Council

5.5 Representations were also received from the following local action groups:

- Bedworth Heath Action Group
- Bermuda Bridge Action Group

- Heart of Whitestone Residents Association
- Woodlands Action Group

5.6 Representations were also received from local landowners/developers and their agents, and also from local residents and any other interested parties.

5.7 Appendix C summarises the responses received during the consultation. The spreadsheet lists and summarises individual comments made by each respondent and categorises them according to which part of the Plan they are referring to. The spreadsheet also indicates whether the representation considers the Plan sound, legally compliant and complies with the Duty to Cooperate.

6. Petitions

6.1 A petition was received by the Council to remove the Bedworth Woodlands (HSG4) site from the Borough Plan. The petition was signed by 947 people.

7. Main issues raised

7.1 Of the 477 comments received, 32% were in relation to policy NB2 – Scale and Location of Growth, with many others indirectly associated with this policy.

7.2 The main and recurring issues raised by respondents are outlined in Table 2.

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

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

Table 2. Main Issues raised during consultation

7.3 Respondents were also able to comment on whether they thought the Plan is sound, legally compliant and complies with Duty to Cooperate. Table 3 provides a summary of these responses (however these are broken down per comment rather than per respondent).

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

Table 3. Responses on soundness, legal compliance and Duty to Co-operate

8. How the issues have been addressed

8.1 All of the representations made during the consultation process have been given due consideration in the progression of the Borough Plan to the Publication version.

8.2 The main changes made to the Plan as a result of the representations received are outlined in Table 3. There have also been a number of other minor amendments made.

Section of the plan	Changes made
NB2 – Scale and Location of Growth	Further information has been added to both the Plan and supporting evidence base to provide more information on the housing allocation process

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

Table 4. Main changes made to the plan

9. Statement of Community Involvement

9.1 The Statement of Community Involvement (SCI) was first adopted by the Council in 2006 and was updated in 2015 to reflect changes to planning regulations.

9.2 The SCI is a statutory document that formally sets out how the community and other stakeholders with an interest in the development of the Borough can engage with the planning system.

9.3 The Council has undertaken consultation for the submission version of the Plan in accordance with the requirements set out in the SCI.

9.4 This has therefore ensured the public and relevant interested parties have had sufficient and equal opportunity to comment on the Plan at each stage of its development.

10. Duty to Cooperate

10.1 The Duty to Co-operate requires the Council to engage constructively, actively and on an on-going basis with neighbouring authorities and other statutory bodies on strategic cross boundary matters associated with Plan making.

10.2 In preparing the Local Plan, the Council has complied with the legal requirements of the Duty to Co-operate. A separate statement will be submitted with the Plan at examination outlining how the Council has met this duty.

11. Conclusion

11.1 A number of amendments have been made to the Borough Plan and its policies following the representations received at the submission version round of consultation. Further work to the supporting evidence base has also been undertaken where relevant.

11.2 The next version of the Borough Plan to be consulted on will be the Borough Plan Publication version. This statement will be updated following the next round of consultation prior to submission of the Plan for examination.

Appendix A – List of Bodies Consulted (as set out in SCI)

DUTY TO COOPERATE BODIES

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

SPECIFIC CONSULTATION BODIES

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

GENERAL CONSULTATION BODIES

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

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

OTHER CONSULTEES

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

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

Appendix B – Consultation Response Form

Borough Plan Submission Consultation Response Form

Please use a separate form for each topic you wish to comment on.

Part 1: Contact details

Please fill in all of the contact details below, however if you are making an additional response, you are only required to fill in the name and organisation details.

	Personal details	Agent details
Name		
Organisation (if applicable)		
House no./Street		
Town		
Postcode		
Email		
Phone		

Your personal information will be handled by Nuneaton and Bedworth Borough Council in accordance with the Council's policies on data protection and in accordance with the Data Protection Act 1998. Details of the Council's Fair Processing notice can be obtained by contacting Customer Services on 02476 376376 or via the Council's website at www.nuneatonandbedworth.gov.uk/info. This document will be made available for public inspection at our offices, in accordance with the relevant legislation, unless you tell us in writing that you wish your details to be withheld. The Council will consider any such requests but is unlikely to agree to them unless there are very good reasons to withhold your personal information.

Part 2: Response

1. Which document do you wish to comment on? (please mark ONLY one box with an X)

Borough Plan	
Sustainability Appraisal	
Infrastructure Delivery Plan	
Habitat Regulations Assessment	
Other document from evidence base	

- If you wish to comment on the Borough Plan, please answer questions 2 – 10.
- If you wish to comment on the Sustainability Appraisal, Infrastructure Delivery Plan, Habitat Regulations Assessment or another document from the evidence base, please only answer questions 11 and 12.

2. Which part of the document do you wish to comment on?

Section	
Policy	
Paragraph	

3. Do you consider the Plan to be legally compliant?

Yes	
No	

4. If you consider the Plan is not legally compliant, which aspect of the legal compliance do you believe the Borough Plan has not met:

It has not been identified in the current Local Development Scheme (LDS) and the key stages have not been followed	
It does not comply with the Planning and Compulsory Purchase Act 2004 (as amended)	
It does not comply with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012	
It is not accompanied by an adequate Sustainability Appraisal Report	
It is not accompanied by an adequate Habitat Regulations Assessment	
Its consultation has not been carried out in accordance with the Council's Statement of Community Involvement	
Has not consulted the appropriate consultees	
Has not fulfilled its Duty to Cooperate with other Local Planning Authorities, County Councils and other bodies with Statutory Functions	

5. Do you consider the Plan to be sound? (the definition of soundness can be found in the guidance notes)

Yes	
No	

6. If you consider the Plan to be unsound, which of the soundness criteria do you not believe the Plan meets?

It has not been positively prepared	
It is not justified	
It is not effective	
It is not consistent with national policy	

7. If you consider the Plan is not sound, does not meet any of the soundness criteria, or is not legally compliant, please specify why in the box below. Please be as specific as possible. Alternatively, if you consider the Plan is sound, meets the soundness criteria, and/or is legally compliant, please explain why in the box below.

8. Please provide details of the changes you consider necessary to make the Plan sound, or legally compliant.

9. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes	
No	

10. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary.

11. If you wish to comment on the Sustainability Appraisal, Infrastructure Delivery Plan, Habitat Regulations Assessment or another document from the evidence base, please specify the document and which part of the document you wish to comment on:

Title	
Section	
Paragraph	

12. Please use the box below to provide any comments on the Sustainability Appraisal, Infrastructure Delivery Plan, Habitat Regulations Assessment or another document from the evidence base. Also, please use the box to suggest any changes you would like to see to the document.

Please send completed forms to:

planning.policy@nuneatonandbedworth.gov.uk

Alternatively, if responses cannot be sent electronically, they can be posted to the Council at the address below. **If posting responses, we would prefer the responses to be word processed.**

Planning Policy and Economic Development

Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, NUNEATON, CV11 5AA

Deadline: Friday 18th December 2015

Borough Plan Submission Consultation Response Form – Guidance Note

Definition soundness

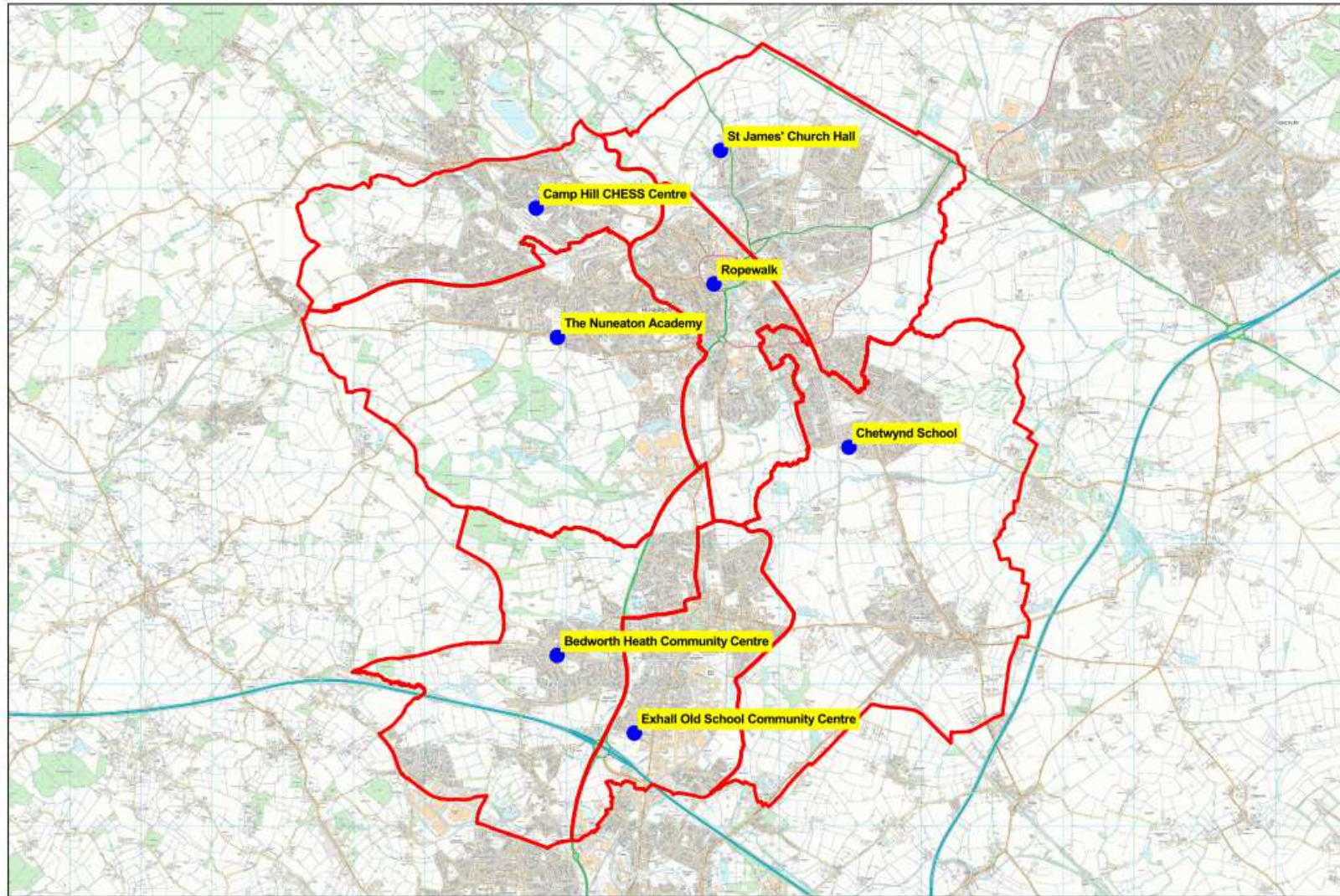
Part 2 of the response form asks for your views on the legal compliance and soundness when commenting on the Borough Plan. The definition of these terms is set out below:

Test of Soundness

For the Borough Plan to be sound, it needs to be:

- Positively prepared – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- Effective – the Plan should be deliverable over its period and based on effective joint cross-boundary strategic priorities
- Consistent with national policies – the Plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Appendix C – Map of Consultation Event Locations



Appendix D – Consultation Responses Spreadsheet

Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
1-001	Barton Willmore	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	It is considered that Nuneaton and Bedworth Borough Council should be contributing towards a housing target of up to 6,297 dwellings per annum across the Coventry and Warwickshire HMA over the period of 2011 to 2031. As such, the Council will require to release further Green Belt land across the Borough and it is our recommendation that land to the north of Wentworth drive should be included in the plan. The benefits of developing this land, a site information leaflet and landscape and visual appraisal and Green Belt review is included in the response.	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 respondent should note that 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.
2-001	Barton Wilmore	NB2 - Scale and Location of Growth	yes	yes	yes	no	Supportive of the increase in identified housing target from 7,900 to 10,040 but it is necessary for NBBC to remain flexible in order to be able to demonstrate that they have met the 'duty to cooperate' and likely shortfall of housing in Coventry. Inclusion of 'north Nuneaton' for allocation of 3,530 dwellings is supported and an increase in allocation will help support delivery of infrastructure. Representation confirms site is suitable, achievable and available.	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.
2-002	Barton Wilmore	NB3 - Settlement Hierarchy and Roles	yes	yes	yes	no	Supportive of directing most development to Nuneaton as the most sustainable settlement.	Noted.
2-003	Barton Wilmore	NB9 - Affordable Housing	yes	yes	yes	no	Careful consideration of viability and costs of providing affordable housing be given, particularly to ensure that the delivery of infrastructure will not be detrimentally affected.	Noted. This will be assessed through the planning application process. The Viability Assessment 2014 considers the realistic parameters for affordable housing to be 20-20% as has been assessed rigorously. This was also assessed as part of the Whole Plan Viability Study which indicates that 25% is viable.

Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
2-004	Barton Wilmore	NB11 - Ensuring the Delivery of Infrastructure Provision	yes	yes	yes	no	Careful consideration of viability and costs of infrastructure provision be given, particularly to ensure that the delivery of residential development will not be detrimentally affected.	Noted. A Viability Study has been undertaken to consider the overall viability of the Plan taking into account infrastructure and affordable housing requirements. Development will only be supported where it is in conformity with the IDP or adequate infrastructure requirements have been agreed to suit developments and what is attainable.
2-005	Barton Wilmore	NB12 - Strategic Accessibility and Sustainable Transport	yes	yes	yes	no	Support is given to the shift towards sustainable transport modes. It is noted that the client's site has ample opportunity to improve accessibility and connectivity.	Noted.
2-006	Barton Wilmore	NB16 - Open Space	yes	yes	yes	no	Improvements to open spaces to Buttermere Recreation Ground could be achieved through section 106 contributions.	Noted. The consideration of planning obligations is also considered as part of Policy NB11.
3-001	Tetlow King Planning	N/A	N/A	no	N/A	N/A	SHMA 2015 states that 35% is an acceptable and affordable amount to spend on rent - this differs from the 2013 SHMA which stated that is was not affordable to spend more than 25% on rent. Adopting this 35% leads to a reduction in the annual need for affordable housing from 298 affordable dwellings per annum to 85 per annum. The application of this sensitivity testing is entirely inappropriate because the PRS does not offer security of tenure and is not a cost effective alternative. Affordable housing should be available in the long term and serve as an asset for the Registered Provider which manages it. PRS does not offer security of tenure, the role of the PRS was stated by an Inspector at the Eastleigh Local Plan examination - the PRS with local housing allowances should not be regarded as the provision of affordable housing	Comments noted.

Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
							compliant with the Framework, there is no justification in the NPPF or PPG for reducing identified need for affordable housing by the assumed continued role of the PRS and Local housing Allowance. As such, the SHMA should assess the affordable housing need in light of an assumption that an expenditure of 25% of income on rent is an acceptable basis.	
3-002	Tetlow King Planning	NB9 - Affordable Housing	N/A	no	N/A	N/A	The Council's target tenure split does not meet the identified need and little justification is given for this - the policy requirement instead reflects the split recommended in the previous 2013 SHMA. On the 9th of November, Brandon Lewis, Minister for Housing and Planning, wrote to all Local Planning Authority Chief Planning Officers. He asks them to take a more pragmatic approach to negotiations on tenure mix of affordable housing in response to RP reviews on existing financial commitments following Budget 2015. As such, Policy NB9 should give greater flexibility in allowing scheme amendments where for example a different mix could better meet site specific circumstances, local needs and the need to deliver homes without delay.	As set out in paras 7.30 and 7.31, the tenure split has been amended to be more appropriate reflecting local circumstances. The policy enables flexibility in the affordable housing requirements where a viability statement is provided to demonstrate that the requirements will render the scheme unviable. A Viability Study has been undertaken to consider the overall viability of the Plan taking into account infrastructure and affordable housing requirements. NBBC and the Homes and Communities Agency is supportive of affordable rented and intermediate housing.
3-003	Tetlow King Planning	NB22 - Renewable and Low Carbon Energy	N/A	no	N/A	N/A	The Council should consider rewording Policy NB22 to reflect the advice of the Housing Standards Review 2015. The Written Ministerial Statement of 25/03/2015 states that, in relation to energy performance, Local Authorities are permitted to set and apply energy policies.	Noted. The Council considers up to date guidance when producing and finalising the Plan. Policies will be amended where necessary.

Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
3-004	Tetlow King Planning	NB23 - Sustainable Design and Construction	N/A	no	N/A	N/A	As set out in the WMS, Local Planning Authorities should not set in their emerging Local Plans any additional technical standards or requirements relating to the construction, internal layout or performance of new dwellings. With this in mind, NB23 should be removed.	Noted. However, the Council considers that Policy NB23 is required in the Plan.
4-001	Heaton Planning Ltd	N/A	N/A	N/A	N/A	N/A	SHLAA Ref: NUN 163 site is well related to the village with regards to facilities and provides an attractive gateway to the village. Considered development can be accommodated here and northern boundary could be reinforced. Site could deliver average of 40 dwellings per annum and off-site affordable housing. Site is located in a designated Green Belt.	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.
4-002	Heaton Planning Ltd	N/A	N/A	N/A	N/A	N/A	SHLAA Ref: NUN 155 site can provide unrestricted and immediately available. The site is well contained and has a strong visual relationship with the existing settlement and its release from Green Belt would not compromise the function of the land. site recommended by the SHLAA to be taken forward by the JGBS for detailed study. 75% of the gross area could be developed for 115 units at 40 dwpa. The site could contribute to a sustainable and mixed community and the site is available for development with no legal or ownership constraints.	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.

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4-003	Heaton Planning Ltd	NB25 - Landscape Character	N/A	N/A	N/A	N/A	SHLAA Ref: NUN 163 site is well related to the village with regards to facilities and provides an attractive gateway to the village. Considered development can be accommodated here and northern boundary could be reinforced. Site could deliver average of 40 dwellings per annum and off-site affordable housing. Site is located in a designated Green Belt. SHLAA Ref: NUN 155 site is un-restricted and immediately available. The site is well contained and has a strong visual relationship with the existing settlement and its release from Green Belt would not compromise the function of the land. Site recommended by the SHLAA to be taken forward by the JGBS for detailed study. 75% of the gross area could be developed for 115 units at 40 dwpa. The site could contribute to a sustainable and mixed community and the site is available for development with no legal or ownership constraints.	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 designation of appropriate sites through the site selection process. The sites which are considered to be most sustainable are set out in Policy NB2. It is not intended to include NUN 163 or NUN155 at this stage as alternative sites are considered to be more appropriate for long term growth in the Borough.
4-004	Heaton Planning Ltd	N/A	N/A	N/A	N/A	N/A	Requests the Council take into account the role of Bulkington and its ability to deliver further development in this settlement. The level of growth envisaged is below the level required to assist in improving the availability and affordability of housing for locals. low level growth could lead to loss of facilities and services.	Noted. Site allocations for this Plan were subject to extensive assessment and were assessed using set criteria, as set out in the background paper for Scale of Growth. Policy NB2 directs almost 3,000 dwellings to the existing urban areas of the Borough, including Bulkington. 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.

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4-005	Heaton Planning Ltd	NB1 - Presumption in Favour of Development	N/A	N/A	N/A	N/A	This policy is supported.	Noted.
4-006	Heaton Planning Ltd	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Sites: HSG1, HSG2, HSG3, HSG5, HSG6 will all result in a loss of agricultural land located outside of the existing urban areas. HSG4 is within the existing urban areas of Nuneaton and Bedworth Borough. Supports the aim to deliver 10,040 dwellings but delivery of the number is questioned. Objects to the reliance on 6 strategic sites and remainder directed within the existing urban areas of the Borough. request that a more flexible approach be taken with 'sustainable urban extensions' included within policy. the proposed allocations HSG1 to HSG6 will take time to deliver housing whereas 2 parcels of land at Bulkington are less constrained . Two sites for residential development have been put forward to be included in the Plan - nun 163 and 155 - both in Green Belt but close to amenities and provide a more attractive gateway to the village.	The Plan includes a range of allocations (HSG1 – HSG6) of various sizes. In addition, the Plan directs almost 3,000 dwellings towards sites within existing urban areas. 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. The Council is proposing growth in the most sustainable and appropriate locations.
4-007	Heaton Planning Ltd	NB3 - Settlement Hierarchy and Roles	N/A	N/A	N/A	N/A	None of the strategic sites are located within Bulkington which is stated as having a role for housing, shopping leisure and local services according to the Settlement Hierarchy. This policy is supported.	Policy NB2 directs almost 3,000 dwellings to the existing urban areas of the Borough, including Bulkington.
4-008	Heaton Planning Ltd	NB7 - Hierarchy of Centres	N/A	N/A	N/A	N/A	The criteria of the policy is supported, however objects to the sentence referring to 'development within District centres will be considered acceptable in principle.' It is suggested that 'sustainable urban extensions should be included to allow for flexibility of other windfall sites'. By focussing large-scale development around	Noted. It is considered that this policy is flexible in terms of the parameters put in place for development and the criteria it must meet. The Plan includes a range of allocations (HSG1 – HSG6) of various sizes. In addition, the Plan directs almost 3,000 dwellings towards sites within existing urban areas.

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							only one urban area, the Council is unnecessarily testing the ability of the housing market. Requested that 2 parcels of land be released from the Green Belt. These sites include Land off Bedworth Road (Site Reference NUN 163) and Land off Lancing Road (Site Reference NUN 155).	
5-001	GVA	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	The report acknowledges that there is an insufficient amount of housing being proposed in the Plan and that objectively assessed need is not met. The need must be met by the rest of the surrounding market area to ensure paragraph 47 of the NPPF is met.	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.
6-001	Tetlow King Planning	NB9 - Affordable Housing	N/A	N/A	N/A	N/A	A need for revisions to the Plan to take account of the proposed changes to the NPPF including the definition of affordable housing. The Council's target split of 26% intermediate housing to 74% social or affordable rented should be applied flexibly. Recommend the incorporation of Rent to Buy housing within the mix, recommends a minor amendment to Policy NB9 to reflect Minister's guidance: 'where developers consider applying the affordable housing policy is unviable or where a different mix would better match local needs and site specific circumstances, a viability statement must be included with the planning application stating the reasons.' Notes the Council's intention to produce an Affordable Housing SPD and request that no changes are made to the Plan prior to examination or adoption and that additional policies be consulted on. Representation includes a letter from the housing minister regarding	Noted. However, the NPPF consultation is ongoing and yet to be finalised, so it would be premature to incorporate changes at this stage. However, the Council will monitor changes to National Planning Policy and the further information provided and will make any amendments to the policy where required. The policy already incorporates flexibility through the opportunity for developers to demonstrate at the planning application stage if and why a particular scheme cannot meet the overall affordable housing requirements. However, the Plan as a whole has been viability tested and is considered to be viable.

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							the delivery of Affordable Housing, a briefing note from Rentplus and Rentplus Model .	
7-000	Advance Land and Planning	NB8 - Range and mix of Housing	N/A	N/A	N/A	N/A	Broadly in support, the SHMA average market and affordable indicators outlined in paragraph 7.7 need to be treated as guidelines not targets or standards.	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.
7-001	Advance Land and Planning	NB1 - Presumption in Favour of Development	yes	no	yes	yes	This policy is welcomed, however the sentiment of working proactively with applicants jointly to find solutions is not reflected in other policies which follow.	Noted. The Borough Plan is consistent with National Policy and aims to facilitate a pro-active and positive approach towards planning.
7-002	Advance Land and Planning	NB2 - Scale and Location of Growth	yes	no	yes	yes	Object to the policy as it does not provide sufficient housing provision to cater for people's needs in N and B. The housing allocations are too focussed on Nuneaton, too geographically concentrated with none in Bulkington. Too few sites with overall housing allocation being targeted to one site. The mention of additional land to assist in meeting the needs of Coventry and Warwickshire is welcomed, however withheld until the matter is resolved. Advise that the Council need to consider allocating a wider range of sites to show more choice to meet people's needs. Want to work with the Council to bring Bedworth Road/Severn Road site forward. Needs to reflect environmental quality and confidence in the local economy.	The Plan includes a range of allocations (HSG1 – HSG6) of various sizes. In addition, the Plan directs almost 3,000 dwellings towards sites within existing urban areas. 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. The Council is proposing growth in the most sustainable and appropriate locations

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7-003	Advance Land and Planning	NB3 - Settlement Hierarchy and Roles	yes	no	yes	yes	strongly object to the proposal that Bulkington should only perform a local role for housing and shopping, leisure and local services.	The Settlement Hierarchy is based on the findings of a Settlement Analysis Report of Nuneaton and Bedworth (NBBC 2011) which considered the size of each of the settlements in the area, accessibility to a range of services and facilities and transport provision. On the basis of this evidence, the hierarchy positively promotes delivery of new development to the most sustainable locations in the Borough.
7-004	Advance Land and Planning	NB7 - Hierarchy of Centres	yes	no	yes	yes	Should be noted that Bulkington has a wider range of facilities than those listed in the Council's spreadsheet. Request that it must be noted that Bedworth Road/Severn Road site fulfils both the criteria in NB7.	Noted. The facilities identified in Bulkington will be reviewed and amended if required
7-005	Advance Land and Planning	NB9 - Affordable Housing	yes	no	yes	yes	Notes the aspiration of the Council to seek 25% and 20% affordable housing on sites. Suggests a 50%/25%/25% split between rented/intermediate and starter homes. Does not accept that developers should contribute 50% affordable rent and 50% social rent.	Noted. All comments received will be considered by the Council in determining how to progress the Plan to submission for examination in public. The requirements are based upon the evidence provided by the SHMA, and reflect local circumstances.
7-006	Advance Land and Planning	NB11 - Ensuring the Delivery of Infrastructure Provision	yes	no	yes	yes	Policy does not mention key principles within NPPF and PPG that contributions must relate to the site and reasonable in scale. Proposal for land north of Nuneaton will create major challenges for Borough in that dwellings will require great services and facilities. suggests more modest sites of 100-150 dwellings with positive impacts.	The Council considers the Plan is in conformance with national policy. 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.
7-007	Advance Land and Planning	NB12 - Strategic Accessibility and Sustainable Transport	yes	no	yes	yes	A policy that supports another documents is not adequate as a policy statement. Considers clearer statement needs to be made as to what the Local Plan proposes.	Policy NB12 contains information that supports strategic infrastructure proposals. Regard must also be had to the County Council's Local Transport Plan and other relevant documentation when submitting proposals. Policy NB11 and the Infrastructure Delivery Plan set out requirements for future infrastructure requirements for the Borough associated with future development

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7-008	Advance Land and Planning	NB15 - Green Infrastructure	yes	no	yes	yes	Supports the Council's objectives to strengthen the green network of the Borough. Stresses, that the green infrastructure network serves a different purpose to the Green Belt. Advocates potential development at Bedworth Road/Severn Road as this would not adversely affect green infrastructure.	Noted.
7-009	Advance Land and Planning	NB19 - Biodiversity and Geodiversity	yes	no	yes	yes	Understands that Government has abandoned experiment into biodiversity to it conflicting with red tape challenge.	Noted.
7-010	Advance Land and Planning	NB25 - Landscape Character	yes	no	yes	yes	Accept it is important to protect high quality landscape, but not sensible to impose blanket restrictions on ordinary Green Field land as it de-values the currency of higher quality landscapes.	It is considered that a wide ranging policy, in addition to specific requirements set out in NB15, NB16 and NB18, is important to provide for proper assessment of all other development that could result in an impact on the character of the landscape.
8-001	Oxalis Planning	Vision	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. The 8 objectives do not give consideration to the amount of housing required by the Borough or from the redistribution of housing in the HMA.	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. 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.

