

 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Main Modifications Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

Borough Plan Main Modifications

Please return to Nuneaton and Bedworth Borough Council by **7th November 2018** via:

Email: planning.policy@nuneatonandbedworth.gov.uk

Post: Planning Policy Consultation, Town Hall, Coton Road, NUNEATON, CV11 5AA

This form has 2 parts:

Part A – Personal details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal details* <small>* If an agent is appointed, only the Title, Name and Organisation boxes in section 1. are required. Agent details should be completed in section 2.</small>	2. Agent's details (if applicable)
Title	Mr	
First name	Allen	
Last name	Gilbey	
Job title (where applicable)		
Organisation (where applicable)		
House number	(Redacted)	
Street	(Redacted)	
Town	(Redacted)	
Post code	(Redacted)	
Telephone number	(Redacted)	
Email address	(Redacted)	

3. Which of the following age brackets do you fall within?

Up to 15	
16-19	
20-29	
30-39	
40-49	
50-59	
60-69	
70-79	
80+	

Part B – Please use a separate sheet for each representation

4. Name or Organisation

5. To which main modification does this representation relate?

MMC reference MMC4 – **UPDATED REPRESENTATION**

6. Do you consider the Borough Plan is:

6.(1) Legally compliant

Yes	
No	X

6.(2) Sound

Yes	
No	X

Please mark with an 'X' as appropriate

7. Please give details of why you consider the main modifications are not legally compliant or are unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the main modifications, please also use this box to set out your comments.

The housing requirements in MM10 are both excessive and do not add up.

At the Stage 2 examination it was suggested that the final number to be accepted was 14060 including the 4020 Coventry overspill.

If you add up the totals in MM10 it comes to 15047 yet in MM14 it is 14836.

In Application of proposed formula for assessing housing need with contextual data published by government in September 2017 the housing need for Nuneaton and Bedworth is 8400.

In Appendix C of 5th September 2018 NBBC Cabinet meeting it has become 15050 (or 15555 if you include those completed after 2031 cut off for the Plan)

In this document the build rate trajectory rockets from 400 per annum in 2016/17 to 1522 by 2020/21.

Whilst the Hawkesbury site has been added to the Plan as HSG12 the Plan excludes sites such as:

- 775 at Caldecote (NBBC planning reference 035538)
- 200 more at HSG 11 Tuttle Hill. The original 200 has become 400 (NBBC planning reference 035647 & 035595). MMC 21 refers to this site.
- 330 off Eastboro Way/Long Shoot (NBBC planning reference 033157)
- 650 off Eastboro Way/Long Shoot (NBBC planning reference 035033)
- 200 at White House Farm (NBBC planning reference 035338)
- 380/500 off Chetwynd Drive/Purcell Avenue** (in discussion but with no NBBC reference yet).

** in his statement to Nuneaton Telegraph and Nuneaton News published on Wednesday 3rd October the planning portfolio holder, Neil Phillips, states that this site will not be approved as it is green belt. This has not prevented other sites that are green belt being put into the Plan e.g. HSG 9 which if built on reduces green belt boundary from land controlled by Rugby Borough Council to just one small field.

NBBC have recently published issue No 40 of their 'In Touch' newspaper covering October 2018 to March 2019. On page 4 it states:

'The notable changes to the Borough Plan include an increase in the number of houses The Plan will deliver, up from 13374 to 14060, which is as a result of developers gaining planning permission for more houses on the strategic housing site in the north of Nuneaton than had been anticipated when the plan was last published'.

This is clear indication that the Plan is not based on a planned housing need but on the ability on developers to gain planning permission from NBBC.

Numbers will also increase due to the text 'at least' that now precedes the target number for the sites with an HSG prefix. Developers will love this as there is no upper limit.

In the Sky News survey (Sky News Line 18 on web) Nuneaton and Bedworth comes out 307th out of 390 boroughs for housing need. This does not make Nuneaton and Bedworth a case for this excessive build.

It is by NBBC own admission the most densely populated borough in Warwickshire (5.75 time the average).

Jobs are not available to support this growth in housing build.

It is widely said that the Coventry housing needs are heavily overstated and are based on continuing increases in student numbers both studying and remaining in the area after graduation and the continuing expansion of Jaguar Land Rover. Both are unsustainable growths. The rate of build of student accommodation must release private properties, once rented to students, back into the private sector for rent or redevelopment. It seems Coventry are reviewing their needs downwards.

NBBC is in danger of becoming a suburb of Coventry with no jobs, a dying town centre, and thus a dormitory/commuter town leading to even more traffic and pollution.

MM14 states that there must be 'exceptional grounds' to build on green belt. These do not exist with these overinflated targets and The Secretary of State for the Environment. Michael Gove MP, repeatedly calls to protect the green belt especially where it is used for food production.

(Continue on a separate sheet / expand box if necessary)

8. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified at 5 above where this relates to soundness. You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There is an urgent need to review these projected excessive housing numbers – both the actual need for Nuneaton and Bedworth and the Coventry overspill.

The numbers seem to increase every time anything comes out of NBBC – in military terms this is 'mission creep' and the residents of the borough are the 'collateral damage'.

This excessive rate of build will lead to multiple unfinished sites – builders on some sites are advising build out rates of up to 12 years and depending on market conditions may never be completed.

The housing numbers and build rate must be reduced to a sustainable level that jobs and infrastructure will support and that are actually needed for Nuneaton and Bedworth.

The green belt must be protected.

**NOTE: Please do not reject this representation if it is in any way not compliant with the process.
If necessary, contact me to amend this representation.**

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

9.

Signature: (If you are filling in an electronic copy, please just type your name)	Allen Gilbey
Date:	17 th October 2018 (updated 27th November 2018)

Guidance notes for Representation Form

1. Introduction

1.1 The Planning and Compulsory Purchase Act 2004 (as amended) (PCPA) states that the purpose of the examination is to consider whether the plan complies with the legal requirements and is sound. The publication of the Schedule of Proposed Main Modifications to the Borough Plan Publication (2017) document is a formal stage in the Examination process. Representations should relate specifically to the legal compliance and soundness of the proposed main modifications. The Council has prepared a schedule setting out the proposed Main Modifications it considers necessary in order for the Borough Plan to be found sound. This document, along with an updated Sustainability Appraisal Report and Habitats Regulations Assessment have now been published for public consultation, alongside other updated documents that helped inform the modifications.

2. Legal Compliance

2.1. The Inspector will first check that the plan meets the legal requirements under s20(5)(a) of the PCPA before moving on to test for soundness.

2.2. You should consider the following before making a representation on legal compliance:

- The plan in question should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the Local Development Documents (LDDs) it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for independent examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at its main offices.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement (SCI) (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of LDDs (including plans) and the consideration of planning applications.
 - The plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). On publication, the LPA must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The LPA must also notify the various persons and organisations set out in the Regulations and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when it publishes a plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.

3. Soundness

3.1. Soundness is explained in paragraph 182 of the National Planning Policy Framework (NPPF, 2012). The Inspector has to be satisfied that the plan is positively prepared, justified, effective and consistent with national policy:

- **Positively prepared:** This means that 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 reasonable alternatives, based on proportionate evidence.
- **Effective:** The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- **Consistent with national policy:** The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

4. General advice

4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should make clear in what way the plan or part of the plan is inadequate having regard to legal compliance and the four requirements of soundness set out above. You should try to support your representation by evidence showing why the plan should be modified. It will be helpful if you also say precisely how you think the plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at the main modifications stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

4.2. Where there are groups who share a common view on how they wish to see a plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases, the group should indicate how many people it is representing and how the representation has been authorised.