



Ref:

Coventry Local Plan Review Regulation 19

Proposed Submission (Publication) Stage
Representation Form
(guidance note below)

(For official use only)

**Name of the
Plan to which
this
representation
relates:**

**Coventry Local Plan Review – Regulation 19 Proposed
Submission (Publication)**

Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025 email to planningpolicy@coventry.gov.uk, via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:
www.coventry.gov.uk/planningpolicyprivacynotice

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be ‘made available’ in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

-
Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

Mrs

2. Agent's Details (if applicable)

First Name

Joscelyne

Last Name

Bigham

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

Part B – Please use a separate sheet for each representation

Name or Organisation: Joscelyne Bigham

3. To which part of the Local Plan Review does this representation relate?

Paragraph

Policy

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="text" value="✓"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="text" value="✓"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input checked="" type="text" value="✓"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

The HRA Screening Report appears to be inaccurate with its statements regarding Coventry's Main Rivers and the use of terms. Furthermore, the conclusion does not appear to have considered that the Local Plan area is hydrologically linked with the Severn Estuary SAC/Ramsar site through the River Sowe tributary of the Warwickshire River Avon.

The HRA Screening Report states that 'a requirement for HRA will continue as set out in the Conservation of Habitats & Species (Amendment)(EU Exit) Regulations (2019).' Therefore, if there is an issue with the accuracy of the HRA and the validity of its conclusions, it could have an impact on whether the Local Plan Review is considered to be legally compliant and/or sound.

Has the Environment Agency's Statutory Main River Map and Catchment Data Explorer been used as a reference?

'The statutory main river map is a spatial (polyline) dataset that defines statutory watercourses designated by the Environment Agency as main rivers.'

'The Catchment Data Explorer is designed to help you explore and download information about the water environment used in River Basin Management Plans. You can find catchments and water bodies of interest using a map, or by searching

for names, view summary information about catchments, download data and follow links to other useful sites.'

On looking at these maps, a confluence of the River Sherbourne with the River Sowe appears to take place just south of the A45 near Baginton. The River Sowe's confluence with the River Avon occurs further downstream, south of Stoneleigh. Therefore, would it not be more accurate to say that the River Sherbourne is a tributary of the River Sowe and that the River Sowe is a tributary of the River Avon? This needs to be clarified.

In terms of the River Avon, the HRA also states that 'the river runs to the south-west passing within about 5 km of the administrative boundary for Coventry.' Could this be clarified? At the point where it flows underneath the A45, it appears to be within 1km of the City's administrative boundary at Rowley Road and a small section of the boundary appears to run along the rivers' course in between London Road and Siskin Drive.

There appear to be other watercourses marked on the Statutory Main River Map as Main Rivers. Even if they do not have 'river' in their names, should they still be referenced within the HRA? Canley Brook? Withy Brook?

There is also concern as to why habitats sites have been 'screened out for appropriate assessment with regard to water quality.' If the River Sowe is a tributary of the River Avon, surely it (and its tributaries) is hydrologically linked with the Severn Estuary SAC/Ramsar site. Furthermore, the River Sowe (and its tributaries) could potentially become part of a Local Nature Recovery Strategy (LNRS) in the future. As such, it would be ideally placed to tackle issues such as water quality, nature recovery, environmental inequity and climate change through natural flood management (NFM) schemes.

Although they are not a 'responsible authority', CCC will still be required, as a planning authority, to produce a Biodiversity Report and this will involve giving details on how LNRS has been considered. For the West Midlands, it is the West Midlands Combined Authority (WMCA). For Warwickshire, the responsible authority is Warwickshire County Council, working with the Local Nature Partnership.

The Habitats Regulations Assessment of the Nuneaton and Bedworth Local Plan Review Addendum October 2024, states,

'2.1 In their response to the consultation on the Local Plan Review and its HRA, Natural England observed that the Plan area is located upstream of the Severn Estuary Special Area of Conservation (SAC) and Ramsar Site (approximately 96km to the south-west) and is hydrologically linked to the designated sites through the River Sowe tributary of the Warwickshire River Avon'

'2.2 The Severn Estuary migratory fish species (Atlantic salmon, sea trout, allis shad, twaite shad, sea lamprey, river lamprey and European eel) travel upstream through the River Severn and its tributaries, spending part of their life cycle in the wider Severn hydrological catchment. Currently the tidal weir at Tewkesbury is

believed to present an obstacle to most of the migratory fish species, with the exception of the European eel, which has been recorded within the Warwickshire Avon... It is also understood that European eel have been recently recorded in the River Sherbourne, which is a tributary of the River Sowe. There is therefore the possibility of these species being present during the Plan period within the...River Sowe (and possibly tributaries) which would render these rivers functionally-linked habitat for the...Severn Estuary SAC/Ramsar site.'

