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



currently undertaking further work to update and Availability Assessment using an agreed ogy to understand the total capacity of the ate additional housing needs from Coventry. It may lead to the allocation of additional land ne needs of the Coventry and Warwickshire This will be the subject of a further round of Should the Plan be altered then the will be updated accordingly.

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ly undertaking further work to update the Availability Assessment using an agreed sub to understand the total capacity of the ate additional housing needs from Coventry. It may lead to the allocation of additional land he needs of the Coventry and Warwickshire

|         |         | land could be included within the allocation south of Woodlands Lane as shown on the attached plan. The proposed allocation           | Housing Market Area. Th       |
|---------|---------|---|-------------------------------|
|         |         | excludes 3 parcels of land that are controlled by A R cartwright Ltd which have been promoted in previous SHLAA exercises.            | focused consultation. The     |
|         |         | We request that this additional land be added to the allocation. The concern is raised that the proposed identification of            | will be reviewed, and furt    |
|         |         | 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.   |                               |
| 264-001 | Savills | The representation considers that the Plan has not been positively prepared, is not justified, is not effective and is not consistent | Various submission docum      |
|         |         | with national policy. It also considers that the Plan is not legally compliant because it has not been identified in the current      | Council. The LDS as publi     |
|         |         | Local Development Scheme, it is not accompanied by an adequate Sustainability Appraisal and has not fulfilled the Duty to             | reference to the Borough      |
|         |         | Cooperate. Arbury Estate supports the Plan and its allocations wholeheartedly but expresses some concern about the Plan's             | LDS will be updated in du     |
|         |         | inadequacies that must be corrected and can be corrected at the next stage of the Plan's progress towards submission for              | undertaking further work      |
|         |         | Examination by an independent Inspector. More land will need to be found for housing and employment purposes than shown               | Availability Assessment u     |
|         |         | in the current version of the Plan. The Estate has the capacity and ability to provide further land for this purpose and in a         | to understand the total ca    |
|         |         | sustainable manner. Unfortunately, we must express the view that the Plan is likely not to be legally compliant in its current        | additional housing needs      |
|         |         | form due to the fact that it does not deal with the agreed extent of unmet housing need for Coventry and for which Nuneaton           | to the allocation of addition |
|         |         | and Bedworth Borough Council must make provision in this Plan. There is also a need to reconsider the spatial strategy for the        | round of focussed consult     |
|         |         | housing allocations accordingly. The Estate has provided a critique of the highways and transport evidence supporting the Plan        | discussions with relevant     |
|         |         | and concludes that both in terms of the allocations affecting the Estate and the additional allocations suggested, these can be       | requirements for highway      |
|         |         | accessed in an appropriate manner using the existing infrastructure available. However, the Estate is willing to enter into           | The evidence supplied wi      |
|         |         | discussions should there be a need for further strategic road additions to the Plan. The Estate has also provided a Landscape         | process. The Landscape a      |
|         |         | and Green Belt study which provides evidence that further allocations are possible within the Estate boundary and remain              | alongside the work the C      |
|         |         | within the good landscape and Green Belt principles. In respect of the Council's Sustainability Appraisal we consider that it         | capacity and the unmet n      |
|         |         | contains a number of biases which offer lesser scores on the sustainability of the Plan than is actually the case. However,           | Appraisal is considered ro    |
|         |         | fatally, the SA does not address the proper scale of development required as it does not analyse the additional unmet housing         | the sustainability of the P   |
|         |         | need requirement. However, these issues can be addressed with a suitably corrected SA in time for the next round of public            | Sustainability Appraisal w    |
|         |         | consultation. Unfortunately we consider that the Plan is not legally compliant under the duty to co-operate nor sound at present      | in due course to reflect a    |
|         |         | but that by including the additional allocations that we suggest and holding a further round of public consultations on the basis     | to vehicular access to site   |
|         |         | of the adjusted Plan, we believe this can go some way towards creating a legally compliant and sound plan. With the benefit           | delivery of each site will l  |
|         |         | 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 | where necessary in the p      |
|         |         | assist the Borough Council to develop a sound Plan. The Estate has shown from its previous submission to the Borough Council          | noted that the proposed       |
|         |         | that it has the capacity to put forward strategic urban extension land in a sustainable manner that can assist in providing           | new highway infrastructu      |
|         |         | around 3400 dwellings. The quality of the environment envisaged by the Estate and the surroundings that it can offer will be          |                               |



This will be the subject of a further round of he requirements for the delivery of each site inther details provided where necessary.

uments noted and will be reviewed by the blished in September 2015 did include gh Plan and timescales for production. The due course. The Council is currently k to update the Strategic Housing Land using an agreed sub regional methodology capacity of the Borough to accommodate ds from Coventry. These findings may lead itional land. This will be subject to a further ultation. The Council is in ongoing nt highways authorities to consider ay improvements associated with the Plan. will be further considered as part of this and Green Belt study will be reviewed Council are undertaking to consider total needs of the Coventry. The Sustainability robust and has comprehensively considered Plan throughout its production. The will be reviewed and updated if necessary any changes made to the Plan. In relation ite allocations, the requirements for the I be reviewed, and further details provided policy and or on the Proposals Map. It is development is likely to require significant ture in order to be sustainable. It is

