

3 August 2018

SPECIAL CABINET – 13 AUGUST 2018

A special meeting of Cabinet will be held at 6.00pm on Monday 13 August 2018 in the Council Chamber, Town Hall, Rugby.

Adam Norburn
Executive Director

A G E N D A

PART 1 – PUBLIC BUSINESS

1. Apologies.

To receive apologies for absence from the meeting.

2. Declarations of Interest.

To receive declarations of –

(a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) pecuniary interests as defined by the Council's Code of Conduct for Councillors; and

(c) notice under Section 106 Local Government Finance Act 1992 – non-payment of Community Charge or Council Tax.

Note: Members are reminded that they should declare the existence and nature of their interests at the commencement of the meeting (or as soon as the interest becomes apparent). If that interest is a prejudicial interest, the Member must withdraw from the room unless one of the exceptions applies.

Membership of Warwickshire County Council or any Parish Council is classed as a non-pecuniary interest under the Code of Conduct. A Member does not need to declare this interest unless the Member chooses to speak on a matter relating to their membership. If the Member does not wish to speak on the matter, the Member may still vote on the matter without making a declaration.

Growth and Investment Portfolio

3. Local Plan Post Hearing Main Modifications Consultation.

PART 2 – EXEMPT INFORMATION

There is no business involving exempt information to be transacted.

Any additional papers for this meeting can be accessed via the website.

The Reports of Officers (Ref. CAB 2018/19 – 3) are attached.

Membership of Cabinet:

Councillors Stokes (Chairman), Mrs Crane, Lowe, Mrs Parker and Ms Robbins.

CALL- IN PROCEDURES

Publication of the decisions made at this meeting will normally be within three working days of the decision. Each decision will come into force at the expiry of five working days after its publication. This does not apply to decisions made to take immediate effect. Call-in procedures are set out in detail in Standing Order 15 of Part 3c of the Constitution.

If you have any general queries with regard to this agenda please contact Claire Waleczek, Senior Democratic Services Officer (01788 533524 or e-mail claire.waleczek@rugby.gov.uk). Any specific queries concerning reports should be directed to the listed contact officer.

If you wish to attend the meeting and have any special requirements for access please contact the Democratic Services Officer named above.

AGENDA MANAGEMENT SHEET

Report Title:	Local Plan Post Hearings Main Modifications Consultation
Name of Committee:	Special Cabinet
Date:	13 August 2018
Report Director:	Executive Director
Portfolio:	Growth and Investment
Ward Relevance:	All
Prior Consultation:	None
Contact Officer:	Vicky Chapman, Development Strategy Manager, 01788 533758
Public or Private:	Public
Report subject to Call-In:	No
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	This report relates to the following priority(ies): GROWTH AND INVESTMENT – Promote sustainable growth and economic prosperity
Statutory/Policy Background:	Planning and Compulsory Purchase Act 2004, National Planning Policy Framework, Localism Act and the Town and Country Planning Regulations 2012, National Planning Policy Framework, Rugby Borough Publication Local Plan
Summary:	The report requests that Cabinet permit the consultation of the proposed modifications as appended to this report.
Financial Implications:	An adopted Local Plan potentially unlocks funding through fees and central government funding.

- Risk Management Implications:** There are no risk management implications arising from this report.
- Environmental Implications:** Rugby Borough Local Plan has broad environmental implications.
- Legal Implications:** A local plan is a local development document for the purposes of the Council's Local Development Scheme. The Council is required to prepare and keep a Local Plan up to date.
- Equality and Diversity:** There are no equality and diversity implications for this report.
- Options:**
- 1: Approve the Main Modifications schedule for the purposes of public consultation.
- Risks: There are no risks associated with this option.
- Benefits: Consultation is required on the Main Modifications in order to progress the Local Plan and allow the Inspector to write his final report.
- 2: Do not approve the Main Modifications for the purposes of public consultation.
- Risks: The Mains Modifications are required to be subject to public consultation. As indicated in his letter without the Main Modifications the Inspector cannot conclude that the plan can be found sound and the plan would have to be withdrawn.
- Benefits: There are no benefits associated with this option.
- Recommendation:**
- 1) The Main Modifications schedule as appended to this report together with the Sustainability Appraisal Addendum and Habitat Regulation Assessment be approved for the purposes of public consultation and submission of responses to the Inspector for his consideration in writing his final report.
- 2) Delegated authority be given to the Executive Director in consultation with the Portfolio Holder to make any minor presentational, grammatical or correctional amendments to errors to the Local Plan, including those contained within the Minor Modification schedule.

3) The schedule of modifications to the Policies Map, as appended to this report be approved for the purposes of public consultation.

