

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

31	D Massie	NA	NA	SDC1	Insufficient attention paid to specifying good design as required by NPPF para 56. In particular to make new development compatible with existing houses in Bilton/Woodlands. Massing specified for SW Rugby close to the existing built up area should NOT exceed two-storeys in height.	Local Plan should be improved by dropping this policy. Change DS8 to specify maximum appropriate height for housing close to existing built up area of Rugby	All development will demonstrate high quality, inclusive and sustainable design and new development will only be allowed where proposals are of a scale, density and design that would not cause any material harm to the qualities, character and amenity of the areas in which they are situated. Factors including the massing, height, landscape, layout, materials and access should also be a key consideration in the determination of planning applications. Details would be finalised during any future Planning Application stage.
89	Helen Massie	NA	NA	SDC1	SW Rugby should not be built on while developers are not building out on planning permission at Rugby Radio Station site. Greater consideration should be given to accelerating the development of brownfield sites. Insufficient attention paid to specifying good design in new housing development as required by NPPF para.56. To make new development compatible with housing at Woodlands/Bilton, the massing of SW Rugby development close to built up area should not exceed two	Remove Policy DS8. Change SDC1 to specify the maximum appropriate height for housing close to the existing built up area of Rugby.	The selection of sites as informed by the SHLAA, and other relevant evidence, for proposed allocation contained within the development strategy represents the most sustainable strategy and the housing allocations ensure a continuous supply of housing to meet the housing target. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan.

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1398	Ian Bentlett	Harborough PC and Hill St Youth Center	NA	SDC1	<p>storeys in height.</p> <p>Chapter 11: Throughout the whole document there is a high level of concentration on positively growing the facilities in the bough and its future sustainability. However the document fails to adequately address the highways issues and transport systems, particularly HGVs and the effects on rural roads.. Why no mention of potential for duelling A5?. Highways have poor record on planning and underestimating requirements. New spinal road seemingly is not to be dual carriageway; this is short sighted if so. In and out of town parking receives inadequate attention on the document. The document mentions uses with town centre shops and dramatic plans for expansion of floor space, but no mention of improvement to major access roads into the town centre and parking once there. Unless the document commits to resolving such problems caused for example by the rail bridge when approaching the town from the north it will not achieve its stated aims and is therefore unsound. Lack of access and poor parking are one of the major reasons for people not venturing</p>		<p>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. Additional details will be finalised at the Planning Application stage.</p> <p>The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. 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. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels. Proposed Appendix 3 Infrastructure Delivery Plan and DS9 have been amended following consideration of this consultation response and the updated</p>

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					into the centre for their shopping needs.		Strategic Transport Assessment (LP54.46 - 54.58 and LP54.120- 124). Potential impacts of proposed development on wider road network have been assessed as part of the STA. Future works to the A5 is part of a separate process.
1440	Becky Clarke	Environment Agency	NA	SDC1	Strongly support modification from previous consultation version, i.e. protection of amenities and need to ensure compatibility where housing near to sensitive sites (e.g waste management).	-	Support noted however no further action considered necessary
1909	Paul Hill	RPS	St Modwen	SDC1	<p>The wording of the first paragraph, however, is considered a little ambiguous and should closely resemble paragraph 58 of the Framework which makes reference to decisions seeking to ensure that development will add to the overall quality of an area, this is very different from the current wording within the Local Plan that specifies that the qualities of an area should not be materially harmed. Frameworks seek to add to the overall not just to prevent harm.</p> <p>Para 10.9 support no density targets but it continues to state “densities are expected to be significantly higher than the minimum”, however no minimum or maximum targets have been set therefore this sentence does</p>	<p>1. Amend first paragraph to read: All development will demonstrate high quality, inclusive and sustainable design and new developments will only be allowed where <u>should aim to ensure</u> proposals are of a scale, density and design that would not cause any material harm to the qualities, character and amenity of the <u>add to the overall quality of the areas</u> in which they are situated.</p> <p>2. Amend supporting text at paragraph 10.9 to read: Bringing forward new development at the</p>	Policy reworded partially in line with suggestion, including reference to aiming to add to overall quality of areas. Agree that use of term 'minimum' in relation to densities is ambiguous, and reference to rural areas added instead. Proposed policy SDC1 has been amended following consideration of comments. MiM ref: 54.75 and MiM re: 54.76.