| 287-02       Tetow King       How so the setuce of the site of th  |        |             |   |                             |
|--|--------|-------------|---|-----------------------------|
| <ul> <li>impacting adversely on Arbury Hall, its Gardens or the listed buildings within the Estate. Moreover, new development offers the opportunity for providing resources to improve those assets and ensure their long term future. The Estate is about 23% of the subject of the whole Eorogia and therefores simply in terms of Scale alone, it is a najor potential baset to its residuents and businesses. The Proposals Map no longer includes indications of vehicular access and access roads as was the case in the earlier Prefered Options veision. Our transport consultants have found no reference to this strategic road either from the Submission Pian or from the evidence assumed that this is no longer a proposal in the Plan. Unfortunately, the consequence is that the boundaries drawn on the Proposal Map for HSG2 no longer include a link from the site to a significant public highway. The Estate is of the view that the Proposal Map should be corrected at the earliest possible stage to include the land identified by the Estate in its "all of rost" 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 bose does include a proposed roade of the "Link Road" within the Strategic Modes 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, readiustment to the existing road network and junctions. The intervad Shuth allocation of the Faultiands Farm employment allocation. The Estate is one of the landowners within the State Housing allocation shown on the Ran. We note that the supporting Evidence Appendix C - Landscape R Green Bett - Critique of Supporting Evidence is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map. The Proposals Map. The Proposals Map. The Proposals Map. The Strate is one of the landowners within the staddressed more explicitly in the Plan and cross-referenced to An</li></ul> |        |             | attractive to investors in providing housing for the elderly. The Estate contains a large proportion of the historic assets of the  | accepted that this should I |
| 267-02       Tetow Kng       Plaves in the Subarbability Appraisal of the site of a site of the subarbability Appraisal of the site of a site of the subarbability Appraisal of the site of a site of the subarbability Appraisal of the site of a site of the subarbability Appraisal of the site of a site of the subarbability Appraisal of the site of a site of the subarbability Appraisal of the site of a site of the site of a site of the subarbability Appraisal of the site of a site of the site of a site of a site of site of a si  |        |             |   | in the IDP, if necessary.   |
| Size of the whole Borough and therefore simply in terms of scale alone, it is a major potential asset to its residents and<br>businesses. The Proposals Map no longer includes indications of vehicular access and as asses the case in the<br>earlier Preferred Options version. Our transport consultants have found no reference to this strategic road either from the<br>submission Plan or from the evidence material supplied. We have therefore assumed that this is no longer a proposal in the<br>Plan. Unfortunately, the consequence is that the boundaries drawn on the Proposals Map for HSC2 no longer include a link<br>from the site to a significant public highway. The Estate is of the view that the Proposals Map for HSC2 no longer include a link<br>from the site to a significant public highway. The Estate is one of the<br>evidence documents. The link road bhould also therefore, feature in the Infrastructure Delivery Plan. The Estate is one of the<br>landowners within the HSG4 housing allocation shown on the Phan. We note that the supporting evidence does include a proposed route of the "Link Road" within the Strategic Modelling Report 2015 included within the<br>evidence documents. The link road bhould also therefore, feature in the Infrastructure Delivery Plan. The Estate is one of the<br>landowners within the HSG4 housing allocation shown on the Phan. We note that the supporting evidence does indicate how<br>access is to be made to that allocation but that its in the interests of darity and deliverability, we would recommend that<br>measing allo attemptore of detailed appendixes i. Including: Appendix B - OAM,<br>S-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.The everarching aim of the<br>vas assessed allogiade<br>easing allocation shown on the set its first whithin a sustainable location is not are presented on as in a dar greenfield set<br>support of development on this site.The everarching a   |        |             | impacting adversely on Arbury Hall, its Gardens or the listed buildings within the Estate. Moreover, new development offers the     |                             |
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| 267-02Tetow KingFully in the source and the sou   |        |             | businesses. The Proposals Map no longer includes indications of vehicular access and access roads as was the case in the            |                             |
| Plan. Unfortunately, the consequence is that the boundaries drawn on the Proposal Map for HSG2 no longer include a link<br>from the site to a significant public highway. The Estate is of the view that the Proposals Map should be corrected at the earliest<br>possible stage to include the land identified by the Estate in its "call for sites" submission of November 2015 which included<br>testate land with a boundary with Heath End Road. Further information is provided in the AECOM report in Appendix B. the<br>evidence base does include a proposed route of the "Link Road" within the Strategic Modelling Report 2015 included within the<br>evidence documents. The link road should also therefore, feature in the Infrastructure Delivery Plan. The Estate is one of the<br>landowners within the HSG4 housing allocation show non the Plan. We note that the supporting evidence does indicate how<br>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-<br>adjustment to the existing road network and junctions. In the interests of clarity and deliverability, we would recommend that<br>the matter is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map<br>a plas in Indicates the location of the Faulthands Farm employment allocation and Highways<br>- Critique of Supporting Evidence; Appendix C - Landscape & Green Belt - Critique of Supporting Evidence; Appendix D - Landscape & Green Belt - Critique of Supporting Evidence; Appendix C - Landscape & Green Belt - Critique of Supporting is usatinable location<br>the substanability Appraisal of the site at NB20 Hawkeebury Golf Course. The site scores the same as other sites with<br>map also indicates the location the NB20 Hawkeebury Golf Course. The site scores the same as other sites.The overarching aim of th<br>sites in sustainable location as is not a greenfield site.<br>Transport Statement, Vision Document, Planning Evidence document  |        |             | earlier Preferred Options version. Our transport consultants have found no reference to this strategic road either from the         |                             |
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| <ul> <li>267-02</li> <li>Tetlow King</li> <li>Planning</li> <li>Planning</li></ul>   |        |             | Plan. Unfortunately, the consequence is that the boundaries drawn on the Proposal Map for HSG2 no longer include a link             |                             |
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| <ul> <li>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 readjustment to the existing road network and junctions. In the interests of darity and deliverability, we would recommend that the matter is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map. Critique of Supporting Evidence; Appendix C - Landscape &amp; Green Belt - Critique of Supporting Evidence; Appendix D - OAN, S-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.</li> <li>Z67-02 Tetlow King Planning Haws 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.</li> </ul>  |        |             | Estate land with a boundary with Heath End Road. Further information is provided in the AECOM report in Appendix B. the             |                             |
| <ul> <li>Iandowners 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 readjustment 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 Faultands Farm employment allocation. The Estate is entirely in support. The representations made by Savilis include a number of detailed appendices, including: Appendix B - Transportation and Highways - Critique of Supporting Evidence; Appendix C - Landscape &amp; Green Belt - Critique of Supporting Evidence; Appendix C - OAN, 5-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.</li> <li>267-02 Tetiow King Planning Haws been allocated, yet it has not been allocated. The site itself is within a sustainable location as is not a greenfield ste. Transport Statement, Vision Document, Planning Evidence document and Landscape Report have also been submitted in support of development on this site.</li> <li>267-02 Tetiow King Planning Under the site is all the site is ease is a sustainable location as is not a greenfield ste. Transport Statement, Vision Document, Planning Evidence document and Landscape Report have also been submitted in support of development on this site.</li> </ul>  |        |             | evidence base does include a proposed route of the "Link Road" within the Strategic Modelling Report 2015 included within the       |                             |
| <ul> <li>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-<br/>adjustment to the existing road network and junctions. In the interests of clarity and deliverability, we would recommend that<br/>the matter is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map. The Proposals<br/>Map also indicates the location of the Faultlands Farm employment allocation. The Estate is entirely in support. The<br/>representations made by Savills include a number of detailed appendixes, including: Appendix B - Transportation and Highways<br/>- Critique of Supporting Evidence; Appendix C - Landscape &amp; Green Belt - Critique of Supporting Evidence; Appendix D - OAN,<br/>S-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.</li> <li>267-02 Tetlow King<br/>Planning</li> <li>Planning</li> <li>Plans in the Sustainability Appraisal of the site at NB20 Hawkesbury Golf Course. The site scores the same as other sites which<br/>have been allocated, yet it has not been allocated. The site itself is within a sustainable location as is not a greenfield site.<br/>Transport Statement, Vision Document, Planning Evidence document and Landscape Report have also been submitted in<br/>support of development on this site.</li> <li>was assessed alongside of<br/>whether there would be so<br/>on non-Green Belt greenfie<br/>exceptional circumstances<br/>for development, however<br/>within the Green Belt, the<br/>circumstances. The Counc<br/>update the Strategic Hous<br/>agreed sub regional methin<br/>of the Borough to accomment.</li> </ul>   |        |             | evidence documents. The link road should also therefore, feature in the Infrastructure Delivery Plan. The Estate is one of the      |                             |
| adjustment to the existing road network and junctions. In the interests of clarity and deliverability, we would recommend that the matter is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map. The Proposals Map also indicates the location of the Faultlands Farm employment allocation. The Estate is entirely in support. The representations made by Savills include a number of detailed appendices, including: Appendix B - Transportation and Highways - Critique of Supporting Evidence; Appendix C - Landscape & Green Bet - 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.       The overarching aim 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 scores the same as other sites which 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 stelf 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 score the same as other sites which as 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, however within the Green Belt, the circums  |        |             | landowners within the HSG4 housing allocation shown on the Plan. We note that the supporting evidence does indicate how             |                             |