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8-002	Oxalis Planning	NB2 - Scale and Location of Growth	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. Policy NB2 does not account for the unmet need from neighbouring authorities. Does not accord with the NPPF. Not fulfilled its duty to cooperate with neighbouring authorities. The delivery of the 10,040 dwellings is heavily weighted to 6 key strategic sites with remaining need restricted to main urban areas. The inclusion of a proposal for a site on land west of Ash Green to deliver up to 200 homes in the early part of the plan period. Site has been considered as part of the SHLAA and the site is Green Belt land. Support for Prologis Park.	Noted. All comments received will be considered by the Council in determining how to progress the Plan to Submission for Examination-in-Public. The Plan includes a range of allocations (HSG1 – HSG6) of various sizes. In addition, the Plan directs almost 3,000 dwellings towards sites within existing urban areas. 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.
8-003	Oxalis Planning	NB3 - Settlement Hierarchy and Roles	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. The role of Ash Green/Neals Green should be positively recognised for the strategic role in accommodating the city's unmet housing need.	The Settlement Hierarchy is based on the findings of a Settlement Analysis Report of Nuneaton and Bedworth (NBBC 2011) which considered the size of each of the settlements in the area, accessibility to a range of services and facilities and transport provision. On the basis of this evidence, the hierarchy positively promotes delivery of new development to the most sustainable locations in the Borough. 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.
8-004	Oxalis Planning	NB16 - Open Space	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. Point a) should factor in opportunities to strengthen	Noted. Opportunity is provided in the policy for the enhancement of open space, albeit not specific to any of the strategic allocated sites. Policy NB15 and NB18 also make provision to enhance open space and it is

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							the use and extent of the Blackberry Lane Park through development of Ash Green.	therefore considered that adequate provision is made to improve open space where it is appropriate.
8-005	Oxalis Planning	N/A	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. Comments include the inclusion of map of Land to the West of Ash Green, Warwickshire, initial concept plan as a proposed site.	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. 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, if required
9-001	JMW Planning Solutions Ltd	Vision	yes	yes	N/A	N/A	Objectives 1 and 2 meet the soundness criteria and strategy based on objectively assessed needs. The extension to Prologis Park is supported.	Noted.
9-002	JMW Planning Solutions Ltd	Objectives	yes	yes	N/A	N/A	Objectives 1 and 2 meet the soundness criteria and strategy based on objectively assessed needs. The extension to Prologis Park is supported.	Noted.
9-003	JMW Planning Solutions Ltd	NB2 - Scale and Location of Growth	yes	yes	N/A	N/A	Policy NB2 meets the soundness criteria, is justified, deliverable and consistent with national policies. The extension to Prologis Park is supported as its readily available and deliverable.	Noted
9-004	JMW Planning Solutions Ltd	NB4 - Existing Employment Estates	yes	yes	yes	N/A	Policy NB4 meets the soundness criteria, based on objectively assessed needs and the supporting evidence base is justified and deliverable. The extension to Prologis Park is supported.	Noted.
9-005	JMW Planning Solutions Ltd	NB5 - Nature of Employment	yes	yes	yes	N/A	The policy meets the soundness criteria and based on objectively assessed needs and is justified, deliverable and consistent with national policies. The extension to Prologis	Noted.

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		ent Growth					Park is supported as its readily available and deliverable.	
250-001	Cerda Planning Ltd	NB2 - Scale and Location of Growth	yes	no	yes	yes	The plan is considered to be unsound because it is not justified, effective and is not consistent with national policy. The scale and distribution of the housing is inappropriate insofar that it does not account for the acknowledged increase in the Objectively Assessed Housing Need (OAHN) arising from Coventry and Birmingham. At present the local plan is proposing that 7,325 homes will be delivered through the Strategic Allocations. Given the size of strategic sites it is unlikely that these sites will be commenced and completed within the first five years of the plan. At present the local plan is proposing that 2,805 homes will be delivered by windfall development within existing urban areas of Nuneaton, Bedworth, Bulkington, Keresley and Ash Green/Neals Green. The windfall element equates to 27.9% of the overall housing target, which is considered excessive and unachievable in light of the historical undersupply of housing. The current undersupply of housing of housing has been calculated using the 'Liverpool' method, the application of the 'Sedgefield' method results in a more acute under supply than the council has acknowledged. Additional strategic sites should be allocated that can be delivered now. A recent outline application for 350 houses abutting Nuneaton is a deliverable option to improve housing supply.	Noted. All comments received will be considered by the Council in determining how to progress the Plan to Submission for Examination-in-Public. 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 Council's five year land supply statement (2015) (paragraph 4.3) explains why using the 'Sedgefield' approach may not be the most appropriate in this instance. The Plan includes a range of allocations (HSG1 – HSG6) of various sizes. In addition, the Plan directs almost 3,000 dwellings towards sites within existing urban areas.
250-002	Cerda Planning Ltd	NB3 - Settlement	yes	yes	yes	yes	Support is given to the hierarchy set out in Policy NB3 including Nuneaton as the most sustainable settlement. As such, it is	Noted.

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		Hierarchy and Roles					considered that Nuneaton is an appropriate location for additional residential allocations.	
250-003	Cerda Planning Ltd	NB8 - Range and mix of Housing	yes	yes	yes	yes	Support is given to policy NB8 that sets out that general housing developments will include a mix of housing types, sizes and tenures, taking into account the need and demand set out in the SHMA and the characteristics of the surrounding area. It is queried whether the table at paragraph 7.5 is necessary as it relates to the 2013 SHMA and will be updated going forward.	Noted. Table 10 relates to the 2013 SHMA as this is the most up to date information at this time and is for guidance. It is acknowledged that the SHMA will be updated over the plan period, and the Council may therefore remove the table from the policy.
250-004	Cerda Planning Ltd	NB9 - Affordable Housing	yes	no	yes	yes	The plan is considered to be unsound because it is not justified, effective and is not consistent with National Policy. Objection is made based on the specificity of tenure split set out in Policy NB9. It is considered to be overly prescriptive to identify a tenure split and housing mix that may change over the plan period. The inclusion of flexibility around a viability assessment is supported.	Noted. The requirements are based on evidence from the SHMA and the Council have adapted their calculations to a more appropriate split. It is acknowledged that the SHMA will be updated over the plan period, and the Council may therefore remove the specific targets from the policy.
250-005	Cerda Planning Ltd	NB22 - Renewable and Low Carbon Energy	yes	no	yes	yes	The Plan is considered to be unsound because it is not justified, effective and is not consistent with National Policy. This policy is in conflict with the Deregulation Bill 2015 and seeks to impose technical standards that are already covered through building regulations.	Noted. The requirements will be reviewed and if necessary removed from the Plan.
250-006	Cerda Planning Ltd	NB23 - Sustainable Design and Construction	yes	no	yes	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. This policy is in conflict with the Deregulation Bill 2015 and seeks to impose technical standards that are already covered through building regulations.	Noted. The requirements will be reviewed and if necessary, removed from the Plan.

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251-001	Cerda Planning Ltd	NB7 - Hierarchy of Centres	yes	yes	yes	no	Support is given for the inclusion of a public house as a town centre use within the Crow Hill local centre.	Noted.
251-002	Cerda Planning Ltd	NB22 - Renewable and Low Carbon Energy	yes	no	no	no	The Plan is considered to be unsound because it is not justified, effective and is not consistent with National Policy. This Policy is in conflict with the Deregulation Bill 2015 and seeks to impose technical standards that are already covered through building regulations.	Noted. The requirements will be reviewed and if necessary removed from the Plan.
251-003	Cerda Planning Ltd	NB23 - Sustainable Design and Construction	yes	no	yes	no	The plan is considered to be unsound because it has not been positively prepared, it is not justified, effective and is not consistent with National Policy. This policy is in conflict with the Deregulation Bill 2015 and seeks to impose technical standards that are already covered through building regulations.	Noted. The requirements will be reviewed and if necessary, removed from the Plan.
212-001	Cerda Planning Ltd	NB2 - Scale and Location of Growth	yes	no	yes	yes	The plan is considered to be unsound because it is not justified, effective and is not consistent with national policy. The scale and distribution of the housing is inappropriate insofar that it does not account for the acknowledged increase in the Objectively Assessed Housing Need (OAHN) arising from Coventry and Birmingham. At present the local plan is proposing that 7,325 homes will be delivered through the Strategic Allocations. Given the size of strategic sites it is unlikely that these sites will be commenced and completed within the first five years of the plan. At present the local plan is proposing that 2,805 homes will be delivered by windfall development within existing urban areas of Nuneaton, Bedworth, Bulkington, Keresley and Ash Green/Neals Green. The windfall element equates to 27.9% of the	Noted. All comments received will be considered by the Council in determining how to progress the Plan to Submission for Examination-in-Public. The Council considers that the 'windfall' allocation is achievable, taking into account available evidence. 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 Council's five year land supply statement (2015) (paragraph 4.3) explains why using the 'Sedgefield' approach may not be the most appropriate in this instance. The Plan includes a range of allocations (HSG1 – HSG6) of various sizes. In addition, the Plan directs

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							overall housing target, which is considered excessive and unachievable in light of the historical undersupply of housing. The current undersupply of housing of housing has been calculated using the 'Liverpool' method, the application of the 'Sedgefield' method results in a more acute under supply than the council has acknowledged. Additional strategic sites should be allocated that can be delivered now. A site at Coventry lane, Bulkington was discounted at stage 1 due to the objectives of the Green Belt. However, in order to meet housing needs, the development for circa 250 houses could be brought forward for development and delivered in its entirety over the first 5 years of the plan period and reduce the reliance on strategic allocations.	almost 3,000 dwellings towards sites within existing urban areas.
252-002	Cerda Planning Ltd	NB3 - Settlement Hierarchy and Roles	yes	yes	yes	yes	Support is given to the hierarchy set out in Policy NB3 including Bulkington as a 3rd tier settlement. As such, it is appropriate to support a proposed development site that could deliver 250 homes.	Noted.
252-003	Cerda Planning Ltd	NB8 - Range and mix of Housing	yes	yes	yes	yes	Support is given to policy NB8 that sets out that general housing developments will include a mix of housing types, sizes and tenures, taking into account the need and demand set out in the SHMA and the characteristics of the surrounding area. It is queried whether the table at paragraph 7.5 is necessary as it relates to the 2013 SHMA and will be updated going forward.	Noted. Table 10 relates to the 2013 SHMA as this is the most up to date information at this time and is for guidance. It is acknowledged that the SHMA will be updated over the plan period, and the Council may therefore remove the table from the policy
252-004	Cerda Planning Ltd	NB9 - Affordable Housing	yes	no	yes	yes	The plan is considered to be unsound because it is not justified, effective and is not consistent with National Policy. Objection is made based on the specificity of tenure split set out in Policy NB9. It is considered to be overly prescriptive to identify a tenure split and housing mix that	Noted. The requirements are based on evidence from the SHMA and the Council have adapted their calculations to a more appropriate split. It is acknowledged that the SHMA will be updated over the plan period, and the Council may therefore remove the specific targets from the policy.

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							may change over the plan period. The inclusion of flexibility around a viability assessment is supported.	
252-005	Cerda Planning Ltd	NB22 - Renewable and Low Carbon Energy	yes	no	yes	yes	The Plan is considered to be unsound because it is not justified, effective and is not consistent with National Policy. This Policy is in conflict with the Deregulation Bill 2015 and seeks to impose technical standards that are already covered through building regulations.	Noted. The requirements will be reviewed and if necessary removed from the Plan.
252-006	Cerda Planning Ltd	NB23 - Sustainable Design and Construction	yes	no	yes	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, effective and is not consistent with National Policy. This policy is in conflict with the Deregulation Bill 2015 and seeks to impose technical standards that are already covered through building regulations.	Noted. The requirements will be reviewed and if necessary removed from the Plan.
253-001	R John Craddock Associates	NB2 - Scale and Location of Growth	yes	no	yes	no	Considers that the Plan has not been positively prepared, is not justified or effective. The scale of housing is inappropriate insofar that it does not account for the acknowledged increase in the Objectively Assessed Housing Need (OAHN) arising from Coventry and Birmingham. The Plan is therefore not based upon effective joint working across boundaries. The Plan does not set out a reasoned argument as to why the spatial distribution of growth is the most appropriate. It is not explained how the strategy meets objective 6 e 'creating well planned and integrated communities that foster cohesion and accessibility for all'. It is not clear why no housing allocations have been included at Bulkington. The Green Belt study acknowledges that land west of Bulkington scores low in terms of the	Noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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.

Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
							purposes of the Green Belt. This is not in the interests of community cohesion	
253-002	R John Craddock Associates	N/A	yes	yes	yes	no	Provides further submission in respect of SHLAA site NB5b. The site provides an opportunity to meet the future needs of Bulkington and the unmet housing requirements arising from Coventry. The site lies within BU3 of the Green Belt study which is low scoring. In addition, the railway embankment protects the wider countryside from encroachment. The site has considerable merits for housing development, is immediately available, and should be considered for future release	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, if required
254-001	Framptons	NB2 - Scale and Location of Growth	no	no	no	yes	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	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

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							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.	
255-001	Framptons	NB2 - Scale and Location of Growth	no	no	no	yes	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	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

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							representation concludes that the site should be allocated as a housing site with associated marina under policy NB2 for approximately 130 dwellings.	
256-01	Aitchison Raffety	NB1 - Presumption in Favour of Development	no	no	no	no	There is no supporting text corresponding to this policy.	Noted. The policy is considered to be self-explanatory.
256-02	Aitchison Raffety	NB2 - Scale and Location of Growth	no	no	no	no	Total housing supply in this policy does not fulfil the OAN of the Borough. Further engagement required with wider HMA. There are also risks to adopt larger strategic sites to provide housing, considerations should be given to other options which provide a greater level of flexibility. Land off Blackhorse road should be included in the Plan as it is capable of providing much needed housing, it has minimal impact on the Green Belt and due to the 5HLS this low grade Green Belt should be removed from the Green Belt so it can be developed.	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. The Plan includes a range of allocations (HSG1 – HSG6) of various sizes. In addition, the Plan directs almost 3,000 dwellings towards sites within existing urban areas.
256-03	Aitchison Raffety	NB8 - Range and mix of Housing	no	no	no	no	Higher proportion of dwellings outside of the C3 use class will need to be take into account, in addition to the additional dwellings.	The policy already covers more than just C3 uses .

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257-001	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB2 - Scale and Location of Growth	no	no	no	yes	<p>The County Council considers that the Plan is unsound because it is not positively prepared, is not justified, is not effective and is not consistent with national policy. The representations are submitted in respect of WCC's land interests in the Borough at Top Farm, Weddington and land off Eastboro Way, Attleborough. WCC supports the allocation of land to the north of Nuneaton for 3,530 dwellings, but feels that amendments are required to the Plan to make it sound. Land off Eastboro Way should be included as a strategic site. NBBC has not complied with the Duty to Cooperate given the need to resolve the housing market area's need in full. The housing target is far below what is required to meet existing and future housing needs for the Borough and the wider HMA as identified by the SHMA and recent MOU. The Council needs to plan for an addition of 4,020 dwellings up to 2031, which equates to a total of 14,060 dwellings over the plan period. Based on these figures the Council should be allocating further sites to meet its needs. Land off Eastboro Way, Nuneaton can provide a sustainable location for up to 360 dwellings and should be included under policy NB2. WCC is currently preparing an outline planning application for the site. The allocation of HSG1 is supported, but it is considered that the Plan does not provide sufficient information on how HS1 (and other strategic sites) will be brought forward, especially in terms of infrastructure required to support the proposed development. This is inconsistent with the PPG. There is uncertainty as to what needs to be required, where it is to be</p>	<p>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. 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.</p>

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							<p>located and which landowners / developers would be liable for funding. The Plan assumes that each parcel of land within the wider allocation will be responsible for bringing forward the infrastructure to support their individual development through on-site provision and S106 contributions. However, this appears contradictory to the IDP which states that CIL will provide infrastructure to support the development of an area rather than making an individual planning application acceptable in planning terms. The Council has already permitted smaller developments within the allocation area and secured S106 agreements towards infrastructure. As a result, restrictions on pooling of S106 contributions may lead to a funding gap and could undermine the timely delivery of the proposed urban extensions. Land to the north of the northern boundary of HSG1 is proposed by the Council to be brought forward as a landscaped buffer between the proposed development and the A5. However this is unlikely to be deliverable as there is no incentive for the landowners to use the land in this way. WCC is concerned that land for housing at Top Farm may be required instead to provide landscape buffering. Instead, WCC suggests that the land in question is included within the allocation to allow the landowners to deliver some additional housing along with a landscape buffer.</p>	

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257-002	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB3 - Settlement Hierarchy and Roles	no	no	no	yes	WCC supports Nuneaton as the primary location for housing and other forms of development within the Borough.	Noted.
257-003	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB5 - Nature of Employment Growth	no	no	no	yes	The County Council considers that the Plan is unsound because it is not positively prepared, is not justified, is not effective and is not consistent with national policy. The representations are submitted in respect of WCC's land interests in the Borough at Top Farm, Weddington and land off Eastboro Way, Attleborough. No specific comments are included in relation to NB5	Noted.
257-004	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB7 - Hierarchy of Centres	no	no	no	yes	The County Council considers that the Plan is unsound because it is not positively prepared, is not justified, is not effective and is not consistent with national policy. The representations are submitted in respect of WCC's land interests in the Borough at Top Farm, Weddington and land off Eastboro Way, Attleborough. The policy contradicts the monitoring table in terms of sites that are required to provide a new District Centre. Clarification is sought in relation to this matter	Noted. The Council will review the tables to ensure consistency and make amendments if required
257-005	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB11 - Ensuring the Delivery of Infrastructure Provision	no	no	no	yes	The County Council considers that the Plan is unsound because it is not positively prepared, is not justified, is not effective and is not consistent with national policy. The representations are submitted in respect of WCC's land interests in the Borough at Top Farm, Weddington and land off Eastboro Way, Attleborough. Neither the Borough Plan nor the IDP sets out specific requirements for strategic site HSG1. The Plan must set out a comprehensive strategy for infrastructure delivery to support the	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.

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							strategic allocations in order to be positively prepared, effective and consistent with national policy.	
257-006	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB18 - Sport and Exercise	no	no	no	yes	The County Council considers that the Plan is unsound because it is not positively prepared, is not justified, is not effective and is not consistent with National Policy. The representations are submitted in respect of WCC's land interests in the Borough at Top Farm, Weddington and land off Eastboro Way, Attleborough. The Council has not provided details in the Borough Plan or IDP as to what new community and / or sports facilities will be required to meet the needs arising from HSG1. The Plan is therefore not positively prepared and is not effective.	Noted. It is stated that new developments should include measures to meet playing pitch requirements, outdoor sports uses, sports facilities and open space, green infrastructure and allotment requirements. Policy NB11 together with the Infrastructure Delivery Plan identifies the infrastructure requirements associated with the Plan. The Playing Pitch Study and Sports Recreation and Community Facilities study is being undertaken and will specify needs. The requirements for the delivery of each site will be reviewed, and further details provided where necessary.
257-007	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB22 - Renewable and Low Carbon Energy	no	no	no	yes	The County Council considers that the Plan is unsound because it is not positively prepared, is not justified, is not effective and is not consistent with National Policy. The representations are submitted in respect of WCC's land interests in the Borough at Top Farm, Weddington and land off Eastboro Way, Attleborough. This requirement is already covered by Building Regulations. Therefore, the Plan should remain silent on this matter. There are no legal requirements to improve carbon emission reduction by 19% and therefore this is unjustified. The Council should amend or delete this policy.	Noted. The requirements will be reviewed and if necessary removed from the Plan.

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257-008	Amec Foster Wheeler Environment & Infrastructure UK Ltd	NB23 - Sustainable Design and Construction	no	no	no	yes	The County Council considers that the Plan is unsound because it is not positively prepared, is not justified, is not effective and is not consistent with National Policy. The representations are submitted in respect of WCC's land interests in the Borough at Top Farm, Weddington and land off Eastboro Way, Attleborough. The Policy should be reworded to provide flexibility recognising that the requirements in the policy should be provided where viable, and that they will not preclude development of sustainable sites where these standards cannot be achieved.	The Council considers that the policy already incorporates sufficient flexibility.
258-001	Pegasus Group	NB2 - Scale and Location of Growth	yes	no	yes	no	The Coyne Group are in control of 'the New Inn, Rugby Road, Bulkington'. Plans identifying the location of the site and an indicative layout for a residential scheme are supplied. NB2 is not considered to be effective or consistent with national policy. The identification of Bulkington as a sustainable settlement which will accommodate a proportionate level of residential growth is supported and soundly based. However, the Plan does not include any detail in relation to how much growth will be accommodated within Bulkington, or how this will be achieved. Policy NB2 should be modified to provide detail of how the remaining 2,795 dwellings not accommodated on allocated sites will be apportioned between the settlements. As currently written the policy is not effective as it does not provide sufficient detail and justification for the level of growth that is to be delivered within identified settlements. The Plan is also not consistent with national policy because it does not identify how the Council plan to meet their full needs	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. The scale of growth in each urban area will be dependent upon the number of site proposals that come forward in each area, and the suitability of those proposals when considered against the Borough Plan policy requirements as a whole. The Strategic Housing Land Availability Assessment and wider evidence base provides evidence to support the quantum of development directed towards the existing urban areas, and provides an indication of potential capacity within each settlement.

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258-002	Pegasus Group	NB3 - Settlement Hierarchy and Roles	yes	no	yes	no	The Coyne Group are in control of 'the New Inn, Rugby Road, Bulkington'. Plans identifying the location of the site and an indicative layout for a residential scheme are supplied. NB3 is not considered to be effective or consistent with national policy. We support the identification of Bulkington as a settlement to accommodate a level of residential development. However, the policy provides insufficient detail in relation to what a 'local role' entails. Without providing detail of the level of growth considered appropriate for each settlement it is unclear how the housing requirement will be delivered. The policy or explanatory text should be modified to clearly set out the role of each settlement in the hierarchy in meeting the unmet housing need identified in Policy NB2.	The Plan directs development to settlements at a scale that reflects the role and function of the settlement in the hierarchy and the settlement's ability to accommodate change. Policy NB2 directs almost 3,000 dwellings to the existing urban areas of the Borough, including Bulkington.
258-003	Pegasus Group	NB7 - Hierarchy of Centres	yes	no	yes	no	The Coyne Group are in control of 'the New Inn, Rugby Road, Bulkington'. Plans identifying the location of the site and an indicative layout for a residential scheme are supplied. NB7 is not considered to be justified. The Proposals Map should be modified to remove the New Inn site from the proposed Bulkington Local Centre. This would be consistent with the explanatory text which makes clear that the existing use of the site for a public house is not integral to the functions of a 'local centre' as defined by the Local Plan. The flexible approach to development within identified 'local centres' is supported. The policy should however recognise the important role that residential development can play in ensuring the vitality of centres is maintained as required by NPPF para 23.	Noted. Comments will be considered in relation to the identification of the site on the proposals map

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258-004	Pegasus Group	NB14 - Retaining Community Facilities	yes	no	yes	no	The Coyne Group are in control of 'the New Inn, Rugby Road, Bulkington'. Plans identifying the location of the site and an indicative layout for a residential scheme are supplied. NB14 is not considered to be consistent with National Policy. The flexibility of Policy NB14 in relation to development proposals which would result in the loss of community facilities is supported. The Policy should be modified to include a further circumstance where development is permissible if the current land use is demonstrated to be unviable. This would provide adequate flexibility, and make the Policy consistent with National Policy which seeks to encourage the use of brownfield land, particularly ensuring that brownfield land is brought back into viable use and para 70 which guards against the 'unnecessary' loss of community facilities.	Noted. The Council have accounted for development that would lead to a loss of community facilities in the four bullet points within the policy. The forth bullet point has regard to a lack of demand for the community facility use.
259-001	NLP	NB2 - Scale and Location of Growth	yes	yes	yes	no	The consultation response supports draft policy NB2 and the inclusion of sites HSG1 as a strategic housing sites to deliver 3530 dwellings. Our clients land at Higham Lane forms a significant part of HSG1. Previous reps have demonstrated that the land is suitable and available in accordance with para 47 of the NPPF. Prologis are in advanced discussions with a national housebuilding operator to take the site forward for residential development at the earliest opportunity. Importantly, the delivery of Higham Lane will help unlock the eastern part of the wider HGS1 allocation, through the provision of a spine road which will be made available for use by adjacent landowners / developers. The development of the site is considered to be both	Noted

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							deliverable and viable in line with para 47 of the NPPF.	

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260-001	Barton Willmore	NB2 - Scale and Location of Growth	yes	no	yes	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. The consortium previously wrote to NBBC to highlight concerns in relation to OAN for housing within the wider HMA, and the evidence provided within the joint SHMA. Since then the relevant authorities within the HMA have prepared a further update to the assessment of OAN for the HMA - undertaken by GL Hearn. This has been reviewed and has resulted in the preparation of a further report by Barton Willmore which is provided with the representations. This report continues to show that in order to fully accommodate forecast economic growth and in turn address worsening market signals issues, there is a requirement for at least 5,005 dwellings per annum / 100,100 dwellings in total across the HMA during the Plan period 2011-2031. This indicates a shortfall in the full, objective assessment of housing need of at least 14,660 dwellings when compared against the most recent update to the joint SHMA of September 2015. The same evidence prepared on behalf of the Consortium has been issued to other relevant authorities within the HMA, most notably Warwick District Council and Stratford-on-Avon District Council as part of the Examination of their relevant development plans. For consistency, we therefore ask that the Council take fully into account the enclosed evidence when considering the scale of housing that should be planned for within the Borough Plan. This is on the basis that we consider that the	Noted. However, the Council is confident that the SHMA, together with updates and relevant evidence provide a robust basis for the identification of objectively assessed housing needs. 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.

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							<p>evidence on which the Plan has been prepared does not comply with national guidance and as a result, does not accurately reflect the full, OAN of the HMA. As detailed above, the evidence base on which the Council has determined its OAN for the Borough is not considered to provide a full and objective assessment of housing need within the wider HMA. As a result, it is considered that there is a significant risk that the Plan as proposed for Submission does not plan to adequately meet housing need. Whilst it is appreciated (as detailed at paragraph 5.8 of the Draft Plan) that there may be a requirement to plan for additional housing need to help accommodate some of the unmet needs arising from neighbouring Coventry City and that further consultation may be necessary, this issue can only be resolved once the full, objectively assessed need for housing across the HMA has been resolved. To date, the evidence presented within the Joint SHMA is under scrutiny, having been subject to unresolved objections by the Consortium and other parties through the Warwick and Stratford-on-Avon Plan Examinations and cannot therefore be relied on until such objections have been addressed.</p>	

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261-001	Framptons	NB2 - Scale and Location of Growth	no	no	no	yes	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	NB2 - Scale and Location of Growth	no	no	no	yes	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	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 requirements for the delivery of each site will be reviewed, and further details provided where necessary.

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							<p>status. We agree with NBBCs assessment that there has been no change in circumstances to justify exceptional circumstances. It is apparent that additional 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>	
262-001	Howkins & Harrison	NB2 - Scale and Location of Growth	yes	yes	yes	no	The representation confirms that the owner of some of the land included as part of HSG6 (indicated cross-hatched on supplied plan) supports the proposed allocation of the site and the land is available	Noted

263-001	David Lock Associates Ltd.	NB2 - Scale and Location of Growth	yes	no	yes	yes	<p>The representation considers that the Plan is not justified, is not effective and is not consistent with national policy. Policy NB2 is not sound in three respects: Firstly, the numbers of dwellings proposed for four of the six Strategic Sites (HSG 3-6) are overly precise – 518, 1223, 676 and 298 respectively. It is surmised that those numbers result simply from multiplications of the site areas concerned by assumed average housing densities. In the case of the Gipsy Lane Strategic Site (HSG 3), the much more sophisticated masterplanning approach that underpinned the 2013 Outline planning application for the site (application reference 032436) resulted in a proposal for up to 575 dwellings. Secondly, the requirement that Strategic Sites “will be supplemented by Masterplan documents in the form of Supplementary Planning Documents (SPDs)” is unnecessary, at least in the case of the Gipsy Lane Strategic Site (HSG 3). The Gipsy Lane Strategic Site is in the freehold ownership of its development promoter. Its delivery is not dependent on the provision of major new strategic infrastructure. Its development is therefore readily deliverable. Furthermore, its early delivery would be entirely appropriate given the ongoing lack of a deliverable 5-year housing land supply in the Borough. In these circumstances, any requirement for a SPD for the Gipsy Lane Strategic Site is entirely unnecessary. For these reasons, any requirement for a SPD for the Gipsy Lane Strategic Site is neither “consistent with national policy” (in being discordant with both the NPPF and the Planning Practice Guidance) nor “effective” (in reducing the deliverability of development) (para. 182 of the NPPF refers). Thirdly, no “exceptional circumstances” justifying the proposed releases of Strategic Sites from the Green Belt have been set out, as the NPPF (para. 83) requires. Those “exceptional circumstances” are essentially</p>	<p>Policy NB2 provides a breakdown of the strategic sites for allocation. The proposed allocations indicate the approximate minimum numbers of units required to be delivered on each site. These are not intended to be prescriptive. The Council considers that Masterplan documents are required for the strategic sites in order to ensure that sufficient guidance is provided to ensure high quality and coordinated delivery on each site. However, the requirement for masterplan documents is not intended to restrict development proposals from being developed or planning applications being submitted to the Council.</p>
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						<p>that the housing and employment land requirements for the Borough over the Plan period cannot be accommodated in a sustainable or a deliverable manner by attempting to confine development to those parts of the Borough outside the Green Belt (para. 84 of the NPPF refers). These circumstances apply with particular force to the Gipsy Lane Strategic Site (HSG 3), for the reasons outlined above and below. Here, it is the case that Gipsy Lane itself forms a suitable replacement Green Belt boundary, being a “clear”, “readily recognisable” and “permanent” “physical feature” (para. 85 of the NPPF), which would also “restrict” any “sprawl” of Nuneaton, prevent the town from “merging into” Bedworth and limit the degree of “encroachment” into the countryside (para. 80 of the NPPF refers), thereby enabling the fundamental purposes of the Green Belt on the south side of Nuneaton to continue to be upheld. Omitting to set out these “exceptional circumstances” is therefore “not consistent with national policy”. For the avoidance of doubt, the proposed allocation of the Gipsy Lane Strategic Site is strongly supported in principle. That proposal is not only readily deliverable (see above) and thereby highly “effective” (para. 182 of the NPPF refers), but is also eminently sustainable (in maximising accessibility to existing and planned employment opportunities, as well as to a wide range of other facilities, in addition to minimising harm to environmental assets) and thereby fully “justified” (again, para. 182 of the NPPF refers). To assist the forthcoming Examination Inspector in assessing the soundness of this allocation, the 2013 Outline planning application is appended to this representation. To reiterate, that application was refused – against officers’ recommendation – solely on the grounds of Green Belt policy.</p>	
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Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
263-002	David Lock Associates Ltd.	N/A	N/A	N/A	N/A	N/A	<p>Appendix 1: Nuneaton and Bedworth Assessment Sheets, Pages 121-127 (parcel N5). The assessment of parcel N5, which includes both the Faultlands (EMP 1) and the Gipsy Lane (HSG 3) Strategic Sites, is defective in ignoring the function of Gipsy Lane itself in restricting any “sprawl” of Nuneaton, preventing the town’s “merging” with Bedworth and limiting the extent of its “encroachment” into the countryside.</p> <p>Previous Green Belt studies commissioned by the Council acknowledged those functions of Gipsy Lane in their assessments of land in this location.</p> <p>Affording proper recognition to those important functions would result in a much more accurate and reliable assessment of the contribution of this area to the purposes of Green Belt policy.</p> <p>Importantly, those functions enable the fundamental purposes of the Green Belt on the south side of Nuneaton to be upheld even following the development (and removal from the Green Belt)</p>	Comment noted. NBBC will review the assessment of parcel N5 within the Joint Green Belt Study

264-001	Savills	All Policies	no	no	no	yes	<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</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 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 accepted that this should be reflected in any future allocation and in the IDP, if necessary.</p>
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						<p>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 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</p>	
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					<p>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.</p> <p>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</p>	
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							<p>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>	
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264-002	Savills	N/A	no	no	no	yes	We do not consider that the Plan is legally compliant in its current form as the Plan does not demonstrate that it has engaged; “constructively, actively and on an ongoing basis” under the duty to co-operate with other Local Planning Authorities, County Councils and other bodies with Statutory Functions. The housing target is far below what is required to meet existing and future housing needs for the Borough and the wider HMA as identified by the SHMA and recent MOU. The Council needs to plan for an addition of 4,020 dwellings up to 2031, which equates to a total of 14,060 dwellings over the plan period. In a similar vein we are of the opinion that the Plan is unsound in its current form for this same reason as it does not comply with National Planning Policy Guidance. It is our opinion that the Plan has not been positively prepared due to the lack of addressing unmet need with no corresponding clear argument contained in the supporting evidence as to why this unmet need should not be accommodated within the Borough	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.