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					not have any meaning. It is suggested that the wording “within rural areas” is included instead.	right density is important and new development will be expected to harmonise with or enhance the surrounding area. Where development sites are located in or close to Rugby town centre, densities are expected to be significantly higher than the minimum <u>within rural areas</u> .	
2028	Nicola Draper	NA	NA	SDC1	Insufficient attention has been paid to the housing development as in Para 56. In Particular to make a new development compatible with the existing houses. Houses should not exceed 2 storeys. Change Policy DS8 to specify the maximum appropriate height for housing close to the existing built up area.		Heights of dwelling are determined during the Planning application process.
2109	Louise Steele	Framptons	Louise Steele	SDC1	The Parties are generally supportive of this policy and consider it effective and welcome a flexible approach to density in new development	-	Comments noted however no further action considered necessary
1406	Julie Warwick	Wolvey Parish Council	NA	SDC2	Support Policy	-	Comments noted however no further action considered necessary

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1909	Paul Hill	RPS	St Modwen	SDC2	<p>Appears some duplication between the requirements within policies SDC2 and NE4, and some of the same issues of soundness are also relevant to this policy. Specifically, the proposed SDC2 in the second bullet repeats the main failing of policy NE4 – stating that “all proposals should ensure... landscape character is retained and where possible enhanced” this in many instances will be impossible to comply with as greenfield development may not be able to retain the character of the landscape. The recommended change is to re-word this to reflect the Framework.</p>	<p>SDC2 The second bullet point should be replaced with the following text: <u>The proposed change to the landscape can be accommodated within the landscape character area it is located within, without undue change or harm to its overall character, whilst promoting effective mitigation strategies to prevent or minimise any harm occurring.</u></p>	<p>Acknowledge potential difficult of interpretation and application of second bullet point. Considered suitable to remove. General landscape character covered sufficiently in NE4. Proposed policy SDC2 has been amended following consideration of comments. MiM ref: 54.77.</p>
1428	Anne Denby	Canal & River Trust	NA	SDC3	<p>The Trust welcomes the consideration given to non-designated heritage assets within the policy and the need for development to assess impact upon them. There are a number of statutory designations along the canal network in terms of buildings / bridges etc. However, the network itself is considered as a non-designated heritage asset and the Trust welcomes the protection afforded to them as such by this policy.</p>	-	<p>Support noted. No further action considered necessary.</p>

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1442	Rohan Torkilsden	Historic England	NA	SDC3	<p>Historic England notes this welcome core policy as an important part of a clear and positive strategy for the historic environment (NPPF Paragraphs 9 and 126). This will in turn help support the delivery of development that will afford appropriate protection of the Borough's heritage assets and make a positive contribution to local character and distinctiveness.</p> <p>Note that the monitoring indicator and target needs to be finalised.</p>		Comments welcomed. Policy formed following consultation with English Heritage at Preferred Option stage.
1451	Anna Stocks	WCC Archaeology	NA	SDC3	<p>Recommend inclusion of SDC3 as will help ensure conservation and enhancement of the Borough's historic environment.</p> <p>Recommend reference to 'Warwickshire Historic Towns Appraisal' be amended to "Warwickshire Historic Towns Study". Bullet Point a) As written this paragraph could be taken to suggest that detailed assessment will only be necessary where an application will have an impact upon a known heritage asset, however, as set out in paragraph 128 of the NPPF, detailed assessment may be necessary across those sites where there is a potential to include heritage assets with archaeological</p>		Amend Warwickshire Historic Towns Appraisal to Warwickshire Historic Towns Study for clarity. Agree adding 'potential' and associated wording to (a) to help with interpretation and compliance with NPPF. Amend paragraph 10.23 to clarify data sources WCC can provide. See MiM Ref: 54.77a, 54.77b, and 54.77c.