| the matter is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map. The Proposals Map also indicates the location of the Faultlands Farm employment allocation. The Estate is entirely in support. The representations made by Savills include a number of detailed appendices, including: Appendix B - Transportation and Highways - Critique of Supporting Evidence; Appendix C - Landscape & Green Belt - Critique of Supporting Evidence; Appendix D - OAN, 5-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.       The overarching aim of the site is used 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 was assessed alongside of whether there would be significant of the Spatial Objectives of t was assessed along company. The exceptional circumstances for development, however within the Green Belt, the circumstances. The Councuptate the Strategic Hous agreed sub regional method of the Borough to accompany.  |        |             | 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-     |                             |
| Map also indicates the location of the Faultlands Farm employment allocation. The Estate is entirely in support. The representations made by Savills include a number of detailed appendices, including: Appendix B - Transportation and Highways - Critique of Supporting Evidence; Appendix C - Landscape & Green Belt - Critique of Supporting Evidence; Appendix D - OAN, 5-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.   |        |             | adjustment to the existing road network and junctions. In the interests of clarity and deliverability, we would recommend that      |                             |
| representations made by Savills include a number of detailed appendices, including: Appendix B - Transportation and Highways<br>- Critique of Supporting Evidence; Appendix C - Landscape & Green Belt - Critique of Supporting Evidence; Appendix D - OAN,<br>S-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.The overarching aim of the<br>sites in sustainability Appraisal of the site at NB20 Hawkesbury Golf Course. The site scores the same as other sites which<br>have been allocated, yet it has not been allocated. The site itself is within a sustainable location as is not a greenfield site.The overarching aim of the<br>sites in sustainable location<br>the Spatial Objectives of t<br>was assessed alongside of<br>whether there would be si<br>on non-Green Belt greenfi<br>exceptional circumstances<br>for development, however<br>within the Green Belt, the<br>circumstances. The Course<br>update the Strategic House<br>agreed sub regional metho<br>of the Borough to accommethor   |        |             | the matter is addressed more explicitly in the Plan and cross-referenced by annotation on the Proposals Map. The Proposals          |                             |
| <ul> <li>- Critique of Supporting Evidence; Appendix C - Landscape &amp; 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.</li> <li>267-02 Tetlow King Planning</li> <li>Planning</li> <li>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.</li> <li>on non-Green Belt greenfield set of the sceptional circumstances for development, however, within the Green Belt, the circumstances. The Course agreed sub regional method of the Borough to accommunication.</li> </ul>   |        |             | Map also indicates the location of the Faultlands Farm employment allocation. The Estate is entirely in support. The                |                             |
| S-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.       Tetlow King       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.       The overarching aim of the sites in sustainable location as is not a greenfield site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.       The overarching aim of the site itself is within a sustainable location as is not a greenfield site.       The overarching aim of the sites in sustainable location as is not a greenfield site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.       The overarching aim of the sites in sustainable location as is not a greenfield site.       Sites in sustainable location is site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of development on this site.       The overarching aim of the sites in sustainable location as is not a greenfield site.       Sites in sustainable location is support of development on this site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estates.       The overarching aim of the sate is sustainable location is support of development on this site.       The overarching aim of the sate is support of development on this site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocatin athe supp   |        |             | representations made by Savills include a number of detailed appendices, including: Appendix B - Transportation and Highways        |                             |
| S-Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.       Tetlow King       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.       The overarching aim of the sites in sustainable location as is not a greenfield site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.       The overarching aim of the site itself is within a sustainable location as is not a greenfield site.       The overarching aim of the sites in sustainable location as is not a greenfield site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estate.       The overarching aim of the sites in sustainable location as is not a greenfield site.       Sites in sustainable location is site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of development on this site.       The overarching aim of the sites in sustainable location as is not a greenfield site.       Sites in sustainable location is support of development on this site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocations and Infrastructure at Arbury Estates.       The overarching aim of the sate is sustainable location is support of development on this site.       The overarching aim of the sate is support of development on this site.         Year Housing Land Supply and Unmet Need; and Appendix E - The Delivery of Allocatin athe supp   |        |             |   |                             |
| 267-02       Tetlow King       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.       The overarching aim 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.       The overarching aim of the site at NB20 Hawkesbury Golf Course. The site scores the same as other sites which the Spatial Objectives of the same as other sites which is usualinable location.         267-02       Planning       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.       The overarching aim of the site at NB20 Hawkesbury Golf Course. The site scores the same as other sites which is usatinable location the Spatial Objectives of the Spatial Objectives of the Spatial Objectives of the Spatial Objectives of the same as other site.         267-02       The overarching aim of the site at NB20 Hawkesbury Golf Course. The Course as the same as other sites which is the Spatial Objectives of the Spatial Objectives of the Spatial Objectives of the same as other sites.       The overarching aim of the same as other sites.         267-02       The overarching aim of the site at NB20 Hawkesbury Golf Course.       The overarching aim of the same as other sites.         267-02       The overarching aim of the site at NB20 Hawkesbury Golf Cours  |        |             |   |                             |
| Planning       have been allocated, yet it has not been allocated. The site itself is within a sustainable location as is not a greenfield site.       sites in sustainable location         Transport Statement, Vision Document, Planning Evidence document and Landscape Report have also been submitted in       support of development on this site.       sustainable location         Wether there would be site       on non-Green Belt greenfield       seceptional circumstances       for development, however         Vision Document, Planning       in all call of the Borough to accomment       seceptional circumstances       for development, however         Vision Document, Planning       in all call of the Borough to accomment       seceptional circumstances       for development, however  | 267-02 | Tetlow King |   | The overarching aim of the  |
| Transport Statement, Vision Document, Planning Evidence document and Landscape Report have also been submitted in       the Spatial Objectives of t         support of development on this site.       was assessed alongside of         on non-Green Belt greenfil       exceptional circumstances         for development, New end       for development, howevend         within the Green Belt, the       circumstances         inclument, Planning Evidence document and Landscape Report have also been submitted in       the Spatial Objectives of t         was assessed alongside of       was assessed alongside of         whether there would be si       on non-Green Belt greenfil         exceptional circumstances       for development, howevend         within the Green Belt, the       circumstances         update the Strategic Hous       agreed sub regional method         of the Borough to accomment       of the Borough to accomment  |        |             |   | _                           |
| support of development on this site.       was assessed alongside of whether there would be site.         on non-Green Belt greenfile       on non-Green Belt greenfile         exceptional circumstances       for development, however         within the Green Belt, the       circumstances. The Counce         update the Strategic Hous       agreed sub regional method         of the Borough to accomment       of the Borough to accomment   |        | 5           |   |                             |
| whether there would be so<br>on non-Green Belt greenfi<br>exceptional circumstances<br>for development, however<br>within the Green Belt, the<br>circumstances. The Counc<br>update the Strategic Hous<br>agreed sub regional metho<br>of the Borough to accomm  |        |             |   |                             |
| Image: Sector                                      |        |             |   | _                           |
| exceptional circumstances<br>for development, however<br>within the Green Belt, the<br>circumstances. The Counc<br>update the Strategic Hous<br>agreed sub regional metho<br>of the Borough to accomm  |        |             |   |                             |
| for development, however<br>within the Green Belt, the<br>circumstances. The Counc<br>update the Strategic Hous<br>agreed sub regional metho<br>of the Borough to accomm   |        |             |   | 2                           |
| within the Green Belt, the<br>circumstances. The Counc<br>update the Strategic Hous<br>agreed sub regional metho<br>of the Borough to accomm   |        |             |   |                             |
| circumstances. The Counc<br>update the Strategic Hous<br>agreed sub regional metho<br>of the Borough to accomm   |        |             |   |                             |
| update the Strategic House<br>agreed sub regional metho<br>of the Borough to accomm  |        |             |   |                             |
| agreed sub regional methods of the Borough to accomm   |        |             |   |                             |
| of the Borough to accomm   |        |             |   |                             |
|  |        |             |   |                             |
| Coventry. The findings of  |        |             |   | 2                           |
|  |        | <u> </u>    |   | Coventry. The findings of   |