Would it be possible to include a similar text within Coventry City Council's HRA?

Where relevant, the Local Plan should identify locations (strategic employment/housing sites, local wildlife sites, potential local wildlife sites and local nature reserves) which are hydrologically linked with the Severn Estuary SAC/Ramsar site. It needs to ensure that there is appropriate assessment regarding water quality and quantity/flow/levels and that measures are put into place to improve water quality and conditions for migratory fish such as European eel.'

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

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Rewrite the HRA to address the inaccuracies highlighted in the previous section and reevaluate the conclusion in light of the River Sowe being functionally-linked habitat for the...Severn Estuary SAC/Ramsar site.' Consider using the text from Nuneaton and Bedworth Borough Council's HRA Addendum.

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

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

No, I do not wish to participate in hearing session(s)

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Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

1.5, 1.6, 6.29, 6.30 & 6.31

Please add any further comments relating to the SA report in the box below.

‘It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site.’

There are inaccuracies within the HRA Screening document which need to be addressed and its conclusion regarding the effects on the Severn Estuary SAC/Ramsar site will need to be reevaluated. Consult with Natural England and use up to date online resources such as Environment Agency’s Statutory Main River Map and Catchment Data Explorer.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan Review does this representation relate?

Paragraph	5.27 – 5.32 & 12.55 – 12.58	Policy	Policy JE5: Industrial and Storage / Distribution Development & Policy AC7: Freight
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4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

B8 tends to be located close to the administrative boundary of the City, near the strategic road network (SRN) particularly at junctions such as the M6 J2 and M6 J3 and along public transport routes associated with deprived areas (where levels of car ownership are lower).

Currently, these policies do not address the cumulative cross-boundary effects on traffic levels and air quality within areas such as Longford and Foleshill. The effects of B8 sites located within other administrative areas also need to be considered. For example, strategic sites surrounding M6 J3 and further along the A444 at the Griff Island Nuneaton.

There are West Midlands Combined Authority (WMCA) funded infrastructure projects in the pipeline such as the Keresley Link Road and the Coventry North Package (M6 J3 improvements) which are being led by CCC. Yet, these do not appear to be referenced. Should the delivery of B8 be timed to link with these projects? What happens to traffic levels along the B4113 and A444 if these projects are delayed, cut back or cancelled?

Yet, the following is stated elsewhere within the Regulation 19 Proposed Submission,

‘12.5 Public health is also a key consideration. A citywide Air Quality Management Area (AQMA) was declared in Coventry in 2009 due to significantly high levels of air quality emissions. Research demonstrates that emissions from road transport are the principal source of elevated concentrations of Nitrogen Dioxide (NO₂) which causes poor air quality. The main transport corridors to the North and North East of Coventry (linked to the M6) are identified as being most likely to exceed the NO₂ standard.’

It is important that policies are cross-referenced to ensure that there is a consistent approach and that delivery on key issues, such as air quality, is not undermined.

What measures will be put into place to prevent increases in HGV movements along the B4113 and its side roads such as Windmill Road? How are school walk routes being considered in terms of air quality and road safety? Is there a priority route network for HGVs within Coventry and Warwickshire? Should more weight limit restrictions be introduced? Should APNR be used to enforce weight limit restrictions and prevent issues such as bridge strikes?

A recent NBBC Strategic Transport Assessment referred to ‘peak spreading’ in response to congestion,

‘3.60 The purpose of peak spreading the growth demand is to replicate the re-timing of trip departure times based on the projections of historic count data which provides evidence for the shifting of traffic into the shoulder hours when the network is particularly congested.’

