

Representation from David Parr.

I should like to comment on the Area designated EMP7 in the Borough Plan Review. This is covered in the Employment_Land_Portfolio paragraphs 5.35 to 5.42

I attended the Public Inquiry on the Borough Plan in 2019 when this area was discussed. In the morning Warwickshire Highways representatives objected to the proposal because of the severe impact it would have on the local road system, but later the same day they unaccountably changed their minds and found it acceptable.

In the four succeeding years the wisdom of this decision has obviously been found to be badly lacking.


In that time hundreds more houses have been built on School Lane, Smarts Road and at various other nearby locations, with hundreds more planned at Hawkesbury, Hospital Lane and other sites in the area.

In addition the employment site EMP6 is under construction and that at EMP2 has just been approved on appeal.

All of these developments will have a massive impact on the already-severe traffic problems on School Lane, Pickards Way and M6 Junction 3, and many surrounding residential roads, which are already frequently used as alternative routes.

Nothing has been done to improve the road system to cope with these problems, and if EMP7 goes ahead the extra HGV movements along School Lane will cause utter chaos. Paragraph 5.37 mentions the site's proximity to the M6 but that is only relevant if access to and from the motorway is easy. That could only be achieved if new slip roads both onto and off the motorway were to be constructed from the site, but that is not likely to be financially viable.

For this reason I consider the Employment site EMP7 should be removed from the Borough Plan Review

	Borough Plan Review Issues & Options consultation draft Response Form	Ref: (For official use only)
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Please return to Nuneaton and Bedworth Borough Council by 6th August 2021 via:

Email: planning.policy@nuneatonandbedworth.gov.uk or

Post: Town Hall, Coton Road, NUNEATON, CV11 5AA.

This form has two parts –

Part A – Personal details

Part B – Your response.

Part A

	1. Personal details* * If an agent is appointed, please complete only the title, name and organisation boxes below but complete the full contact details of the agent in 2.	2. Agent's details (if applicable)
Title	Mr	
First name	David	
Last name	Parr	
Job title (where relevant)		
Organisation (where relevant)		
House no. and street		
Town		
Post code		
Telephone number		
Email address	d	

Part B

Duration of Borough Plan

Question 1. Do you agree that a Plan period of 2023 - 2038 is appropriate? If not, which other plan period would you recommend? Please justify your answer.

Yes.

The evidence changes too quickly to allow a longer period.

(Expand box if necessary)

Question 2. Do you agree that the existing evidence base set out above needs to be updated or replaced? Please justify your answer.

Yes.

For example the requirement to help address Coventry's housing need has been called into question by the Office Of Statistics Regulation report of May 2021, which queries the city's future population growth forecast.

(Expand box if necessary)

Question 3. Are there any other evidence base studies which require updating? If so, what are they? Please justify your answer.

Yes.

The Joint Green Belt Study 2015 which was relied on as evidence at the Borough Plan inquiry is a deeply-flawed document, in fact it could reasonably be accused of gerrymandering in its drawing of Green Belt parcels, in order to produce its recommendations. This was especially true in the case the parcel BE5. Many of its conclusions need to be looked at again.

It was also a shoddily-produced document, containing for example ambiguous maps, open to misinterpretation.

(Expand box if necessary)

Employment

Question 4. Which of the options set out below do you favour for the location of future employment areas? Please set out why.

- Option 1 – Provide new employment through extension of existing employment estates with no focus on a particular area within the borough.
- Option 2 – Provide new employment in close proximity to the A5.
- Option 3 – Provide new employment in close proximity to junction 3 of the M6.

Option 1.

It would be inadvisable to adopt Option 3 to provide more employment near to junction 3 of the M6. This junction is already inadequate for the amount of traffic it carries, and the resulting congestion causes traffic to divert on to the local road network, affecting residential areas. The current published plans for improvement at this junction (M6 Interim Scheme) will do very little to remedy the situation. It is also the case that the type of employment which would be attracted to the area around junction 3 would be predominantly warehousing, which provides few jobs, and is likely to provide even fewer as technology evolves.

(Expand box if necessary)

Question 5. Are there any other reasonable options for the locating of new employment areas that have not been set out above? Please justify your answer.

The Borough Plan proposal to provide 107.8 hectares of employment land should be

re-examined. The future requirement for employment land has always been predicated upon the forecast future population, but as I have pointed out in Question 2 above, these figures are now seriously in doubt because of the OSR report. So if the population forecast is too high, it follows that the requirement for employment land is also likely to be too high.