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264-003	Savills	Vision	no	no	no	yes	In respect of objective 2 we consider that the Plan has not adequately planned for additional housing under the duty to co-operate and therefore there is likely to be a corresponding undersupply of employment sites in locations where growth is likely to occur. The Plan can be made sound by a recalculation of the need and the consideration of additional employment land close to the A444 and to the south of Griff Lane, close to Bermuda. In respect of objective 4, we consider that whilst an allocation at HSG2 will provide an opportunity for a good quality and varied mix of housing, there are is an additional need for housing that can also be accommodated in closely related sites nearby. This would address the need to identify further housing. In support of this, we have provided a more detailed critique of the Plan in respect of Landscape and Transport matters which are attached as Appendices B and C and indicated the sites concerned. The Plan can be made sound by the allocation of these sites. In respect of objective 5 we are concerned that the Plan may be unsound as it does not include provision for the delivery of highway infrastructure necessary to implement the Plan in its current form. It is recommended that the Borough Council reviews the requirement in the light of the report attached in Appendix B and make the following changes to the Plan: 1. To amend the boundary of allocation HSG2 to include the land in the Estate's ownership up to Heath End Road. 2. To include the Ansley to Walsingham Road access proposal and to	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. The detailed comments and submissions provided will be reviewed by NBBC, and amendments considered as required as part of the finalisation of the Plan

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							<p>explain how the delivery of the Walsingham Road access point can be viably achieved. 3. To explore the other options for access in this area including access as described on Appendix B of this representation and a re-visitation of the original Ansley Road to A444 strategic road with the prospect of additional housing and employment land allocations according to the Estate's previous submissions. In respect of objective 7 the Estate is unclear from the Plan and its evidence base what the purpose of the Community Park is in respect of an allocation co-incident with the extent of the designated historical asset Arbury Park and Gardens. This is of course private land. The Plan includes insufficient detail on what the designation is for and how it will be delivered and therefore is unsound in that respect. Whilst the Estate is willing to discuss the achievement of community park spaces, this proposal would not be deliverable in its current under-described form.</p>	

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264-004	Savills	NB2 - Scale and Location of Growth	no	no	no	yes	<p>Policy NB2 is unsound as it does not accommodate the unmet need for housing. Please refer to Appendix D for further information in that respect. The Estate can provide land without the need for significant highway infrastructure at the locations identified in its response to the Borough Council's "call for sites" consultation. The Concept Plan is attached within Appendix E to provide a broad location of the suggested developable area and associated extensive green infrastructure. For clarity this comprises: Site A: Tower Farm - the developable area can deliver approximately 760 dwellings. Site B: A re-configuration of HSG2 – the developable area can deliver up to 1850 dwellings. Site C: Arbury East – the developable area can deliver up to 790 dwellings. Together this represents about 2,400 additional dwellings to that provided for in the Plan as published. In previous submissions and as described in the Arbury Opportunity documents referred to above, the estate thus has the ability to successfully accommodate a further 2,650 dwellings towards that need. In addition, there is an opportunity to provide a major employment area commensurate with this scale of population growth, close to the A444 to the south of Griff Lane. Clearly, in these circumstances, it would be in the Borough Council and Estate's interests to discuss the strategic implications for such a proposal, including a re-examination of the previously proposed Ansley Road to A444 strategic road.</p>	<p>Various submission documents noted and will be reviewed by the Council. 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.</p>

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264-005	Savills	N/A	no	no	no	yes	<p>The Estate is in general support of Policy NB9 concerning affordable housing and considers this policy to be sound. It is considered that whilst Policy NB11 itself is generally sound in its approach, there is a practical difficulty in arranging infrastructure provision as a pre-requisite of development. In the case of large scale urban extensions, a more nuanced approach is required to ensure that the investment and timing of infrastructure provision is proportionate to the development as it progresses in time. This should be recognised in the wording of the policy. Of greater concern is the content of the Infrastructure Delivery Plan which does not contain all the infrastructure necessary to deliver the Plan (see comments above) nor offers clarity on which projects are required associated with specific proposals in the Plan. There is no data on the likely costs of delivering infrastructure nor an explanation of how the money is to be found. The Plan is unsound on this basis. In respect of Policy NB15, it is considered that without a clearer explanation of what is required to deliver a Community Park at Arbury, this aspect of the Plan is unsound.</p>	<p>The requirements for the delivery of each site will be reviewed, and further details provided where necessary.</p>

264-006	Savills	N/A	no	no	no	yes	<p>The format and methodology of the appraisal is supported. However, the SA is automatically flawed because it does not analyse the Plan in light of the unmet need. A new SA is required once NBBC has made the decision to re-configure the Plan. We are of the view that SA objective 3 is ambiguous as it would imply that only affordable housing, given the general accepted meaning of such in the context of Local Plans, is to be provided. It is suggested that the wording should be altered to delete the word “affordable” which will then allow the objective to cover all types of housing. Retaining the word “affordability” covers the point that the objective wishes to make. Unfortunately, this error has been translated into the Appraisal Questions as included in the SA Appendix A where only questions relating to the affordability of housing are asked. This creates an unbalanced SA where the need for market housing to support the economy either in itself as an economic driver or as a support to sustainable patterns of development, including the growth of the local economy and businesses, is not given sufficient weight. Nevertheless, correction can easily be made by the alteration suggested above and a new question included in the Appraisal of; “Will it provide sufficient homes commensurate with the local need and the needs of the sub-region.”</p> <p>The Analysis of Site Allocation EMP1 at Faultlands does not take into account the imminent opening of the new Railway Station nearby. This should result in more positive impacts on town centre vitality, access to services and access to public transport. It should also be noted that the land has been damaged by previous industrial use and therefore the site has been inappropriately negatively scored under “prudent use of resources.”</p> <p>Alterations to this scoring will improve the sustainability credentials of the site. The</p>	<p>Noted. The Sustainability Appraisal questions are based on the needs of the area as identified in the SHMA. The inclusion of 'affordable' within the SA question is considered to be an appropriate measure for each site. 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. The Sustainability Appraisal will be updated as required</p>
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						<p>analysis of Site Allocation HSG2 at Arbury also does not take account of the opening of the new Railway Station nor the contribution that an improved access links and consequential new bus services will make to the area. Taking such into account, the site has been inappropriately negatively scored under “enhance the vitality of town centres”, “public transport” and “access to services”. Given that the Estate can give a commitment to ensuring that the development follows “secure by design” principles and the inherent location of the site within the Estate boundary allows defensible space design attributes to be easily built into the form a positive scoring on “crime and behaviour” can be attributed to this site. In addition, it is unreasonable to assume that the site will not contribute to recreational opportunities. A negative scoring has been provided on the question of “Biodiversity”. However, investigations over several years has established that the Ensor’s Pool SAC no longer has the white crayfish for which the designation was made. The scoring is therefore incorrect and should be raised from a negative to a neutral score. In summary, Site HSG2 scores more highly in respect of its sustainability credentials than provided in the SA. This enhances support for its allocation within the Plan. The Sustainability Appraisal refers to other site which have not been allocated under the references PDA4, PDA5 and ECON1 for housing and employment uses. However, these areas do not correspond with the areas for such uses as now considered by the Estate as suitable for analysis. The sites have been omitted from the Plan, citing impact on the Landscape as a negative factor in each case The Estate’ proposed amended versions of these sites have been submitted under the recent “call for sites” initiative of the Borough</p>	
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							<p>Council. However it is appropriate to refer to the Landscape Analysis and Transport Study attached as Appendices B and C to these representations which indicates that the Estate's current concept for development in the area has no greater impact using the sustainability criteria than other allocations. In other words, should the Borough Council accept the need to increase housing and employment contributions, there is land available within the Estate of equal sustainability to that currently allocated for the purpose.</p>	
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265-001	The National Federation of Gypsy Liaison Groups	NB10 - Gypsies and Travellers	N/A	no	N/A	N/A	Policy NB10 is unacceptable and does not comply with national policy as set out in DCLG's Planning Policy for Traveller Sites (PPTS) Paragraph 10 of PPTS requires that Local Plans set out criteria for dealing with applications even where no need has been identified. Thus the opening paragraph which includes the phrase "in determining any future planning applications contributing to meeting identified need" is unacceptable and the words I have underlined should be deleted. In criterion (h) the phrase "by walking, cycling and public transport in line with Policy NB7 Hierarchy of Centres" is too restrictive and should be deleted. Criterion (i) is too vague and could be used to unreasonably refuse otherwise acceptable proposals. It may be appropriate for an allocations policy but not as a criterion for determining applications.	The policy requirements are based upon the available evidence set out within the Gypsy, Traveller and Travelling Shoe People Accommodation Assessment. The Council considers the criterion to be prescriptive enough and to be compliant with national planning policy.
266-001	JMW Planning Solutions Ltd	N/A	N/A	N/A	N/A	no	Proposals Map, Existing Employment Sites, Prologis Park, Coventry. Drafting error on the Proposals Map. Plot A2 Prologis Park Coventry should be coloured lilac as per the rest of Prologis Park, being part of the existing employment site.	Noted. Proposals Map to be reviewed and updated accordingly
266-002	JMW Planning Solutions Ltd	N/A	yes	yes	yes	no	Whilst the Borough Council considers that employment land needs can be more than adequately met through the proposed allocations in the Borough Plan, Prologis believes that take-up of sites is likely to have taken place before the end of the Plan period, in view of market conditions. The Borough Plan is concerned with employment-led growth, as is the emerging Coventry Local Plan, and the aspirations of both authorities would suggest that reference should be made in the Borough Plan to a review of the Plan in relation to	Noted. A review of employment land provision shall be undertaken as part of on-going monitoring of the plan, in accordance with the monitoring schedule set out in the proposed Borough Plan.

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							employment land, should allocated sites come forward 'early'. Prologis acknowledges the co-working between Nuneaton and Coventry, especially given the cross-boundary location of Prologis Park Coventry. Further opportunities for the expansion of Prologis Park, later in the Plan period, would help to meet future employments needs of both authorities. Review mechanisms would therefore assist with bringing additional land forward.	
266-003	JMW Planning Solutions Ltd	N/A	N/A	N/A	N/A	no	Infrastructure Delivery Plan, Appendix G - Infrastructure Delivery Schedule, IDP Project Refs GI (i), (j), (k), (l) & (m). GI (i) – the requirement for a new car park to serve the country park as a result of the extension to Prologis Park Coventry [Site EMP3] seems excessive. On what basis are 30 spaces justified? GI (j) – there is already an existing footpath link between the extension land and the country park, and the mown permissive path through the extension land will be retained and slightly realigned. Residents of Blackberry Lane already have a link to the country park at the southern end. GI (k) – as per GI (j) above re footpath link. Also, what is meant by 'supplementary path loop'? A plan would be useful to understand further. GI (l) – it is assumed that the reference to Site EMP3 is an error – an equipped play area and all-weather ball court cannot possibly be justified by a 4 ha extension of an existing employment park. GI (m) – it is accepted that the ecological interests within the country park should be retained, and enhanced as appropriate/proportionate. If the development of the extension land requires	Detailed comments in relation to IDP are noted, and will be taken into account in finalising the IDP

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							<p>off-site ecological mitigation then further habitat could be created within the country park if justified. It is intended that the existing GCN pond within Site EMP3 be retained as part of the development proposals and previous surveys have indicated that other fauna and flora are not likely to be significant constraints on this site. Further surveys will be undertaken as appropriate. Prologis is concerned that detailed analysis of requirements has taken place, including specific costings, with no consultation with Prologis or explanation/justification for the items specified. Prologis would welcome discussion in this regard, and would certainly resist inclusion of any of the specific projects within the policies of the Borough Plan. The infrastructure items associated with Site EMP3 should be viewed as aspirations rather than set requirements</p>	
267-01	Tetlow King Planning	NB9 - Affordable Housing	no	no	no	yes	<p>This policy is inflexible and prescriptive regarding tenure splits it does not take into account proposed changes to the definition of affordable housing, to include starter homes. Tetlow King Planning have provided a suggested amendment which includes flexibility of tenures.</p>	<p>Noted. However, the NPPF consultation is ongoing and yet to be finalised, so it would be premature to incorporate changes at this stage. However, the Council will monitor changes to National Planning Policy and the further information provided and will make any amendments to the policy where required. The policy already incorporates flexibility through the opportunity for developers to demonstrate at the planning application stage if and why a particular scheme cannot meet the overall affordable housing requirements. However, the Plan as a whole has been viability tested and is considered to be viable.</p>

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267-02	Tetlow King Planning	N/A	no	no	no	yes	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.	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 additional land to assist in meeting the needs of the Coventry and Warwickshire Housing Market Area.
267-03	Tetlow King Planning	N/A	no	no	no	yes	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
267-04	Tetlow King Planning	NB3 - Settlement Hierarchy and Roles	no	no	no	yes	Policy NB3 should be amended and the last sentence should be deleted. The deletion of this sentence will ensure that the growth of Bedworth is not artificially constrained - the amendment will make the policy NPPF compliant.	Evidence gathered under the Settlement Analysis Report of Nuneaton and Bedworth (NBBC 2011) places Nuneaton at the top of the settlement hierarchy as the most sustainable settlement in the Borough, and is therefore the primary focus for new development.

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267-05	Tetlow King Planning	NB2 - Scale and Location of Growth	no	no	no	yes	Not positively prepared on a strategy which seeks to objectively meet the needs of the Housing Market Area, no positive approach to managing development. Not effective as it does not take into consideration Coventry's unmet housing needs as required by the NPPF. Not justified as it does not deliver sufficient housing growth in Nuneaton and Bedworth and the Housing Market Area, the background papers fail to justify the housing allocations and do not explain why other sites were discounted. It is not consistent with national policy as it fails to significantly boost the housing supply and provides a shortfall of housing. More specifically to this policy, the plan needs to address the Coventry housing need and policy NB2 should be amended to provide for at least 14,120 housing.	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.
268-01	Landmark Planning	NB2 - Scale and Location of Growth	no	no	no	yes	Land at Judkins, on the north side of Tuttle Hill should be included in this policy - it is a brownfield site outside of Green Belt and within the settlement boundary. The site has always been promoted and was put forward in the most recent Call for Sites (2015). Further reasons for putting this site forward are in the response.	Noted
268-02	Landmark Planning	NB5 - Nature of Employment Growth	yes	yes	N/A	yes	Land at Judkins, on the north side of Tuttle Hill should be included in this policy.	Noted. All consultation responses will be considered in further preparation of the Borough Plan.
268-03	Landmark Planning	NB8 - Range and mix of Housing	no	no	N/A	no	There is a need for some flexibility in the indicative sizes of the properties set out in Table 10.	Noted. Table 10 relates to the 2013 SHMA as this is the most up to date information at this time and is for guidance. It is acknowledged that the SHMA will be updated over the plan period, and the Council may therefore remove the table from the policy.

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268-04	Landmark Planning	NB9 - Affordable Housing	yes	yes	N/A	no	There is a need for some flexibility in the indicative sizes of the properties being sought. There is little demand from registered providers for 4 bedrooms or more affordable provision.	Noted. The four plus bedroom houses have been given the smaller percentage as defined as being recommended in the SHMA and the Council's Housing Register.
268-05	Landmark Planning	NB15 - Green Infrastructure	yes	yes	N/A	yes	Land at Judkins would ensure that the promotion of green infrastructure would be met - therefore this site should be put forward.	Land allocation has been considered as part of policy NB2 - Scale and location of growth.
268-06	Landmark Planning	NB20 - Contamination and Land Instability	yes	yes	N/A	no	My clients support the need for contaminated land to be supported by evidence that any risks can be mitigated - this has been done for land at Judkins and, therefore, this land should be put forward.	Noted.
501	Jack Parker	NB2 - Scale and Location of Growth	N/A	no	N/A	yes	Objection is based on the allocation of land at Woodlands, Bedworth for residential development due to issues with flooding impact on the countryside and the need for the allocation.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals.
502	County Councillor, St Nicholas Division, Nuneaton	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objects to the siting of the majority of the Borough's housing on the north east side of Nuneaton. Infrastructure in the area is restricted. The site is on the opposite side of the town from employment uses. Further investigation and consultation is required. The proposed allocation of the traveller is in an inappropriate location due to the sensitive character of the area, impact on local business and nearby dwellings. No mitigation from County Council is proposed and plan fails to demonstrate connectivity with local residents needs.	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. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 allocation of traveller sites is being considered separately and comments will be considered in relation to that consultation.

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503	Mr A Grant	All Policies	yes	no	N/A	yes	It is considered that inadequate consultation has been undertaken and that the consultation that has been undertaken has been designed to restrict potential responses. It is not sound to have 10,000 homes thrust upon us without proper scrutiny.	Noted. The Council has produced the Borough Plan in accordance with relevant regulations and the Statement of Community Involvement. The Borough Plan will be subject to detailed scrutiny in due course through the Examination-in-Public process.
504-001	John J Hurley	N/A	N/A	N/A	N/A	N/A	Respondent has provided comments in relation to the Gypsy and Traveller Site Allocations document	The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
504-002	John J Hurley	NB2 - Scale and Location of Growth	N/A	N/A	yes	N/A	Objection is made to allocation of greenfield sites at Hospital Lane, School Lane, Elliot Gardens and the Woodlands. Brownfield land should be used first. Allocation of these sites would cause highway safety issues.	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. Improvements to highways will be required in order to enable the development of strategic sites, in accordance with Policy NB12.
505	John Ison	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	Issues are raised with the allocation of land at The Nook for development due to part of the land being on a flood plain. Development would increase the risk of flooding and the plan should be amended to take this into account. There are also land ownership issues that need to be addressed.	Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals.
506	Revd. Donald Jones	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Concern is raised that the consultation response form is too complicated to allow responses from the general population. The allocation of HSG2 would cause significant traffic issues in the area, particularly the A444. The allocation of this site would result in a significant adverse impact on farm land and wildlife. It is recommended that the allocation be relocated to the south, to abut Bermuda Park.	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. Whilst it is appreciated that planning terminology can be confusing at times, the Council has sought to ensure that consultation is as clear as possible. However, the Submission Stage requires the Council to consult specifically on 'soundness' and 'legal compliance' of the Plan. The Council acknowledges that additional infrastructure will be required to support new planned development,

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								including the proposed allocation HSG1. 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.
507	Mr K Round	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the allocation of land off Eastboro Way as the site is prone to flooding and existing traffic congestion in the area. Any development should not include affordable dwellings and no buy to let homes as these are not in keeping with the character of the area.	Noted. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality and Policy NB25 - Landscape Character) and national planning policy, which provide strict development requirements. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development. 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. New housing development will be required to provide a suitable mix to meet the needs of the Borough, in accordance with policy NB8.
508-01	Bedworth Heath Action Group	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Submission of reference numbers for objection letters previously submitted, opposing the Hospital Lane allocation site (HSG5).	Noted.

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508-02	Bedworth Heath Action Group	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection to the inclusion of HSG5 due to the issues set out in previous rounds of consultation. Due to it not being feasible to gather further comments from previous consultation undertaken by the Action Group and as no change to the allocation has been made it is requested that the previous responses be reiterated in this round of consultation.	Noted. 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 development proposed will require to be inline with policies in the Plan, which relate to biodiversity, ecology, air quality and transport and highways. 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 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.
509	Bedworth Heath Action Group	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the allocation of land at Hospital Lane (HSG5) and Woodlands (HSG4) on the basis that the extent of development would result in an adverse impact on air quality, ecology and biodiversity, local infrastructure, including local GPs, and traffic congestion. Therefore the development is unsustainable. The loss of Green Belt land is not supported due to loss of recreation, farmland, flooding and climate change. Comments submitted at the preferred options stage are to be reiterated as part of the current consultation responses.	Noted. 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 development proposed will require to be inline with policies in the Plan, which relate to biodiversity, ecology, air quality and transport and highways. 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 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.

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511-001	George Eliot Fellowship Response	NB24 - Valuing and Conserving our Historic Environment	N/A	N/A	N/A	N/A	Comment is made that the Plan should be amended to give full protection to Griff House (the birthplace of author known as George Eliot), associated outbuildings and its surroundings as a heritage asset, including designation as a conservation area and inclusion in the listed building status and the extension of green infrastructure set out in NB15 to include the Griff. (Duplicate comment provided in ref. 1019)	The importance of Griff House is noted as it is a listed building. The appropriate protection of Griff House, including its setting, is considered to be established by virtue of its listing and the wording of policy NB24.
511-002	George Eliot Fellowship Response	NB24 - Valuing and Conserving our Historic Environment	N/A	N/A	N/A	N/A	Request is made to be involved in the on-going review of policy NB24.	Noted. However, as the 'Submission' Plan there is limited scope for further changes to be made to the policy. Further public consultation will be undertaken on the Plan should any significant changes be made prior to Submission for Examination-in-Public
512	Martyn Richards	All Policies	N/A	N/A	N/A	N/A	Indicators and Targets which form supporting tables within the Local Plan should be amended to ensure that targets are clearly measurable, including tables 6, 7, 11 - 24 and 28. It is also recommended that NB16a be amended to open space should be increased, not that there shall be 'no net loss'.	Noted. The Council considers the targets are clearly measurable and accurate, but will take into account the comments provided in finalising the Plan for Submission
513	Michael Quinn	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the proposal to build 10,000 homes in the Borough due to a lack of consultation, excessive traffic impact on existing highways, lack of infrastructure to support new residents, impact on biodiversity and ecology, disruption to area during construction and lack of employment for new residents. Brownfield sites should be used to accommodate new houses, not Green Belt and not on the scale that is proposed.	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. 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. The Council has carefully considered the Green Belt

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								through the site selection process. NBBC have undertaken through consultation, in accordance with the Statement of Community Involvement (2015).
514	Mrs V Ward	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the proposal for a gypsy and traveller site near a crematorium as it is inappropriate due to mourners visiting the crematorium. Further detail regarding the provision of housing on the site as well as gypsy and traveller pitches is required. Use of existing gypsy and traveller sites should be maximised before new sites are allocated. The need for new gypsy and traveller sites is queried. Traffic at the Eastboro Way and Crowhill Road junction is already bad, the plan would make this worse.	The Gypsy and Traveller Site Allocations document is subject to a separate consultation. The policy and requirements for future provision accord with national planning policy and the available evidence which is provided in the Gypsy, Traveller and Travelling Show People Accommodation Assessment (2013)
515	Gill May	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	The allocation of land near a crematorium is questioned. Further housing around St Nicholas Park/Weddington is not supported. Brownfield land should be used more appropriately. Existing infrastructure and highways are not sufficient.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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. 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.
516	Alwyn Waine	N/A	N/A	N/A	N/A	N/A	Further consideration should be given to defining the need for an extension to the cemetery and how this need will be met, similar to the consideration given to gypsy and travellers.	Land for a cemetery extension is allocated at Marston Lane, Bedworth. Cemetery provision has also been included in the Infrastructure Delivery Plan which also focuses on the need to support development applications which will seek to address significant gaps in Green Infrastructure and its publically accessible 'Green Network'.

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518-001	Woodlands Action Group	N/A	N/A	N/A	N/A	yes	Request of Mr Karl Mayer and Ms Susie Pacey to speak at the oral examination in addition to comments submitted on behalf of Woodlands Action Group.	Noted.
518-002	Woodlands Action Group	N/A	N/A	N/A	N/A	N/A	If the stream that runs past Charity Spinney and under the A444 is polluted then it would harm water voles and lead to pollution of Bedworth Slough Nature Reserve.	Development proposals will ensure that ecological networks and services, biodiversity and geological features are conserved, enhanced, restored and, where appropriate, created. Development proposals affecting the ecological network or important geological features will be accompanied by a Preliminary Ecological Assessment. Where the assessment indicates an adverse impact, the assessment must set out a mitigation strategy to halt and reverse the loss of biodiversity.
519	Lynn Wellington	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the proposed development between Milby Road and A5 Eastboro Way due to existing traffic issues being increased by new dwellings. It is also recommended that provision be made for elderly residents to downsize to appropriate dwellings. Social housing should be provided where there is good public transport links with the town centre. The need for housing in Nuneaton is exaggerated. Problems with unemployment and single parents should be addressed.	The Council acknowledges that additional infrastructure will be required to support new planned development. 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. NBBC agrees that a range of housing should be provided, including dwellings for the elderly and social housing. Policy NB8 requires housing to be provided which meets local needs and the local characteristics. This includes homes for older people in accessible locations.
520-001	Course and Shelton	NB12 - Strategic Accessibility and Sustainable Transport	N/A	N/A	N/A	N/A	Objection is made to the proposed development due to the impact that it would have on existing congestion in the borough. Additional development of the scale proposed would make existing traffic issues worse.	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.

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520-002	Course and Shelton	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	The loss of green field land for development is not supported. Consideration should be given to greenfield land only when all other options have been shown to be inappropriate. Land in the Borough should not be used as overspill from Coventry. Land allocations near The Longshoot would add to existing issues with congestion. It is inappropriate to allocate land at Bedworth for a cemetery to be used by residents of Nuneaton.	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. The Council acknowledges that additional infrastructure will be required to support new planned development. 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.
520-003	Course and Shelton	NB6 - Nature of Town Centre Growth	N/A	N/A	N/A	N/A	Car parking and traffic issues should be addressed in order to improve the vitality of the town centre.	Noted. Appropriate actions for car parking will be undertaken through a car parking standards supplementary planning document and an Area Action Plan. Facilities for cars within the town centres will be considered along with other modes of transport.
522	Roy Moss	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Allocated sites at Woodlands, Hospital Lane, Astley lane, and the recently completed houses at Keresley results in over 3500 houses within 3mi of each other. This will result in excessive congestion on highways. Sufficient investigation has not been completed and made available to fully assess this.	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. 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.