d be reflected in any future allocation and

the site selection process was to identify tions that will contribute towards meeting f the Plan. For this reason, Green Belt land other greenfield land as it was not known e sufficient capacity in sustainable locations nfield land. It was recognised that ces are required to release Green Belt land ver, it was considered that, on certain sites hese sites were subject to these exceptional uncil is currently undertaking further work to busing Land Availability Assessment using an thodology to understand the total capacity mmodate additional housing needs from

of this work may lead to the allocation of

|        |              |   | additional land to assist in |
|--------|--------------|---|------------------------------|
|        |              |   | Warwickshire Housing Ma      |
| 267-03 | Tetlow King  | Four of the allocation sites are included in the Green Belt and only one is to be proposed to be released. Hawkesbury Golf        | Comments noted. NBBC         |
|        | Planning     | Course has been ignored by the important evidence base document. Critically, the release of HSG2, HSG3 and HSG4 is not            | relation to the scale and    |
|        |              | justified.  | The Council has carefully    |
|        |              |   | site selection process. T    |
|        |              |   | evidence base, including     |
|        |              |   | informed the spatial grov    |
|        |              |   | considered to be the mos     |
|        |              |   | assessed against other re    |
| 754-01 | Michele      | The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It does | NBBC consider that the Pl    |
|        | Kondakor     | not take into consideration the responses of the previous Issues and Options Statement, especially with regard to housing         | evidenced in the backgro     |
|        |              | numbers. There is not enough employment opportunities in the town to deal with the quantity of housing proposed. There are        | accords with the latest a    |
|        |              | no methods of funding the infrastructure projects required - with a zero CIL rate for the residential developments in the Plan.   | assessed needs for the B     |
|        |              | The sustainability statement is not encouraging with most of the development in northern Nuneaton have already been given         | undertaking further wor      |
|        |              | planning permission without the necessary mitigation improved. NB5 mentions that investment will be supported by SPG - this       | Availability Assessment u    |
|        |              | document should be available for consultation, the Town Centres Action Plan should also be available for commenting on as         | to understand the total      |
|        |              | well as all other mentioned Supplementary Planning Documents or Guidance. There are too many parts to this Plan which are         | additional housing needs     |
|        |              | not evidence based.   | may lead to the allocation   |
|        |              |   | needs of the Coventry an     |
|        |              |   | will be the subject of a f   |
|        |              |   | approach taken is for a ba   |
|        |              |   | planned for and the amou     |
|        |              |   | economic land growth ta      |
|        |              |   | the Sub-Regional Empl        |
|        |              |   | releasing land on a phase    |
|        |              |   | Warwickshire Strategic E     |
|        |              |   | available on the Council's   |
|        |              |   | infrastructure to suppo      |
|        |              |   | obligations.                 |
| 767-01 | Peter Barber | The Plan is not sound, has not been accompanied by an adequate Sustainability Appraisal Report and does not comply with           | Noted. The Council consid    |
|        |              | the necessary Acts. The infrastructure requirements for the proposed Woodlands Development are not enough. Development            | tests of soundness, but      |
|        |              | in the Woodlands area should not be permitted as it is in conflict with its area-character and thus the NPPF. Furthermore, there  | necessary amending the       |
|        |              | are too many dwellings proposed for the Borough. There needs to be a LDS available to the public, The Sustainability Report       | proposals within the alloc   |
|        |              | should be written by professional experts in their fields, the Habitats Regulations Assessment does not specifically mention the  | within the Plan and nati     |
|        |              | Woodlands Development, which is home to protected species. A Statement of Community Involvement should also be                    | development requiremer       |



t in meeting the needs of the Coventry and Market Area.

C has produced a background paper in d location of growth included in the Plan. Ily considered the Green Belt through the The Plan is supported by an extensive g Sustainability Appraisal, which have owth strategy. The spatial growth strategy is nost appropriate for the Borough when reasonable alternatives

Plan is in accordance with National Policy, as round papers provided. The scale of growth available evidence in relation to objectively Borough. However, The Council is currently ork to update the Strategic Housing Land using an agreed sub regional methodology al capacity of the Borough to accommodate ds from Coventry. The findings of this work ion of additional land to assist in meeting the and Warwickshire Housing Market Area. This further round of focused consultation. The balanced link between the amount of housing ount of employment land that is allocated the target. The approach also takes in to account ployment Land Study which recommends sed basis to assist with meeting Coventry and Economic Plan requirements. All SPGs are il's website. New developments will fund the port development through S106 planning

siders that the draft Plan meets the necessary out will be reviewing all comments and if a Plan prior to Submission. Any development ocation will need to accord with other policies ational planning policy, which provide strict nents, which include regard to the risk of

|        |            | published. More specifically to the site allocation at Bedworth Woodlands - this should not be included in the Plan - this site  | flooding. Policy NB11 of   |
|--------|------------|--|----------------------------|
|        |            | should be included in the Green Belt, the proposed development on this site would also cause traffic congestion and would be     | Delivery of Infrastructur  |
|        |            | at risk of flooding on both the site and an increase of flooding elsewhere.  | provision of new infrastr  |
|        |            |  | This is supplemented by t  |
|        |            |  | has undertaken public      |
|        |            |  | accordance with the        |
|        |            |  | Involvement. The Co        |
|        |            |  | Statement demonstrating    |
|        |            |  | and how this has informe   |
|        |            |  | with the Regulations. Ar   |
|        |            |  | website and was updated    |
|        |            |  | considered the spatial st  |
|        |            |  | evidence base, including   |
|        |            |  | large number of factors    |
|        |            |  | considers that growth is   |
|        |            |  | appropriate locations.     |
| 768-01 | Clare Riaz | The Plan is not sound, has not been accompanied by an adequate Sustainability Appraisal Report and does not comply with          | Noted. The Council consid  |
|        |            | the necessary Acts. The infrastructure requirements for the proposed Woodlands Development are not enough. Development           | tests of soundness, but    |
|        |            | in the Woodlands area should not be permitted as it is in conflict with its area-character and thus the NPPF. Furthermore, there | necessary amending the     |
|        |            | are too many dwellings proposed for the Borough. There needs to be a LDS available to the public, The Sustainability Report      | proposals within the alloc |
|        |            | should be written by professional experts in their fields, the Habitats Regulations Assessment does not specifically mention the | within the Plan and nati   |
|        |            | Woodlands Development, which is home to protected species. A Statement of Community Involvement should also be                   | development requiremer     |
|        |            | published. More specifically to the site allocation at Bedworth Woodlands - this should not be included in the Plan - this site  | flooding. Policy NB11 of   |
|        |            | should be included in the Green Belt, the proposed development on this site would also cause traffic congestion and would be     | Delivery of Infrastructu   |
|        |            | at risk of flooding on both the site and an increase of flooding elsewhere.  | provision of new infrastr  |
|        |            |  | This is supplemented by t  |
|        |            |  | has undertaken public      |
|        |            |  | accordance with the        |
|        |            |  | Involvement. The Co        |
|        |            |  | Statement demonstrating    |
|        |            |  | and how this has informe   |
|        |            |  | with the Regulations. An   |
|        |            |  | website and was updated    |
|        |            |  | considered the spatial st  |
|        |            |  | evidence base, including   |
|        |            |  | large number of factors    |
|        |            |  |                            |



of the Borough Plan relates to 'Ensuring the trure Provision' and makes clear that the structure is a pre-requisite of development. y the Infrastructure Delivery Plan. The Council ic consultation on the Borough Plan in e published Statement of Community Council will be producing a Consultation ng how the consultation has been undertaken med the production of the Plan in accordance An LDS can also been found on the Council's ted in January 2016. The Council has carefully strategy for growth taking into account the ing extensive Sustainability Appraisal and a ors. Based on the evidence, the Council is being planned in the most sustainable and

siders that the draft Plan meets the necessary out will be reviewing all comments and if e Plan prior to Submission. Any development ocation will need to accord with other policies ational planning policy, which provide strict ents, which include regard to the risk of of the Borough Plan relates to 'Ensuring the ture Provision' and makes clear that the structure is a pre-requisite of development. the Infrastructure Delivery Plan. The Council ic consultation on the Borough Plan in published Statement of Community Council will be producing a Consultation ng how the consultation has been undertaken ned the production of the Plan in accordance An LDS can also been found on the Council's ed in January 2016. The Council has carefully strategy for growth taking into account the ng extensive Sustainability Appraisal and a ors. Based on the evidence, the Council