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					<p>interest. This could be resolved by amending this bullet point to 'applications with the potential to affect affecting the significance of heritage asset(s) will be required to provide sufficient information...'. The Warwickshire Historic Environment Record (HER) is managed and maintained by the Warwickshire County Council Archaeological Information and Advice Team. The Borough Council has access to the HER through a Service Level Agreement with Warwickshire County Council for Archaeological Planning Advice. As written, paragraph 10.23 suggests that this data set can be obtained via the Council's website, or by contacting the Planning department. I would recommend that that this section be amended to highlight that the HER, Historic Landscape Characterisation, and Warwickshire Historic Towns Project data can be obtained through the Warwickshire County Council Historic Environment Record.</p>		

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1867	Joel Jessup	Heaton Planning	Tarmac Ltd	SDC3	Principle of this policy is supported, i.e. understanding the significance of a heritage asset should dictate the magnitude of conservation measures employed. This approach is compliant with NPPF para.132. However the second paragraph of this policy appears to be at odds with the approach and should be reworded to better reflect the NPPF so that designated and non-designated assets are not necessarily afforded equal protection.	-	Comments noted however policy considered sound and further changes not considered necessary.
1901	Mathieu Evans	Gladman Developments Ltd	NA	SDC3	Policy as currently worded does not accord with national policy as the protection afforded to heritage assets should be proportional to their value. Policy at present does not differentiate between a designated and non-designated asset.	-	Comments noted however policy considered sound and further changes not considered necessary.

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1909	Paul Hill	RPS	St Modwen	SDC3	<p>1. Recommended reference to non-designated assets removed from sentence and further sentence in accordance with para 135 I NPPF included instead. Second half of sentence should also more accurately reflect paragraph 131 NPPF which encourages sustaining and enhancing significance of heritage asset, and making positive contribution to local character. No reference within NPPF to “appearance” of heritage asset - this reference should be removed.</p> <p>2. The first sentence under a) Understand the Asset concludes by requiring a demonstration of how proposal would contribute to asset’s conservation. Not in accordance with paragraph 128 NPPF which requires a study in order to understand potential impact of proposal on an asset’s significance.</p> <p>3. Within part b) Conserve the Asset, policy makes reference to “any harm” to significance of “designated and non-designated” assets should be weighed against the public benefit – in accordance with paragraph 133 NPPF, only “substantial harm” to “heritage assets” should be weighed against the public benefit.</p>	<p>1. Development affecting a designated or non-designated heritage asset and its setting will be expected to <u>sustain, and where appropriate</u> make a positive contribution to it’s <u>the local</u> character, appearance and the <u>asset’s</u> significance. <u>The effects on the significance of non-designated heritage assets will be weighed having regard to the scale of any harm or loss.</u></p> <p>2. To conserve and enhance the Borough’s heritage assets, development proposals must:</p> <p>a) Understand the Asset.....impacts of the proposal on the significance of heritage assets and their setting to demonstrate how that proposal would contribute to the asset’s conservation <u>understand the potential impact of the proposal on their significance.</u></p>	<p>Comments noted however policy considered sound and further changes not considered necessary.</p>

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					<p>Paragraph 139 NPPF scheduled monuments and other no designated archaeological sites that are demonstrably of equivalent significance (not of equivalent importance) should be subject to the same policies for designated heritage assets, rather than “preserved in situ” which is substantially different.</p>	<p>3. b) Conserve the Asset Great weight will be given to the conservation of the Borough’s heritage assets. Any <u>substantial</u> harm to the significance of a designated or non-designated heritage asset..... 4. Scheduled monuments and other non-designated archaeological sites of <u>demonstrably equivalent importance</u> significance should be preserved in situ will be <u>subject to the policies for designated heritage assets.</u></p>	
1110	Sue Green	Home Builders Federation	NA	SDC4	<p>The only technical standards that can now be considered and incorporated into Local Plans are restricted to the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings. No evidence provided for the requirement for the higher water efficiency nor has it been viability tested as per NPPG.</p>	-	<p>Water Cycle Study confirms support for higher optional building regulation in order to achieve Water Neutrality. WCS recommends that in order to achieve this target and enhance sustainable development moving forward, policy should be developed that ensures all new housing is as water efficient as possible and that objectives are set that new housing development is required to achieve the Building Regulations optional requirement water use of 110 l/h/d. Local Plan has been viability tested with this standard in place. Comments noted. Mods reference</p>

