

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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Key	
	Added 23.11.17
	Added 6.12.17
	Added from another policy

1406	Julie Warwick	Wolvey Parish Council	NA	NE1	Support policy		Comments noted
1433	Justin Milward	Woodland Trust	NA	NE1	Pleased with the need for protection of ancient woodland but doesn't protect ancient woodland and trees wholly. Local Plans provide a way for ancient woodland to be absolutely protected to cover what the Woodland Trust deems to be a gap in National Policy. Policies are required on management and the creation of future ancient trees through street planting. Examples of good practice policies from other Local Plans have been provided. Wording has been provided to enhance the policy including "Development that destroys or damages Ancient Woodland and Ancient Trees will not be permitted other than in wholly exceptional circumstances."		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

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1433	Justin Milward	Woodland Trust	NA	NE1	Pleased with the need for protection of ancient woodland but doesn't protect ancient woodland and trees wholly. Local Plans provide a way for ancient woodland to be absolutely protected to cover what the Woodland Trust deems to be a gap in National Policy. Policies are required on management and the creation of future ancient trees through street planting. Examples of good practice policies from other Local Plans have been provided. The Ancient Trees Forum and Woodland Trust would like to see ancient trees scheduled under TPOs and highlighted in plans so they are properly valued in decision making.		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.
1406	Julie Warwick	Wolvey Parish Council	NA	NE2	Support policy		Comments noted
1687	Linda Tomalin	NA	NA	NE2	How can this be soundly and justifiably achieved, when valuable habitats are being lost for building and development? There have been many recent statistics about species decline, such as hedgehogs, butterflies, birds etc. Such huge developments will only do the opposite to enhance habitat biodiversity.		It is acknowledged there will be loss of agricultural land however, this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. WCC Ecology have been fully engaged throughout the development of the plan and further ecological assessment would be undertaken during the planning application phase with any necessary mitigation measures identified.

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2119	Michelle Simpson-Gallego	Pegasus Group	Lioncourt Homes	NE2	NPPF Paragraph 109 does not require a net biodiversity gain. Policy has not correctly interpreted NPPF Paragraph 118 in relation to 'significant harm'. Policy NE2 requires offsetting when there would be 'negative impact' on biodiversity. Biodiversity offsetting is not the most appropriate way to calculate biodiversity loss and gain resulting in inappropriate levels of compensation required.	NE2 should be revised to reflect the wording of the NPPF. A more appropriate metric than biodiversity offsetting be applied.	Policy has been formulated in relation to evidence base and is considered to be sound. Policy wording already considered to reflect NPPF.
2119	Michelle Simpson-Gallego	Pegasus Group	Peter Drakesford	NE2	The policy is not in accordance with Paragraph 109 of the NPPF, which does not consider a net gain for biodiversity to be a requisite for all development. Biodiversity offsetting is not considered the most appropriate way to calculate biodiversity loss and gain as it creates an inappropriate level of compensation requirement. Site specific circumstances should be considered.	Wording of the policy be revised to reflect the NPPF.	Comments noted. Policy wording already considered consistent with NPPF. Where loss of habitat is unavoidable, adequate mitigation measures should be undertaken and only where this is not possible, adequate compensation measures should be implemented. In this instance development proposals should be guided by the Council's approach to biodiversity offsetting (or equivalent) as set out in the Warwickshire, Coventry and Solihull Green Infrastructure Strategy, or any subsequent update to this document and national policy.
2121	Michelle Simpson	Pegasus Group		NE2	There is no requirement to review the SHMA, so the data may become outdated and given it's prepared on a Housing Market Area wide basis, the authority has less control over when the assessments will be revised. The SHMA reviewed housing mix on a borough-wide		The representations highlight concerns relating to the soundness of the plan which need to be explored through the oral part of the examination.

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					basis and does not consider locational differences, which may influence dwelling provision on individual sites. Housing mix should be decided on a site-by-site basis rather than a blanket requirement.		
1428	Anne Denby	Canal & River Trust	NA	NE3	The title of this policy has been amended though the wording within it appears to remain as set out at the Preferred Option stage. The Trust welcome the inclusion of a reference to 'Blue infrastructure' though it is considered that some clarity as to what this means should be included within the policy or at the least within the supporting text. The canals should be acknowledged as 'Blue infrastructure' which serves in a variety of roles, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunication. They also offer opportunities for leisure, recreation and sporting activities as part of the 'natural health		Policy NE3 seeks to work towards the creation of a comprehensive green infrastructure network. Where appropriate new developments must provide suitable Green Infrastructure linkages throughout the development and link into adjacent strategic and local GI networks or assets where present. Policy considered offering sufficient detail.