|        |                |  | considers that growth is appropriate locations.   |
|--------|----------------|--|---|
| 769-01 | J Gray         | The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has<br>not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it<br>does not in accompanied by an adequate Sustainability Appraisal Report. The infrastructure offered is inadequate - the<br>infrastructure requirements are far in excess of what is described (esp. in relation to Woodlands Development). The housing<br>deliverability is very unlikely. No more greenfield land should be lost in this borough to housing. The plan is not realistically<br>deliverable with insufficient demand for housing to meet the Plan's future development projections. Furthermore, there are<br>insufficient jobs available.  | Noted. The Council consider<br>and is consistent with nate<br>LDS in 2015 in line with t<br>subsequently been update<br>accompanied by a Sustain<br>evidence base. Housing re<br>Strategic Housing Land A<br>Housing Market Assessme  |
|        |                |  | undertaking further work<br>capacity of the Borough in<br>Coventry, as is required b  |
| 771-01 | Patrick Murfin | The Plan is not sound, has not been accompanied by an adequate Sustainability Appraisal Report and does not comply with<br>the necessary Acts. The infrastructure requirements for the proposed Woodlands Development are not enough. Development<br>in the Woodlands area should not be permitted as it is in conflict with its area-character and thus the NPPF. Furthermore,<br>there are too many dwellings proposed for the Borough. There needs to be a LDS available to the public, The Sustainability<br>Report should be written by professional experts in their fields, the Habitats Regulations Assessment does not specifically<br>mention the Woodlands Development, which is home to protected species. A Statement of Community Involvement should<br>also be published. More specifically to the site allocation at Bedworth Woodlands - this should not be included in the Plan -<br>this site should be included in the Green Belt, the proposed development on this site would also cause traffic congestion and<br>would be at risk of flooding on both the site and an increase of flooding elsewhere. | Noted. The Council consid<br>necessary tests of soundr<br>and if necessary amendin<br>development proposals w<br>with other policies within<br>which provide strict devel<br>regard to the risk of flood<br>relates to 'Ensuring the D<br>makes clear that the prov<br>requisite of development.<br>Infrastructure Delivery Pla<br>consultation on the Borou<br>Statement of Community<br>producing a Consultation<br>consultation has been und<br>production of the Plan in<br>can also been found on th |
|        |                |  | January 2016. The Counc<br>strategy for growth taking<br>including extensive Susta<br>factors. Based on the evi<br>is being planned in the m  |



#### s being planned in the most sustainable and

siders the Plan has been prepared correctly national policy. The Council have publish the n their progress and the LDS has lated in January 2016. The Plan is cainability Appraisal Report as part of the g requirements have been informed by the l Availability Assessment and the Strategic ment. However, the Council is currently irk to the SHLAA to understand the total h including any additional housing need from d by national regulations.

siders that the draft Plan meets the ndness, but will be reviewing all comments ling the Plan prior to Submission. Any within the allocation will need to accord in the Plan and national planning policy, elopment requirements, which include oding. Policy NB11 of the Borough Plan Delivery of Infrastructure Provision' and rovision of new infrastructure is a prent. This is supplemented by the Plan. The Council has undertaken public ough Plan in accordance with the published ty Involvement. The Council will be on Statement demonstrating how the undertaken and how this has informed the in accordance with the Regulations. An LDS the Council's website and was updated in ncil has carefully considered the spatial ing into account the evidence base, tainability Appraisal and a large number of evidence, the Council considers that growth most sustainable and appropriate locations.

| 775-01   | Micheal Dixon | The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has | Noted. The Council consid    |
|----------|---------------|--|------------------------------|
|          |               | not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it      | and is consistent with nat   |
|          |               | is not in accompanied by an adequate Sustainability Appraisal Report. The current infrastructure offered is inadequate and is    | the LDS in 2015 in line wi   |
|          |               | unable to support the existing area.   | subsequently updated in J    |
|          |               |  | by a Sustainability Apprais  |
|          |               |  | papers published in 2015.    |
|          |               |  | further work to the SHLAA    |
|          |               |  | Borough to accommodate       |
| 776-01   | Mr Barson     | The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has | Noted. The Council consid    |
|          |               | not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it      | compliant and meets the      |
|          |               | is not accompanied by an adequate Sustainability Appraisal Report. The infrastructure offered is inadequate - the                | reviewing all comments a     |
|          |               | infrastructure requirements are far in excess of what is described (esp. in relation to Woodlands Development). The housing      | to Submission. The Counc     |
|          |               | deliverability is very unlikely.   | update the Strategic Hous    |
|          |               |  | agreed sub regional meth     |
|          |               |  | of the Borough to accomr     |
|          |               |  | Coventry. The findings of    |
|          |               |  | additional land to assist in |
|          |               |  | Warwickshire Housing Ma      |
|          |               |  | further round of focused of  |
| 778-01   | David Parr    | Land at Phoenix Way/Wilsons Lane should not be developed. The site is important in providing separation between the              | The Plan is supported by a   |
|          |               | settlements of Coventry and Bedworth. This land fulfils the requirements of Policy NB25 - Landscape Character and, as such,      | Sustainability Appraisal, w  |
|          |               | should not be developed. The Council's current method for calculating the need for employment land is flawed as it is based      | strategy. The spatial grow   |
|          |               | on indirect projections. The Council has oversupplied the need for employment land by 20ha (which is nearly equivalent to        | appropriate for the Boroug   |
|          |               | 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    | reasonable alternatives.     |
|          |               | land.  | in relation to the scale and |
| 779-01   | Kerry Orton   | The Plan has not been positively prepared, is not justified, is not effective and is not consistent with National Policy. It has | Policy NB2 identifies a nur  |
|          |               | not been identified in the LDS and the key stages have not been followed, it does not comply with the necessary Acts and it      | together with the Infrastru  |
|          |               | does not in accompanied by an adequate Sustainability Appraisal Report. there is no evidence that Nuneaton should be             | infrastructure requirement   |
|          |               | accepting more than their share of housing. There is no evidence to support their quantity of housing. Evidence to support       | requirements for the deliv   |
|          |               | any proposals should be clear and up to date, however, in this case, out of date data has been used. The plan outlines no        | further details provided w   |
|          |               | support networks for the proposed developments (which includes infrastructure). Traffic modelling should be used taking into     | accords with the latest av   |
|          |               | account any proposals. There are no cross-boundary strategic objectives or an economic development plan for the Borough          | assessed needs for the Bo    |
|          |               | to state where the employment will be for the occupiers of the new dwellings.  |                              |
| 1010-002 | Coventry City | We are of the view that the Borough Council have sought to satisfy the legal responsibilities under the Duty to Cooperate. We    | Comments from Coventry       |
|          | Council       | welcome the use of the most up to date SHMA work that has been developed for the HMA to help inform the Boroughs                 | dialogue will be welcome     |
|          |               | Objectively Assessed Need for Housing. Furthermore we support Para 5.8 of the Borough Plan (alongside other references in        | issues. The Council is cur   |



siders the Plan has been prepared correctly national policy. The Council have published with their progress and the LDS has n January 2016. The Plan is accompanied raisal Report as part of its background L5. The Council is currently undertaking AA to understand the total capacity of the ate the needs from Coventry.

siders that the draft Plan is legally are necessary tests of soundness, but will be and if necessary amending the Plan prior uncil is currently undertaking further work to busing Land Availability Assessment using an athodology to understand the total capacity mmodate additional housing needs from of this work may lead to the allocation of a in meeting the needs of the Coventry and Market Area. This will be the subject of a d consultation.

y an extensive evidence base, including which have informed the spatial growth owth strategy is considered to be the most ough when assessed against other

NBBC has produced a background paper and location of growth included in the Plan. umber of sites for allocation. Policy NB11 structure Delivery Plan identifies the ents associated with the Plan. The livery of each site will be reviewed, and where necessary. The scale of growth available evidence in relation to objectively Borough.