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1316	James Durrant	Tetlow King	HARP Consortium (Bromford Housing Group, Orbit Heart of England Housing Association , Midlands Heart Limited and Waterloo Housing Association Ltd)	SDC4	Policy SDC4 still makes reference to a need for new residential development to be built to the optional higher building regulations on the water consumption of future occupants. The need for this and the impact on viability has to be assessed in order for it to be included within a Local Plan policy. Neither has been demonstrated. Without testing the impact this has on schemes when combined with all other Development Plan policies, there is a risk that it may lead to schemes being unviable and ultimately affordable housing being reduced by negotiation on those schemes. Support exclusion of Internal space standards as there is no evidence for it.	-	LP54.78 - LP54.81 reflect removal of other Water Cycle Study confirms support for higher optional building regulation. In order to achieve Water Neutrality. WCS recommends that in order to achieve this target and enhance sustainable development moving forward, policy should be developed that ensures all new housing is as water efficient as possible and that objectives are set that new housing development is required to achieve the Building Regulations optional requirement water use of 110 l/h/d. Comments noted however no further action considered necessary
1428	Anne Denby	Canal & River Trust	NA	SDC4	A Canal & River Trust leaflet has been attached including information about using our waterways for heating and cooling purposes. This policy or supporting text at Para 10.26 should be amended by including the use of canal or river water for heating and cooling purposes.	-	Appears to be quite specific to mention in policy or supporting text, however may include mention in Sustainable Design and Construction SPD. Comments noted however no further action considered necessary in terms of plan. Consideration to be given however to inclusion in SPD.

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1909	Paul Hill	RPS	St Modwen	SDC4	<p>1. Paragraph 10.24 makes reference to national targets for achieving zero carbon for residential development by 2016. This target was removed by the government in July 2016. The policy and supporting text therefore require re-writing accordingly. 2. The initial reference to the Building Regulations target for water use requires further clarification and currently reads 110 litres rather than 125 litres. This requirement appears inconsistent with current Building Regulations and therefore its inclusion in the Local Plan is considered unnecessary. At the time of this consultation the Council's evidence to justify such a policy requirement is not available. Furthermore, given that the Building Regulations requirements may change within the Plan Period, this requirement could become outdated and as such this policy would become out-of-date. It is therefore recommended that this requirement is removed. 3. The requirement to meet BREEAM 'very good' has not been justified.</p>	<p>1. Re-draft policy and supporting text reflective of zero carbon homes no longer a national target. Residential buildings 2. All new dwellings shall meet the Building Regulations requirement of 110 litres of water/person/day unless it can be demonstrated that it is financially unviable. Non-residential buildings 3. All non-residential development over 1000 sq. is required <u>should aim</u> to achieve as a minimum BREEAM standard 'very good' (or any future national equivalent) unless it can be demonstrated that it is financially unviable.</p>	<p>1. Reference in para 10.24 (mod reference LP54.80) supporting text to Government's Zero Carbon Policy removed as no longer Government target. 2. 110l is the optional water efficiency Technical Standard, and the use of this is supported by the Water Cycle Study. 3. Agree that very good BREEAM standard should be an aim rather than a requirement, due to available evidence. Proposed policy SDC4 has been amended following consideration of comments. See MiM ref: 54.78 and 54.80. Water efficiency standard formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable for this).</p>

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2109	Louise Steele	Framptons	Louise Steele	SDC4	Government's Ministerial Statement of 25 March 2015 setting of technical housing standards in England. "From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings." Rugby	Parties therefore consider that policy SDC4 should be deleted.	The optional building regulations for water efficiency is one of the standards for new dwellings suitable for inclusion on the plan. Not considered suitable to delete policy on this basis. Comments noted however no further action considered necessary.
1875 & 2119	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	SDC4	Welcomed that the Council is allowing the building regulations to define the policy framework for improving energy efficiency for residential buildings	-	Support noted. Comments noted however no further action considered necessary
289	Roderick Hastie	Grandborough Parish Council	NA	SDC5	SDC5 Flood Risk: Given the known extent of regular flooding within the Borough and in downstream locations outside the Borough, the policy as currently formulated does not go far enough. All future developments should include provision for water capture and retention, with run off only allowed when there is no downstream risk of flooding.	-	Consultation has taken place with Environment Agency and Warwickshire County Council Lead Local Flood Authority. Policies are considered sufficient to address issue of flooding (subject to further minor amendments as recommended by EA and LLFA). Policies include requirement for Sustainable Drainage. Opportunity to consider specific details at planning application stage. Comments noted however no further action considered necessary