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523-001	Merle Gering	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	Stated housing need is not supported by actual evidence. Allocation of housing should be in the most sustainable locations, including near to existing employment sites to reduce the need for commuting. The allocation of housing sites in the past has not resulted in houses being built, it is unlikely that the current plan will achieve the stated targets. The plan fails to provide sufficient provision for the needs of the elderly population. Further evidence is provided in submission documents.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. The scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. However, in accordance with national planning policy and the Duty to Cooperate, 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 Plan includes a number of policies that seek to provide for the elderly population of the Borough, including Policy NB8 and NB14.
523-002	Merle Gering	All Policies	N/A	no	N/A	N/A	The plan process has not allowed the public to participate in environmental decision making. Access should be provided to full databases to allow proper consultation. Further evidence is provided in submission documents.	The Council has undertaken public consultation on the Borough Plan and supporting evidence in accordance with the published Statement of Community Involvement and relevant regulations. 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. The Borough Plan will be subject to detailed scrutiny in due course through the Examination-in-Public process.
523-003	Merle Gering	NB5 - Nature of Employment Growth	N/A	no	N/A	N/A	Employment growth forecast is not supported by past experience or historical trends. Further evidence is provided in submission documents.	Employment growth is supported by the Council's evidence base, and has been derived from bespoke forecasting models.

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524	Rachel Gering-Hastorpe	All Policies	N/A	N/A	N/A	N/A	The Plan is based on principles for development that are unsustainable. Housing should be located close to employment sites to reduce the need for commuting. The proposed employment growth has no prospect of being fulfilled. New allocated housing sites are not well served by public transport links.	The Council considers the Plan is based on sustainable principles given the inclusion of NB1 for developments to adhere to and the wealth of background papers undertaken to support the Plan and the policies, including extensive Sustainability Appraisal. A balanced approach to the allocation of employment and residential land has been proposed to meet the needs of the area as supported by the supporting evidence base.
525	Mr and Mrs Cooper	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection to the site allocation for gypsies on Eastboro Way as it will be detrimental to the stability of the area, potentially cause anti-social behaviour and put a strain on local services, it is also too near to the crematorium where there are grieving people and this proposed development will also encourage further development.	Gypsy site allocations will form part of a separate consultation analysis.
525	Mr and Mrs Cooper	N/A	N/A	N/A	N/A	N/A	Objection to the site allocation for gypsies on Eastboro Way as it will be detrimental to the stability of the area, potentially cause anti-social behaviour and put a strain on local services, it is also too near to the crematorium where there are grieving people and this proposed development will also encourage further development.	The Gypsy and Traveller Site Allocations document is subject to a separate consultation.

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750	Angela Reeve	NB2 - Scale and Location of Growth	no	no	yes	yes	The plan is not considered to be legally compliant as it does not comply with the Town and Country Planning (Local Planning) (England)(Amendment) Regulations 2012, it has not been carried out in accordance with the Council's Statement of Community Involvement and has not consulted the appropriate consultees. The plan is not sound as it has not been positively prepared, it is not justified and it is not effective. Development on Green Belt land is opposed. The School Lane allocation is reprehensible due to its impact on Green Belt land with adverse effect on wildlife, landscape, flooding, traffic and a loss of distinction between Coventry and Bedworth. Objection is also against the stated need of 1200 people in Bedworth looking for a house.	Objection noted. 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. 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. 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. 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. The Council is proposing growth in the most sustainable and appropriate locations. Any development proposals will need to accord with policies within the Plan (such as NB21 – managing flood risk and water quality, Policy NB19 - Biodiversity and Geodiversity, Policy NB12 - Strategic Accessibility and Sustainable Transport and Policy NB25 - landscape character) and national planning policy, which provide strict development requirements.
751-001	Jonathan Taylor	NB25 - Landscape Character	no	no	yes	yes	The plan is not legally compliant because it does not comply with the Town and Country Planning (Local Planning)(England)(Amendment) Regulations 2012. The plan is unsound because it is not justified. The previous approval for 330 houses (033157) contravenes policy NB25 of the proposed Borough Plan. NB25 is not legally compliant as permission has been granted for new development in application ref. 033157.	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. Application ref. 033157 for outline permission to erect up to 330 dwellings was a resolved to be approved subject to completion of a section 106 agreement. At the time of writing, a final decision has not been issued. The section 106 will need to be agreed, a reserved matters application approved and any relevant conditions discharged prior to the development ref. 033157 commencing. In light of this it is considered inappropriate for the proposed local plan

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								to take into account the resolution at this stage. Regardless of this, the land is outside of the proposed Green Belt and outside of the area allocated for development ref. HSG1. The resolution to grant permission is not considered to compromise the soundness of the proposed Local Plan.
751-002	Howard Taylor	NB25 - Landscape Character	no	no	N/A	N/A	The plan is flawed because it does not take into account approved outline permission for 330 dwellings at The Longshoot/Eastboro Way (ref. 033157).	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. Application ref. 033157 for outline permission to erect up to 330 dwellings was resolved to be approved subject to completion of a section 106 agreement. At the time of writing, a final decision has not been issued. The section 106 will need to be agreed, a reserved matters application approved and any relevant conditions discharged prior to the development ref. 033157 commencing. In light of this it is considered inappropriate for the proposed local plan to take into account the resolution at this stage. Regardless of this, the land is outside of the proposed Green Belt and outside of the area allocated for development ref. HSG1. The resolution to grant permission is not considered to compromise the soundness of the proposed Local Plan.
752-01	Jo Johnson	All Policies	yes	no	yes	no	The Plan does not address housing needs, there is insufficient affordable housing provision and not enough is allocated to infrastructure provision. More health and education opportunities need to be included, more green space allocated and more consideration to traffic issues.	The Plan considers housing need in policies NB2, NB8 and NB9 to ensure the population's need are met, reflecting the Strategic Housing Market Assessment. The affordable housing provision has been calculated using the joint SHMA and has been assessed using the Basic Housing Needs Assessment Model. The policy also draws data from several reports undertaken. The policies on green space, health, education and traffic are considered thorough. Provision is made for new infrastructure to be provided as part of the development of strategic sites through the IDP and for windfall sites to contribute through CIL/106 obligations. Policy NB11 together with the Infrastructure Delivery Plan identifies the infrastructure requirements associated with the Plan. The requirements for the

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								delivery of each site will be reviewed, and further details provided where necessary.
753-01	Howard Taylor	NB25 - Landscape Character	no	no	yes	yes	The Plan is not justified and does not comply with the Town and County Planning Regulations 2012. The Plan is not justified as it has been given no weight in the 033157 application at a site South of Long Shoot.	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. Application ref. 033157 for outline permission to erect up to 330 dwellings was a resolved to be approved subject to completion of a section 106 agreement. At the time of writing, a final decision has not been issued. The section 106 will need to be agreed, a reserved matters application approved and any relevant conditions discharged prior to the development ref. 033157 commencing. In light of this it is considered inappropriate for the proposed local plan to take into account the resolution at this stage. Regardless of this, the land is outside of the proposed Green Belt and outside of the area allocated for development ref. HSG1. The resolution to grant permission is not considered to compromise the soundness of the proposed Local Plan.
754-01	Michele Kondakor	N/A	N/A	no	yes	yes	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	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

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							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.	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.
754-02	Michele Kondakor	NB7 - Hierarchy of Centres	N/A	no	yes	yes	Policy NB7 states that new district centres will be required at HSG1 and HSG5 but there is no mention of how this will be achieved. The policy also states a how district or local centres which meet a certain criteria will be considered favourably - this is a laudable aim without absolute guidance and is meaningless.	New District Centres will be provided when new residential development is proposed and the thresholds in the Policy are not met. The centre type will be based on need and where it is appropriate to plan for a new District Centre. Policy NB7 details how development in District and Local Centres will be considered acceptable by following the four criteria given that are wide ranging in subject. The requirements for the delivery of each site will be reviewed, and further details provided where necessary.
754-03	Michele Kondakor	NB8 - Range and mix of Housing	N/A	no	yes	yes	There is no statement in NB8 that designing Lifetime Homes will be a requirement rather than a desire.	The Council will seek to ensure that new development meets lifetime homes standards. However the ability of development to achieve this will vary on a case by case basis depending on a range of circumstances relating to viability.

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754-04	Michele Kondakor	N/A	N/A	no	yes	yes	SHMA (2014) review states that 8440 homes are required in the Borough yet the Plan has used a non evidence based 10,040. Infrastructure will need to be improved before any further development takes place. The recent flooding in Cumbria show that flooding scenarios should be considered rather greater than once in 100 years. Table 16 shows deficiencies of open space and green infrastructure at all levels and yet the development is being proposed in green fields.	Noted. However, the scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. 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 Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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. Policy NB21 is focused on managing Flood Risk and states that the Council will seek to locate development in area of low flood risk. Where major development is proposed in flood risk areas, a site specific flood risk assessment must be included within the application to show that risk both within the site and further downstream is not increased. Table 16 in the IDP does show a deficiency in Open Spaces in the Borough, however, this will be mitigated through policies NB15 and NB16 which look to support developments which create and improve Green Open Spaces.
754-05	Michele Kondakor	N/A	N/A	no	yes	yes	Not encouraging - as most of north Nuneaton has already been given planning provision without the necessary mitigation measures I am very concerned that this Plan will not be sustainable.	Noted

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755-01	Ian and Julie Scott	N/A	yes	no	yes	yes	The Plan has not been positively prepared and is not effective. The Borough Plan has been focused around building houses - but this will not solve the underlying problems in the Borough. In many ways it will exacerbate these issues by encouraging people to move into the Borough and to work outside of it. The Borough for a long time has been a dormitory town and this will only increase under the Borough Plan. The Plan should focus on the following issues - improving education standards, creating employment opportunities, promote the town's unique selling point for the town and provide the town with an Education, Skills and Employment Strategy.	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. The selection of employment sites, while recognising the need to have a relationship with housing seeks to allocate sites that are most likely to come forward from an economic perspective i.e. they are favourable to the market.
756-01	Damon Brown	NB2 - Scale and Location of Growth	N/A	no	N/A	no	The Plan has not been positively prepared, is not justified and is not effective. The housing target of 10,400 is overly-optimistic, other documentation indicates that a target of 6400 would be a more accurate representation. The commitment to take the additional housing from Coventry is against the wishes of the residents of the Borough. Proper, meaningful consultation is required, the consultation document is too complex for those who do not understand planning law. Council's inability to organise consultation events at times which suit the majority of working residents indicates their unwillingness to cooperate with the local residents. To make the Plan sound - revision of the overall housing target for the Borough, removal of the preferred options site at the Woodlands, Bedworth - inclusion is contrary to the unanimous vote in Council on Dec 2008, and the removal of infill green corridor sites that separate Bedworth from Ash Green.	Objection noted. However, the scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. 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. Under Duty to Cooperate, Local Authorities are required to work with neighbouring authorities in their Plan making process to meet the needs of the wider area. The Council has undertaken public consultation on the Borough Plan in accordance with the published Statement of Community Involvement and Local Plan Regulations. The Council will be producing a Consultation Statement in due course demonstrating how the consultation has been undertaken and how this has informed the production of the Plan in accordance with the Regulations. Whilst it is appreciated that planning terminology can be confusing at times, the Council has sought to ensure that consultation is as clear as possible. However, the Submission Stage requires the Council to consult specifically on 'soundness' and 'legal compliance' of the Plan.

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758-01	Jon McDevitt	NB2 - Scale and Location of Growth	yes	no	yes	no	Too many proposed dwellings in this space. No land has been identified in HSG1 to give a meaningful mitigation to policies Nb15, NB16, NB21, NB25. Proposed development in HSG1 will give rise to increase traffic on roads, increase strain on existing infrastructure, make Change Brook more vulnerable to flooding. Land should be identified within HSG1 to provide amenity space and control surface water runoff in the catchment are of Change Brook. An ideal location would be in the fields between Weddington Primary School and Higham Lane and Coronation Walk. Reasons for this preferred site are included in further detail in the response. The number of dwellings in HSG1 should be scaled to a sustainable level. Reassurance must also be given to show that existing infrastructure providers are able to increase capacity and this is included in the proposed wider development.	Objection noted. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. 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. The Council is proposing growth in the most sustainable and appropriate locations. The respondent should note that 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.

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759-01	Clare Golby	N/A	N/A	N/A	N/A	N/A	<p>GEH (g) Improvements should be made to the A444 junction for emergency access to the hospital site prior to the construction of the Bermuda Connection. The new foot and cycle bridge is not required for the Bermuda Lake as this is already existing on the A444 bridge (money should only be spent on improving the existing facility). The Bermuda Connection will cause increased pollution to the Ensors Pool (and is therefore in conflict with the Borough Plan).</p> <p>Gi (o) - contribution of cycle paths - again, cycle paths are already in existence and the implementation of the Bermuda Connection project would contradict the aims of the draft Local Plan in this regard of removing these facilities to create new ones. Project WCC H+T (a) and (aa) should occur before the construction of the Bermuda Connection to ensure that existing traffic patterns do not change. The disused (except for pedestrians and cyclists) bridge over the A444 should not be opened up - this should not be forced on existing communities. Project H + T (w) should be included in the traffic modelling data for the Bermuda Connection scheme. Project cycling (b) is in conflict with the Bermuda Connection which would narrow cycle lane and footways (replacing these would be a waste of money). Walking (c) -improving connections to the George Eliot Hospital does not provide pedestrians with any benefit at all. WCC Bus (f) has no relevance - there is no demand for bus services.</p>	Comments will be shared with Warwickshire County Council

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759-02	Clare Golby	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Proposed site on Arbury land is inappropriate - masses of critical infrastructure missing (including already existing highways issues). This development should be taken directly from the A444 (as a mirror estate to the Sutherland Drive estate in Bedworth). There is a sufficient argument to remove this scrub land from the Green Belt in order to allow building as building has been undertaken on the Bermuda Park industrial estate with no issues. As a trade off the land closer to Stockingford and Arbury Hall could be added into Green Belt.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. The Council acknowledges that additional infrastructure will be required to support new planned development. 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.
760-01	Richard Briggs	All Policies	N/A	no	N/A	no	The level of information presented in this consultation means that it is very hard to expect residents to be able to comment on this. An independent assessment of the soundness of the plan needs to be undertaken by qualified professionals.	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. One of the statutory requirements for the preparation of any local plan is to consult on the legality of the plan. Whilst it is appreciated that the terminology and requirement can be complex, the Council has sought to make consultation as meaningful as possible, in accordance with the Statement of Community Involvement. The Borough Plan will be subject to detailed scrutiny in due course through the Examination-in-Public process.

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760-02	Richard Briggs	N/A	N/A	no	N/A	no	<p>New housing needs to be supported by purpose designed infrastructure, paid for by the developers and minimising or eliminating the impact on existing residents. Strong objection to the Bermuda Connection - this scheme does not align with the emerging Local Plan on many levels and will be damaging to Arbury and Stockingford. The impact of the additional traffic would make the environmental and road safety impacts of the scheme far greater. Bermuda Road and The Bridleway should remain a residential area with no through-road for commuter traffic. Furthermore, any developer wanting to develop the Arbury site should provide a purpose built Nuneaton western by-pass alleviating traffic congestion by linking the A4444 with the B4112. Also, Town Centre ring-road improvements should also be a priority for the Borough as it will include upgrading an existing main road on a strategic corridor between the M6 and A5. Further information in relation to why this Bermuda scheme should not occur are included in the Bermuda Bridge Action Group Report available on: http://bermudabridgeactiongroup.co.uk/</p>	The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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. Comments will be shared with Warwickshire County Council
761-01	Julie Cashmore	NB10 - Gypsies and Travellers	N/A	no	yes	no	<p>The Plan is not justified. The choice of site off Eastboro Way is not in keeping with the surrounding area and fails at least one of the evaluation criteria - the site at Eastboro is not 'derelict land that needs to be brought back into use'. The road near Griff Hollows should be viewed as more suitable as it fulfils this criteria and is also close to the permanent site at Griff Hollows. The methodology used for this site allocation is unsound and significantly over-estimates</p>	Noted. The Council considers the plan is justified and legally compliant. The Gypsy and Traveller Site Allocations document is subject to a separate consultation.

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							the amount of gypsy traveller pitches required. Alternative sites have been suggested but these have not been fully evaluated. Furthermore, estimates used for average encampment size have been taken from another borough and are not specific to this area.	
762-01	David Cockerell	NB2 - Scale and Location of Growth	yes	no	yes	yes	The Plan has not been positively prepared. Paragraph 5.8 does not indicate where the overspill from Coventry will be located. Logic suggests that these sites should be located near Coventry and we feel that it is necessary to suggest where these sites should be. The site at Hawkesbury Basin is identified in the Council's SHLAA as NUN 123 is available for development and should be included. A site deliverability statement is part of this response's evidence. Although this site is in the greenbelt, it has significant hazards and remaining contamination from having been used as a commercial tip and a coalmine. Appearance at examination to fully explain merits of site.	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 promotion of the site at Hawesbury Basin is noted and it is of note that the findings of the updated SHLAA 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.
763-01	Richard and Caroline Crosby	NB2 - Scale and Location of Growth	N/A	no	yes	no	The proposed Plan is not effective. Land identified in policy HSG4 is unsuitable as it is on a flood plain, cause major traffic congestion, have a negative impact on protected wildlife species (which include Great Crested Newts and Bats) and the current infrastructure will be unable to cope with this increase in demand. This proposed development should be moved to a brownfield site.	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 (such as NB21 – managing flood risk and water quality and NB19 - Biodiversity and Geodiversity) and national planning policy, which provide strict development requirements in relation to flood risk and wildlife. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. Policy NB11 of the Borough Plan relates to 'Ensuring the Delivery of Infrastructure

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								Provision' and makes clear that the provision of new infrastructure is a pre-requisite of development. This is supplemented by the Infrastructure Delivery Plan.
764-01	Darran Cashmore	NB10 - Gypsies and Travellers	N/A	no	yes	no	The Plan is not justified. The choice of site off Eastboro Way is not in keeping with the surrounding area and fails at least one of the evaluation criteria - the site at Eastboro is not 'derelict land that needs to be brought back into use'. The road near Griff Hollows should be viewed as more suitable as it fulfils this criteria and is also close to the permanent site at Griff Hollows. The methodology used for this site allocation is unsound and significantly over-estimates the amount of gypsy traveller pitches required. Alternative sites have been suggested but these have not been fully evaluated. Furthermore, estimates used for average encampment size have been taken from another borough and are not specific to this area.	Noted. The Council considers the plan is justified and legally compliant. The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
765-01	Joseph Cashmore	NB10 - Gypsies and Travellers	N/A	no	yes	no	The Plan is not justified. The choice of site off Eastboro Way is not in keeping with the surrounding area and fails at least one of the evaluation criteria - the site at Eastboro is not 'derelict land that needs to be brought back into use'. The road near Griff Hollows should be viewed as more suitable as it fulfils this criteria and is also close to the permanent site at Griff Hollows. The methodology used for this site allocation is unsound and significantly over-estimates the amount of gypsy traveller pitches required. Alternative sites have been suggested but these have not been fully evaluated. Furthermore, estimates used for average encampment size have been taken	Noted. The Council considers the plan is justified and legally compliant. The Gypsy and Traveller Site Allocations document is subject to a separate consultation.

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							from another borough and are not specific to this area.	
767-01	Peter Barber	NB2 - Scale and Location of Growth	no	no	yes	no	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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768-01	Clare Riaz	NB2 - Scale and Location of Growth	no	no	yes	no	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.
769-01	J Gray	All Policies	no	no	no	no	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	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

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							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.	including any additional housing need from Coventry, as is required by national regulations.
769-02	J Gray	NB2 - Scale and Location of Growth	no	no	no	no	Objection to the proposed development at Bedworth Woodlands (HSG4). Bedworth Woodlands should be included in the Green Belt. It was proposed to be included in Green Belt in 2013 but this has changed in this emerging Plan without consultation on this reversal. The Woodlands meets 4 out of 5 purposes of including land in Green Belt as set out in NPPF para. 80. It also meets all 3 criteria in para 85 NPPF for defining boundaries. The Council was right to propose the Woodlands as Green Belt extension in 2013 and should reinstate that by amending the Draft Submission Local Plan accordingly. Furthermore, development located on this site would cause further traffic issues on Heath Road and Newtown Road. Part of this site is also on flood plain (as noted by the Environmental Agency).	Objection noted. 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. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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.
770-01	Heart of Whitestone Residents' Association	N/A	N/A	no	yes	yes	The Plan is not effective. The current proposals involve making minor adjustments to current roads, but a carefully designed southern-bypass is needed in order to alleviate traffic issues, minor changes will not alleviate the problem.	The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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. NBBC will continue to work with Warwickshire County Council and Highways England in order to ensure that the necessary highway

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								improvement measures associated with the Borough Plan are carefully planned for and implemented.
770-02	Heart of Whitestone Residents' Association	N/A	N/A	no	yes	yes	The Plan is not justified, there is no proportional evidence for sections 3.2 and 3.3 at present. There is no supporting data, supporting facts and figures are required in order to provide evidence of the mentioned significant issues.	The facts and figures included within sections 3.2 and 3.3 are taken from a variety of sources included within the evidence base. It is acknowledged that it may be helpful to indicate how this summarised information has been sourced.
771-01	Patrick Murfin	NB2 - Scale and Location of Growth	no	no	yes	yes	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 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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772-01	John Frogley	NB2 - Scale and Location of Growth	yes	no	yes	yes	The Plan has not been positively prepared, greenfield sites have been promoted above the reclamation of derelict land, contaminated and urban sites as none have been mentioned on the proposed sites. There will be too much pressure on infrastructure and wildlife. Furthermore, the number of sites identified only totals 7245, which is only 70% of the required 10,040 - more sites on brownfield land are necessary.	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. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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.
773-01	Alwyn Waine	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	Commitment to build 10,400 additional homes between now and 2031 is unnecessary if you look at the forecasted population growths, it will also cause major issues in terms of infrastructure and there are not enough employment opportunities available for this proposed development. Furthermore, the location of the Gypsy and Traveller site off Eastboro Way is insensitively placed in a sensitive setting, it will cause issues with access and there is no need or demand for this development.	The scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 Gypsy and Traveller Site Allocations document is subject to a separate consultation.
774-01	Tina Moore	NB6 - Nature of Town Centre Growth	N/A	no	yes	no	The Plan is not justified, there is no evidence to prove that (as noted in section 5) the Town Centres are predicted to continue to need a retail-led focus. This focus on shops for town centres is misplaced, instead the town should be part demolished and redeveloped and non-Class A uses should be introduced. Our town centre cannot compete with nearby retail centres, which include, Leicestershire villages and Tamworth, Solihull and Leamington.	A strategic assessment of the quantitative and qualitative need for new retail (comparison and convenience goods) floorspace, commercial leisure use and office space has been undertaken. The evidence base gives recommendations that reduce the figures provided from previous studies to more realistic, but still aspirational figures, as in line with requirements of the NPPF. The Council will be producing a Town Centres Area Action Plan to identify sites for development and specific requirements.

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775-01	Michael Dixon	All Policies	no	no	yes	yes	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.
775-02	Michael Dixon	NB2 - Scale and Location of Growth	no	no	yes	yes	HGS 4 - The Woodlands development should not be included in the Plan as it is rural and any development would permanently adversely change the nature of the area.	Objection noted
776-01	Mr Barson	N/A	no	no	yes	yes	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	NB2 - Scale and Location of Growth	N/A	N/A	N/A	yes	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	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.

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							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.	
779-01	Kerry Orton	NB2 - Scale and Location of Growth	no	no	no	no	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.
1000-001	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB1 - Presumption in Favour of Development	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. Definition of sustainable development in terms of environmental sustainability is necessary, including energy, land use, pollution, resource etc. One planet living policy is required for the plan to be sound.	Sustainable development is central to the Plan, and Policy NB1 sets out the Presumption in favour of Sustainable Development. It should be noted that the Plan does include an appropriate definition of sustainable development within the Glossary section.

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1000-002	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB2 - Scale and Location of Growth	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. The need for 40 traveller pitches is excessive and not based on accurate evidence. It is recommended that the existing Griff site is extended and spaces for those who travel by canal are taken into account. It is expected that need is for a few plots.	The requirements for future provision accord with national planning policy and the available evidence which is provided in the Gypsy, Traveller and Travelling Show People Accommodation Assessment (2013). The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
1000-003	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB3 - Settlement Hierarchy and Roles	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. It is unsound that the majority of housing be allocated to Nuneaton, particularly when the majority of employment sites are directed to Bedworth. It is recommended that the section stating 'most development will be directed to Nuneaton as a priority' be removed.	Evidence gathered under the Settlement Analysis Report of Nuneaton and Bedworth (NBBC 2011) places Nuneaton at the top of the settlement hierarchy as the most sustainable settlement in the Borough, and is therefore the primary focus for new development. 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 selection of employment sites, while recognising the need to have a relationship with housing seeks to allocate sites that are most likely to come forward from an economic perspective where they are favourable to the market.
1000-004	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB4 - Existing Employment Estates	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. It is recommended that the policy to be amended to allow housing within 30m of employment areas subject to extra mitigation to prevent sprawl and allow a more sustainable outcome.	The Plan carefully considers how the interaction between residential and economic development can sometimes be constrained due to conflicting interests and expectations. Whilst Policy NB4 seeks to direct new non B-Use Class development to areas that are more than 30 metres away from employment estates, it does not wholly stipulate against development in this buffer zone, subject to compliance with set criteria to protect existing and future occupiers.
1000-005	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for	NB5 - Nature of Employment Growth	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. It is recommended that B1(a) uses also be directed to areas within 500m of a railway station or major bus interchange with	Noted.

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	Weddington Division						daytime services at 10min intervals or better.	
1000-006	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB6 - Nature of Town Centre Growth	no	no	no	yes	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. Traditional town centres are under threat from high parking charges and internet shopping. It is recommended that the size of the retail area is reduced to maintain footfall and redevelop areas to residential for those without cars. Keep night time economy within a tight area to allow for town centre living. Insist in homes above shops instead of wasted space.	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. The Plan is in accordance with the NPPF which recognises town centres are the heart of communities and seeks to support their vitality. The Council will be producing a Town Centres Area Action Plan to identify sites for development and specific requirements.
1000-007	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB8 - Range and mix of Housing	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. Specific targets should be met to ensure provision of a housing mix that is appropriate to the area in which the development is built. Policy should ensure that provision is made for extra care homes.	Noted. However, the policy is considered to already sufficiently require development to provide a range of housing types, sizes and tenures to meet local needs, and supports the development of extra care housing and residential care homes.
1000-008	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB9 - Affordable Housing	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. It is recommended that additional detail is included to ensure the delivery of affordable housing at appropriate stages of development.	Noted. However, the policy is considered to include sufficient detail to ensure that affordable housing will be provided over the plan period. The policy must incorporate a degree of flexibility to ensure compliance with National Planning Policy.

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1000-009	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB10 - Gypsies and Travellers	no	no	no	yes	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. The stated targets are not based on sound evidence. It is recommended that the targets be reduced and requirement be set out in a separate section which applies to all developments.	Noted. The policy and requirements for future provision accord with National Planning Policy and the available evidence which is provided in the Gypsy, Traveller and Travelling Show People Accommodation Assessment (2013).
1000-010	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB11 - Ensuring the Delivery of Infrastructure Provision	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. Development that cannot viably fund necessary infrastructure should be considered to be unsustainable. It is recommended that additional requirements are set out in a new section to address what happens if infrastructure cannot be delivered.	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. Development will only be supported where it is in conformity with the IDP as stated in NB11. Infrastructure will be delivered through planning obligations and agreements. The requirements for the delivery of each site will be reviewed, and further details provided where necessary.
1000-011	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB12 - Strategic Accessibility and Sustainable Transport	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. Support should be given to town centre living and homes near transport hubs. It is recommended that a new section is included to support development near town centres and railway stations without parking spaces, add a requirement for retail, industrial and leisure development to have provision for full support of cycling.	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. The Plan, together with national planning policy, is considered to already support development in the most sustainable locations, including in or close to existing town centres where possible.

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1000-012	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB15 - Green Infrastructure	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. More management of river catchment areas is necessary to manage flooding. It is recommended that a section is added to address the need to add trees and features to sustainably manage flooding.	Noted. Policy NB15 is primarily associated with the creation, protection, management and enhancement of green infrastructure assets, where as the managing of flood risk is dealt with in policy NB21. Policy NB21 makes clear that site specific flood risk assessments which accompany planning applications must show that the risk both within the site and to sites further downstream is not increased. It makes specific reference to the need for an FRA to have due regard to relevant management plans. Policy NB21 also encourages tree planting as a means to reduce surface water run off. Paragraph 7.28 refers to a range of measures highlighted within the River Trent and River Severn Catchment Flood Management Plans and the emerging Humber and Severn Flood Risk Management Plans which are required to reduce the risks of flooding, including 'returning watercourses to a more natural state, increasing biodiversity and opening up green river corridors'.
1000-013	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB22 - Renewable and Low Carbon Energy	no	no	no	yes	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. Unnecessary restrictions should not be placed upon wind turbines. Amend section to support wind turbines where they meet national regulations and where there is suitable wind speed for effective operation.	Noted. However, the policy is not considered to be too restrictive. Reflecting the evidence base, the policy seeks to encourage small scale wind energy development. The potential for large scale wind energy is restricted.
1000-014	Cllr Keith Kondakor, Campaigner and Warwickshire County Councillor for Weddington Division	NB23 - Sustainable Design and Construction	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. The policy is too weak to be sustainable development for commercial buildings. It is recommended that changes should be made to require new development to meet BREEAM excellent standard.	Noted. However, the policy must not render the plan as a whole 'unsound' and therefore requirements need to be carefully considered.