try City Council noted. Further proactive med in relation to the MoU and associated currently undertaking further work to update

|          |                  | the plan and supporting information) that recognises that Coventry "are unlikely to be able to meet the objectively assessed      | the Strategic Housing Lan   |
|----------|------------------|---|-----------------------------|
|          |                  | need for the city within their boundaries and so some redistribution within the HMA is likely to ensure housing needs are met".   | sub regional methodolog     |
|          |                  | We would clarify however, that this is not a case of such an event being "unlikely", it is an accepted fact that has been         | Borough to accommodate      |
|          |                  | communicated by the city for some time, and indeed recognised by the Borough Council on a number of occasions: • Coventry         | The findings of this work r |
|          |                  | City Council was a signatory to the 'Strategic Policy Framework for the West Midlands Metropolitan Area' published March 2012     | to assist in meeting the    |
|          |                  | - which highlighted that the Cities of Coventry and Birmingham would not be able to meet their full needs within their own        | Housing Market Area. Th     |
|          |                  | boundaries. • The city further communicated this fact in response to the Borough Council's Preferred Options consultation         | focused 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 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.  |                             |
| 1017-001 | Warwick District | This is joint response to your Submission Draft Borough Plan consultation on behalf of the following Councils: • Coventry City    | The joint response from C   |
|          | Council, on      | Council • North Warwickshire Borough Council • Rugby Borough Council • Stratford-on-Avon District Council • Warwick               | Borough Council, Rugby B    |
|          | behalf of        | District Council • Warwickshire County Council. This representation focuses specifically on the Duty to Cooperate and             | District Council, Warwick   |
|          | Coventry City    | housing needs. The six Councils that are party to representation reserve the right to make further individual representations     | Council is acknowledged.    |
|          | Council, North   | in addition to this one. This response has been prepared collaboratively by the 6 Councils list above. This has included          | the Duty to Cooperate has   |
|          | Warwickshire     | consultation with political leaders/portfolio holders and with the exception of Coventry City Council, can be read as the formal  | further work is required to |
|          | Borough          | position of each of the Councils. In Coventry's case, this letter currently represents an officer view. However, a report to      | housing area are fully con  |
|          | Council, Rugby   | formally endorse the letter will be considered by the Council's Cabinet on 12th January 2016. The Councils are satisfied that     | Plan. The Council is curre  |
|          | Borough          | the legal responsibilities of the Duty to Cooperate have been met by NBBC. However, the Councils would clarify that               | the Strategic Housing Lan   |
|          | Council,         | Coventry's ability to meet its objectively assessed need within the city boundary should not be described as "unlikely".          | sub regional methodology    |
| μ        |                  |   |                             |



Land Availability Assessment using an agreed logy to understand the total capacity of the late additional housing needs from Coventry. rk may lead to the allocation of additional land ne needs of the Coventry and Warwickshire This will be the subject of a further round of

n Coventry City Council, North Warwickshire y Borough Council, Stratford-on-Avon ck District Council, and Warwickshire County ed. NBBC welcomes the confirmation that has been met, but acknowledged that d to ensure that the unmet needs of the considered in the production of the Borough urrently undertaking further work to update and Availability Assessment using an agreed ogy to understand the total capacity of the

| Stratford-on-    | Instead, it is an accepted fact that is recognised by all the Councils in Coventry and Warwickshire, including Nuneaton and    | Borough to accommodate   |
|------------------|--|--|
|                  |  |  |
| Avon District    | Bedworth Borough Council. all the other Councils in Warwickshire (with the support of City Council) have taken proactive       | The Borough Council will r   |
| Council,         | steps to address Coventry's unmet housing need, including agreeing a Memorandum of Understanding (MoU) and working             | the MoU once the SHLAA   |
| Warwick District | towards Local Plan/Core Strategy proposals which seek to provide for the shortfall. Despite clear evidence of unmet need       | work may lead to the alloc   |
| Council and      | arising in Coventry, the Borough Plan only provides for Nuneaton and Bedworth's objectively assessed housing need and          | meeting the needs of the   |
| Warwickshire     | does not make any tangible attempts to address needs arising from outside the Borough nor does it provide clear up to date     | Market Area. This will be  |
| Country Council  | evidence to demonstrate that it cannot be accommodated. Instead it suggests a further round of "focused consultation" may      | consultation. NBBC looks   |
|                  | be required subject to the completion of further work on the Borough's Strategic Housing Land Availability Assessment          | dialogue with all the respe  |
|                  | (SHLAA). It explicitly recognises (at Para 5.8 for example) that the evidence base which informs the Plan is incomplete and    | Duty to Cooperate process  |
|                  | out of date. This relates most importantly to the SHLAA and the housing capacity of the Borough. This not only raises          |  |
|                  | significant questions regarding the Plan's housing requirement, but also creates real risks for other strategic aspects of the |  |
|                  | plan, most notably around infrastructure and potentially the Duty to Cooperate. It also creates issues around the testing of   |  |
|                  | reasonable alternatives in terms of housing capacity and strategic sites. It cannot be confirmed with any degree of confidence |  |
|                  | therefore that the Sustainability Appraisal is complete and robust. We also highlight the recent Memorandum of                 |  |
|                  | Understanding which was presented to the Shadow Economic Prosperity Board in September 2015. This MoU has been                 |  |
|                  | agreed by The Councils and we would encourage the Borough Council to review its current position with regard to the MoU        |  |
|                  | once the SHLAA update is complete. The Councils understand that the lack of an up to date SHLAA is the reason why              |  |
|                  | Nuneaton and Bedworth Borough Council has been unable to agree to the MoU at this stage. However we are disappointed           |  |
|                  | that The Borough Council has chosen to publish the Plan in advance of completing such a fundamental part of your evidence      |  |
|                  | base, particularly when the implications of the SHLAA are potentially so far-reaching. The Councils would welcome the          |  |
|                  | opportunity to continue working positively and proactively with the Borough Council to rectify the issues with the Plan.       |  |
|                  | However at this point in time The Councils have no option but to object to the proposed housing requirement put forward in     |  |
|                  | the Borough Plan on the basis that it is unsound for following reasons: The housing requirements does not provide for the      |  |
|                  | unmet housing need arising in Coventry. To address Coventry's unmet need, NBBCs housing requirement is 14,060 dwellings        |  |
|                  | over the Plan period; The Plan is not based on up to date evidence in relation to the SHLAA; NBBC will need to continue to     |  |
|                  | engage constructively with the Councils to ensure the outcomes of the Duty to Cooperate are effective. The Councils reserve    |  |
|                  | the right to provide further comments on specific policies and supporting text before the Plan is submitted for examination.   |  |
| Mr and Mrs       | The Sustainability Appraisal is not objective and is not in accordance with the NPPF. The document does not fully focus on     | Noted. The Council consid  |
| Boyd             | the negative and adverse impact of building on Gipsy Lane in terms of flood risk, adverse impact on the town centre and loss   | documents meet the nece  |
|                  | of biodiversity. Further negative impacts are included fully in the response.  | with all necessary national  |
|                  |  | reviewing all comments ar  |
|                  |  | to Submission.   |
| Marion Welton    | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be         | NBBC produced a LDS in 2   |
|                  | addressed and a Statement of Community Involvement need to be published.   | This document was update   |
|                  |  | Plan was also subject to a   |
|                  |  | ,  |
|                  | Warwick District<br>Council and<br>Warwickshire<br>Country Council<br>Mr and Mrs<br>Boyd                                       | <ul> <li>Warwick District Council and WarwickShire Council and Council and Plan Only provides for Nuneaton and Bedworth's objectively assessed housing need and does not make any tangible attempts to address needs arising from outside the Borough nor does it provide clear up to date evidence to demonstrate that it cannot be accommodated. Instead it suggests a further round of "focused consultation" may be required subject to the completion of further work on the Borough's Strategic Housing Land Availability Assessment (SHLAA). It explicitly recognises (at Para 5.8 for example) that the evidence base which informs the Plan is incomplete and out of date. This relates most importantly to the SHLAA and the housing capacity of the Borough. This not only raises significant questions regarding the Plan's housing requirement, but also creater seal 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 chosen to publish the Plan in advance of completing such a fundamental part of your evidence base, particularly when the implications of the SHLAA is presented to the proposed housing requirement but orward in the Borough Plan on the basis that it is unsound for following reasons: The housing requirement but orward in the Borough Plan on the basis that it is unsound for following reasons: The hous</li></ul> |



te additional housing needs from Coventry. Il review its current position with regard to A update is complete. The findings of this location of additional land to assist in ne Coventry and Warwickshire Housing be the subject of a further round of focused ks forward to further ongoing constructive spective Councils as part of the ongoing ess.

siders that the draft Plan and its supporting cessary tests of soundness and are in line nal policy and guidance, but will be and if necessary amending the Plan prior

a 2015, which can be found on the website. ated on the 28th of January, 2016. The