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1247	Cllr Emma Crane	NA	NA	SDC5	The Environment Agency responded to the previous draft local plan consultation and proposed a number of amendments (both to the above draft policy and also to other policies in the draft local plan). It is noted that a number of these amendments do not appear to have been adopted and this should be reviewed. It would benefit the local communities living in areas affected by flooding if all of the Environment Agency recommendations are added to the next draft of the Local Plan. In addition, the lead local flood authority (Warwickshire County Council) should be asked to input into the policies, as recommended by the Environment Agency.	-	Further discussions have taken place with the LLFA and WCC LLFA. Some further amendments agreed to the satisfaction of both (see also responses to EA and LLFA). Modifications as per discussions with EA and LLFA (See Action to EA and LLFA response). MiM Refs: 54.82, 54.83, 54.84, 54.85, 54.86, 54.89, 54.90, 54.92, 54.93.
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	SDC5	SDC5: In addition to FRA list, section should mention Planning Practice Guidance within which there is a checklist for site specific flood risk assessments	-	Paragraph added to supporting text to highlight where further guidance can be found. Proposed policy SDC5 has been amended following consideration of comments. MiM ref: 54.85.
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	SDC5	FRA list use of term Council too generic. County /Borough should be specified.	-	Text amended for clarification. Proposed policy SDC5 has been amended following consideration of comments. MiM ref: 54.85.

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1440	Becky Clarke	Environment Agency	NA	SDC5	Support changes made so far however request further amendments to address concerns: Bullet points to policy to include Developer contributions to flood defences/assets that benefit their development; SuDS must be located outside the floodplain; Proposals must restore and enhance watercourses and include 8 metre easement and also meet requirements of an Environmental Permit. Recommend descriptions of main risk management a	Inclusion of suggested bullet points and description of organisations	Following further discussion with EA and LLFA, 1st requested bullet point regarding developer funding of flood defences considered onerous/not justified. Possible to review at time of next local plan however. Other bullet points considered suitable for inclusion, although point relating to SuDS being outside the flood zone considered more suitable for SDC6 instead. Agreed other amendments however and where could be inserted. Regarding description of main Risk Management Authorities, agreed with EA at meeting that mention of these can be included in SPD. Proposed policy SDC5 has been amended following consideration of comments meeting with EA. See minor modification ref: 54.83. Policy SDC6 amended following consideration of comments and meeting with EA. See minor modification ref: 54.89.
1460	Grandborough Parish Council	Grandborough Parish Council	NA	SDC5	SDC5: Given known extent of flooding in the Borough and downstream locations outside, policy does not go far enough. All future developments should include provision for water capture and retention, with run off only allowed where there is no downstream risk of flooding.	-	Consultation has taken place with Environment Agency and Warwickshire County Council Lead Local Flood Authority. Policies are considered sufficient to address issue of flooding (subject to further minor amendments as recommended by EA and LLFA). Policies include requirement for Sustainable Drainage. Opportunity to consider specific details at planning application stage. Comments noted however no further action considered necessary.

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1428	Anne Denby	Canal & River Trust	NA	SDC6	To ensure consistency with other plan policies the 1st bullet point of this policy should be amended to: "be designed and located sensitively to integrate with and not adversely impact on Blue/Green Infrastructure functions". Para 10.45 The addition of a reference to potential for development to discharge into the canal is welcomed however the drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways. The Trust is not a land drainage authority and therefore any proposed discharges are not granted as-of right and where they are granted they will usually be subject to completion of a commercial agreement.	-	1st bullet point to be amended, also as per discussions with EA. Proposed policy SDC6 has been amended following consideration of comments. MiM ref: 54.90.
1428	Anne Denby	Canal & River Trust	NA	SDC6	This needs to be clear and Para 10.45 amended as follows: "Discharge to the Grand Union or the Oxford Canal may be acceptable though any surface water discharge to the waterway will require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted they will usually be	-	Paragraph 10.45 considered sufficient and states that applications will be subject to assessment. Comments noted however no further action considered necessary