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					service' acting as 'blue gyms' and supporting physical and healthy outdoor activity. Within the supporting text the Preferred Option document made specific reference to canals though this appears to have been replaced with 'watercourses' to ensure clarify these reference in Paragraphs 9.10 & 9.11 should be amended to 'canals and watercourse corridors'.		
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	NE3	9.10 Could this include provision of 8m ordinary watercourse buffer similar to EA to allow for maintenance	-	Following meeting and discussion, included in main policy of SDC5. Not considered necessary to include elsewhere however. Comments noted however no further action considered necessary.
1434	Annie English	Warwickshire Wildlife Trust	NA	NE3	The Trust is supportive of the Green Infrastructure proposals identified within policy NE3, and supportive of this policy in general. We suggest that this policy could be more effective if the 'Green Infrastructure Opportunity Area' shown in blue on the Green Infrastructure Proposals map was further extended east from Cock Robin Wood so as it joins with the Strategic Green Infrastructure Network at Ashlawn cutting and then east again to join to the Strategic Green Infrastructure Network at Hillmorton (see Map		Comments noted. Policy NE3 seeks to work towards the creation of a comprehensive green infrastructure network. Green Infrastructure identified considered to serve the aims of the policy. Final details of Lodge Farm to be determined during any future Planning Application stage.

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					submitted with rep). Green Infrastructure here would help to retain local movement of wildlife south of the town and help link up the larger, strategic Green Infrastructure Networks that run predominantly into/out of the town as the town expands. The proposal for development at Lodge Farm (DS3.15) also brings opportunity to provide new Green Infrastructure Areas in this location particularly to link up the Strategic GI networks that are currently disconnected (see map submitted with rep).		
1691	Lee Chase	NA	NA	NE3	The plan as proposed in DS8 and DS9 run a road through the Greenway, an eleven mile green route to Radford Semele along the old rail line, partially consisting of national cycle route. In addition, it throws away the chance of ever connecting Cawston woods to this green route, Dunchurch and other new houses likely to be built in the area. This is contrary to NPPF para.35 and 75. The road cutting across the Greenway should be scrapped. The Greenway should receive a minimum 30M buffer as per the Cawston Woods, perhaps with additional trees to maintain the country feel. The housing	Proposed changes to Framework Masterplan for SW Rugby	It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. Policy NE3 seeks to work towards the creation of a comprehensive green infrastructure network. Green Infrastructure identified considered to serve the aims of the policy. WCC Ecology have been fully engaged throughout the development of the plan and further ecological assessment would be undertaken during the planning application phase with any necessary mitigation measures identified.

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					<p>west of Cawston Woods should be reduced to allow a wide green space to complement and connect the Greenway to Cawston Woods, by my estimates this would be approximately 250m wide. A wider buffer to the south of Cawston Woods to allow walkers and cyclists to continue to enjoy the feeling of being in the countryside, as this part of the ancient woodland is difficult to pass through. Parking facilities should be provided for local residents to access these green spaces.</p>		
1696	Katherine Walls	NA	NA	NE3	<p>Fails to meet NPPF requirements relating to traffic congestion, excessive car journeys and pollution. Fails to meet NPPF requirements relating to mammals and invertebrates.</p>	<p>Proposed spine road should be augmented and extended to release excessive levels of local traffic away from the developed area. Green corridor should be extended to link Cock Robin Wood with other conservation areas and across the new road network to Cawston Woods.</p>	<p>It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. Potential impacts of proposed development on wider road network have been assessed as part of the STA. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered.</p>