- an extensive Sustainability Appraisal,
- Assessment and Habitat Regulations

|         |                |  | Assessment, all of which   |
|---------|----------------|--|----------------------------|
|         |                |  | national policy requireme  |
|         |                |  | structure can be found or  |
|         |                |  | Community Involvement      |
| 3501-02 | John A Patrick | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 1   |
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         |                |  | Plan was also subject to a |
|         |                |  | Strategic Environmental A  |
|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
|         |                |  | structure can be found or  |
|         |                |  | Community Involvement      |
| 3502-02 | Mr and Mrs     | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Moss           | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         |                |  | Plan was also subject to   |
|         |                |  | Strategic Environmental    |
|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
|         |                |  | structure can be found of  |
|         |                |  | Community Involvement      |
| 3503-02 | Gerry Cullen   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was upda     |
|         |                |  | Plan was also subject to   |
|         |                |  | Strategic Environmental    |
|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
|         |                |  | structure can be found of  |
|         |                |  | Community Involvement      |
| 3504-02 | Mr Griffin     | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in     |
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was upda     |
|         |                |  | Plan was also subject to   |
|         |                |  | Strategic Environmental    |
|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
|         |                |  | structure can be found or  |
|         |                |  | Community Involvement      |



| 3505-02 | Mr M Shaw       | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|---------|-----------------|--|-----------------------------|
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which a  |
|         |                 |  | national policy requireme   |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement       |
| 3506-02 | Betty and Jenny | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Croshaw         | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which a  |
|         |                 |  | national policy requirement |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement       |
| 3507-02 | Mr C Blake      | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which    |
|         |                 |  | national policy requirement |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement       |
| 3508-02 | Mr and Mrs      | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Brodie          | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which a  |
|         |                 |  | national policy requirement |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement i     |
| 3509-02 | Paul Mckenna    | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |



2015, which can be found on the website. lated on the 28th of January, 2016. The an extensive Sustainability Appraisal, Assessment and Habitat Regulations ch are in line with all available guidance and nents. A full report and methodological on the Council's website. A Statement of nt is also available on the website. 1 2015, which can be found on the website. lated on the 28th of January, 2016. The an extensive Sustainability Appraisal, Assessment and Habitat Regulations ch are in line with all available guidance and nents. A full report and methodological on the Council's website. A Statement of nt is also available on the website. 2015, which can be found on the website. lated on the 28th of January, 2016. The an extensive Sustainability Appraisal, Assessment and Habitat Regulations ch are in line with all available guidance and nents. A full report and methodological on the Council's website. A Statement of nt is also available on the website. 2015, which can be found on the website. lated on the 28th of January, 2016. The an extensive Sustainability Appraisal, Assessment and Habitat Regulations h are in line with all available guidance and nents. A full report and methodological on the Council's website. A Statement of nt is also available on the website. 2015, which can be found on the website. lated on the 28th of January, 2016. The an extensive Sustainability Appraisal,

|         |                  |  | Assessment, all of which   |
|---------|------------------|--|----------------------------|
|         |                  |  | national policy requireme  |
|         |                  |  | structure can be found or  |
|         |                  |  | Community Involvement      |
| 3510-02 | Keith and Alison | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Jones            | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |                  |  | Plan was also subject to a |
|         |                  |  | Strategic Environmental A  |
|         |                  |  | Assessment, all of which   |
|         |                  |  | national policy requireme  |
|         |                  |  | structure can be found or  |
|         |                  |  | Community Involvement      |
| 3511-02 | Mr John          | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Alderdice        | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         |                  |  | Plan was also subject to a |
|         |                  |  | Strategic Environmental A  |
|         |                  |  | Assessment, all of which   |
|         |                  |  | national policy requireme  |
|         |                  |  | structure can be found or  |
|         |                  |  | Community Involvement      |
| 3512-02 | Mr and Mrs       | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Fenton           | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |                  |  | Plan was also subject to a |
|         |                  |  | Strategic Environmental A  |
|         |                  |  | Assessment, all of which   |
|         |                  |  | national policy requireme  |
|         |                  |  | structure can be found or  |
|         |                  |  | Community Involvement      |
| 3512-02 | Reginald Cole    | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |                  | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |                  |  | Plan was also subject to a |
|         |                  |  | Strategic Environmental A  |
|         |                  |  | Assessment, all of which   |
|         |                  |  | national policy requireme  |
|         |                  |  | structure can be found or  |
|         |                  |  | Community Involvement      |



| 3514-02 | Sarah Jackson  | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|---------|----------------|--|-----------------------------|
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which    |
|         |                |  | national policy requireme   |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement       |
| 3515-02 | Lynn Fisher    | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which a  |
|         |                |  | national policy requirement |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement       |
| 3516-02 | Mrs B A Lennon | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which a  |
|         |                |  | national policy requirement |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement       |
| 3517-02 | Mr and Mrs     | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Quintanilla    | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which a  |
|         |                |  | national policy requirement |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement       |
| 3518-02 | Mr and Mrs     | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Johnson        | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |



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|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
| 3519-02 | Mr Z Nemeth   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |               | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         |               |  | Plan was also subject to a |
|         |               |  | Strategic Environmental A  |
|         |               |  | Assessment, all of which   |
|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
| 3520-02 | Anne O'Malley | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |               | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |               |  | Plan was also subject to a |
|         |               |  | Strategic Environmental A  |
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|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
| 3521-02 | Diane Burne   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |               | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         |               |  | Plan was also subject to a |
|         |               |  | Strategic Environmental A  |
|         |               |  | Assessment, all of which   |
|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
| 3522-02 | Christopher   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in     |
|         | Penn          | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         |               |  | Plan was also subject to a |
|         |               |  | Strategic Environmental A  |
|         |               |  | Assessment, all of which   |
|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
|         | •             |  | •                          |



| 3523-02 | Winifred         | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
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|         | Marshall         | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                  |  | Plan was also subject to a  |
|         |                  |  | Strategic Environmental A   |
|         |                  |  | Assessment, all of which a  |
|         |                  |  | national policy requirement |
|         |                  |  | structure can be found or   |
|         |                  |  | Community Involvement       |
| 3524-02 | Marta Pieniazek- | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Niwinska and     | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         | Krystian         |  | Plan was also subject to a  |
|         | Niwinska         |  | Strategic Environmental A   |
|         |                  |  | Assessment, all of which a  |
|         |                  |  | national policy requirement |
|         |                  |  | structure can be found or   |
|         |                  |  | Community Involvement i     |
| 3525-02 | Julia Marshall   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                  | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                  |  | Plan was also subject to a  |
|         |                  |  | Strategic Environmental A   |
|         |                  |  | Assessment, all of which a  |
|         |                  |  | national policy requirement |
|         |                  |  | structure can be found or   |
|         |                  |  | Community Involvement i     |
| 3526-02 | Ken and Gaynor   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Marshall         | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                  |  | Plan was also subject to a  |
|         |                  |  | Strategic Environmental A   |
|         |                  |  | Assessment, all of which a  |
|         |                  |  | national policy requirement |
|         |                  |  | structure can be found or   |
|         |                  |  | Community Involvement i     |
| 3527-02 | Clive Wager      | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                  | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                  |  | Plan was also subject to a  |
|         |                  |  | Strategic Environmental A   |



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an extensive Sustainability Appraisal,

|         |               |  | Assessment, all of which   |
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|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
| 3528-02 | Sarah Wager   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |               | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |               |  | Plan was also subject to a |
|         |               |  | Strategic Environmental A  |
|         |               |  | Assessment, all of which   |
|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
| 3529-02 | Luke Wager    | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |               | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |               |  | Plan was also subject to a |
|         |               |  | Strategic Environmental A  |
|         |               |  | Assessment, all of which   |
|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
| 1       |               |  | Community Involvement      |
| 4001-01 | Joy and Roger | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Gear-Evans    | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
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|         |               |  | Strategic Environmental A  |
|         |               |  | Assessment, all of which   |
|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
| 4002-02 | Emma Ashton   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | and Richard   | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         | Troman        |  | Plan was also subject to a |
|         |               |  | Strategic Environmental A  |
|         |               |  | Assessment, all of which   |
|         |               |  | national policy requireme  |
|         |               |  | structure can be found or  |
|         |               |  | Community Involvement      |
|         |               |  | -,                         |



| 4003-02 | Lee Nolan       | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
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|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which    |
|         |                 |  | national policy requirement |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement       |
| 4004-02 | David and Marit | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Rouse           | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which    |
|         |                 |  | national policy requirement |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement       |
| 4005-02 | Mr Ian Ferguson | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which a  |
|         |                 |  | national policy requirement |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement i     |
| 4006-02 | Marinne and     | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Paul Galley     | addressed and a Statement of Community Involvement need to be published. This is not democracy.                        | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |
|         |                 |  | Assessment, all of which a  |
|         |                 |  | national policy requirement |
|         |                 |  | structure can be found or   |
|         |                 |  | Community Involvement       |
| 4007-02 | Martin Thay     | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                 |  | Plan was also subject to a  |
|         |                 |  | Strategic Environmental A   |