Reasons for Recommendation: Main Modifications are required by the Inspector to be subject to public consultation. Without them the plan cannot be found sound.

Special Cabinet – 13 August 2018

Local Plan Post Hearing Main Modifications Consultation

Report of the Development Strategy Manager

Recommendation

- 1) The Main Modifications schedule as appended to this report together with the Sustainability Appraisal Addendum and Habitat Regulation Assessment be approved for the purposes of public consultation and submission of responses to the Inspector for his consideration in writing his final report.
- 2) Delegated authority be given to the Executive Director in consultation with the Portfolio Holder to make any minor presentational, grammatical or correctional amendments to errors to the Local Plan, including those contained within the Minor Modification schedule.
- 3) The schedule of modifications to the Policies Map, as appended to this report be approved for the purposes of public consultation.

1. INTRODUCTION

The Council's Submitted Local Plan was subject to extensive Examination in Public earlier this year. The Examination Inspector, in accordance with the Planning & Compulsory Purchase Act 2004, has indicated that the plan is likely to be unsound unless the Council agrees to make certain Main Modifications to it. The purpose of this report is to seek Cabinet approval for consultation on the proposed modifications. It is anticipated that the final Local Plan will then be submitted to Council for adoption later this financial year.

2. BACKGROUND

The recently adopted Corporate Strategy states that we will promote sustainable growth and economic prosperity by adopting an ambitious Local Plan.

The Local Plan was submitted to Government on 17 July 2017 for examination in public. The Inspector appointed to examine the Local Plan then set the timetable for the hearings sessions. In setting the agenda he decided who the participants would be from those who expressed a desire to take part, in their response to the Publication consultation. The hearings took place in January and April 2018.

During the hearings, modifications to the plan were discussed and Council officers were then tasked with drafting the modifications on the close of the hearings sessions. The majority of plans require modification following examination in public and as such this is allowed for under section 20(7C) of the Planning and Compulsory Purchase Act 2004 where Main Modifications are recommended by an Inspector to make the plan sound. All

Local Plans submitted for examination in the sub region required Main Modifications to be made sound. In the instance of Nuneaton and Bedworth which has recently gained Cabinet approval for Main Modifications for the purposes of public consultation the Main Modifications totalled 174. Appendix 1 contains a total of 183 Main Modifications.

The Local Plan Inspector wrote to the Council on the 16 May 2018 with his interim conclusions. The letter is appended to this report at Appendix 2. In his letter he advised that he considered, subject to Main Modifications, the Plan is likely to be capable of being found legally compliant and sound. The Inspector has now agreed a final set of proposed modifications.

The Main Modifications appended to this report have been subject to Sustainability Appraisal (Appendix 3 – to follow) and Habitat Regulation Assessments (Appendix 4), which are available on the Local Plan page on the Council website to view. These documents will be published alongside the Main Modifications schedule and an update to the Equality Impacts Assessment for the purposes of consultation.

The appended schedule contains all Main Modifications required to make the plan sound on adoption. The most significant of these include the deletion of three of the proposed allocations, namely the proposed extension to Coton House, the proposed Main Rural Settlement at Lodge Farm and the proposed extension of the Main Rural Settlement of Brinklow. Other proposed modifications include changes to wording in policies and supporting text to make the local plan sound.

In addition to Main Modifications to the Publication Local Plan, a schedule of minor modifications has also been produced as contained in Appendix 7. Minor modifications are amendments that are not considered to materially affect the plan and as such are not required to be subject to Sustainability Appraisal, Habitat Regulation Assessment or public consultation. Both schedules were considered by the Inspector, as requested in his letter dated 16th May, before being brought for Cabinet approval on the Main Modifications. This report requests delegated authority to the Executive Director in consultation with the Portfolio Holder to make any minor presentational, grammatical or correctional amendments to the Local Plan, including those contained within the minor modification schedules. For clarity, any such correctional amendments will only be those that do not make a material change to the technical content of the Plan.

This report also seeks approval from Cabinet for the publication of the attached schedule of modifications to the Policies Maps for the purposes of consultation, as contained in Appendix 5. The Policies Map is a map which identifies allocations and designations arising from policies in the Local Plan. It is a separate document to the Local Plan and not subject to examination by the Inspector. As such any modifications to the Policies Map are contained in the separate schedule in Appendix 5.