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1000-015	Cllr Keith Kondakor	NB2 - Scale and Location of Growth	no	no	no	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. The plan is unsound because the working party is a sham and comments from the Preferred Options stage have not been taken into account. It is recommended that housing figures be reduced to 6560 homes over 20 years, allocations to the north of Nuneaton are removed and change Faultlands farm site to housing. Further information has been submitted in supporting documentation.	Noted. However, the Council considers that the scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. 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.
1000-016	Cllr Keith Kondakor	NB21 - Managing Flood Risk and Water Quality	no	no	no	yes	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. More management of river catchment areas is necessary to manage flooding. It is recommended that a section is added to address the need to add trees and features to sustainably manage flooding.	Noted. Policy NB21 makes clear that site specific flood risk assessments which accompany planning applications must show that the risk both within the site and to sites further downstream is not increased. It makes specific reference to the need for an FRA to have due regard to relevant management plans. Policy NB21 also encourages tree planting as a means to reduce surface water run off. Paragraph 7.28 refers to a range of measures highlighted within the River Trent and River Severn Catchment Flood Management Plans and the emerging Humber and Severn Flood Risk Management Plans which are required to reduce the risks of flooding, including 'returning watercourses to a more natural state, increasing biodiversity and opening up green river corridors'.
1000-018	Cllr Keith Kondakor	N/A	N/A	N/A	N/A	N/A	Representation includes resubmission of evidence to the Nuneaton and Bedworth Borough Plan Preferred Options consultation. Documents include Independent Consultation, Response to Infrastructure Delivery Plan, Response to BPPO questions and locations, Sustainable site selection and transport, Economics and population (including appendices and results summary).	The detailed evidence provided is noted

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1000-019	Cllr Keith Kondakor	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is raised to the 5 year land supply and the inclusion of 20% flexibility. Calculations should take into account sites where a resolution to approve has been made by Planning Committee.	Noted. The five year land supply position statement will be updated in due course
1001-01	Highways England	N/A	N/A	N/A	N/A	N/A	Comments provided in relation to the Gypsy and Traveller Site Allocations DPD	The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
1001-03	Highways England	N/A	N/A	N/A	N/A	N/A	Comments provided in relation to the CIL Draft Charging Schedule	The CIL Draft Charging Schedule document is subject to a separate consultation.
1001-02	Highways England	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	Highways England support the overall strategy, which focuses development on the most sustainable and accessible locations. However, at this stage we are unable to provide an informed view on the acceptability of the proposed allocations on the basis that the transport evidence base underpinning the Plan and the related Infrastructure Delivery Plan, does not adequately consider the potential need for improvements to the SRN. We can confirm that the Strategic Transport Assessment (STA) work undertaken on behalf of the Council by Warwickshire CC (which is referenced in the Plan) has only assessed the implications on the local highway network. Given the advanced status of the Plan's preparation, it is our view that this work should be undertaken as a matter of urgency. The work will need to include an individual and cumulative assessment of all sites' impacts on the SRN - particularly the major housing allocation north of Nuneaton, where it can be expected that the traffic impacts on the A5 at The Long Shoot and Higham Lane will be significant and where existing capacity and congestion issues prevail. The future assessment work can be expected to take account of the proposed duelling of the A5 between The Long Shoot	Response from Highways England noted. Discussions to be arranged in order to ensure that further work is completed as required. Comments in relation to Policy NB12 to be reviewed and policy to be amended accordingly

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							and Dodwells, a committed scheme of improvement. It is anticipated that, whilst this improvement may go some way to addressing the traffic impacts associated with the North Nuneaton strategic allocation, a clearer understanding of its implications is required. the Plan specifically refers to the 'A5 Group' (or more accurately the A5 Transport Partnership) and the joint working arrangement. It would be helpful for the Plan to give a clearer indication of the remit and make-up of this group which comprises a number of local planning authorities with interests in the A5 within the East and West Midlands. Under Draft Policy NB12, it is noted that the main transport considerations omit any reference to acceptability of highways impacts, or the requirement to identify any requirements for physical mitigation. Nor is the requirement for Travel Plans included. Whilst the accompanying text does reference NPPF and its associated advice on these matters, it is our view that these key requirements should be fully embedded within the main policy.	
1001-04	Highways England	NB12 - Strategic Accessibility and Sustainable Transport	N/A	no	N/A	N/A	Under Draft Policy NB12, it is noted that the main transport considerations omit any reference to acceptability of highways impacts, or the requirement to identify any requirements for physical mitigation. Nor is the requirement for Travel Plans included. Whilst the accompanying text does reference NPPF and its associated advice on these matters, it is our view that these key	Comments noted. The policy will be reviewed and where necessary amended

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							requirements should be fully embedded within the main policy.	
1002	Nuneaton and Bedworth Branch, Federation of Small Business	All Policies	N/A	N/A	N/A	N/A	Comment is made on the Plan and its impact on existing and potential business and employment uses within the plan area. A wider transport plan that takes into account proposed housing and employment growth is needed. An additional employment site is required in the north of the Borough. Blackhorse Road should be a protected employment area as it forms part of Bayton Road employment area. Consideration should be given to promoting broadband and mobile technology. Concern is raised regarding the current state of Nuneaton Town Centre, larger scale redevelopment is required. Comment is also made in relation to CIL charging. This is dealt with separately.	Comments are noted. The background papers in relation to existing employment estates and the Scale and Location of Growth provide further details in relation to helped to the strategy for housing and employment growth. This has taken into account highway and transport needs and informed Policy NB12. Policy NB13 and the policy text relate to broadband and mobile technology within telecommunications. Concerns in relation to Nuneaton town centre are noted, and the Council will be producing a Town Centres Area Action Plan to provide further details in relation to future requirements for the town centres in the Borough.
1003-001	Historic England	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	In order for the plan to be sound it is recommended that provision is made as part of the Arbury urban extension set out in policy NB2 to include a strategy for the protection and enhancement of heritage assets.	Noted. Heritage assets are protected by national planning policy and by policy NB24. However, the requirements for the delivery of each site will be reviewed, and further details provided where necessary.
1003-002	Historic England	NB24 - Valuing and Conserving our Historic Environment	N/A	yes	N/A	N/A	It is recommended that the wording of Policy NB24 is amended to underpin a robust approach to the protection and enhancement of the Borough's heritage assets (see submission for full recommended wording).	Noted. The policy will be reviewed and amended as necessary to reflect the changes which are highlighted.

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1004-001	Woodland Trust	NB15 - Green Infrastructure	yes	no	yes	no	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective, it is not consistent with National Policy. It is recommended that wider generic reference to woodland creation as a key element of green infrastructure. Trees help with landscape, increase environmental, social and economic benefits, biodiversity, flooding, air quality and reduce 'urban heat islands'. It is recommended that planting of trees within new development should be sought where this would benefit wildlife and biodiversity, enhance landscape or public amenity and health.	Tree planting is referenced twice within the policy as issues the Green Infrastructure Plan should deal with. Provision is also made for new open space in Policy NB16.
1004-002	Woodland Trust	NB18 - Sport and Exercise	yes	no	yes	no	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. In order to reflect National Policy it is recommended that the policy and supporting text be amended to reflect the role that the natural environment - in particular trees and woodland - can play in helping to deliver better health and wellbeing.	Noted. The provision of natural environment has been considered as part of policy NB15 and NB16. Para 7.84 specifically references the multiple benefits of green infrastructure in terms of health and well-being.
1004-003	Woodland Trust	NB19 - Biodiversity and Geodiversity	yes	no	yes	no	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. Policy NB19 should include strong measures to provide full protection for ancient woodland and ancient trees in accordance with National Planning Policy. This should ensure good management of ancient trees and the development of a succession of future ancient trees through new planting. It is recommended that the policy be amended to include 'development which would result in the loss of ancient woodland or ancient	Noted. Policy NB15 and NB16 also relate to the protection of trees within the landscape. Protection is also afforded in Conservation Areas and by the issuance of Tree Preservation Orders. Adequate protection is therefore considered to be provided.

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							trees will not be permitted' and advocates a dedicated trees and woodland policy in this plan.	
1004-004	Woodland Trust	NB21 - Managing Flood Risk and Water Quality	yes	no	yes	no	The Plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with National Policy. It is recommended that policy be amended to reflect the role that woods and trees can play in delivering natural land use solutions for water quality and flooding. An additional bullet point is recommended to NB21 to read 'riparian tree planting to be carried out to protect watercourse banks, improve water quality and slow down excessive flow'.	Noted. Policy NB21 makes clear that site specific flood risk assessments which accompany planning applications must show that the risk both within the site and to sites further downstream is not increased. It makes specific reference to the need for an FRA to have due regard to relevant management plans. Policy NB21 also encourages tree planting as a means to reduce surface water run off. Paragraph 7.28 refers to a range of measures highlighted within the River Trent and River Severn Catchment Flood Management Plans and the emerging Humber and Severn Flood Risk Management Plans which are required to reduce the risks of flooding, including 'returning watercourses to a more natural state, increasing biodiversity and opening up green river corridors'.
1004-005	Woodland Trust	N/A	yes	yes	yes	no	Comment relates to the Infrastructure Delivery Plan, Section 16 - Open Space and Green Infrastructure Networks. Support is given to references to the importance of trees and the Woodland Trust's 'Woodland Access Standard'.	Noted.
1005	George Eliot Hospital NHS Trust	N/A	N/A	N/A	N/A	N/A	Comments provided in relation to the CIL Draft Charging Schedule	The CIL Draft Charging Schedule document is subject to a separate consultation.
1006-001	Warwickshire County Council	NB5 - Nature of Employment Growth	N/A	N/A	N/A	N/A	Nuneaton and Bedworth economy is stated to be underperforming. It is evidenced that there is demand for more employment land, in particular for mid-sized properties. The Local Plan should form part of the strategy towards the provision of a diverse economic activity. Further discussion on this would be welcomed.	One of the Council's objectives is to diversify the Borough's economy. The Plan seeks to provide employment land to cater for forecasted growth, and the suggested demand for mid-sized units will be considered. Further discussion with WCC in relation to how economic objectives and the diversification of economic activities will be achieved will be welcomed

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1006-002	Warwickshire County Council	NB6 - Nature of Town Centre Growth	N/A	N/A	N/A	N/A	It is recommended that the policy is strengthened to encourage cultural and tourism planning policies and stimulate overall growth. It is recommended that policy wording is amended to 'The Borough's town centres will be supported and strengthened to ensure that they continue to be <i>thriving hubs for the community and a place where businesses choose to invest in</i> '.	Noted that cultural and tourism policies are not in Policy NB6 or the supporting text. The Policy will be reviewed accordingly
1006-003	Warwickshire County Council	NB11 - Ensuring the Delivery of Infrastructure Provision	N/A	N/A	N/A	N/A	The proposed growth in the number of homes in the Borough will require additional infrastructure in order to provide adequate school places. Additional infrastructure will be required if an additional 4000 homes is required following the review of the SHMA. WCC will work with NBBC to provide the necessary infrastructure provision. It is likely that the planned growth will require the provision of a new school in the Borough.	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. Policy NB11 states that new development must be willing to mitigate against any negative impacts on the Borough's ability to improve educational attainment. NBBC will continue to work with WCC and other infrastructure providers to ensure that the Borough Plan will require all necessary infrastructure to support future development in the Borough
1006-004	Warwickshire County Council	NB12 - Strategic Accessibility and Sustainable Transport	N/A	N/A	N/A	N/A	It is noted that a transport assessment has been undertaken on behalf of WCC and NBBC. WCC Transport Planners shall provide comment on public transport and sustainable transport measures.	Noted.
1006-005	Warwickshire County Council	NB13 - Telecommunications	N/A	N/A	N/A	N/A	It is suggested that a new policy is added to the Local Plan to address the need for both high quality Broadband and Telecommunication provision. (See comment for full wording of proposed policies.)	The suggested new policy in relation to telecommunications and broadband is noted. However, policy NB11 of the Borough Plan requires the delivery of infrastructure provision associated with new development. In addition, the Infrastructure Delivery Plan also includes details of communications requirements (Chapter 9) which relates to broadband and telecommunications. Rather than create an additional policy, it would be prudent to make

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								alterations to Policy NB11 to ensure that the Plan sufficiently incorporates explicit requirements for new broadband and telecommunications provision associated with new development.
1006-006	Warwickshire County Council	NB17 - Health	N/A	N/A	N/A	N/A	Support is given to the restriction of hot food takeaways due to the benefits to public health. It is recommended that the infrastructure delivery plan is amended to take into account the data in the GP Capacity Table.	Noted. The IDP will be updated in due course to reflect the latest data.
1006-007	Warwickshire County Council	NB21 - Managing Flood Risk and Water Quality	N/A	N/A	N/A	N/A	It is noted that the SuDS Approval Body has been replaced by Lead Local Flood Authorities (LLFA), the plan should be amended to take this into account. On individual sites it will be responsibility of the developer to address any flooding issues. References to Warwickshire Surface Water Management Plan should be changed to Local Flood Risk Management Strategy. Reference to SUDS should be amended to SuDS. The site contained at HSG4 Woodlands is noted as being prone to flooding. Consideration should be given to flood management if the site is taken forward.	Noted. The policy will be amended to reflect the changes which are highlighted.

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1007-01	Warwickshire Development and Resources - WCC	N/A	N/A	no	N/A	no	Additional Policy insertion required. Constructions should require superfast broadband. There should be a requirement for developers to provide infrastructure within their developments - this should appear through CIL and local policy. This is also supported by policy 43 in the NPPF. Introducing such a policy in the Local Plan will be fundamental in in both economic growth, inward investment and sustainable living environments and place promotion. Within developments, if broadband is not installed from the outset - there is a much greater cost and disruption later on. This Plan needs to ensure that new developments deliver broadband services that meet the ambition of the governments Digital Communications Strategy and the European Digital Agenda. A policy insert has been advised. This policy suggestion focuses on the need for developers to incorporate broadband in their developments. Furthermore, they state that the advantage of having a sub-regional policy is that it would provide clarity and certainty to developers, so CSW Broadband are working with all Local Planning Authorities to have this policy implemented.	The suggested new policy in relation to broadband is noted. However, policy NB11 of the Borough Plan requires the delivery of infrastructure provision associated with new development. In addition, the Infrastructure Delivery Plan also includes details of communications requirements (Chapter 9) which relates to broadband and telecommunications. Rather than create an additional policy, it would be prudent to makes alterations to Policy NB11 to ensure that the Plan sufficiently incorporates explicit requirements for new broadband provision associated with new development.
	Health and Safety Executive	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Comment is made that site HSG1 (HSE Ref. SHS) encroaches within the inner and outer consultation zones of a major gas pipeline. Land uses within the consultation zone may be restricted. Refer to full consultation comment for further advice.	Noted. The information provided will be reviewed and considered.

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1009-001	Simon Daly	NB22 - Renewable and Low Carbon Energy	N/A	N/A	N/A	N/A	Policy NB22, under "Residential development", where it says "Residential Development Until zero carbon regulations come into effect, major residential development will be required to incorporate to improve carbon emission reduction by 19% more than the Building Regulations 2015 with at least 20% of the carbon emission reductions resulting from the inclusion of renewable and low carbon energy sources." Remove the text that says "to improve" .	Noted. Policy text to be revised.
1009-002	Simon Daly	N/A	N/A	N/A	N/A	N/A	On p36, at paragraph 5.51, it says, "The boundaries of the district and local centres are set out in Error! Reference source not found.."	Noted.
1010-001	Coventry City Council	N/A	N/A	N/A	N/A	N/A	We note the reference in paragraph 2.3 of the SCI which refers to neighbouring authorities as key stakeholders in discharging the Duty to Cooperate. For the avoidance of doubt however, we would request that such a reference is added to Appendix A	Noted.

1010-002	Coventry City Council	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	<p>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 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:</p> <ul style="list-style-type: none"> • 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). • 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 	<p>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 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>
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						<p>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>	
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1010-003	Coventry City Council	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	we welcome in principle the proposed employment allocations at Pro-Logis Park Keresley and the land east of the A444 (south of the M6) identified in policy NB2. Given these proposals sit on the city's administrative boundary and would reflect a planned extension to its urban area however we would welcome some dialogue to help understand the potential impacts and benefits that may exist to the city as a result of these. This is particularly in relation to infrastructure implications, especially along the A444. These allocations also amplify why the edge of Coventry should be included within the settlement hierarchy set out in policy NB3. Failure to do so risks conflict between policies NB2 and the NB3.	Noted. Further discussions with Coventry City Council in this regard would be welcomed
1010-003	Coventry City Council	NB3 - Settlement Hierarchy and Roles	N/A	N/A	N/A	N/A	In relation to policy NB3, we are of the view that land within Nuneaton and Bedworth Borough, but which adjoins the city's urban boundaries, should be identified within the settlement hierarchy. We welcome the reference in the supporting text, however believe this is not strong enough and should be included in the policy. This would reflect the urban relationships that exist between Coventry City and Nuneaton and Bedworth Borough, the need to consider additional capacity that originates from the city and the wider proposals in the Borough Plan.	The Settlement Hierarchy is based on the findings of a Settlement Analysis Report of Nuneaton and Bedworth (NBBC 2011) which considered the size of each of the settlements in the area, accessibility to a range of services and facilities and transport provision. 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.

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1011-001	Hinckley and Bosworth Borough Council	NB2 - Scale and Location of Growth	yes	N/A	yes	N/A	The Borough Council supports the Plan and has no concerns in relation to the Duty to Cooperate. However, comments are provided in relation to housing allocation HSG1. Whilst the Council are not objecting to the allocation, the development of 3,530 dwellings in this location would significantly increase traffic numbers on the A5 trunk road and could exacerbate existing significant issues currently faced at the Long Shoot Junction and Dodwells Roundabout. These impacts need to be fully explored, including potential mitigation measures such as a public transport strategy to improve cross boundary connectivity between our administrative areas. It is acknowledged that the NBBC Infrastructure Delivery Plan (2015) acknowledges the need for transport improvements for this site, however additional detail regarding mitigation of impacts on the A5 could be included within this document to ensure that sufficient contributions are made to this nationally important route, including the need for the future duelling of this section of the route. To help facilitate this duelling, it is considered that a significant buffer should be identified between the A5 and the allocation HSG1. The Council fully appreciates the good working relationship and cooperation that the two authorities have established through the A5 Transport Partnership Group and consider that the work and aspirations of this group should be explicitly reflected in the Borough Plan.	Noted. NBBC will continue proactive dialogue with Hinckley and Bosworth Council through the A5 Transport Partnership Working Group. This should include further detailed consideration of impacts and potential mitigation measures associated with growth arising from the Borough Plan.

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1013-001	Rugby Borough Council	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	Rugby Borough Council supports the joint response received by NBBC from other Coventry and Warwickshire planning authorities, and their response should be read alongside it. Rugby Borough Council wishes to emphasise its disappointment that, as stated within the joint response, despite clear evidence of unmet need arising in Coventry, the Borough Plan only provides for Nuneaton and Bedworth's objectively assessed housing need. NBBC has not made any tangible attempts to address needs arising from outside the Borough nor does it provide clear up to date evidence to demonstrate that these needs cannot be accommodated. Rugby Borough Council objects to the proposed housing requirements that has been put forward by NBBC. Further discussions following the completion of the evidence base are central to ensuring that the Duty to Cooperate is discharged effectively.	Objection to proposed housing requirement 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. NBBC looks forward to further ongoing constructive dialogue with Rugby Borough Council as part of the ongoing Duty to Cooperate process.
1015-001	The Coal Authority	N/A	yes	yes	yes	no	It is recommended that appropriate signposting is included in the introduction to plans being prepared by WCC, such as the Warwickshire Minerals Local Plan in order to make sure that users are aware of the full context.	Noted.
1015-002	The Coal Authority	NB20 - Contamination and Land Instability	yes	yes	yes	no	Support is given to the clarity that the policy provides for developers to ensure that contamination and unstable land are given due consideration and remediation, as necessary prior to development.	Noted.

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1016-001	Warwickshire County Council	All Policies	N/A	N/A	N/A	N/A	The representation provides comments in relation to the Gypsy, Traveller and Travelling Show People Site Allocations DPD and the CIL Preliminary Draft Charging Schedule as well as the Borough Plan. Only comments relating to the Borough Plan are summarised here. There is an evidenced need for more employment land (employment land supply) within the Borough, as the Councils "Invest in Warwickshire" team have dealt with, and continue to receive, property enquiries from businesses that wanting to locate/re-locate within the Borough but are unable to do so due to a lack of suitable land and premises. There is a particular concern over the availability of mid-sized properties - i.e. 5,000 square feet and more. The emerging economic development strategy for the Borough, alongside this Local Plan, should also set out clear pathways to help diversify the type and structure of economic activity within the area, encouraging more office and knowledge-intensive businesses through an appropriate mix of land and property and wider support mechanisms. We would welcome further discussion on these matters.	One of the Council's objectives is to diversify the Borough's economy. The Plan seeks to provide employment land to cater for forecasted growth, and the suggested demand for mid-sized units will be considered. Further discussion with WCC in relation to how economic objectives and the diversification of economic activities will be achieved will be welcomed

1016-002	Warwickshire County Council	NB11 - Ensuring the Delivery of Infrastruc ture Provision	N/A	N/A	N/A	N/A	<p>The representation provides comments in relation to the Gypsy, Traveller and Travelling Show People Site Allocations DPD and the CIL Preliminary Draft Charging Schedule as well as the Borough Plan. Only comments relating to the Borough Plan are summarised here. the implementation of policy NB11 will be critical and in particular for the delivery of schools and transport provision. The County Council is required to “plan effectively for school organisation” within the County. We have a duty to ensure that there are sufficient school, early years and childcare places as well as ‘post 16’ provision within the County area. We will work with the Borough Council to achieve school places and environments i.e. expansion within the boundary of existing schools, expansion of existing schools onto new sites and supporting free schools. The proposed housing growth in the Borough will put pressure on the County Council’s services and in particular provision of school places. The County Council will monitor school places and provide further evidence and clarify where pressure for school places exists and the pressure points that are likely to occur. The increase in housing numbers (with the additional 4000) and the demographic forecast is likely to indicate the need for a new secondary school in the Borough towards the end of the Borough Plan. The Borough has seen a significant increase in the birth rate over recent years and this has put pressure on the number of places for entry into primary schools. Steps have already been taken to increase the size of a number of schools within the Borough to cope with the increased demand resulting from a rise in birth rate. There is very little ‘spare’ capacity in primary schools anywhere in the Borough. In addition to the local authority primary schools there are eight independent schools providing education to children aged 4-11. At secondary phase a number of the schools</p>	<p>Noted. NBBC welcomes the pro-active approach taken by WCC to ensure that the Borough Plan will cater sufficiently for future educational provision in the Borough</p>
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						<p>within Borough are full and forecast to remain so. However, there is a degree of spare capacity within the secondary sector although this will not be the case once the higher numbers currently entering primary schools transfer through to secondary schools in 2017 and beyond. We expect that towards the end of the Plan period there may be a need for new secondary school places. Further housing in the Borough is likely to require the provision of additional capacity within primary schools. In most parts of the Borough additional capacity would also be required in the secondary phase and an increase in SEN and Early Years provision. further housing allocations sites will be assessed on their merits for impacts. Consequently, additional school places will be met through one or more of the following: - New schools built on the development site - Extensions/refurbishments to existing schools - Changes to school priority areas. The strategic sites identified in the local plan are of sufficient size to require specific solutions to ensure there is sufficient education provision to serve them. Details are provided within the appendices; however, there will likely be a need for a new secondary school, several new primary schools and a number of significant expansions of existing schools. The need to provide significant levels of additional places for the families that will move to these sites means that S106 agreements would be a more appropriate funding mechanism. In the case of smaller, non-strategic sites, these will also have an impact on the availability of school places in the area and WCC would seek funding through CIL to meet its sufficiency duties through school expansions or the building of new schools. It is the view of WCC that there is scope to expand many of the existing schools to varying extents using one or more the following options: • Remodelling of existing</p>	
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							<p>accommodation • Construction of additional basic teaching space • Construction of additional specialist facilities such as science labs, technology areas or sports facilities • Moving 6th form pupils into new bespoke accommodation thereby freeing up space within the existing buildings. This is not an exhaustive list: individual school projects will be set out each year identifying how the additional places required will be delivered. The current Memorandum of Understanding between the Warwickshire Councils and Coventry City Council for distribution of housing indicates that an additional 4000 homes need to be allocated to Nuneaton and Bedworth Council area. We note that to meet this additional housing requirement the Borough Council has undertaken a “call for sites” Consequently, we wish to register that this further growth is likely to trigger the need for a new secondary school in the Borough. Therefore, we will work with the Borough on identifying possible site options for a new secondary school.</p>	
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1016-003	Warwickshire County Council	N/A	N/A	N/A	N/A	N/A	<p>The representation provides comments in relation to the Gypsy, Traveller and Travelling Show People Site Allocations DPD and the CIL Preliminary Draft Charging Schedule as well as the Borough Plan. Only comments relating to the Borough Plan are summarised here. The 'Statement of community involvement' makes no mention of the Lead Local Flood Authority (LLFA), particularly in relation to planning applications. As of April 2015, WCC as LLFA is a statutory consultee for surface water drainage on all major applications. Page 51, paragraph 11.25 refers to the SuDS Approval Body. These bodies have been replaced by making Lead Local Flood Authorities (LLFAs) statutory consultees on major developments. This paragraph should be removed. Page 94, paragraph 18.2 asks who is responsible for delivering the infrastructure required. In terms of flood risk, typically on an individual site basis this will be the developer and their proposals must include the long term maintenance of the system. On larger, strategic sites, there will be more stakeholders and the Environment Agency and this team as LLFA may be involved. Page 104 should include WCC as LLFA in the Flood Protection section. Policy NB21 - Managing Flood Risk & Water Quality is welcomed, however it should be updated to reflect the LLFA statutory consultee role and that the Environment Agency no longer evaluate all applications. There are several references to the Warwickshire Surface Water Management Plan (SWMP), ideally these references should be changed to Local Flood Risk Management Strategy (LFRMS). The SWMP</p>	<p>Noted. Reference to up to date authority on flooding is essential. Reference to WCC as Lead Local Flood Authority is accepted and reference to SuDS instead of SUDS is noted.</p>

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							is still a valid document and acts as the risk assessment for the LFRMS. Page 118 uses the acronym, SUDS is described as Sustainable Urban Drainage Systems, this has been 'rebranded' as SuDS and the word "Urban" dropped to give Sustainable Drainage Systems. The new site contained in HSG4 at Woodlands contains a couple of areas prone to surface water flooding including a significant area opposite Dove Close. There should be consideration on how this will be managed if the site is taken forward.	
1016-004	Warwickshire County Council	N/A	N/A	N/A	N/A	N/A	The representation provides comments in relation to the Gypsy, Traveller and Travelling Show People Site Allocations DPD and the CIL Preliminary Draft Charging Schedule as well as the Borough Plan. Only comments relating to the Borough Plan are summarised here. The proposed policies for the restriction of hot food takeaway premises are supported as a positive policy in assisting wider health benefits. Following discussions with NHS England about the current data contained in the	Noted. IDP will be updated accordingly in due course

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							Infrastructure Delivery Plan, the table on page 58, should be updated with the supplied GP Capacity Table version.	
1016-005	Warwickshire County Council	N/A	N/A	N/A	N/A	N/A	The representation provides comments in relation to the Gypsy, Traveller and Travelling Show People Site Allocations DPD and the CIL Preliminary Draft Charging Schedule as well as the Borough Plan. Only comments relating to the Borough Plan are summarised here. WCC have supplied a suggested new policy relating to Telecommunications and Broadband, in accordance with para 43 of the NPPF	The suggested new policy in relation to telecommunications and broadband is noted. However, policy NB11 of the Borough Plan requires the delivery of infrastructure provision associated with new development. In addition, the Infrastructure Delivery Plan also includes details of communications requirements (Chapter 9) which relates to broadband and telecommunications. Rather than create an additional policy, it would be prudent to make alterations to Policy NB11 to ensure that the Plan sufficiently incorporates explicit requirements for new broadband and telecommunications provision associated with new development.
1016-006	Warwickshire County Council	N/A	N/A	N/A	N/A	N/A	The representation provides comments in relation to the Gypsy, Traveller and Travelling Show People Site Allocations DPD and the CIL Preliminary Draft Charging Schedule as well as the Borough Plan. Only comments relating to the Borough Plan are summarised here. We will continue to work with the Borough Council regarding transport matters and further growth in the Borough. Comments regarding public transport and sustainable transport measures will be communicated to you directly by the County Council's Transport Planners.	Noted.

Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
1016-007	Warwickshire County Council	N/A	N/A	N/A	N/A	N/A	The representation provides comments in relation to the Gypsy, Traveller and Travelling Show People Site Allocations DPD and the CIL Preliminary Draft Charging Schedule as well as the Borough Plan. Only comments relating to the Borough Plan are summarised here. The Borough Plan appears to omit planning policies relating to the cultural and tourism planning policies. The cultural assets and connection with George Eliot has potential economic benefits for the Borough. In recognition of this, the County Council is jointly funding with the Borough Council a "Destination Assessment". This study will highlight the potential of tourism growth across the Borough including leisure and business tourism. The significance of business tourism including; business travel, meetings, incentives, product launches, training events, conferences to the North of the County should not be underestimated, as it also stimulates overall growth.	Noted. The benefits of tourism to the town are appreciated. However, heritage and economic benefits are considered as part of NB24 and NB5 respectively, and these policies will be reviewed in light of the representation. It is therefore not considered to be essential to include a new policy specifically relating to tourism.

1017-001	Warwick District Council, on behalf of Coventry City Council, North Warwickshire Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council and Warwickshire County Council.	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	<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". 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</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 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>
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						<p>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</p>	
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							<p>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>	
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1018-001	Warwickshire County Council	N/A	N/A	N/A	N/A	N/A	The Getting West Nuneaton Moving: Bermuda Connection highway capacity improvement scheme and its contribution to delivering the objectives in the Borough Plan should be referenced as a key infrastructure project.	Reference is given to Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan and Warwickshire County Council's Local Transport Plan (2011-2026). However, it is accepted that the proposed Local Plan does not refer to the Bermuda Connection which is a significant infrastructure addition which could impact the achievement of the objectives and visions of the Local Plan. The Infrastructure Delivery Plan and Borough Plan will be reviewed accordingly
1018-002	Warwickshire County Council	N/A	N/A	N/A	N/A	N/A	The Getting West Nuneaton Moving: Bermuda Connection highway capacity improvement scheme and its components should be shown on the map namely, the new road connection, the new off-street car park for Bermuda Park rail station and the new strategic shared pedestrian / cycleway.	Noted. The Infrastructure Delivery Plan and Borough Plan (including Proposals Map) will be reviewed accordingly
1018-003	Warwickshire County Council	Objectives	N/A	N/A	N/A	N/A	Support for objectives 2a with respect to Bermuda. Support for objectives 5, 6a, 7f and 8e.	Noted.
1018-004	Warwickshire County Council	NB4 - Existing Employment Estates	N/A	N/A	N/A	N/A	A small part of the existing Employment allocation located close to Bermuda Park rail station will be required to provide an off street car park for the rail station. This small area of land will not compromise the purpose of the employment land and will facilitate the delivery of the wider growth and sustainable objectives of the plan whilst also reducing congestion. The policy should be reworded to allow for the provision of an off-street car park for Bermuda Park rail station as it meets the wider objectives of the plan and will not compromise the primary function of the allocation.	Noted. However, the Council does not consider that the policy is restrictive in this manner. Non b-use class proposals may be acceptable on the site subject to the criteria set out within the policy.
1018-005	Warwickshire County Council	NB6 - Nature of Town Centre Growth	N/A	N/A	N/A	N/A	Support – the economic vitality of the centres and in particular Nuneaton will be enhanced by the construction of the approximate 1.3 mile additional highway link between West Nuneaton and Griff Roundabout (via Bermuda Bridge), the	Noted.

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							shared cycleway and footpath improvements and the associated off-street car park for Bermuda Park rail station.	
1018-006	Warwickshire County Council	NB11 - Ensuring the Delivery of Infrastructure Provision	N/A	N/A	N/A	N/A	Support – The Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme is a central tenant of the necessary infrastructure.	Noted.
1018-007	Warwickshire County Council	NB12 - Strategic Accessibility and Sustainable Transport	N/A	N/A	N/A	N/A	Support - The Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme forms part of the proposed transport interventions highlighted in the Coventry and Warwickshire Local Enterprise Partnership Strategic Economic Plan. It also forms part of the Strategic Transport Assessment submitted as part of the Borough Plan transport evidence. Support - Para 7.56 The Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme is a central requirement to relieving the congestion cited. Support - Para 7.57 The Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme is a central requirement to the delivery of the Strategic Cycle Network.	Noted.
1018-008	Warwickshire County Council	NB14 - Retaining Community Facilities	N/A	N/A	N/A	N/A	Support - The Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme facilitates the enhancement of and sustainable access to the community facilities at Bermuda Park (Phoenix centre).	Noted.

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1018-009	Warwickshire County Council	NB15 - Green Infrastructure	N/A	N/A	N/A	N/A	Support – The Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme delivers the cited new cycleway links to facilitate the safe and sustainable enjoyment of parks and open spaces.	Noted.
1018-010	Warwickshire County Council	NB16 - Open Space	N/A	N/A	N/A	N/A	Support – The Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme delivers part of the network of strategic and local walking and cycling routes and will increase the connectivity of open spaces.	Noted.
1018-011	Warwickshire County Council	NB17 - Health	N/A	N/A	N/A	N/A	Support – The health benefits of the Getting West Nuneaton Moving: Bermuda Connection highway capacity enhancement scheme have been assessed and will contribute to improving local health, particularly by virtue of reducing congestions and facilitating the use of cycling, rail and walking.	Noted.
1018-012	Warwickshire County Council	NB20 - Contamination and Land Instability	N/A	N/A	N/A	N/A	Support.	Noted.
1018-013	Warwickshire County Council	NB21 - Managing Flood Risk and Water Quality	N/A	N/A	N/A	N/A	Support.	Noted.
1018-014	Warwickshire County Council	NB23 - Sustainable Design and Construction	N/A	N/A	N/A	N/A	Support.	Noted.

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1018-015	Warwickshire County Council	NB24 - Valuing and Conserving our Historic Environment	N/A	N/A	N/A	N/A	Support.	Noted.

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1020-001	Woodlands Action Group	All Policies	no	no	N/A	N/A	<p>It is not clear how NBBC has met the requirements for public consultation. The consultation response form is difficult to use. The Plan is not in accordance with the NPPF because it is not sustainable. It is contrary to NBBCs policies on Biodiversity and its Statement of Community Involvement. With regards to the Woodlands both the Conservation of Habitats and Species Regulations 2010 and Habitats Directive 92/43/ECC are contravened as there are Great Crested Newts and bat roosts in the area. The degraded MG4 grassland found in the Nook spreads beyond into the fields under threat, and this is a protected habitat. The Woodlands was not an option in the 2013 draft plan. A public consultation must be taken on such a big change to the Plan. The evidence base documents are poor quality in general. The SMHA is being misinterpreted and the statement that 10400 houses are required is incorrect. The SHMA report is out of date - if you apply the updated SNPP 2015 figures the per annum figure drops from 502 to 407 or 6105 in total. The Plan does not include a clear economic plan to create 1.5% jobs growth. According to the evidence job numbers are falling, and it is therefore unnecessary to add additional housing for this. There is no funding to follow through on the plans in the IDP. Additional cars will have to negotiate already congestion junctions. The addition of traffic lights on the A444 at the Bedworth Interchange will make the Borough less attractive to warehousing and distribution companies. The plan for 3 sets of traffic lights along Newton rd between</p>	<p>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. The Council considers the Plan is in accordance with the NPPF. The Plan is also in accordance with the Shadow Habitat Regulations Assessment published in 2015. The scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. Policy NB5 deals with the issue of employment growth in the Borough. The LDS was published in 2015 and an update to the document was published in January 2016. An SCI was published in 2015. Flood risk is dealt with in policy NB21. Policy NB24 relates to developments conserving and enhancing their environments and having regard for historical events. Habitats have been assessed and considered in the Background Paper on Biodiversity and Geodiversity. Highways infrastructure requirements are addressed by NB11 and NB12. The Borough Plan will be subject to detailed scrutiny in due course through the Examination-in-Public process.</p>

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							<p>Heath Rd and Croft Pool will add to congestion. Both the Local Development Scheme and Statement of Community Involvement are missing from the evidence base. There is no mention of flooding in any of the documents. Woodlands is designated as flood plain. There is no provision for the removal of excess water- the culvery under the A444 is insufficient. The nature of the soils also makes subsidence a possibility. Ponds will be detrimentally impacts upon. There is no mention of how local mining impinges on the proposed development. Woodlands should be provided Green Belt protection. The site of ridge and furrow (found at the point where A444 and Woodland Rd almost intersect) is an area of local history that hasn't been explored. The whole area of Woodlands is a rare example of Arden landscape. It is not possible to mitigate the loss of a habitat that has taken decades if not centuries of management to achieve.</p>	

1021-001	CPRE Warwickshire	NB2 - Scale and Location of Growth	no	no	no	yes	<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. The Plan is not legally compliant because the consultation has not been carried out in accordance with the Council's Statement of Community Involvement, has not considered the appropriate consultees, and does not comply with the duty to cooperate. The plan and policy includes no description of the housing or employment allocations, nor does it includes justification for their locations. The need for 10,040 houses 2011-2031 is wholly unproven and unjustified. The need for employment land is greatly overstated. The major allocations proposed HS2 and HSG4 are unsound and should be deleted. Allocation HSG1 should be reduced substantially. No exceptional circumstances are included for removing HSG2 from the Green Belt. It meets the 4 purposes of:</p> <ul style="list-style-type: none"> • Check the sprawl of a built-up area; • Prevent neighbouring towns merging into one another; • Assist the safeguarding of countryside from encroachment; • Assist in urban regeneration by encouraging the recycling of land in the urban area. <p>HSG4 - Bedworth Woodlands were proposed as 'Green Belt extension' in 2013 by NBBC in the Preferred Options plan. Yet in 2015 the Submission Draft Local Plan changes that status to land with 1220 houses proposed (HSG4). No consultation took place on this reversal. If the Preferred Option was to be so dramatically changed there should have been a second Preferred Option stage. The Woodlands meets four of the five purposes of including land in Green Belt set out in the National Planning Policy Framework [NPPF] para 80. It would:</p> <ul style="list-style-type: none"> • Check the sprawl of a built-up area; • Prevent neighbouring towns merging into one another; • Assist the safeguarding of countryside from encroachment; • Assist in urban regeneration by encouraging the recycling 	<p>Comments are noted. The requirements for the delivery of each site will be reviewed, and further details provided in policy and / or supporting text where necessary. 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. The scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. 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 and the need for 'exceptional circumstances' to be demonstrated for the release of sites through the site selection process.</p>
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						<p>of land in the urban area. The NPPF states at para 83 that a Green Belt boundary can be revised only in a Local Plan review, and that 'exceptional circumstances' need to be shown. There are exceptional circumstances in the case of the Woodlands to change the boundary. The representation provides further details of these exceptional circumstances. HSG1 - The amount of new housing in location HSG1 should be reduced to approx. 1,000 dwellings. Otherwise the site would potentially lead to coalescence between Nuneaton and Hinckley. In summary, the policy should be changed as follows: Reduce employment land requirement to reflect realistic expectation of job numbers – only small changes from the employment levels in 2012-14; Reduce housing requirement from 10,040 houses 2011-2031 to 6,560 houses; Delete Housing Allocations HSG2 (Arbury) and HSG4 (Bedworth Woodlands); Reduce HSG1 (north of Weddington) from 3,500 to 1,000 houses and delete area proposed for housing which is nearest to Hinckley (eastern part); Alter Green Belt boundary west of Bedworth to include in the Green Belt the land now shown as 'white' or proposed for housing – that is, restore the proposal for a Green Belt Extension in the 2013 Preferred Option draft of the Local Plan.</p>	
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1021-002	CPRE Warwickshire	Vision	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. The Plan is not legally compliant because the consultation has not been carried out in accordance with the Council's Statement of Community Involvement, has not considered the appropriate consultees, and does not comply with the duty to cooperate. The vision and objectives completely omit any reference to the Green Belt or the countryside. The Green Belt and the countryside beyond it should be highlighted as key features and objectives for their conservation and preservation. Agriculture is also not mentioned despite over 50% of the land area being farmland. This should also be included in the vision and objectives.	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. Comments in relation to the vision and objectives noted, and these will be reviewed when finalising the Plan.
1021-003	CPRE Warwickshire	N/A	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. The Plan is not legally compliant because the consultation has not been carried out in accordance with the Council's Statement of Community Involvement, has not considered the appropriate consultees, and does not comply with the duty to cooperate. Chapter 3 omits any reference to the Green Belt or the countryside. The Green Belt covers about 50% of the Borough and should be highlighted as a key feature. This should be included as an issue facing the Borough.	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. Comments in relation to Chapter 3 noted, and these will be reviewed when finalising the Plan.

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1021-004	CPRE Warwickshire	N/A	no	no	no	yes	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. The Plan is not legally compliant because the consultation has not been carried out in accordance with the Council's Statement of Community Involvement, has not considered the appropriate consultees, and does not comply with the duty to cooperate. Chapter 2 omits any reference to the Green Belt or the countryside. The Green Belt covers about 50% of the Borough and should be highlighted as a key feature. Agriculture should also be covered. The Plan should include detailed of farmed area and production from the farms in the Borough.	Noted. Comments in relation to the Spatial Portrait are noted, and the chapter will be reviewed accordingly to take into account the comments received.

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1022-001	Environment Agency	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	All Strategic Sites identified should be sequentially tested in flood risk terms. In terms of employment sites: EMP1 – The Griff Brook runs along the northern boundary of the site. It may need to be modelled as part of a Level 2 SFRA as the modelling is unlikely to be accurate on this ordinary watercourse. EMP2 – The majority of the site is located in Flood Zone 1 but the south western corner is in the River Sowe floodplain which is a Main River. Further modelling is not necessary and it should not impact on the site. EMP 3 – The site is located in Flood Zone 1 and is a brownfield site, so priority should be given to redevelopment of this site first. In terms of housing sites: HSG1 - We recommend that detailed hydraulic modelling of the Change Brook and the ordinary watercourses bisecting the site is carried out as part of site-specific FRA for this site undertaken by a developer. HSG 2 – The site is located in Flood Zone 1. However there is an ordinary watercourse along the east and southern boundary of the site with associated floodplain. HSG 3 - The majority of the site is located in Flood Zone 1; however a small section of the site is located in Flood Zone 2 and 3 associated with the floodplain of the ordinary watercourses Griff Brook and Wem Brook. We recommend that detailed hydraulic modelling is undertaken by the developer to properly define the flood extent. HSG 4 - The majority of the site is located in Flood Zone 1; however a small section of the site is located in Flood Zone 2, 3 and 3b associated with the floodplain of the ordinary watercourses on the southern boundary of the site. We recommend that	Comments from the Environment Agency noted. Comments in relation to strategic sites noted. The requirements for the delivery of each site will be reviewed, and further details provided where necessary.

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							detailed hydraulic modelling is undertaken by the developer to properly define the flood extent. To support the recommendations of the Level 2 SFRA, we recommend that on page 15 (Policy NB2) the following supporting text should be included: 'Priority should be give to developments that are considered to be in more sustainable locations including compatibility with the level of flood risk posed and opportunities to reduce flood risk within the wider catchment.' Policy NB2 forecasts a significant capacity of office, retail and leisure facilities in Nuneaton and Bedworth town centres. We would like to highlight that both Nuneaton and Bedworth are at risk of flooding from fluvial and surface water sources as identified in the Level 2 SFRA and the Local Flood Risk Management Strategy (LFRMS).	
1022-002	Environment Agency	NB10 - Gypsies and Travellers	N/A	N/A	N/A	N/A	We recommend the following additional policy wording: 'Where sites are proposing to connect to a non-mains foul system, details should be submitted to demonstrate why connection to the foul main sewer is not viable'. Early consultation with Severn Trent should be encouraged, and we	Noted. The Council will look to amend the policy to reflect the proposed changes.

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							recommend this is highlighted in the supporting text.	
1022-003	Environment Agency	NB11 - Ensuring the Delivery of Infrastructure Provision	N/A	N/A	N/A	N/A	The role of Infrastructure Delivery in reducing flood risk is an important aspect of the plan that appears to have been overlooked in the policy. We recommend that a bullet point should be added in relation flood risk as well. This may in practice include contributions to the maintenance, or development of new or upgraded flood defences or other methods of flood risk management such as flood storage areas.	Noted. The policy will be amended to include reference Flood risk mitigation measures
1022-004	Environment Agency	NB15 - Green Infrastructure	N/A	N/A	N/A	N/A	Policy welcomed, but suggest that a minimum easement from development is considered - 8m is often used. Also recommend that policy incorporates blue infrastructure. Networks of blue and green infrastructure shall be created, protected and enhanced. Green spaces can be used to manage flood flows and create flood storage areas to help reduce flood risk. It can also be used to improve accessibility to watercourses and improve biodiversity, supporting regeneration and improving opportunities for leisure, economic activity and biodiversity. River corridors identified as functional floodplains should be protected as they act as an excellent linkage of GI and can provide storage during a flood event. SuDS must be incorporated into all developments. All development proposals and public realm improvements should consider the use of urban wetlands and street rain gardens as part of Sustainable Drainage schemes, particularly where there are known surface water flooding problems	Noted. We will amend the policy to take these comments into account.

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							or where wildlife habitat connectivity could be enhanced.	
1022-005	Environment Agency	NB16 - Open Space	N/A	N/A	N/A	N/A	We recommend the inclusion of the following points: 1. Create space for flooding by designating public open spaces in areas located in Flood Zone 2 or in areas at risk of reservoir failure. 2. Open spaces must be multifunctional and should include areas of flood storage. The level 2 SFRA recommends that areas located in flood zone 2 or at risk of reservoir flooding should be considered for public open spaces.	Noted. This may limit where open space can be created and also reduce its ability to link new developments through the Green Network if only located in Flood Zone 2. However, it is accepted that open spaces within flood zones 2 and 3 could be multifunctional. NBBC will re-examine the policy accordingly
1022-006	Environment Agency	NB19 - Biodiversity and Geodiversity	N/A	N/A	N/A	N/A	Policy supported. Within the policy under adapting to climate change, reference should be made to watercourses of all sizes as providing natural linkages and contributing to ecological networks if they can be joined up along their routes.	The need to reinforce policy wording to take into account the potential linkages of ecological networks is noted.
1022-007	Environment Agency	NB20 - Contamination and Land Instability	N/A	N/A	N/A	N/A	It may aid the developer in the supporting text that the work described in the policy are often referred to as a Preliminary Risk Assessment and/or a Desk Study. Policy NB21 could also refer to the need to prevent pollution from occurring during development. Reference could be made within the text to the advice on pollution prevention measures available on our website (www.gov.uk/environment-agency). Additionally our 'Groundwater Protection: Principles and Practice' (GP3) document, also available from our website, sets out our position on a wide range of activities and developments,	It is accepted that clarification could be made within the proposed policy to take into account potential contamination issues.
1022-008	Environment Agency	NB21 - Managing Flood Risk and Water Quality	N/A	N/A	N/A	N/A	We consider that the "Managing Flood Risk" section of the policy could be worded more strongly to ensure that it fulfils the requirements of paragraph 100 of NPPF i.e. to manage flood risk from all sources, apply a sequential, risk-based approach to the	Noted. We will amend the policy to take these comments into account.

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							<p>location of development to avoid flood risk to people and property and manage any residual flood risk, take account of climate change and seek opportunities to reduce flood risk elsewhere and ensure land that is required for current and future flood risk management is safeguarded. The Policy references Warwickshire's Surface Water Management Plan (SWMP). However, this does not cover Nuneaton and Bedworth Borough area so we suggest this is removed. Instead of just listing strategic documents, we recommend that relevant conclusions should be extracted and included in the Policy. This would make the Policy more locally specific rather than generic. The representation provides suggested re-worded text for the policy which should be referred to. In terms of water quality the policy should reference the Water Framework Directive (WFD), prior to the Humber and Severn District River Basin Management Plans reference, i.e. 'In doing so, development proposals will have regard to the principles of the Water Framework Directive and the associated actions and objectives of the Humber and Severn River Basin Management Plans.' In paragraph 7.25 Monitoring of the chemical and ecological status of the water bodies in the Humber and Severn river basin areas indicates that the quality is below current standards. This should either read 'below current accepted standards' or 'below desired/acceptable standards'. In paragraph 7.32, we would also like to see some mention of the need to manage/prevent deterioration of the environment as a result of growth and</p>	

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							<p>increased flows in the sewer network. This relates to continuous discharges of treated final effluent and storm related discharges from combined sewer overflows, storm tanks and pumping stations. There doesn't appear to be any mention of this and it remains a key requirement of WFD. Ideally, Severn Trent would also carry out Water Quality modelling to determine the potential for deterioration as a result of the growth and increased sewage discharges. Severn Trent should also consider the impact on concentrations in the rivers related to percentage deterioration, impact on current WFD classifications, and potential for future WFD failures. Due regard should be taken of the recommendations Nuneaton and Bedworth Borough Council's Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) –. The Level 2 SFRA maps out Flood Zones with climate change and you may choose to use these maps for land allocation purposes to avoid increased vulnerability due to the impacts of climate change. We would like to make you aware that the allowances are shortly to be revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. The main change to the allowances will be for peak river flow. Allowances will be provided for each river basin district, similar to those in 'Adapting to climate change: Guidance for flood risk management authorities'. Warwickshire County Council's Local Flood Risk Management Strategy Phase 2 is currently out for consultation and should be referenced as a source of flood risk information and any relevant actions</p>	

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							<p>noted. The Water Cycle Study (2010) in chapter 6.4.2 contains recommendations for Nuneaton and Bedworth Borough Council in terms of flood risk management. P.77 – Section 7.31 of the Borough Plan states that the Environment Agency and Council Planning Officers should be consulted with regard to SuDS and discharge rates. This is incorrect as the Lead Local Flood Authority should now be consulted. Since 15 April 2015, the Environment Agency is no longer statutory consultee for surface water drainage for sites over one hectare. Warwickshire County Council as the Lead Local Flood Authority (LLFA) has taken over the role of statutory consultee for assessing surface water drainage proposals for major applications. We would like to make you aware that we are currently undertaking a hazard mapping study for Nuneaton covering the Main Rivers (We Brook, River Anker and River Anker Relief Channel). The study will include an assessment of how the Relief Channel work and what standard of protection it offers. The study is expected to be completed before the end of this financial year and may result in our Flood Map being updated.</p> <p>Warwickshire County Council as the Lead Local Flood Authority (LLFA) should be consulted regarding the surface water drainage content of the Local Plan. You should also work with the LLFA to identify opportunities to reduce and manage surface water flooding.</p>	
1022-009	Environment Agency	NB23 - Sustainable Design	N/A	N/A	N/A	N/A	We are pleased to note that Policy NB23 includes a water efficiency target. Severn Trent Water Ltd published their latest Water	Noted.

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		and Construction					Resources Management Plan in 2014. The Borough now falls within Severn Trent's Strategic Grid Zone.	
1022-010	Environment Agency	N/A	N/A	N/A	N/A	N/A	Section 8 (Waste and Water Treatment) of the IDP. With the increase in housing numbers recently set out, it is important to look at this aspect of infrastructure in respect of capacity and water quality, particularly because such issues can often impact on the phasing and timescales of housing delivery. Section 11 (Flooding and Drainage) From a drainage/surface water perspective, flood risk can be managed within the site with appropriate sustainable drainage methods and adequate space set aside. With regard to flood defence for this plan period, it may be necessary for new development benefitting from existing flood defences to have to pay through CIL or S106 to provide contributions to its upkeep and maintenance. The Environment Agency's budget for maintenance is being, and has been, cut in recent years and we will not have the resources for the maintenance of defences to the required standards across the region for the entire plan period. New development in the Town Centre near to the museum or Sainsbury's where the flood defences are not to the required standard could potentially contribute through the IDP for flood defence upgrades, nearer to the 1 in 100 year standard.	Comments noted. Provision is made for the delivery of necessary infrastructure through Policy NB11, including the issues set out in the IDP. Comments will be taken into account further in finalising the IDP

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1250 -01	Place Partnership Ltd	N/A	yes	no	yes	no	The text for 15.18-15.27 is out of date - it does not refer to the latest Police and Crime Plan or make specific reference to the need for police infrastructure contributions for the items of infrastructure required. A policy suggestion is included in this response which focuses on the need to alleviate crime and to provide future police infrastructure to meet growth aspirations. The proposed changes would make the IDP and therefore the Borough Plan more effective in addressing police infrastructure issues. It would also help to provide the security infrastructure require by paragraphs 17, 58, 69, 70, 156, 162, 177 and 204 of the National Planning Policy Framework. Such contributions would also be consistent with CIL Regulations 122 and 123.	Comments noted. Proposed changes will be considered in finalising the IDP and Plan
1251-002	Place Partnership Ltd	NB23 - Sustainable Design and Construction	yes	yes	yes	no	Support reference to crime and the adoption of the principles of Secured by Design.	Noted.
1251-003	Place Partnership Ltd	N/A	yes	no	yes	no	The representation considers that the Plan is not effective and is not consistent with national policy. The vision and objectives need to be amended to take full account of the importance of maintaining safe and secure communities and reducing crime and anti-social behaviour. Objective 6 appears to suggest that design alone will tackle crime, which is misleading and inaccurate. The representation provides reference to relevant paragraphs of the NPPF, and excerpts from the Herefordshire Local Plan to demonstrate the desired approach. It is suggested that the vision statement (4.1) is amended as follows: '4.1 By 2013, Nuneaton	Noted. Proposed amendments will be reflected where appropriate in finalising the plan

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							and Bedworth Borough will be a place where there are opportunities for sustainable economic growth with diverse job prospects, healthy and safe communities and an integrated infrastructure network.....'. It is also suggested that under objective 5 sub-section (d) an additional bullet point of 'emergency services provision' is added. Objective 6 should be amended as follows '4.7 To create healthy, safe and strong communities'	
1251-004	Place Partnership Ltd	NB11 - Ensuring the Delivery of Infrastructure Provision	yes	no	yes	no	The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy. WP/WMP would like to see the bullet points altered as follows: 'Community safety and emergency services'. New development should contribute to maintaining the same level of service to both new and existing developments. Contributions to enhancing the policy service are a type of infrastructure and these are consistent with CIL Regs 122 and 123. The text of the IDP describes policing in the Borough but does not identify items of infrastructure suitable for funding. Policy requests are likely to include contributions towards officer equipment, police vehicles, additional premises and Automatic Number Plate Recognition cameras. This should be recognised in the IDP. The representation provides reference to relevant paragraphs of the NPPF, and excerpts from other adopted Core Strategies to demonstrate the desired approach.	Noted. Amendments will be made to the policy and IDP to reflect comments received.