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					subject to completion of a commercial agreement."		
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	SDC6	SDC6: Should developers submit proposals for SuDS include future maintenance? This will be asked for in any application. Warwickshire has completed a Local Flood Risk Management strategy which contains Draft Advice for developers as an appendix. Warwickshire as LLFA is the statutory consultee for surface water on all major applications and point to the draft standing advice in the LFRMS as an appendix and a freestanding document. Surface Water Management Plan should also be referred to alongside the SFRA as a source of finding historic flood hotspots and areas at risk of surface water flooding. - Which will need consideration when it comes to development?	-	Supporting text amended to include reference to consideration of future maintenance. No further amendments considered to be required. Proposed policy SDC5 has been amended following consideration of comments. Mods ref: 54.86.
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	SDC6	10.45: Should be mentioned that discharging/building structures such as outfalls into an ordinary watercourse requires consent from WCC as the LLFA	-	Additional sentence added for clarification. Proposed policy SDC5 has been amended following consideration of comments. Mods ref: 54.93.
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	SDC6	10.49: Should be included that Water Framework Directive considered by both WCC and the EA when environmental permits and ordinary watercourse consents approved. Straightening or culverting of watercourses is	-	Discussed at meeting with LLFA. Appears quite specific and may not be suitable to include. Agreed to not including this as reference. Comments noted however no further action considered necessary

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					discouraged for reasons relating to fish passage etc. in addition to flood risk issues.		
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	SDC6	10.57: Specify 'Borough' Council	-	Additional text added for clarification. Proposed policy SDC6 has been amended following consideration of comments. Mods ref: 54.95.
1431	Mark Ryder (Jagjit Mahal, Lead Local Flood Authority)	WCC (Lead Local Flood Authority)	NA	SDC6	10.58: Flood Defence Consents now part of Environmental Permitting. WCC should be specified as the LLFA.	-	Additional text added for clarification. Proposed policy SDC6 has been amended following consideration of comments. Mods ref: 54.97.
1440	Becky Clarke	Environment Agency	NA	SDC6	Support policy	-	Comments noted, no further action considered necessary
1909	Paul Hill	RPS	St Modwen	SDC6	The last paragraph mentions the re-use of surface water, and domestic waste water on site. This reference is not related to the policy as a whole which is focusing on the drainage of surface water and duplicates the content of Policy SDC4 which is focussed on sustainability within buildings. There is no mention as to how this would be applied within the supporting text and therefore this last sentence should therefore be removed as it is unnecessary and not directly related to the policy matter..	SDC6 The final sentence should be removed, as follows: The re-use and recycling of surface water and domestic waste water within new development will be encouraged.	Comments noted however re-use and recycling of surface water may reduce run-off or infiltration to an extent. Encouraged only, so not considered to be onerous. Comments noted however no further action considered necessary

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1909	Paul Hill	RPS	St Modwen	SDC7	<p>1. The first bullet point is somewhat vague and is inconsistent with the Framework as it states that development will be directed to areas where there is a guaranteed and adequate supply of water. Paragraph 99 of the Framework states that New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change (including the impacts upon water supply). It goes on to state that when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure – not that development should be directed away from these areas.</p> <p>2. The second bullet is concerned with ensuring waterbodies can achieve a good status as required by the Water Framework Directive. The policy needs to make clear however that the aim is to prevent any adverse effects, not just effects in general.</p>	<p>1. The first bullet point should be amended as follows:</p> <ul style="list-style-type: none"> · minimising the need for new infrastructure by directing <u>encouraging</u> development to areas <p>2. The second bullet point should be amended as follows:</p> <ul style="list-style-type: none"> · , ensuring development is in accordance with the Water Framework Directive Objectives and does not <u>adversely</u> affect the waterbodies' ability to reach good status or potential as set out in the River Severn 'River Basin Management Plan' (RBMP). 	<p>1. Comments noted although requirements of policy are not considered to conflict with NPPF and is suitably worded. 2. Policy considered to be suitably worded and supporting text emphasises negative impacts will not be permitted. Comments noted however no further action considered necessary</p>