3. NEXT STEPS

Consultation will be undertaken on the Main Modifications to the submission local plan. This incorporates the modifications as contained in examination document reference LP54 and those as instructed in the Inspector's letter dated 16 May. For clarity the consultation will be strictly limited to the proposed Main Modifications. All other matters and elements of the Plan have been the subject of extensive consultation and Examination. All consultees on the development strategy consultation database will be contacted consistent with Appendices 1 and 2 of the adopted Statement of Community Involvement,

2015. The adopted Statement of Community Involvement contains a commitment for a Consultation Strategy to be produced for each public consultation undertaken by the Council. The Local Plan Post Hearings Main Modifications Consultation Strategy is appended to this report at Appendix 6.

As with the Publication Local Plan the Development Strategy team will send all representations received to the Inspector, including a summary document of comments raised. This summary document will not include council responses to representations as it is for the Inspector to consider representations at this stage. It is anticipated that a very large number of representations will be submitted to the Council and the time required to log and summarise the representations should not be underestimated. The planned timetable for the remainder of the process is set out as follows:

- Special Cabinet Meeting Monday 13 August
- Main Modifications, SA and HRA consultation begins Tuesday 14 August
- Consultation close Friday 5 October
- Council receipt of Inspector's report TBC

The Inspector's report will set out his final conclusions on all of the main issues discussed at the hearings, taking account of the responses to the consultation on the proposed main modifications. No timetable or indication from the Programme Officer has been given as to when the Council will be in receipt of the Inspector's final report.

If, as indicated in his letter dated 16 May, the Inspector recommends in his final report that the Local Plan is found sound then the modified Local Plan will be taken to a future Full Council meeting with a recommendation for adoption, alongside the Policies Map.

Name of Meeting: Special Cabinet

Date of Meeting: 13 August 2018

Subject Matter: Local Plan Post Hearings Main Modifications Consultation

Originating Department: Growth and Investment – Development Strategy

List of Background Papers

There are no background papers relating to this item.

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Rugby Borough Local Plan – 2011-2031 – Publication Draft Table of Main Modifications

The following table sets out the proposed Main Modifications to the Publication Draft of the Rugby Borough Local Plan 2011-2031 to address soundness issues arising from the examination of the Plan.

Key

New text proposed to be added: underlined text

Text proposed to be deleted: ~~strikethrough text~~

Paragraph numbers in second column conform with the numbering of the Publication Draft Plan.

Chapter 2: Context, Vision & Objectives			
Ref	Policy/Paragraph No	Proposed Change	Reason for Change
MM1	New paragraph after 2.23 and amended key diagram.	<u>The overall strategy for managing development in the borough during the plan period is illustrated in the key diagram</u>	Additional paragraph and key diagram added to ensure the plan is consistent with national policy.

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		<p>Rugby Borough Key Diagram</p> <p>The map shows the Rugby Borough area with various land use allocations. Key features include: <ul style="list-style-type: none"> Urban Areas: Rugby Urban Area (dark grey), Coventry, Nuneaton, Warwick, and Daventry. Green Belt: A large green shaded area surrounding Rugby. Motorways: M6, M45, and M1. Railways: Indicated by dashed lines. Other Land Use: Main Rural Settlement Allocation (orange triangles), Main Rural Settlement Allocation (orange squares), and Rural Village (light grey). </p> <p>Key</p> <ul style="list-style-type: none"> Rugby Urban Area Main Rural Settlement Rural Village Urban Area Allocation Main Rural Settlement Allocation Motorway (with junction) A-Road Green Belt Railway Town or City <p>Rugby Borough Council Local Plan 2011-2031 Submission Version</p>	
Chapter 3: General Principles			
Ref	Policy/Paragraph No	Proposed Change	Reason for Change

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<p>MM2</p>	<p>Policy GP1</p>	<p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants to jointly find solutions, which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application the development plan is absent, silent, or relevant policies are out of date at the time of making the decision, then the Council will grant planning permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or specific policies in that Framework indicate that development should be restricted. 	<p>To ensure the Plan is consistent with national policy.</p>
<p>MM3</p>	<p>Paragraph 3.4</p>	<p>At the heart of the Government’s national policy on planning is a presumption in favour of sustainable development. It is described as a ‘golden thread’ running through the entire planning framework, which must be reflected in both plan-making and decision taking. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<p>To ensure the Plan is consistent with national policy in the revised NPPF.</p>
<p>MM4</p>	<p>Policy GP2</p>	<p>Main Rural Settlements</p>	<p>To ensure the settlement hierarchy is effective and consistent</p>