(Expand box if necessary)

Question 6. Which of the options set out below do you favour for dealing with non-employment uses on existing industrial estates? Please set out why.

- Option 1 – Continuation of the protection of existing employment uses from non-employment uses.
- Option 2 – Set out the types of non-employment uses that would be allowable in existing employment uses.
- Option 3 – Set out the existing employment areas within which non-employment uses would be acceptable.
- Option 4 – Restrict the number of non-employment uses that each employment area can accommodate.
- Option 5 – Remove any form of protection of existing employment uses from non-employment uses.

Option 5 – treat each application on its merits, having consideration of evolving evidence.

(Expand box if necessary)

Green Belt

Question 7. Which of the options set out below do you favour for the locating of new residential uses? Please set out why.

- Option 1 – Prioritise the existing urban areas of the Borough followed by land in the countryside that is not Green Belt, and then Green Belt land.
- Option 2 – Prioritise the existing urban areas of the Borough followed by land in the countryside no matter whether it is designated as Green Belt or not.
- Option 3 – Prioritise to the most sustainable locations no matter whether it is designated as an urban area, countryside, or Green Belt.

Option 1.

Building in the Green Belt should always be the last resort because there is a very good reason that land is defined as Green Belt. This is usually because numerous studies over many decades have recognised its value and concluded it should be protected as such.

A prime example of this is the housing and employment site EMP2 which was allocated in the latest Borough Plan despite being classed as valuable green belt land for over 30 years by a series of government inspectors.

The presumption should always be against development in the Green Belt unless there are truly exceptional circumstances.

(Expand box if necessary)

Question 8. Which of the options set out below do you favour for the locating of new employment uses? Please set out why.

- Option A – Prioritise land that is in the countryside that is not Green Belt followed by Green Belt land.
- Option B – Prioritise land that is in the countryside no matter whether it is designated as Green Belt or not.

- Option C - Prioritise to the most sustainable locations no matter whether it is designated as countryside or Green Belt.

Option A

Reason is same as question 7 above.

(Expand box if necessary)

Question 9. Is there another reasonable hierarchy for selecting land for development, particularly housing, but including employment uses? If so, what would this look like? Please justify your answer.

(Expand box if necessary)

Housing

Question 10. Do you agree that there should be a review of the existing allocated sites? Please state why.

Yes.

Because the allocation was partly to satisfy Coventry's perceived need, which has now been shown to have been based on very dubious statistics, meaning NBBC did not need to provide 4020 dwellings for this purpose.

Also increasing numbers of windfall sites have come forward and this is likely to increase still further, particularly in town centres with the decline in retail use.

So it would be extremely unfortunate to sacrifice all of the greenfield sites which have been allocated, then find in a year or two that we did not need to do so after all.

(Expand box if necessary)

Question 11. Which of the spatial options do you favour for the location of future housing? Please set out why.

Option 1

In order to help improve the environment within existing settlements, particularly in areas which are rundown or derelict.

(Expand box if necessary)

Question 12. Are there any other potential spatial options that need to be considered? If so, please specify.

(Expand box if necessary)

Net Zero Carbon Emissions

Question 13. Should the new Borough Plan seek to set targets for tree planting in large scale developments (option 1)? If not, why not. If so, should these targets be based on area or number of trees? Please justify your answer.

Yes.

Should be based on a combination of area and both number and type of trees, otherwise we might end up with some very small trees which have very little carbon reduction benefit.

(Expand box if necessary)

Question 14. Should the new Borough Plan seek to require an orchard in large scale developments (option 2)? If not, why not.

Yes.

(Expand box if necessary)

Question 15. Is there a definition of large-scale development that would be appropriate to use? If so, please set out what this is.

(Expand box if necessary)

Question 16. Should the Borough Plan set no targets for tree planting in the Borough (option 3)? If so, why so?

No, option 3 is unacceptable.

(Expand box if necessary)

Town Centres

Question 17. Which of the options set out below do you favour for the protection of primary and secondary frontages in the town centres? Please set out why.

- Set out that use class E and use classes A4 and A5 (as was) are acceptable uses.
- Set out that use class E are acceptable uses but not use classes A4 and A5 (as was).
- Set out that use classes E and F1 are acceptable uses.
- Set out that use class E and C3 (residential) uses are acceptable.

All classes E, A4, A5, F1 and C3 should be acceptable, to help revitalise town centres.