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1392	Diane Gregory	Churchover PC	NA	SDC8	Policy is inadequate. Should be explicit provision that where solar installations are proposed they should first be proposed on the roofs of existing or proposed new buildings. Proposals should be required to demonstrate why solar should not be installed on new buildings, not suitable to leave this to BREEAM certification. Policy should require sequential approach that no non-agricultural land is available. Also reference to temporary should be amended.	-	Not considered suitable to require this in policy for new development. There may be acceptable alternatives or reasons for not developing roofs. Also may go above and beyond NPPF requirements. Visual and amenity considerations etc. would still apply. Each case to be considered on its merits. Comments noted however no further action considered necessary
1440	Becky Clarke	Environment Agency	NA	SDC8	Support policy	-	Comments noted however no further action considered necessary
1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	SDC8 and accompanying paragraphs are unsound. NPPF para 97 requires LPA design their policies to maximise renewable and low carbon development, while ensuring adverse impacts are addressed satisfactorily	-	Policy supports renewables in principle however seeks to minimise impacts of development. This is considered adequate for soundness and compliance with NPPF. Comments noted however no further action considered necessary.
1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	SDC8 and accompanying paragraphs are unsound. NPPF para 97 requires LPA design their policies to maximise renewable and low carbon development, while ensuring adverse impacts are addressed satisfactorily	-	Policy has been formulated in relation to evidence base and is considered to be sound. (Therefore amendments not considered necessary or suitable). Comments noted however no further action considered necessary

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1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	Para 10.55. Does not clarify what large scale solar farm is. Further clarity should be given as it may otherwise preclude suitable sites.	Further clarity should be given as to what scale of solar farm proposals this policy relates to.	Large scale solar farm' is a term used in the Planning Practice Guidance without clarification. It is also considered unsuitable to impose a specific threshold. Each proposal determined on its merits. This is also just supporting text so advisory in nature. Applications will be judged on a case by case basis. As phrase in supporting text, is more advisory in nature. 'Large scale solar farm' is also a term used in the Planning Practice Guidance without further definition. Also not considered to be suitable to establish specific thresholds for this type of development in this policy.
1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	Para 10.55 states that where possible the best and most versatile agricultural land should be protected. It is contended this is more restrictive than national policy in the NPPF and PPG	Reword policy to give support for solar farm development on poorer quality agricultural land and to expressly state this refers to 3b, 4 and 5, if they are relevant classifications.	Some rewording of policy considered suitable in order to be more in accordance with NPPF. Proposed policy SDC8 has been amended following consideration of comments. See minor modification ref: 54.94
1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	Little relevant evidence in relation to ground mounted solar development. Camco study was published in 2010. In addition this made no specific reference to ground mounted solar farms. Landscape study conducted for wind developments in 2011 but not ground mounted solar development.	Include positive guidance on the development of non-large-scale solar farms (subject to the criteria set out in the policy itself) and based on an up to date evidence base.	Policy supports development in principle. Not considered necessary to elaborate further. Although no specific landscape study for solar farms, this can still be assessed at planning application stage, and potentially has less visual impact than wind turbines. Comments noted however no further action considered necessary.