Is increasing travel to work times sustainable? What impact does this have on other businesses? What are the implications for health and wellbeing? What are the impacts for those living in areas where peak levels of traffic are extended into the ‘shoulder hours’? What about those working in jobs that don’t offer flexitime or options to work at home? Will they need to pay extra childcare costs?

The policy also needs to ensure that job opportunities for residents in deprived wards are not limited to B8 by a lack of connection to other forms of employment within Coventry & Warwickshire through public transport. The planned closure of the Hello Fresh site in Nuneaton illustrates why overreliance on one sector can increase levels of risk to the local economy. If poor public transport links (and costs) limit the opportunity to work in other sectors, the impacts of such closures will have the greatest effect on deprived wards.

Currently, bus services within Coventry do not cover our ‘travel to work areas’ (TTWAs) well as many of these fall within Warwickshire. This is in part due to our older industrial sites (brownfield) being used for housing developments since the 1980’s. Over the same period, there had been a reduction in employers provided their own subsidised services. Currently, transport appears to be focused on destinations such as the City Centre and University Hospital Coventry as hubs. Although these are important, many workplaces (Ansty Business Park, MIRA Tech

Park, Spa Park, Warwick Innovation Centre, Squab Workspace, Prologis Rugby Central Park, Bermuda Park, etc) are based on the outskirts of the City often outside its (and WMCA's) administrative boundary. Although, Warwickshire County Council and many of the district/borough councils are associate members of WMCA this does not appear to be extended to public transport arrangements. This creates issues in terms of access to employment opportunities for those who do not own cars. The cost of buying separate bus tickets/passes to cover the different operators when crossing over an administrative boundary is prohibitive. For example, as soon as you go under the railway bridge CNN/25 Bedworth Road (A444) into Warwickshire, a WMCA bus pass cannot be used. This leads to inconvenience and longer journey times because customers cannot use all of the services running along a particular route. Poor public transport links across Coventry & Warwickshire also increase the levels of through traffic on roads such as the B4113 (Bedworth Road–Longford Road–Foleshill Road) making bus journeys even longer during peak hours.

The following is stated elsewhere within the Regulation 19 Proposed Submission,

‘12.39 Buses offer a realistic modal choice for many local trips, and particularly those into the city centre. Bus network coverage across the city is generally good although there are some examples of where service frequencies are inadequate to provide an attractive and realistic option, such as more peripheral edge of town employment sites.’

‘12.42 The existing bus network primarily follows the radial network of roads across the city, and whilst this supports good access to the city centre, it does not necessarily support the demand for orbital trips such as those between residential and edge of town employment sites. More recently operators have introduced orbital services which have helped to address this issue. The West Midlands Strategic Transport Plan sets out a strategy for a core bus network which is closely integrated with a high frequency rail and rapid transit network to enhance connectivity to other strategic centres across the West Midlands.’

It is important that policies are cross-referenced to ensure that there is a consistent approach and that delivery on key issues is not undermined. For example, although the issue of access to edge of town employment sites is outlined in the section on ‘Active Transport Provision’, the policies do not effectively address cross-boundary issues such as access to Coventry’s TTWAs within Warwickshire.

The policy also states, ‘...proposals for such development will also need to demonstrate that they would not result in significant harm to the amenities of persons occupying nearby residential property...’ How is ‘significant harm’ defined? Would it not be better to have specific guidelines for B8 regarding nearby residential properties? Why not specify heights and distances with inner and outer zones? Why not require artificial lighting impact assessments? Why not include protections such as requiring loading bays, parking areas and fixed plant to be located away from sensitive receptors? Why not require the use of landscaped buffers and acoustic bunds? At what point should proposals include pick-up and drop-off points for employees, a bus terminus, cycle ways/facilities, overnight parking facilities for HGVs and a separate access road for emergency vehicles? In

the long run, outlining requirements within a policy/SPD would benefit developers as well as protecting residents by streamlining the planning process later on.

Within the West Midlands Strategic Employment Sites Study 2023/24 Final Report (WMSESS) it states,

‘3.42...More thought to be given to the design of sites close to existing residential developments or where a residential development is likely to take place in the future.’

‘6.2 Both the West Midlands Strategic Employment Site 2015 and 2021 studies and definitions in West Midlands Regional Spatial Strategy...confirmed that 25 ha remains a relevant threshold for strategic sites in most instances.’