(Expand box if necessary)

Question 18. Are there other uses not set out above that should be included as acceptable in primary and secondary frontages in the town centres? If so, which ones and why.

(Expand box if necessary)

Question 19. Which of the options set out below is appropriate for setting out the extent of the primary and secondary frontages in the town centres? Please set out why.

- Option A – Remove any designations of primary and secondary frontages.
- Option B - Reassess and redraw the extent of the primary and secondary frontages.
- Option C - Retain the designation of primary and secondary frontages as set out in current Borough Plan.

(Expand box if necessary)

Transport

Question 20. Should policies SA1 and HS2 be amended to give greater emphasis to the importance of cycling and walking connections/infrastructure being provided (option 1)? If not, why not.

Yes.

(Expand box if necessary)

Question 21. Should the new Borough Plan be amended from that set out in policy HS2 to require new developments to install vehicle charging points (option 2)? If so, what should the requirement be. If not, why not.

No.
Because electric vehicles are a blind alley which we will look back on in 20 years and wonder why we ever went down that route, with all its problems associated with lithium mining, range anxiety and end-of-life battery disposal.
We should instead be concentrating on fuel cell technology using hydrogen, which can be generated from water by renewable energy sources and produces no harmful emissions.
Rather than spending money on charging points (which will one day be redundant) we should invest in hydrogen re-fuelling infrastructure, which is currently pitifully poor.

(Expand box if necessary)

Question 22. Should the new Borough Plan leave policies SA1, SA2 and HS2 unchanged (option 3)?

No.

(Expand box if necessary)

Other Matters

Question 23. Should the new Borough Plan require, through policy, new development to meet, as a minimum, a 10% biodiversity gain? If not, what should be the target for biodiversity gain? Please justify your answer.

It should be 20%, to try to compensate for the large amount of biodiversity we have lost in recent years.

(Expand box if necessary)

Question 24. Do you agree that design codes are best dealt with as supplementary planning documents? Please justify your answer.

Yes, but only if the SPDs produced are given legal weight and therefore can govern

eventual developments. The SPDs produced since the Borough Plan was adopted have involved lots of work and public consultation, and many came up with sensible guidance for development, but subsequently it appears that developers have assumed that they can completely ignore them, for example in the case of the EMP2 site, and indeed we have been told by Planning Officers that SPDs are not binding. It is imperative that SPDs are given legal force, otherwise all the effort put into their production is a complete waste of time and money.

(Expand box if necessary)

Question 25. Do you agree that the key issues for the Borough Plan review have been identified ?. Please justify your answer.

No.

Open Space provision and Heritage Protection should be included, as mentioned in section 11.5

(Expand box if necessary)

Question 26. Are there any other issues that need to be considered and addressed ? Please justify your answer.

The allocation of site EMP7 should be re-examined. The traffic infrastructure for this site is totally inadequate, and was identified as such by WCC Highways at the Borough Plan Public Inquiry, before all objections were inexplicably withdrawn. The fact that access to the site is unsuitable is borne out by the fact that there has been no application for development.

The allocation of site EMP2 should also be re-examined. As mentioned in question 3 above, its removal from the Green Belt was totally illogical and unjustified. The type of development now proposed would :

- a) place an intolerable strain on the local road network
- b) destroy an important natural environment, wiping out hedgerows and trees and thus removing wildlife corridors, as well as losing its role in absorbing carbon
- c) create noise and light pollution in an otherwise rural area
- d) accentuate existing flooding problems downstream from the site
- e) severely degrade the existing footpath network, much valued locally over many years, and especially so for the last 18 months
- f) effectively merge Bedworth with Coventry
- g) the SPD for the site fails to address issues such as the need for a landscape buffer, such as that considered vital during previous hearings and appeals since the 1980s.

(Expand box if necessary)

Question 27. Are there any other parts of the Borough Plan review document that you wish to comment on?

Vision	
Objectives	
Page number	
Paragraph number	
Comments	---

(Expand box if necessary)

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

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

Sustainability Appraisal Report

Question 28. Do you have any comments you would like to make on the Sustainability Appraisal Report that accompanies the Borough Plan review document?

Page number	
Paragraph number	
Table number	
Comments	<div style="height: 100px; vertical-align: bottom; text-align: right;"> (Expand box if necessary) </div>

Future Consultations

If you would like to be kept informed of other future stages of planning policy production then please tick the relevant box below.

Do you wish to be kept informed of other Supplementary or Development Plan Documents?

Yes ☐ ☒

Signature	David W Parr
Date	05/08/21