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1251-005	Place Partnership Ltd	NB6 - Nature of Town Centre Growth	yes	no	yes	no	<p>The representation considers that the Plan is not justified and is not effective. The Borough Plan needs specific policy provision to address the evening and night time economy in the town centres of the Borough, otherwise it is considered to be ineffective and unsound. The representation provides reference to relevant paragraphs of the NPPF, and excerpts from other Plans to demonstrate the desired approach. The WP/WMP recommend that the following additional paragraphs are added to the end of Policy NB6: 'The Council will welcome developments that create a safe, balanced and socially responsible evening and night time leisure offer in the Borough. An enriched mix of uses will be encouraged to achieve this including late-night shopping, cultural and theatrical activities, cafes, restaurants, pubs and bars.</p> <p>Developments linked to the evening and night-time economy will be required to implement safeguards by contributing towards public realm, public transport and other infrastructure improvements to deliver a sense of well-being, safety and security. This will involve ensuring activity is facilitated during the daytime to avoid the clustering of 'dead' frontages.</p> <p>Working in partnership with the Council and other stakeholders, owners and operators of evening and night time economy related development will be expected to take part in active management measures to help the public and support the emergency services. If the above is achieved no development on its own, or cumulatively with other uses, will create an unacceptable impact on</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. Policy NB6 refers to ensuring the vitality and viability are not undermined in the town centres. Please note that the Council will be producing a Town Centres Area Action Plan to identify sites for development and specific requirements.</p>

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							<p>neighbouring uses, residents or the surrounding area by reason of noise pollution, light pollution, anti-social behaviour, crime, disturbance or traffic. If necessary, planning conditions and legal agreements will be implemented to ensure this.'</p> <p>The supporting text should specifically state that the evening and night time economy will be addressed in more detail through the proposed Town Centres Area Action Plan.</p>	

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1252-001	Coventry and Warwickshire Growth Hub	All Policies	no	no	no	N/A	<p>The Plan does not set out any wider vision for the current and future role of the Borough as a key part of the sub region. There is a need for each Local Authorities in the sub region to explain its role in the wider context of the sub region. We believe that Chapter 4 of the draft plan should be strengthened to explicitly address these economic linkages and interdependencies. Concern is raised that the evidence base in relation to employment provision and housing supply is now out of date, particularly as the Plan must take into account 'relevant market and economic signals' (NPPF para 158). In terms of the Duty to Cooperate NBBC has worked closely with others to discharge its obligations. However, the Plan fails to address the wider requirements that occur in surrounding areas but which cannot be met in situ. the proposed policy framework in Chapter 5 is supported by insufficient background information. On the basis of the evidence it is not clear if the proposed level of employment allocation is sufficient to meet the future economic needs of the local and sub-regional employment markets. Further consideration needs to be given to sectorial analysis. NBBC has not complied with the Duty to Cooperate given the need to resolve the housing market area's need in full. The Plan should provide for 14,060 homes, or set out why this cannot be accommodated within the Borough (and how any shortfall can be dealt with outside the Borough). There is an absence of detail on the costing, funding mechanisms and particularly the timing of provision of physical and community infrastructure to support the</p>	<p>Noted. The employment data is supported by background papers on employment estates and growth forecasting for the area and Policy NB5 relates to how employment growth will be supported. 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 vision and objectives will be reviewed to ensure that they sufficiently reflect economic linkages and interdependent with the wider sub region and LEP. In relation to employment provision the targets included within NB2 reflect evidence available. Further details are set out within the Scale and Location of Growth Background Paper 2015. 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.</p>

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							<p>growth provision. It is difficult to comment on the effectiveness of the proposed allocations without further details. The CWLEP seeks clarification on how the Plan aligns with the strategic economic growth ambitions of the overall LEP area.</p>	

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1253-001	Bermuda Bridge Action Group	N/A	N/A	N/A	N/A	N/A	<p>There are several points of conflict that occur between the NBBC Borough Plan proposals and the WCC Bermuda Connectivity Scheme where the proposals outlined directly contradict the stated aims and benefits to be provided by the Borough Plan. IDP project ref GEH(g) Improvements to the A444 junction should be done before implementation of the Bermuda Connection Scheme. IDP project ref GI(e) This bridge already exists in the form of the A444 Bermuda Bridge. Money should be spent on improving pedestrian and cycle routes to this existing facility and protecting it as a green corridor. IDP project ref GI (o) This cycle route already exists from Griff Island to St Georges Way and informally further. NBBC should be protecting these routes and investing in formalising what currently occurs. IDP project ref WCC H&T (a) and WCC H&T (aa) This should be done before the implementation of the Bermuda Connection Scheme. IDP project ref WCC H&T (v) It is imperative that there are conditions attached to CIL at Arbury to deliver a purposed built bypass before any construction on housing can commence. IDP project ref WCC H&T (w) this should be included in any traffic modelling data that WCC undertake as part of the Bermuda Connection Scheme. IDP project ref WCC Cycling (b) This doesn't connect to Nuneaton! Bermuda Rd and St George's Way currently deliver a safe cycling route - but only if protected from the Bermuda Connection Scheme. IDP project ref WCC Cycling (g) these cycle links already exist. Creating these links to replace those lost in the Bermuda Connection Scheme would be</p>	Comments will be shared with Warwickshire County Council. References to the Bermuda Connectivity Scheme in the Borough Plan and IDP will be reviewed accordingly

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							a waste of money. IDP project ref WCC Cycling (h) Bermuda Rd and St. George's way already provide these links if protected from the Bermuda Connection Scheme and could easily be formalised. IDP project ref WCC walking (c) This delivers no pedestrian benefits at all and would only serve to remove safe pedestrian access to the areas mentioned. IDP project ref WCC Rail (e) This does not deliver access for pedestrian and cyclist to the Bermuda Park Station. A link is provide to a cycle briefing note. IDP project ref WCC bus (f) this has no relevance. There is no demand for bus services and it has no bearing on the Bermuda Connection Scheme.	
2000	Ms M E Borton	All Policies	N/A	N/A	N/A	N/A	Objection is made to development on Green Belt land, in particular, land at School Lane. Brown field land should be used as a priority in order to retain the space between Nuneaton, Bedworth and Coventry. Houses near School Lane will be affected by the pylons and noise from the M6. A traffic survey should be undertaken prior to development. Sewers and water pipes may need to be updated. Local services and	Care has been taken to reduce the involvement of Green Belt land through directing development onto strategic sites and existing urban areas as seen in Policy NB2. However, there is insufficient brownfield land to accommodate the forecast growth in the area and therefore it has been necessary to allocate some development on greenfield land. With regards to transport, all developments should be supported by a Transport Survey or Transport Assessment to assess

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							infrastructure struggle already, additional houses will make things worse. New development should not result in the loss of wild life. The gypsy and traveller site should be located on spare land near the existing site. The public consultation process was not suitable.	traffic impacts. The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
2001-001	Allen Gilbey	N/A	N/A	N/A	N/A	N/A	Objection is made to the allocation of land for gypsy and travellers off Eastboro Way.	The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
2001-002	Allen Gilbey	NB12 - Strategic Accessibility and Sustainable Transport	N/A	no	N/A	N/A	The plan is considered to be unsound because it is not effective due to existing highways issues within the Borough. It is recommended that the Local Plan sets out improvements to highway infrastructure to remedy this.	Noted. Highway infrastructure is assessed in the Infrastructure Background Paper and the IDP. Policy NB12 requests that developments clearly demonstrate how they make the best of and improve transport infrastructure.
2001-003	Allen Gilbey	NB15 - Green Infrastructure	N/A	no	N/A	N/A	The Plan is considered to be unsound because it is not effective. It is recommended that greater efforts are made to improve the canal to make it more inviting to tourists and residents.	Noted. Provision is made for improvements to be made to the canal, alongside other publically accessible open spaces.
2001-004	Allen Gilbey	NB2 - Scale and Location of Growth	N/A	no	N/A	N/A	The plan is considered to be unsound because it is not justified and it is not effective. Objection is raised regarding the allocation of HSG3 and consideration of various sites within the Shadow Habitats Regulations, including NB42, NB49, NB62.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations
2001-005	Allen Gilbey	N/A	N/A	N/A	N/A	N/A	It is queried why additional sites are included within the Shadow Habitat Regulations Assessment 2015.	The Shadow HRA considers all sites that have been added, amended and promoted throughout the process as the Borough Plan has been progressed. Therefore the HRA has undergone a number of iterations, to reflect these changes. The Shadow HRA documents the progression of the Borough Plan, in regards to the different iterations of the HRA, and documents the assessment of all the sites and policies that were

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								considered and rejected during the evolution of the plan.
2002	Mrs J Tedds	N/A	N/A	N/A	N/A	N/A	Objection is raised to the allocation of any land near School Lane for development due to the impact of extra traffic, the limited capacity of local infrastructure, loss of Green Belt and impact on wildlife and ecology. The consultation form and community consultation was not clear.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations and acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation near School Lane. 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. Whilst it is appreciated that planning terminology can be confusing at times, the Council has sought to ensure that consultation is as clear as possible. However, the Submission Stage requires the Council to consult specifically on 'soundness' and 'legal compliance' of the Plan.
2003	R Wilson	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Strongly object to site allocations. Should use brownfield sites only. Highway and infrastructure needs to be improved. Brown field sites should be used before Green Belt.	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. The Council is proposing growth in the most sustainable and appropriate locations. 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

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								accommodate needs. It is therefore necessary to allocate development on greenfield sites.
2004	Mr A Schofield	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the proposed sites. Highway and infrastructure capacity should be increased. Brownfield sites should be built on rather than Green Belt.	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. Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. In Policy NB11 new development is required to contribute towards infrastructure as well as mitigating negative effects from the development.
2005-001	Craig Tracey MP, North Warwickshire and Bedworth	N/A	N/A	N/A	N/A	N/A	Concerns are raised over the complicated process that has made it difficult for the public to comment on the proposed plan. Consultation events did not clearly explain the proposals or process. Concern is raised regarding the complexity of questions on the consultation response form and the difficulty that this poses to the general public being able to submit meaningful comment.	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. Whilst it is appreciated that planning terminology can be confusing at times, the Council has sought to ensure that consultation is as clear as possible. However, the Submission Stage requires the Council to consult specifically on 'soundness' and 'legal compliance' of the Plan.

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2005-002	Craig Tracey MP, North Warwickshire and Bedworth	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	HSG4 - Concern is raised with regards to allocation HSG4 and the allocation of Green Belt land for development, the waiving of CIL on strategic sites and the need for spending on local infrastructure if the site is allocated. Traffic and highways issues are also raised. Clarity is requested regarding the proposal to build a new primary school in area HSG4. HSG5 - Objection is made to the allocation of development on greenfield land due to impact on biodiversity, landscape, flooding, and ecology. HSG6 - Objection is made to the use of greenfield land. Query is raised regarding potential impact on future residents from noise from nearby M6 and capacity of local infrastructure.	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. 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 requirements for the delivery of each site will be reviewed, and further details provided where necessary. Policy NB19 relates to biodiversity and geodiversity, and requires development proposals to ensure that ecological networks and services, biodiversity and geological features are conserved, enhanced, restored and, where appropriate, created. Policy NB21 relates to managing flood risk. Policy requirements in relation to residential amenity and noise will be re-examined.
2005-003	Craig Tracey MP, North Warwickshire and Bedworth	NB5 - Nature of Employment Growth	N/A	N/A	N/A	N/A	It is recommended that an open air market is introduced to Bedworth, similar to Nuneaton. Query is raised as to how the plan will ensure that high quality employment will be brought to the area which will have aspirational benefits, instead of low paid work for which there could be high levels of competition due to the extent of proposed housing.	Suggestion of the open air market in Bedworth is noted. The Plan supports employment prioritised in the Economic Development Strategy, and a Supplementary Planning Document will be produced to support inward investment development that provides high quality and high density employment opportunities.
2005-004	Craig Tracey MP, North Warwickshire and Bedworth	N/A	N/A	N/A	N/A	N/A	Comment is made regarding the allocation of land at Gypsy Lane for a gypsy and traveller site in Burbages Lane.	The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
2005-005	Craig Tracey MP, North Warwickshire and Bedworth	NB9 - Affordable Housing	N/A	N/A	N/A	N/A	Support is given to the requirement to provide 25% affordable housing, it is recommended that a firm stance be taken in the application of this in the future to ensure appropriate provision of affordable and social housing.	Noted.

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2005-006	Craig Tracey MP, North Warwickshire and Bedworth	NB11 - Ensuring the Delivery of Infrastructure Provision	N/A	N/A	N/A	N/A	Concern is raised that strategic sites will not be required to pay any CIL and that there is not a guarantee that necessary services and facilities can be provided through 106 agreements.	Noted. Developments are required as set out in NB11 to deliver infrastructure provision that is secured through a planning obligation or agreement which is legally binding. This looks to provide many services, facilities and infrastructure through this method. When CIL is adopted in late 2017 all qualifying development will be required to pay it to support infrastructure development.
2005-007	Craig Tracey MP, North Warwickshire and Bedworth	NB12 - Strategic Accessibility and Sustainable Transport	N/A	N/A	N/A	N/A	The proposed Woodlands development site would result in significant impacts on highway congestion. It is recommended that policy wording be strengthened to require greater investigation into the potential traffic impacts for the lifetime of the development.	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. Policy NB12 requires all developments that are likely to have highways implications to clearly demonstrate how they propose to address and mitigate against them. All developments that generate a significant amount of movements should be supported by a Transport Statement or Transport Assessment as well as a Travel Plan.
2005-008	Craig Tracey MP, North Warwickshire and Bedworth	NB14 - Retaining Community Facilities	N/A	N/A	N/A	N/A	There is no protection to the local residents against the closure of community facilities.	Noted. Policy NB14 seeks to safeguard community facilities as far as appropriate.
2005-009	Craig Tracey MP, North Warwickshire and Bedworth	NB15 - Green Infrastructure	N/A	N/A	N/A	N/A	Greater protection needs to be given to the Green Belt within Bedworth over the allocation of residential development.	Noted. The allocation of land within the Green Belt for development is addressed in Policy NB2. NBBC has produced a background paper in relation to the scale and location of growth included in the Plan. 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.
2005-010	Craig Tracey MP, North Warwickshire and Bedworth	NB21 - Managing Flood Risk and Water Quality	N/A	N/A	N/A	N/A	The impact of allocated residential development on flooding of existing residents has not been considered in the plan. This is particularly necessary as part of the Woodlands allocation.	Noted. Any future proposals will be required to include assessment and mitigation measures as appropriate to deal with potential flooding in order to comply with the proposed policy. The intention is now for the flood zone land to be removed, it is suggested that the Council review this component of the allocation.

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2005-011	Craig Tracey MP, North Warwickshire and Bedworth	NB22 - Renewable and Low Carbon Energy	N/A	N/A	N/A	N/A	The Policy is weak because it allows profit to dictate viability.	The Policy must not impose unnecessary restrictions upon development. It needs to incorporate sufficient flexibility to ensure that development will not be rendered unviable.
2005-012	Craig Tracey MP, North Warwickshire and Bedworth	NB23 - Sustainable Design and Construction	N/A	N/A	N/A	N/A	The data is confusing and does not add up.	It can be appreciated that planning terminology can be confusing, the Council has sought to ensure that the Plan is as clear as possible and contains correct and accurate data.
2005-013	Craig Tracey MP, North Warwickshire and Bedworth	NB25 - Landscape Character	N/A	N/A	N/A	N/A	Valued landscapes should be protected and enhanced clearly does not mean removing Green Belt or the woodlands and replacing with housing. Landscape policies contradict with the allocation of sites on Green Belt.	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. 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. The Council is proposing growth in the most sustainable and appropriate locations. The allocation of a site will require design proposals to include measures to mitigate the impact on the wider landscape setting. Proposed Policy NB25 is considered to ensure that wider protection is provided where development could result in an impact on landscape character.
2006	Portfolio Holder, Economy, Development and Culture, Rugby Borough Council	All Policies	N/A	N/A	N/A	N/A	Rugby Borough Council support the response from Coventry and Warwickshire Planning Authorities and request that these comments are read in conjunction with the joint response. Objection to the plan is made based on it not including adequate provision for the needs of an up to date market needs assessment. It is recommended that no further strategic decisions are made until further investigation has been undertaken and NBBC has engaged in discussion with RBC.	NBBC welcomes the opportunity to further discuss the evolution of the Plan with Rugby Borough Council 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. 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

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2007	www.NuneatonHistory.com	All Policies	N/A	N/A	N/A	N/A	The plan does not meet the requirements for sustainable development. NBBC should be balancing new housing with existing employment and locating growth by quality public transport links and reduce daily commuting from the local area to places where people work outside of the borough.	Comments are noted. NBBC has sought to produce a Plan which will promote sustainable development in accordance with the National Planning Policy Framework. Requirements for Sustainable transport are included within policy NB12. 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. The Council is proposing growth in the most sustainable and appropriate locations.
2008	Home Builders Federation	All Policies	no	no	no	yes	The plan is considered to be unsound because it is not positively prepared, justified, effective or consistent with the NPPF because of an underestimation of the OAHN, failing its role to assist in meeting unmet housing needs from Coventry, no 5 year housing land supply on adoption and unjustified policy requirements which are unviable and threaten housing delivery. Further information to substantiate comments is provided within the consultation response letter.	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.
2009-001	Course and Shelton	NB12 - Strategic Accessibility and Sustainable Transport	N/A	N/A	N/A	N/A	Objection is made to the proposed development due to the impact that it would have on existing congestion in the borough. Additional development of the scale proposed would make existing traffic issues worse.	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. Policy NB12 requires all developments that are likely to have highways implications to clearly demonstrate how they propose to address and mitigate against them. All developments that generate a significant amount of movements should be supported by a Transport Statement or Transport Assessment as well as a Travel Plan.

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2009-002	Course and Shelton	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	The loss of green field land for development is not supported. Consideration should be given to greenfield land only when all other options have been shown to be inappropriate. Land in the Borough should not be used as overspill from Coventry. Land allocations near The Longshoot would add to existing issues with congestion. It is inappropriate to allocate land at Bedworth for a cemetery to be used by residents of Nuneaton.	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. 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.
2009-003	Course and Shelton	NB6 - Nature of Town Centre Growth	N/A	N/A	N/A	N/A	Car parking and traffic issues should be addressed in order to improve the vitality of the town centre.	Policy NB6 addresses traffic issues through ensuring that development will be expected to create a more accessible, well-connected and well designed centre with particular emphasis on linkages , by walking, cycling and public transport.
2010	Heaton Planning Ltd	All Policies	N/A	N/A	N/A	N/A	The majority of the proposed local plan is supported. However, it is recommended that further consideration be given to additional development around Bulkington, particularly at Land off Bedworth Road and land off Lancing Road with potential to provide an additional 145 and 115 dwellings respectively. The additional sites are an option that would help to meet the predicted land supply in the region.	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
2011	Roger Foster	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the allocation HSG4 due to it being located within an area previously to be defined as Green Belt. The proposed development of the site for residential use would be subject of flooding within the site and would increase the likelihood of flooding downstream. The addition of 12200 houses to the area would result in the additional traffic on roads that are already congested.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. New developments are required to mitigate their effects through additional or updated infrastructure provision. Flood risk is detailed in Policy NB21 and aims to reduce the risk and likelihood of flooding.

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2012	Miss H Parker and Mr D P V Parker	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objections to large scale housing development in the vicinity of Higham Lane is objected to on the basis that the local road network will not be able to cope with the level of traffic generated by the development, there is no spare capacity in any of the local schools, poor health services, very poor public transport services, loss of habitat, valuable agricultural land, open space, increased drainage issues and additional traffic congestion.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. Policy NB11 deals with the provision of new and improved infrastructure provided by new development.
2013	Mrs J Ward	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to proposed growth and residential allocation at HSG1 for the reasons of development putting additional strain on local infrastructure, the land is liable to flooding, it will lead to increased traffic on congested roads, the stated employment growth is inaccurate, more jobs have been lost recently so why are more houses needed.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations
2014	Mrs P Clarke	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Proposed housing growth is excessive and would result in severe adverse impact on the local highway network, increased pollution and even worse service from local GPs and schools. The proposed development would also reduce the amount of wildlife. The town centre should be improved before any new housing is built.	The scale of growth accords with the latest available evidence in relation to objectively assessed needs for the Borough. Policy NB11 ensures that new development and investment contributes to the sustainability of the Borough and the provision of infrastructure. Policy NB19 ensures biodiversity and geological features are conserved, enhanced and created.
2015	Stuart and Jean Smart	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	The proposed development at Arbury Estate would result in the loss of Green Belt which would have an adverse impact on wildlife and ecology, the proposed development would also result in the loss of farmland, reducing agricultural capacity, and would result in excessive traffic congestion.	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. New development would be required to provide for or increase infrastructure to mitigate negative effects arising from the development.

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2016-001	Mrs K Price	Objectives	N/A	N/A	N/A	N/A	Objection is made against objective 1, 3 and 4 based on the contradiction of setting out the objective to create a nice place to live and invest and then to spoil it by building over 10,000 homes in the countryside, the development would add to traffic congestion, and would fail to improve the town centre.	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. Transport infrastructure issues are addressed as part of Policy NB12. Measures to support town centre growth are set out in Policy NB6.
2016-002	Mrs K Price	NB1 - Presumption in Favour of Development	N/A	N/A	N/A	N/A	The allocation of the amount of houses and increased demand on local services contradicts the presumption for sustainable development set out in the policy.	The plan is considered to conform with National Planning Policy in terms of the presumption in favour of sustainable development. The Plan is required to plan to meet objectively assessed needs for housing in accordance with National Planning Policy.
2016-003	Mrs K Price	NB8 - Range and mix of Housing	N/A	N/A	N/A	N/A	The range and mix of family housing should be located nearer to Bedworth where it is needed.	The policy considers a range of housing type and size to accommodate many households based on the most up to data from the SHMA .
2016-004	Mrs K Price	NB10 - Gypsies and Travellers	N/A	N/A	N/A	N/A	Alternative sites should be found, such as close to industrial estates, due to adverse impact that gypsy and traveller have on the appearance of the area and the cost that is left to council tax payers.	The Gypsy and Traveller Site Allocations document is subject to a separate consultation. The policy provides criteria to determine the future suitability of site provision.
2016-005	Mrs K Price	NB11 - Ensuring the Delivery of Infrastructure Provision	N/A	N/A	N/A	N/A	Previous development has not resulted in any increased capacity for schools or health services, only increase congestion and pollution.	Noted. Policy NB11 requires developments to mitigate negative impacts on the Borough's ability to improve educational attainment and health and well-being of its community. This is supplemented by the Infrastructure Delivery Plan. The requirements for the delivery of each site will be reviewed, and further details provided where necessary.
2016-006	Mrs K Price	NB21 - Managing Flood Risk and Water Quality	N/A	N/A	N/A	N/A	Development at Longshoot has resulted in flooding and the proposed development is likely to make this worse.	Noted. Policy NB21 sets out the requirement to fully assess potential flooding for major development within Flood Zone 2.

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2017	Marguerite Smith	All Policies	N/A	N/A	N/A	N/A	The proposed plan is entirely unsustainable as it does not balance the provision of houses with jobs. The majority of people in the Borough commute out for work and therefore there is not the need for housing within the Borough, when people are travelling out to other areas.	The Council considers the Plan to be sustainable. 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.
2018	Truda Ann Thornton	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the allocation of land for residential development at Arbury Road on the basis of adverse impact on Green Belt, wildlife, historical archaeology, loss of farm land, inadequate provision of infrastructure, traffic congestion and no extra jobs will be created so houses will be occupied by people without a link to the locality. It is also considered that the consultation process has been inadequate.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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.
2019	Mr Maurice Thornton	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	Objection is made to the allocation of land for residential development at Arbury Road on the basis of adverse impact on Green Belt, wildlife, historical archaeology, loss of farm land, inadequate provision of infrastructure, traffic congestion and no extra jobs will be created so houses will be occupied by people without a link to the locality. It is also considered that the consultation process has been inadequate.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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.
2020	G Davies	All Policies	N/A	N/A	N/A	N/A	Objection is made to development on green field land due to the impact that it will have on wildlife, such as has happened at Longshoot and Weddington.	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.

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2021	Mrs B Gibbs	All Policies	N/A	N/A	N/A	N/A	The proposed allocations, particularly near Exhall, will result in increased traffic congestion. It will also result in excess demand on local health services and schools.	Noted. The Council acknowledges that additional infrastructure will be required to support new planned development. 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.
2022	G G Hiffe	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	The proposed allocations, particularly at Gypsy Lane, would result in a significant increase in traffic volume and increase flooding. The allocation of land for a gypsy and traveller site at Gypsy Lane is inappropriate. Brownfield sites should be used, even if they are spread throughout the town. The allocation of 4000 additional homes from the Coventry overspill should not be accepted as it will affect greenfield land.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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.
2023	Mr Lyndon and Mrs Catherine Evans	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	The allocation of land at Arbury is objected to due to the impact that it would have on wildlife and habitat, the loss of productive arable land, loss of Green Belt and increased traffic. Local infrastructure will be unable to cope with the increased pressure from development.	Noted. 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. The Council is proposing growth in the most sustainable and appropriate locations.
2999-01	Dennis Allen	NB2 - Scale and Location of Growth	yes	no	N/A	N/A	The Council have failed to take into account land that is readily available adjacent to land already in the Borough Plan and near to Coventry City boundary as per Kelly Ford site visit w/c 26.10.2015.	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.

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3000-01	Miss H and Mr D Parker	All Policies	no	no	yes	N/A	The Plan has not been positively prepared and is not justified. The Plan process has denied people the right to handwrite responses, very few people are able to use a processor. The language used in the document will not be understood by people who have a poor knowledge of the English language. Simpler language needs to be used and options to have the document in Braille or to have it available on a CD for the blind.	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. Whilst it is appreciated that planning terminology can be confusing at times, the Council has sought to ensure that consultation is as clear as possible. However, the Submission Stage requires the Council to consult specifically on 'soundness' and 'legal compliance' of the Plan. Hand written responses have been accepted and taken into account. Alternative forms of the plan have been made available in accordance with the Statement of Community Involvement.
3001-01	Roger Foster	NB2 - Scale and Location of Growth	no	no	no	yes	The plan is not effective and is not consistent with national policy. I am collecting information on the hydrology of the Woodlands area and the upper catchment area of the River Sowe. Adequate attention to flooding in this area has not been given. Further comments on its Flood Risk are included in the response.	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. Within the Woodlands area the flood zone land will be removed from the allocation.
3002-01	The Bedworth Society	NB2 - Scale and Location of Growth	no	no	yes	no	The Woodlands development will result in a loss of countryside. The major change between the preferred options stage and this submission version has not been consulted properly. The alternative of cleaning up derelict land has not been actively pursued. The policy of treating the site as the main overflow from Coventry is unacceptable. A proper consultation stage should occur to reconsider this plan. There should be explanation as to why this major change between the Plan process occurred. There should also be a report to show what steps were taken to acquire the funding for a clean up of derelict land as an alternative.	Noted. The flood zone land will be removed from the Woodlands site. 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.

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3002-02	The Bedworth Society	NB3 - Settlement Hierarchy and Roles	no	no	yes	no	Refer to Statement made at the Preferred Options Stage. Bedworth has been wrongly classified - it is a successful market town to be developed as a vibrant visitor destination. Delete the final paragraph of Policy NB3.	The Settlement Hierarchy is based on the findings of a Settlement Analysis Report of Nuneaton and Bedworth (NBBC 2011) which considered the size of each of the settlements in the area, accessibility to a range of services and facilities and transport provision. The hierarchy recognises the role these settlements have in terms of employment, town centre, leisure and service provision.
3003-01	Mr W H Sheppard	NB2 - Scale and Location of Growth	no	no	yes	yes	The Plan is unsound and not legally compliant. Its consultation has not been carried out in accordance with the Council's Statement of Community Involvement. Faultlands Farm and Gipsy Lane should not be developed as they are in the Green Belt and their development would be contrary to the NPPF. I object to the lack of inclusion of urgently needed burial land for Nuneaton.	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. 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. 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. The Council is proposing growth in the most sustainable and appropriate locations. Concern in relation to burial ground noted.
3004-01	Mr R Welsh	NB2 - Scale and Location of Growth	N/A	no	N/A	no	The Plan is not sound - infrastructure requirements for HSG2 have not been satisfactorily met, there will be an increase in traffic if this development is to go ahead which will then cause air pollution levels to rise. The surrounding roads are already congested at peak times. This area is already the largest populated area in the Borough and does not need any more housing especially with no proposed expansion to the nearby doctor's surgeries.	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. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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.

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3005-01	Mrs K Palmer	NB15 - Green Infrastructure	no	no	yes	no	The Plan is not justified, is not effective and is not consistent with National Policy. The proposed site adjacent to the Arbury View Estate is on Green Belt land which is protected from development. The roads and infrastructure in the area will be unable to cope with this development. The Plan will destroy the countryside. Housing should be put on brownfield sites.	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. 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. 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.
3005-02	Mr R A Palmer	NB15 - Green Infrastructure	no	no	yes	no	The Plan is not justified, is not effective and is not consistent with National Policy. The proposed site adjacent to the Arbury View Estate is on Green Belt land which is protected from development. The roads and infrastructure in the area will be unable to cope with this development. The Plan will destroy the countryside. Housing should be put on brownfield sites.	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. 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. 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.
3007-01	Mr and Mrs Boyd	All Policies	N/A	no	N/A	N/A	The Plan is not objectively prepared - the plan has been devised by a working party which does not represent all residents. The Plan also proposes development next to an SSSI and will not meet its Air Quality needs. The Plan is not consistent with National Policies as the Plan is based on development on greenfield land and land in a Flood Risk Zone.	Noted. The allocation of sites is considered to be the most sustainable locations to meet the proven demand for housing and employment in the area. 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. 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.

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3007-02	Mr and Mrs Boyd	N/A	N/A	no	N/A	N/A	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.	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.
3008-01	Mrs C Walsh	NB2 - Scale and Location of Growth	N/A	no	N/A	no	The Plan is not sound - infrastructure requirements for HSG2 have not been satisfactorily met, there will be an increase in traffic if this development is to go ahead which will then cause air pollution levels to rise. Development should not occur on Green Belt land.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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. 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.
3009-01	John Clee	All Policies	no	no	yes	no	The Council failed to publicise the consultation venues to the local residents sufficiently. There were insufficient response forms available at the consultation.	The Council has undertaken public consultation on the Borough Plan in accordance with the published Statement of Community Involvement, and has sought to consult as widely as possible with the public. Whilst it is regrettable if insufficient consultation forms were available, the Council has accepted responses in a wide variety of formats. 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.

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3009-02	John Clee	NB2 - Scale and Location of Growth	no	no	yes	no	Objection to the proposed development at HSG2 - it is within Green Belt, land adjacent to the A444 would be more suitable for development with better access to roads and infrastructure.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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. 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.
3010-01	Peter Hollowood	NB2 - Scale and Location of Growth	no	no	yes	yes	The Plan is not justified and is not effective. The consultation is lip service to the process. There is little justification of using this Arbury green field site as a site for proposed development. Infrastructure provisions have not been dealt with properly and it will cause severe disruption to existing residents. There is more adequate land next to the A444. Arbury View should be better recognised. Arbury Land Parcel should be removed from the Plan all together.	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. 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. Objection to the Arbury site is noted. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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.