‘11.14...The 25 ha / 60 acre threshold was considered the typical minimum to generate sufficient value to support the delivery of enabling infrastructure.’

‘...Preferred plot ratios being a minimum of 0.3516...ideally sites would be a minimum of 25ha and readily over 50ha which takes into account the landscaping and infrastructure involved in delivering sites of this scale as well as inclusion of smaller employment units where appropriate.’

‘Is located away from incompatible land-uses (including residential) and has the ability to undertake 24/7 unrestricted operating hours and manage noise/lighting expectations.’

‘The ability to deliver high-bay warehousing at least 20m height (recognising the landscape impacts and need for appropriate locations and / or mitigation).’

Should references be made to the WMSESS threshold (25ha) and technical strategic site criteria within this policy? Is a plot ratio used to calculate the maximum floorspace to ensure that a site remains sustainable and delivers the appropriate level of landscaping and infrastructure? When allocating/assessing sites are constraints such as PRowWs, National Grid infrastructure (pylons and wayleaves), water distribution mains and buffers for hedgerows, trees, watercourses and local wildlife sites identified early on? Are these accounted for within calculations of maximum floorspace?

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

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Include references to the WMSESS threshold (25ha) and technical strategic site criteria. Use specific and measurable requirements rather than the phrase 'would not result in significant harm' which is difficult to define and open to interpretation.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

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8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

7.9, 7.13 &
7.14

Please add any further comments relating to the SA report in the box below.

To achieve SA objectives public transport links with to Coventry's TTWAs within Warwickshire need to be addressed. To tackle poor air quality, measures need to be put into place to reduce through traffic and to limit HGV movements along the B4113 and its side roads (Bedworth Road–Longford Road–Foleshill Road).

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part B – Please use a separate sheet for each representation

Name or Organisation: Joscelyne Bigham

3. To which part of the Local Plan Review does this representation relate?

Paragraph

Policy

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4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
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Longford Ward should be included within the HMO Article 4 designated area. Located in Coventry Northeast, it experiences similar issues to Foleshill. It appears as if properties are being converted with the intention of changing the use to small HMO (3-6 people, C4) later on. There also seems to have been an increase in planning applications for side extensions, etc. The removal of family homes and an increase in short term lets is having an impact on social cohesion and increasing levels of transience. HMOs are unsuitable accommodation for young families. Locally, HMOs appear to be associated with an increase in levels of fly tipping, demand for on-street parking, etc.

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

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Look at including Longford Ward within the HMO Article 4 designated area.

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

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8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

4.28– 4.34, 5.7 & 5.8

Please add any further comments relating to the SA report in the box below.

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

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Part B – Please use a separate sheet for each representation

Name or Organisation: Joscelyne Bigham

3. To which part of the Local Plan Review does this representation relate?

Paragraph Policy

4. Do you consider the Local Plan Review is:

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4.(2) Sound	Yes <input type="text"/>	No <input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input checked="" type="checkbox"/>

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The Coventry Historic Landscape Characterisation (2013) seems very outdated. Should it be reviewed? Should Longford not have its own Historic Landscape Characterisation rather than it being split between HLC Area 24 (Foleshill) and HLC Area 41 (Alderman's Green). There appears to very little reference to its history and character (including association with Coventry Canal), locally listed buildings, Grade II listed buildings, public houses and places of worship (Former Salem Baptist Chapel – House of Empowerment, St Thomas', Union Place Baptist Church – Longford Baptist Church). Historic England: 1418247, 1076617

Should Longford be considered as a conservation area in its own right or could the Coventry Canal Conservation Area be extended to cover a wider area within Longford so that includes properties within Longford Square, Hurst Road, Longford Road/Bedworth Road, Oban Road, Woodshire's Road, Rowley's Green Lane and Wilson's Lane?

The area has already lost important sites such as Southfields, Vine Cottage, Manor House Farm and a garden that had a design supervised by Sir Joseph Paxton (1803-65). It is of concern that there could be further losses if Longford's character is not officially recognised.

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

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Review the conservation status of Longford. Consider making it into a conservation area and update The Coventry Historic Landscape Characterisation document.

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

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8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

3.13

Please add any further comments relating to the SA report in the box below.

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

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