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1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	Para 10.55 states where green field proposed should be demonstrated that use of agricultural land is necessary. This follows wording in PPG, however without determining what large scale is, this is unduly restrictive. Implies some kind of sequential test.	Redraft policy to include definition of large scale solar farms and that it should be more positively worded.	Applications will be judged on a case by case basis. As phrase in supporting text, is more advisory in nature. 'Large scale solar farm' is also a term used in the Planning Practice Guidance without further definition. Also not considered to be suitable to establish specific thresholds for this type of development in this policy. Comments noted however no further action considered necessary
1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	Grid capacity scarce commodity and cannot be delivered to brownfield or greenfield sites at will. It exists where it exists - not necessarily close to a brownfield site.	-	Details of applications considered on a case by case basis. Comments noted however no further action considered necessary.
1446	Liz Boden	Pegasus	WCC (Renewable Energy)	SDC8	10.55 should include positive guidance on non-large-scale solar farms and this should be informed by an up to date evidence base.	-	Policy considered to be in accordance with NPPF and sufficiently supportive. Comments noted however no further action considered necessary.
1106 & 1913	David Joseph	NA	NA	SDC9	DS 3.8 land North of Coventry Road, Long Lawford could be capable of accommodating more than 100 dwellings, so greater flexibility on capacity assumptions required	Amend residential allocation DS3.8 to a minimum of 100 dwellings	The Main Rural Settlement Pack details the allocation of DS3.10 including reference to the heritage asset review and the archaeological constraints which are considered at the local plan stage to limit the capacity of the site to 100. No change recommended.
1118	David Penn	Coventry & Warwickshire Chamber of Commerce	NA	SDC9	Relaying of comments from three local businesses regarding lack of fast broadband provision to existing employment sites in the Borough (Glebe Farm and Central Park specifically referred to) and impact this may have on retaining these businesses in the local area.		Proposed Policy SDC9 requires new development, including employment and commercial, to facilitate and contribute towards the provision of broadband infrastructure to ensure new employment land supply is fit for purpose where broadband provision is concerned. However the Local Plan has

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							no control over retrospective provision or improvements to broadband provision to existing employment sites.
1394	David Parnell	Combe Fields Parish	NA	SDC9	SDC9 (and DS5) should be implemented in favour of Combe Fields Parish. Implementation of broadband on brownfield sites and new developments - should include Ansty Park and All Parishioners of Combe Fields.	-	Main focus of policy is for new developments. May be onerous on developer to require provision of this service outside of what is required for the development. Comments noted however no further action considered necessary
1406	Julie Warwick	Wolvey Parish Council	NA	SDC9	Support Policy	-	Comments noted however no further action considered necessary
1909	Paul Hill	RPS	St Modwen	SDC9	1. The second paragraph refers to meeting the ambitions of others. It is suggested this wording is imprecise and therefore this paragraph should be removed. The supporting text paragraph 10.61- 10.62 provides sufficient background to this.	Policy SDC 9: Broadband and mobile internet The second sentence should be removed: Developers must make sure that broadband services that meet the ambitions of the Digital Communications Infrastructure Strategy and the European Digital Agenda are available, wherever practicable, to all residents of the development at market prices and with a full choice of all available UK service providers.	Comments noted although policy as written considered suitable in order to achieve targets. Comments noted however no further action considered necessary
1875 & 2119	Michelle Simpson-Gallego	Pegasus Planning	AC Lloyd / Persimmon	SDC9	The policy cannot be practically implemented as agreements with network providers cannot be secured in advance of applying for planning permission. Also in	-	Comments noted although not considered necessary to amend policy, although in relation to concerns about the practical implementation of the policy, it was considered suitable to

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					many circumstances the developer who will deliver the residential/commercial units is not involved with obtaining planning permission for the principle of development.		include the matter of broadband provision in the Infrastructure Delivery Plan.
1445	Steph Matthews	Natural England	NA	SDC1-2	As with the Natural Environment Policies these provide an opportunity to influence functional sub-urban green infrastructure, particularly within the larger scale developments. We would be very keen to see this included to support the fundamentals of the natural environment within sustainable design and landscaping as part of wider green infrastructure and ecological connectivity.	-	Considered that existing provisions within SDC Policies (e.g. SDC6 Sustainable Urban Drainage) will influence the provision and management of green infrastructure in addition to the Natural Environment policies, which include specific Green and Blue infrastructure policy (NE3). Comments noted however no further action considered necessary
1452	Public Health Warwickshire	Public Health Warwickshire	NA	SDC1-SDC9	Secure on street or communal bicycle parking should be provided for those residents in flats. Discouragement of smoking shelters. Decent and affordable internet should be made available to promote employment and health.		This is currently outside the Local Plan.
2121	Michelle Simpson	Pegasus Group	NA	SDC4 & SDC9	There is no requirement to review the SHMA, so the data may become outdated and given its 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 basis and does not		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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					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.		