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3011-01	Robin Freestone	NB10 - Gypsies and Travellers	N/A	no	N/A	no	The Plan is not justified. The choice of site off Eastboro Way is not in keeping with the surrounding area and fails at least one of the evaluation criteria - the site at Eastboro is not 'derelict land that needs to be brought back into use'. The methodology used for this site allocation is unsound and significantly over-estimates the amount of gypsy traveller pitches required. Alternative sites have been suggested but these have not been fully evaluated. Furthermore, estimates used for average encampment size have been taken from another borough and are not specific to this area.	Noted. The Council considers the plan is justified and legally compliant. The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
3012-01	Linda Ann Freestone	NB10 - Gypsies and Travellers	N/A	no	N/A	no	The Plan is not justified. The choice of site off Eastboro Way is not in keeping with the surrounding area and fails at least one of the evaluation criteria - the site at Eastboro is not 'derelict land that needs to be brought back into use'. The methodology used for this site allocation is unsound and significantly over-estimates the amount of gypsy traveller pitches required. Alternative sites have been suggested but these have not been fully evaluated. Furthermore, estimates used for average encampment size have been taken from another borough and are not specific to this area.	Noted. The Council considers the plan is justified and legally compliant. The Gypsy and Traveller Site Allocations document is subject to a separate consultation.
3013-01	Alan Herbert	N/A	N/A	N/A	N/A	no	Major flood and sewage issues with the site opposite Higham Lane - sewage improvements needs to be undertaken prior to any further development.	The Council acknowledges that additional infrastructure will be required to support new planned development. 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.
3013-02	Alan Herbert	N/A	N/A	N/A	N/A	no	Incorrect traffic movement calculation, construction of link road will not relieve pressure, already serious pollution problems on Old Hinckley Road will be vastly	NBBC will continue to work with Warwickshire County Council and Highways England in order to ensure that the necessary highway improvement measures

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							worsened. Only the construction of a new outer ring road would relieve the problem.	associated with the Borough Plan are carefully planned for and implemented.
3013-03	Alan Herbert	N/A	no	N/A	N/A	no	The Plan and its technical documents are extremely difficult to understand from an average person point of view. A summary of the main points would have been useful. More time should have been given for consultation and study, the response form is also not customer friendly. It would have been better to include 5 different response forms for each document.	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. Whilst it is appreciated that planning terminology can be confusing at times, the Council has sought to ensure that consultation is as clear as possible. However, the Submission Stage requires the Council to consult specifically on 'soundness' and 'legal compliance' of the Plan.
3013-04	Alan Herbert	N/A	yes	no	N/A	no	Pressures on existing infrastructure need to be upgraded - this needs to occur before development.	The Council acknowledges that additional infrastructure will be required to support new planned development. 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.
3014-01	Michael Jones	All Policies	no	no	no	yes	Don't go ahead with this plan is my main objection. In sufficient notice of consultation events.	Noted. 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.
3014-02	Michael Jones	NB2 - Scale and Location of Growth	no	no	no	yes	Land adjacent to School Lane should not be included in the Plan as it is Green Belt. This proposed development would cause major traffic disruption.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations.

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3500-01	Marion Welton	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3500-02	Marion Welton	All Policies	no	no	no	no	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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3501-01	John A Patrick	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3501-02	John A Patrick	All Policies	no	no	no	no	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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3502-01	Mr and Mrs Moss	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3502-02	Mr and Mrs Moss	All Policies	no	no	no	no	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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3503-01	Gerry Cullen	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3503-02	Gerry Cullen	All Policies	no	no	no	no	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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3504-01	Mr Griffin	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3504-02	Mr Griffin	All Policies	no	no	no	no	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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3505-01	Mr M Shaw	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3505-02	Mr M Shaw	All Policies	no	no	no	no	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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3506-01	Betty and Jenny Croshaw	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3506-02	Betty and Jenny Croshaw	All Policies	no	no	no	no	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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3507-01	Mr C Blake	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3507-02	Mr C Blake	All Policies	no	no	no	no	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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3508-01	Mr and Mrs Blodie	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3508-02	Mr and Mrs Brodie	All Policies	no	no	no	no	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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3509-01	Paul Mckenna	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3509-02	Paul Mckenna	All Policies	no	no	no	no	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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3510-01	Keith and Alison Jones	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3510-02	Keith and Alison Jones	All Policies	no	no	no	no	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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3511-01	Mr John Alderdice	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3511-02	Mr John Alderdice	All Policies	no	no	no	no	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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3512-01	Mr and Mrs Fenton	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3512-02	Mr and Mrs Fenton	All Policies	no	no	no	no	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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3513-01	Reginald Cole	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3513-02	Reginald Cole	All Policies	no	no	no	no	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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3514-01	Sarah Jackson	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3514-02	Sarah Jackson	All Policies	no	no	no	no	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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3515-01	Lynn Fisher	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3515-02	Lynn Fisher	All Policies	no	no	no	no	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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3516-01	Mrs B A Lennon	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3516-02	Mrs B A Lennon	All Policies	no	no	no	no	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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3517-01	Mr and Mrs Quintanilla	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3517-02	Mr and Mrs Quintanilla	All Policies	no	no	no	no	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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3518-01	Mr and Mrs Johnson	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3518-02	Mr and Mrs Johnson	All Policies	no	no	no	no	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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3519-01	Mr Z Nemeth	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3519-02	Mr Z Nemeth	All Policies	no	no	no	no	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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3520-01	Anne O'Malley	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3520-02	Anne O'Malley	All Policies	no	no	no	no	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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3521-01	Diane Burne	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3521-02	Diane Burne	All Policies	no	no	no	no	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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3522-01	Christopher Penn	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3522-02	Christopher Penn	All Policies	no	no	no	no	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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3523-01	Winifred Marshall	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3523-02	Winifred Marshall	All Policies	no	no	no	no	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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3524-01	Marta Pieniazek-Niwinska and Krystian Niwinska	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3524-02	Marta Pieniazek-Niwinska and Krystian Niwinska	All Policies	no	no	no	no	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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3525-01	Julia Marshall	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3525-02	Julia Marshall	All Policies	no	no	no	no	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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3526-01	Ken and Gaynor Marshall	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3526-02	Ken and Gaynor Marshall	All Policies	no	no	no	no	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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3527-01	Clive Wager	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3527-02	Clive Wager	All Policies	no	no	no	no	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.

Comment Reference Number	Organisation /Name	Policy Number	Legally Compliant (yes / no)	Sound (yes / no)	Complies with Duty to Cooperate (yes / no)	Appearance at Examination (Yes/No)	Summary of Comment	Council Response
3528-01	Sarah Wager	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3528-02	Sarah Wager	All Policies	no	no	no	no	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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3529-01	Luke Wager	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
3529-02	Luke Wager	All Policies	no	no	no	no	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	All Policies	no	no	no	no	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

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								structure can be found on the Council's website. A Statement of Community Involvement is also available on the website.
4001-02	Joy and Roger Gear-Evans	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. Too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.

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4002-01	Emma Ashton and Richard Troman	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. Too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4002-02	Emma Ashton and Richard Troman	All Policies	no	no	no	no	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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4003-01	Lee Nolan	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. Too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4003-02	Lee Nolan	All Policies	no	no	no	no	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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4004-01	David and Marit Rouse	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. Too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4004-02	David and Marit Rouse	All Policies	no	no	no	no	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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4005-01	Mr Ian Ferguson	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. Too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4005-02	Mr Ian Ferguson	All Policies	no	no	no	no	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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4006-01	Marinne and Paul Galley	NB2 - Scale and Location of Growth	no	no	no	yes	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. Too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4006-02	Marinne and Paul Galley	All Policies	no	no	no	yes	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.

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4007-01	Martin Thay	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4007-02	Martin Thay	All Policies	no	no	no	no	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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4008-01	Mr and Mrs Claybrook	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4008-02	Mr and Mrs Claybrook	All Policies	no	no	no	no	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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4009-01	Keith Brooks	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4009-02	Keith Brooks	All Policies	no	no	no	no	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.
4010-01	Michael Gladwin	NB2 - Scale and Location of Growth	no	no	no	yes	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In

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							Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4010-02	Michael Gladwin	All Policies	no	no	no	yes	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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4011-01	Robert Leonard	NB2 - Scale and Location of Growth	no	no	no	N/A	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4011-02	Robert Leonard	All Policies	no	no	no	N/A	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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4012-01	Mr and Mrs A Rickets	NB2 - Scale and Location of Growth	no	no	no	N/A	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4012-02	Mr and Mrs A Rickets	All Policies	no	no	no	N/A	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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4013-01	Mr Shingara Singh Tut	NB2 - Scale and Location of Growth	no	no	no	N/A	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4013-02	Mr Shingara Singh Tut	All Policies	no	no	no	N/A	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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4014-01	Malcolm Sidney Golding	NB2 - Scale and Location of Growth	no	no	no	yes	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4014-02	Malcolm Sidney Golding	All Policies	no	no	no	yes	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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4015-01	Mrs. D.J. Campbell	NB2 - Scale and Location of Growth	no	no	no	yes	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4015-02	Mrs. D.J. Campbell	All Policies	no	no	no	yes	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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4016-01	Pegley	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4016-02	Pegley	All Policies	no	no	no	no	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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4017-01	Mr and Mrs Wake	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4017-02	Mr and Mrs Wake	All Policies	no	no	no	no	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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4018-01	Sheila Collard	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4018-02	Sheila Collard	All Policies	no	no	no	no	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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4019-01	Mr and Mrs B S Taylor	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4019-02	Mr and Mrs B S Taylor	All Policies	no	no	no	no	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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4020-01	JM and PM Williams	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4020-02	JM and PM Williams	All Policies	no	no	no	no	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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4021-01	N Pateman	NB2 - Scale and Location of Growth	no	no	no	no	Infrastructure requirements are unavailable. Woodlands development should not be included in the Plan - it is a Green Belt area, and the proposed development is not consistent with its semi-rural character. Other issues in relation to this development include Flood Risk and Traffic and Road Safety as the current surrounding roads will be unable to cope with this development. There are too many houses proposed. The Culvert in Croft Pool could not cope with any heavier water.	Noted. However, only a small proportion of the site is located within the EA identified flood zone. Any development proposals within the allocation will need to accord with other policies within the Plan (such as NB21 – managing flood risk and water quality) and national planning policy, which provide strict development requirements in relation to flood risk. In addition, the EA and the Lead Local Flood Authority will be consulted in relation to any development proposals. The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
4021-02	N Pateman	All Policies	no	no	no	no	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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4022-01	J Pollock	All Policies	N/A	no	N/A	no	Infrastructure issues with all of the proposed development, all remaining green spaces have been targeted for development. Objection to the entire Plan.	The Council acknowledges that additional infrastructure will be required to support new planned development, including the proposed allocation HSG1. 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 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.
5000-01	Pegasus Group	NB2 - Scale and Location of Growth	no	no	no	yes	There are elements that are sound and unsound to this policy. The allocation of employment on EMP2 is supported. Although the site is located within the Green Belt it does not consider that the five NPPF purposes are relevant to this site now. However, the eastern site is restricted from employment use due to its boundary arrangement and the resulting configuration of land parcels. Further information regarding this site's economic, environmental and social benefits to be used as majority employment and part residential site are fully detailed in the response. The policy fails to meet the OAN for housing in the Borough and the unmet requirements from neighbouring authorities. As such the Plan is not positively prepared, justified, effective or consistent with national policy and is unsound. With	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.

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							this increase in housing requirement - there will also be an increase demand for employment and further assessment required of jobs growth. The housing requirement in NB2 must include an element of Coventry City's unmet housing needs for it to be sound and for the Council to meet their Duty to Cooperate obligations.	
5000-02	Pegasus Group	NB2 - Scale and Location of Growth	no	no	no	yes	Non-allocation of land adjacent to M6 Junction 3. The land is made of 6 parcels which are all within Green Belt. However there are many benefits, including its proximity to infrastructure. These sites should be used for a mix of new residential and public open space. If developed, their impact on the wider amenity will be small scale. The benefits of developing these 6 parcels of land are included in detail in the response form.	The promotion of an additional site is noted. The respondent should also note that the Council is currently undertaking further work to update the Strategic Housing Land Availability Assessment and 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.
5000-03	Pegasus Group	NB3 - Settlement Hierarchy and Roles	yes	yes	no	yes	This policy ignores the southern part of the Borough to Coventry. Paragraph 5.20 states a need to consider the wider context in which the Borough is located, however this is not reflected in the policy. Without having done so, this policy is not justified as it may not be the most appropriate strategy for identifying sustainable development. To make the Plan sound it is considered that the role of Coventry needs to be explicitly included.	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.

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5000-04	Pegasus Group	NB5 - Nature of Employment Growth	yes	yes	no	yes	This policy is too restrictive. It would seem to contradict the prioritisation of B1(b) research and development somewhat. The Council needs to recognise the level of job creation that can come with the B8 distribution warehouse, especially those relating to e-commerce. Local Plans need to have policies that are flexible enough to accommodate needs not anticipated in the Plan. The policy should be amended to say that economic development will be supported for B1, B2 and B8 uses with the focus being B2 and B8.	Comments noted. The policy seeks to prioritise the delivery of B2 and B8 uses, and direct B1 uses firstly to Town Centres. Nevertheless, there is also flexibility within the policy for other uses to be considered, subject to compliance with set criteria.
5000-05	Pegasus Group	NB7 - Hierarchy of Centres	yes	yes	no	yes	The use of distance and time thresholds between new residential development and District and Local Centres provides us with many concerns. There is no recognition of District and Town Centres in Coventry. There is also no account of topography which causes further confusion. Simply because a site would fail the thresholds set out in policy NB7 does not necessary make development unsustainable.	Noted. The policy wording will be reviewed to ensure clarity on this point
5000-06	Pegasus Group	N/A	yes	yes	no	yes	Housekeeping matter - Local Centres at Dark Lane, Bedworth and Ash Green are included in the Plan Submission Map but are not included in Table 8 or Appendix 1 - clarification is required on this point.	This issue is noted. The Council shall review the designation and either amend the proposal map or relevant sections in the Local Plan as necessary.
5000-07	Pegasus Group	NB12 - Strategic Accessibility and Sustainable Transport	yes	yes	no	yes	Clarification is required on the 15% model shift requirement. - what is the Council envisaging and how will this be monitored.	Comment noted. Further clarification will be provided in the supporting text
5000-08	Pegasus Group	NB17 - Health	yes	yes	no	yes	The HIA threshold also requires further clarification in terms of its threshold for being required within the submission of	Noted. It is considered the threshold is the same as that for requiring an EIA. The policy requires an HIA for

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							planning applications - what is the threshold?	applications that also meet the threshold for requiring an EIA.
5000-09	Pegasus Group	NB22 - Renewable and Low Carbon Energy	yes	yes	no	yes	The Policy does not consider the 'fabric first' approach. We do not believe that the Policy NB22 is the correct way to seek a reduction in carbon emissions.	Noted. The Council considers Policy NB22 to be a correct and robust policy.
5000-10	Pegasus Group	NB25 - Landscape Character	yes	yes	no	yes	This policy states that the locations of the area important for separation between settlements are identified on the Proposals Map - but this is not the case. This policy needs to accurately establish what precise land is affected. As we are unable to comment at this time, we reserve the right to make further representations for this part of the policy necessary.	Noted. The proposals map is considered to clearly set out the important areas for separation. Hard copies are available at the Council Offices should there be any issues with viewing the electronic version.
5001-01	D Baker	NB2 - Scale and Location of Growth	no	no	no	no	Objections to the allocation of houses on Hospital Lane. Some reasons for this objection include - its Green Belt status, unsustainable nature, poor air quality, distance from amenities and infrastructure.	Objection noted. 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. The Council is proposing growth in the most sustainable and appropriate locations.

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5001-02	D Baker	N/A	no	no	no	no	<p>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.</p>	<p>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.</p>

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5002-01	Pegasus Group	All Policies	N/A	no	no	no	The Plan has not co-operated with adjoining planning authorities - in particular Coventry's housing needs. The necessity to provide this quantum of housing has not been included in the plan. Link between this Plan and the IDP is poor and not reader friendly. To overcome this - a specific policy for each strategic site should be included in the Plan which would also draw on information in the IDP.	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. 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.
5002-02	Pegasus Group	NB2 - Scale and Location of Growth	N/A	no	N/A	no	This policy fails to meet the objectively assessed need for housing of the Borough - housing need outside of the borough have not been met, there is concern about the household formation rates used in the SHMA - a more robust method needs to be used. Site ref HSG1 would be better broken down into 3 individual, smaller schemes - the site is, however, sustainable, and we welcome its inclusion in the Plan. Land in the Green Belt should only be used as a last resort in terms of development and inclusion as proposed sites for development.	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. 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.
5002-03	Pegasus Group	NB3 - Settlement Hierarchy and Roles	N/A	no	N/A	no	Policy NB3 is endorsed and supported.	Noted.
5002-04	Pegasus Group	NB8 - Range and mix of Housing	N/A	no	N/A	no	This policy is largely supported, however, it would be appropriate to make clear, in the supporting text, that the policy will be applied flexibly to respond to particular circumstances.	Noted. However, the policy is considered to already provide for a degree of flexibility concerning the future mix of housing. Para 7.8 makes clear that developers will also need to consider the character of the local area surrounding the site in terms of the types and sizes of new housing.

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5002-05	Pegasus Group	NB9 - Affordable Housing	N/A	no	N/A	no	This policy need to be able to be used flexibly to deal with changing circumstances. There is a concern that the SHMA might not be regularly updated.	Noted. The policy reflects the evidence provided by the SHMA, and this document will be updated on a regular basis.
5002-06	Pegasus Group	NB12 - Strategic Accessibility and Sustainable Transport	N/A	no	N/A	no	Issues understanding the reference to the 15% model shift mentioned in this policy - what is the council envisaging? It is unclear as to what the model shift is referring to and whether the 15% is a global aim or Borough aim to meet.	Comment noted. Further clarification will be provided in the supporting text
5002-07	Pegasus Group	NB15 - Green Infrastructure	N/A	no	N/A	no	It would be more effective if the requirement of North Nuneaton (strong landscape structure), was to be found under a separate heading.	Noted. However, it is considered that the current format is appropriate and in keeping with the rest of the document.
5002-08	Pegasus Group	NB17 - Health	N/A	no	N/A	no	Clarification needs to be had as to which applications require HIA and what requires to meet the threshold. Furthermore, this policy mentions an SPD which is yet to be published and therefore the clarity of this policy is lacking.	Noted. It is considered the threshold is the same as that for requiring an EIA. The policy requires an HIA for applications that also meet the threshold for requiring an EIA. An SPD will be developed which will assist in determining how an HIA should be undertaken.
5002-09	Pegasus Group	NB18 - Sport and Exercise	N/A	no	N/A	no	Clarification is also required for this policy - it is unclear as to what is required in terms of sport and exercise.	Noted. It is stated that new developments should include measures to meet playing pitch requirements, outdoor sports uses, sports facilities and open space, green infrastructure and allotment requirements. The Playing Pitch Study and Sports Recreation and Community Facilities study is being undertaken and will specify needs.
5002-10	Pegasus Group	NB22 - Renewable and Low Carbon Energy	N/A	no	N/A	no	There is no inclusion of a 'fabric first' approach. Evidence is missing from this policy (which includes the Council's Viability Assessment 2014 produced by DSP).	Noted. The Council considers Policy NB22 to be a correct and robust policy . The viability Study relates to a large number of policies in the Plan, and where necessary, this will be listed in relation to appropriate plan policies.
5002-11	Pegasus Group	NB23 - Sustainable Design and	N/A	no	N/A	no	This policy needs to be reconsidered in terms of its compatibility with National Policy.	Noted. The Council considers the Plan is compatible with National Policy.

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		Construction						
5002-12	Pegasus Group	NB25 - Landscape Character	N/A	no	N/A	no	This policy is restrictive. It is not obvious on the Proposals Map as to where these sites are located. There is little justification for this approach.	Noted. The Proposals Map includes the important areas for separation and provides information based on the recommendations set out in the Landscape Character Assessment. Particular regard has been given to land in the vicinity of Callender Farm in 'Analysis of Pegasus' Landscape Justification Note and Indicative Development Framework for development proposals in the vicinity of Callendar Farm, Nuneaton, March 2015' and 'Explanation of Landscape Recommendations for the Land in the vicinity of Callendar Farm, Nuneaton, March 2015' prepared by TEP and made available via the Council's website
5002-13	Pegasus Group	N/A	N/A	no	N/A	no	The Land at North Nuneaton should be shown as three separate development areas. In association with this, the proposed housing site and landscape buffer should be amended to reflect the Indicative development Framework.	Noted. The allocation of the site is considered to be appropriate at this stage. Further detail will be established as part of the masterplanning of the site.
5600-01	David Lock Associates	NB2 - Scale and Location of Growth	yes	no	N/A	yes	The Plan is not justified, or effective and is not consistent with national policy. The number of dwellings proposed are overly precise. The requirement that Strategic Sites will be documented by Masterplan documents is unnecessary at least in the case of site HSG3. Thirdly, there are no justified reasons as to why Green Belt sites have been released and included in this policy. It is also of note that the proposed allocation of Gipsy Lane is strongly supported in principle.	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. Policy NB2 provides a breakdown of the strategic sites for allocation. The proposed allocations indicate the approximate minimum numbers of units required to be delivered on each site. These are not intended to be prescriptive. 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.
5600-02	David Lock Associates	N/A	N/A	N/A	N/A	N/A	The assessment of parcel N5 is defective in ignoring the function of Gipsy Lane itself in restricting any sprawl of Nuneaton. Affording proper recognition to those important functions would result in a much more accurate and reliable assessment of	Comment noted. NBBC will review the assessment of parcel N5 within the Joint Green Belt Study

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							the contribution of this area to the purposes of the Green Belt policy.	
6000-01	Warwick District Council	NB2 - Scale and Location of Growth	yes	no	yes	yes	The plan is considered to be unsound because it has not been positively prepared, it is not justified, it is not effective and it is not consistent with national policy. The representation elaborates and amplifies concerns raised in the joint response from Coventry and Warwickshire Councils. Response also bites the specific issues raised in Cllr Harvey's letter to Warwick District Council dated 22nd October 2015. We note your contention that capacity in the Borough is constrained. However, no up to date evidence is offered to show this and your case rests on a SHLAA that is out of date. The Borough Plan does not address these issues [of constraints in the Borough] effectively and the lack of land in a SHLAA of itself falls short of the NPPF 14 definition of a "constraint" to capacity, particularly where a SHLAA is not up to date. Instead a constraint should only be applied where it can be shown through up to date evidence that the criteria of para 14 can be met. There is also a need to balance evidence of constraint against the need for housing growth in order to boost significantly the supply of housing. Equally the SHLAA should not be viewed as an absolute constraint in itself. NPPG paragraph 016 makes the role of the SHLAA one of providing for any identified shortfall. The agreed Coventry & Warwickshire SHLAA methodology 2015 explains the purpose of the SHLAA, which is to include considering less sustainable locations to meet needs in	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. NBBC looks forward to further engagement with Warwick District Council in relation to finalising the Borough Plan.

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							<p>circumstances where needs cannot be met. The Borough Plan has failed to meet the identified needs of the HMA, but has not provided the evidence to support such a constrained approach to strategic growth. Further, a strategy of constraint is taken with regards to Coventry's needs without a corresponding level of evidence or any consideration of the wider strategic implications. Given the above, we consider the Plan is premature with regard to the emerging evidence including lack of justification for constraint in positively meeting needs; it lack a positive approach to strategy growth issues and therefore does not effectively deal with unmet needs in Coventry; and it fails to consider the strategic alternatives for significantly boosting the supply of housing. We would ask NBBC to reconsider its approach thus far and rectify the issues raised with a positive and proactive approach to meeting strategic needs.</p>	

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6001-01	Natural England	NB2 - Scale and Location of Growth	N/A	N/A	N/A	N/A	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 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	The comments are noted and the Council will take these comments on board prior to the submission of this Plan.

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7000-01	Walter Milner	NB1 - Presumption in Favour of Development	yes	no	no	no	Paragraph 5.8 includes: At the time of writing it is unclear that the total capacity of Nuneaton and Bedworth is to accommodate additional housing from Coventry. It is apparent from this sentence that the Local Council have failed to comply with their duty to cooperate. In addition, there is an implication that the housing number would be raised, to an unspecified level, and in unspecified locations. On that basis it is impossible to judge whether such development would be sustainable. The SHLAA needs to be completed according to a joint methodology and policies need to be established which will provide this development in a sustainable manner.	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 respondent should not that 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.
7001-01	Aspbury Planning	NB6 - Nature of Town Centre Growth	yes	no	yes	N/A	Goodyers End should be added to the Appendix B as the defined Local Centre under this policy. It is an appropriate and sustainable location for the consolidation and modest expansion. This response also suggests an additional policy in relation to small scale convenience shopping and how, if they are within the defined town centre boundary, should not be subject to a sequential test.	It is noted that the Proposals Map includes Goodyers Rd/Dark Lane as a local service centre but that table 8 and appendix A do not refer to this. A review of the designation is necessary to ensure that the document is accurate and does not contain conflicting information.
7001-02	Aspbury Planning	NB14 - Retaining Community Facilities	yes	no	yes	N/A	The policy, at present, is unduly restrictive and places unreasonable evidence burden on the owners or operators of community facilities. Demonstrating that there is no demand for facility sets the test too high to be reasonable and entirely neglects commercial and economic considerations. The policy should also admit the loss of an existing community facility if it is replaced by another such facility of demonstrably equal or greater value. The definition of 'community facility' should also be amended	Accessible local facilities are an essential part of sustainable development. NB14 seeks to ensure that key services and facilities are not lost, subject to the criteria set out therein. Paragraph 7.73 sets out a non-exhaustive list of community facilities, including local shops.

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							to include 'local shops' as it also provides an important facility.	
7002-01	Inland Waterways Association	NB2 - Scale and Location of Growth	yes	no	yes	yes	The plan has not been positively prepared, is not justified and is not consistent with national policy. Development of sites EMP1 and HSG3 would unnecessarily damage the setting of the Coventry Canal and is therefore inconsistent with national policy on Green Belt protection. The attractive countryside setting of this section of the canal would be lost by these proposals which would diminish its value to the local community and the visitor economy. These two allocations would threaten to seriously damage the rural environment of the canal and its heritage, amenity value, tourism and economic development. There is also an excessive allocation of both housing and employment sites. Furthermore, the plan is deficient in containing no policy on the protection of the Borough's section of the West Midlands and is thus contrary to the NPPF.	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. 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. The Council is proposing growth in the most sustainable and appropriate locations. 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. NB 15 and NB16 take into account measures to protect and enhance the landscape, including the Canal.
7003-01	Home Builders Federation	NB2 - Scale and Location of Growth	yes	no	no	N/A	The Duty to Cooperate is not met as it does not make provision for the unmet needs of Coventry. Further sensitivity testing of migration trends, unattributable population change (UPC) and household formation rates are also necessary. It is considered that G L Hearn's work in calculating OAHN for Coventry and Warwickshire HMA does not give sufficient consideration to sensitivity factors in its assessment of demographic projections. The approach to supporting economic growth across the HMA is confusing. It seems to be a re-distribution rather than an uplift. Further clarification is necessary. There also appears to be no uplift for worsening market signals	Noted. The Council is currently undertaking further work to update the OAHN using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional growth 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 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.

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							in the G L Hearn work, as required by national policy. The NPPG advocates that an increase in the total housing included in the Local Plan should be considered where it could help to deliver the required number of affordable homes but this is not the case in this local plan.	
7003-02	Home Builders Federation	NB3 - Settlement Hierarchy and Roles	yes	no	no	N/A	The council does not have a 5 year housing land supply and, as result, its plan will neither be effective or consistent with national policy. For the plan to become sound, more site allocations should be included to increase housing deliverability.	Noted. The Council is currently undertaking further work to update the OAHN using an agreed sub regional methodology to understand the total capacity of the Borough to accommodate additional growth 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 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.
7003-03	Home Builders Federation	NB9 - Affordable Housing	yes	no	no	N/A	It is inappropriate to set unachievable policy obligations and it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.	The policy enables flexibility in the affordable housing requirements where a viability statement is provided to demonstrate that the requirements will render the scheme unviable. A Viability Study has been undertaken to consider the overall viability of the Plan taking into account infrastructure and affordable housing requirements
7003-04	Home Builders Federation	NB22 - Renewable and Low Carbon Energy	yes	no	no	N/A	This policy (and policy NB23) should be deleted as they do not confirm with the Deregulation Bill 2015 which states that the Councils should not set any additional local technical standards or requirements relating to construction, internal layout or performance of new dwellings.	Noted. The requirements will be reviewed and if necessary removed from the Plan.