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|         |                 |  | national policy requireme  |
|         |                 |  | structure can be found or  |
|         |                 |  | Community Involvement      |
| 4008-02 | Mr and Mrs      | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Claybrook       | addressed and a Statement of Community Involvement need to be published.   | This document was upda     |
|         |                 |  | Plan was also subject to a |
|         |                 |  | Strategic Environmental A  |
|         |                 |  | Assessment, all of which   |
|         |                 |  | national policy requireme  |
|         |                 |  | structure can be found or  |
|         |                 |  | Community Involvement      |
| 4009-02 | Keith Brooks    | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was upda     |
|         |                 |  | Plan was also subject to   |
|         |                 |  | Strategic Environmental    |
|         |                 |  | Assessment, all of which   |
|         |                 |  | national policy requireme  |
|         |                 |  | structure can be found or  |
|         |                 |  | Community Involvement      |
| 4010-02 | Michael Gladwin | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in     |
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was upda     |
|         |                 |  | Plan was also subject to   |
|         |                 |  | Strategic Environmental    |
|         |                 |  | Assessment, all of which   |
|         |                 |  | national policy requireme  |
|         |                 |  | structure can be found of  |
|         |                 |  | Community Involvement      |
| 4011-02 | Robert Leonard  | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in     |
|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was upda     |
|         |                 |  | Plan was also subject to   |
|         |                 |  | Strategic Environmental    |
|         |                 |  | Assessment, all of which   |
|         |                 |  | national policy requireme  |
|         |                 |  | structure can be found o   |
|         |                 |  | Community Involvement      |



| 4012-02 | Mr and Mrs A   | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|---------|----------------|--|-----------------------------|
|         | Rickets        | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which    |
|         |                |  | national policy requireme   |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement i     |
| 4013-02 | Mr Shingara    | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Singh Tut      | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which a  |
|         |                |  | national policy requirement |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement i     |
| 4014-02 | Malcolm Sidney | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Golding        | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which    |
|         |                |  | national policy requirement |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement       |
| 4015-02 | Mrs. D.J.      | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         | Campbell       | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
|         |                |  | Plan was also subject to a  |
|         |                |  | Strategic Environmental A   |
|         |                |  | Assessment, all of which a  |
|         |                |  | national policy requirement |
|         |                |  | structure can be found or   |
|         |                |  | Community Involvement       |
| 4016-02 | Pegley         | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2    |
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was updat     |
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|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
|         |                |  | structure can be found or  |
|         |                |  | Community Involvement      |
| 4017-02 | Mr and Mrs     | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Wake           | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |                |  | Plan was also subject to a |
|         |                |  | Strategic Environmental A  |
|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
|         |                |  | structure can be found or  |
|         |                |  | Community Involvement      |
| 4018-02 | Sheila Collard | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         |                | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
|         |                |  | Plan was also subject to a |
|         |                |  | Strategic Environmental A  |
|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
|         |                |  | structure can be found or  |
|         |                |  | Community Involvement      |
| 4019-02 | Mr and Mrs B S | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Taylor         | addressed and a Statement of Community Involvement need to be published.   | This document was updated  |
|         |                |  | Plan was also subject to a |
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|         |                |  | Assessment, all of which   |
|         |                |  | national policy requireme  |
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|         |                |  | Community Involvement      |
| 4020-02 | JM and PM      | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be | NBBC produced a LDS in 2   |
|         | Williams       | addressed and a Statement of Community Involvement need to be published.   | This document was updat    |
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|         |                |  | Assessment, all of which   |
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| l       |                |  |                            |



| 4021-02 | N Pateman       | No LDS in place, no adequate Habitat Regulations Assessment, Sustainability Appraisal inadequate. These all need to be             | NBBC produced a LDS in 2     |
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|         |                 | addressed and a Statement of Community Involvement need to be published.   | This document was updat      |
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|         |                 |  | Strategic Environmental A    |
|         |                 |  | Assessment, all of which a   |
|         |                 |  | national policy requirement  |
|         |                 |  | structure can be found or    |
|         |                 |  | Community Involvement i      |
| 5001-02 | D Baker         | Objection relates to Hospital Lane allocation ref. HSG5. Comment refers to comments made at previous stages of the Local           | The comments are noted.      |
|         |                 | Plan process. Comment is summarised as follows: 1) The site was included in the later stages of the decision making process,       | and its supporting docum     |
|         |                 | despite not meeting stage 1 criteria. 2) The site selection for stage 1 did not include the Green Belt status. 3) The              | soundness and are in line    |
|         |                 | consideration of the travel distances were incorrect. 4) The site was listed as being grade 4 land. However, Defra categorise      | guidance, but will be revie  |
|         |                 | 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      | amending the Plan prior t    |
|         |                 | the sustainability assessment and yet was selected as being sustainable. 6) The site assessment considered the site to be of       | land will result in the loss |
|         |                 | low value due to its irregular shape, something typical for the history of the area. 7) The site assessment noted the location     | Agricultural Land Classific  |
|         |                 | abutting the urban fringe. This is typical for Green Belt and has resulted in the assessment of the site being incorrect. 8) The   | land as predominantly urb    |
|         |                 | site does not support the local centres of Nuneaton and Bedworth. 9) The development of the site would reduce public               | good. Clarification would    |
|         |                 | 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        | strategic sites shall be rec |
|         |                 | flooding. 12) The proposed employment areas at Prologis Park and Bayton Road are not accessible enough to provide real             | assessment. It is noted th   |
|         |                 | employment opportunities. 13) Access to local health services in the area is poor. 14) There is a lack of capacity in local        | should be protected. How     |
|         |                 | schools and a history of underdelivery of new schools in other developments.   | housing in the Borough. F    |
|         |                 |  | to the existing urban area   |
|         |                 |  | insufficient 'brownfield' la |
|         |                 |  | accommodate needs. It i      |
|         |                 |  | development on greenfiel     |
|         |                 |  | required to provide infras   |
|         |                 |  | necessary. This is provide   |
| 6001-01 | Natural England | With regard to Ensor's Pool SAC surveys of the pool (most recently in Sept 2015) have failed to find the white clawed crayfish     | The comments are noted       |
|         |                 | for which the site is designated as an SAC. Based on the evidence Natural England has concluded therefore that the                 | on board prior to the sub    |
|         |                 | 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       |                              |
| ·       |                 | 1  | 1                            |



2015, which can be found on the website. lated on the 28th of January, 2016. The an extensive Sustainability Appraisal, Assessment and Habitat Regulations ch are in line with all available guidance and nents. A full report and methodological on the Council's website. A Statement of nt is also available on the website. ed. The Council considers that the draft Plan uments meet the necessary tests of ne with all relevant national policy and viewing all comments and if necessary to Submission. It is acknowledged that the ss of Green Belt and agricultural land. Defra fication Map for west Midlands shows the urban, abutting grade 3 – moderate to ld be beneficial. Any development of required to undertake a flood risk I that Green Belt and the wider landscape owever, the SHMA sets out a need for new Policy NB2 directs almost 3,000 dwellings eas of the Borough. However, there is land available in the Borough to further It is therefore necessary to allocate ield sites. Any new development will be astructure contributions as reasonably ided for in NB11.

ed and the Council will take these comments ubmission of this Plan.

| 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.                       |  |