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1719	Jennie Basford	NA	NA	NE3	Area around Rainsbrook and Hillmorton cannot sustain more people and cars on the roads. Would like Rainsbrook Valley to be given protected green infrastructure status. With Houlton being developed surely this is sufficient new houses for the area.		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. Discussions with developers/landowners of existing sites benefiting from planning permissions have taken place to inform a deliverable housing trajectory. These sites alone will not be sufficient to deliver the housing target and a continuous 5 year land supply throughout the plan period. Policy NE3 seeks to work towards the creation of a comprehensive green infrastructure network and further amendment to it not considered necessary.
1731	John Judd	NA	NA	NE3	I would like to request that the countryside around the Rainsbrook Valley (i.e. Onley Lane, Kilsby Lane & Barby Lane) is protected as Green Infrastructure.		Policy NE3 seeks to work towards the creation of a comprehensive green infrastructure network. Green Infrastructure identified considered to serve the aims of the policy. Policy has been formulated in relation to evidence base and is considered to be sound.
1733	Jonathan Lines	NA	NA	NE3	In view of the current pressures on the area for residential development, I am writing to request that the Rainsbrook Valley is protected in its current form and given Green Infrastructure status. I consider this, or the equivalent, should have been included in previous plans but is much more pertinent now		Policy NE3 seeks to work towards the creation of a comprehensive green infrastructure network. Green Infrastructure identified considered to serve the aims of the policy. Policy has been formulated in relation to evidence base and is considered to be sound.

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1406	Julie Warwick	Wolvey Parish Council	NA	NE4	Support policy		Comments noted
1489	D Ralph	NA	NA	NE4	On human front, need quiet spaces, to be able to enjoy our countryside and to bring up our children with awareness of the importance of the natural world and the solace such an environment can give.		It is acknowledged there will be loss of agricultural land however, this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. DS8 makes specific requirement of a buffer between Rugby and Dunchurch, which will be further detailed in the framework masterplan and adhered to in subsequent planning applications.
1489	D Ralph	NA	NA	NE4	Significant amount of land, open space, trees and hedgerows will be sacrificed and lost and the proposed offset is totally inadequate. Examples of proposals that Public Rights of way be realigned and hard paved. Do not want to walk on tarmac or hard paving where you can't pick berries because it has been developed and manicured. Want natural pathed with natural hedgerows where do not encounter cars or their noise.		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. DS8 makes specific requirement of a buffer between Rugby and Dunchurch, which will be further detailed in the framework masterplan and adhered to in subsequent planning applications. WCC Footpaths consulted and will be consulted for any future Planning Applications.

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1687	Linda Tomalin	NA	NA	NE4	It is not sound or justified to say that landscape will be protected because the current landscape will be lost in the development. Hedgerows, trees etc. are disappearing in suburban gardens at an alarming rate already and, even if they are initially kept, new households may soon destroy them.		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. WCC Ecology has been fully engaged throughout the development of the plan and further ecological assessment would be undertaken during the planning application phase with any necessary mitigation measures identified.
1451	Anna Stocks	WCC Archaeology	NA	NE4	Pleased to note paragraph 9.16 highlights the need for Policy NE4: Landscape Protection and Enhancement to be cross referenced against Policy SDC3: Protecting and Enhancing the Historic Environment.		Comments noted
1434	Annie English	Warwickshire Wildlife Trust	NA	NE1 & NE2	The Wildlife Trust is supportive of the inclusion of policies NE1 and NE2 within the Local Plan.		Comments noted
1452	Public Health Warwickshire	Public Health Warwickshire	NA	NE1 - NE4	It is important to protect and enhance the physical natural environment. Parks and green spaces have a positive effect on mental wellbeing. The focus on these policies is more on conservation than on health.		It is acknowledged there will be loss of agricultural land however; this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA.

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1756	Cllr K Lawrence	NA	NA	NE1,NE3 & NE4	<p>The Rainsbrook Valley should be designated as part of the green infrastructure and any development should not be considered, Specifically the land that backs onto Barby Lane, High Street, Fellows Way, Florin Place, Duffy Place, Moat Farm Drive, Astley Place, Foresters' Place, Kilsby Lane, and Crick Road. The character of the landscape should be protected as it outweighs the need for further development. Hillmorton has the largest urban development in the borough and further development is not sustainable as the infrastructure with regard to GP provision, school places, transport links cannot cope with the current housing and population. The plan does not really factor in the strain that DIRFT places on Hillmorton. The policy numbers which relate to this are H55, NE1, NE3, NE4.</p>		<p>It is acknowledged there will be loss of agricultural land however, this is the case for all of the proposed allocations as there is extremely limited brownfield capacity as demonstrated in the SHLAA. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.</p>