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	<i>[second section in table]</i>	Development will be permitted within the existing boundaries of all Main Rural settlements <u>and on allocated sites</u> .	with the development strategy of the plan.
MM5	Paragraph 3.15	3.15 Green Belt affords the greatest protection of land in planning terms. I and therefore only in very exceptional circumstances will development <u>will only be permitted in the</u> . These circumstances are determined where national policy on Green Belt allows and development will be permitted through the application of the relevant criteria as set out in national policy.	To ensure the Plan is consistent with national policy on the Green Belt.
MM6	Paragraph 3.16	3.16 The hierarchy in Policy GP2 provides a clear sequential approach to the selection of sustainable locations for <u>sustainable</u> development through the life of the Local Plan. However, there are locations that are specifically excluded from this hierarchy which could be considered as sustainable <u>accessible</u> locations for development. The administrative boundary of Rugby Borough sits very close to urban areas such as Bedworth, Nuneaton, Hinckley and Coventry in addition to existing major developed sites such as Magna Park and Daventry International Rail Freight Terminal (DIRFT). Development within the Borough that is related to these <u>urban</u> areas or sites remains contrary to the wider approach <u>spatial strategy</u> set out in this strategy <u>the Plan to focus development at Rugby and the Main Rural Settlements</u> . Therefore as any such development would not assist in achieving sustainable development focused on Rugby Town. Any such proposal would be judged on its merits in partnership consultation with the relevant neighbouring Local Planning Authority, taking account of other policies of this plan and national planning policy.	To ensure Policy GP2 is consistent with the potential locations for gypsy and traveller accommodation in Policy DS2 and with national policy.
MM7	Policy GP3	Policy GP3: Previously Developed Land and Conversions	To ensure that Policy GP3 is effective, justified and consistent with national policy.

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		<p>The Council will support the redevelopment of previously developed land <u>where proposals are compliant with the policies within this Local Plan. In particular in consideration will be given to</u> of the following:</p> <ul style="list-style-type: none"> • The visual impact on the surrounding landscape and properties; • The impact on existing services if an intensification of the land is proposed; <u>and</u> • The impact on any heritage or biodiversity assets. <p>In addition the Council will support and promote the innovative reuse of the existing building stock for social, cultural and economic purposes.</p> <p>Proposals to re-use and adapt existing buildings <u>in rural areas</u> will be permitted subject to the following criteria:</p> <ul style="list-style-type: none"> • the building is of permanent and substantial construction; • the condition of the building, its nature and location, makes it suitable for re-use or adaptation; • the proposed use or adaptation can be accommodated without extensive rebuilding; • The proposal is of a high quality and sustainable design, retaining the external and/or internal features that contribute positively to the character of the building and its surroundings; • the proposal retains and respects the special qualities and features of listed and other traditional rural buildings; and • the appearance and setting of the building following conversion protects, and where possible enhances, the character and appearance of the countryside. <p><u>Proposals which are deemed to be Permitted Development or where Prior Approval is required and granted under The Town and Country Planning</u></p>	
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		<p><u>(General Permitted Development) (England) Order 2015 (or any subsequent updates to this) do not need to comply with the provisions of GP3.</u></p> <p><u>For proposals which involve changes to historic assets or their setting, this policy should be read in conjunction with SDC3: Protecting and Enhancing the Historic Environment.</u></p> <p>When granting permission for any development under this Policy the Council will remove any permitted development rights applying to the building and its curtilage.</p>	
MM8	Policy GP4	<p>Policy GP4: Safeguarding development potential</p> <p>Planning permission will not be granted for development which would prejudice:</p> <ul style="list-style-type: none"> • The development potential of other land being realised <u>which is necessary to meet the identified development needs of the Borough, support the long term planning of the area or, including the comprehensive development of an allocated larger site;</u> • The provision of infrastructure <u>identified as necessary to support the current and future development of the Borough;</u> or • Land that is demonstrated as required for flood risk management. 	To ensure the policy is justified and effective.
MM9	Paragraph 3.21	<p>Development may prevent the potential of other land being realised. Such land may or may not be contiguous and any potential it might have could be within the period of this Local Plan, or beyond. Similarly, it may prevent the provision of important infrastructure, e.g. extensions to the drainage system and the highway network, or the implementation of other transport schemes, including pedestrian and cycle links. It may in particular hinder the achievement of appropriate mixed use developments. Such development could therefore</p>	To clarify the purpose of the policy and ensure it is effective.

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		<p>frustrate the proper planning of the <u>wider larger</u> area and a comprehensive approach to its development, which would not be consistent with the efficient use of resources. The sterilisation of areas of land can often occur with the development of ‘backland’ and areas of vacant or underused land. Where appropriate the Council will prepare briefs <u>or Masterplan Supplementary Planning Documents (SPDs)</u> to assist the comprehensive development of an area, including land allocated for development in this Local Plan.</p>	
MM10	After paragraph 3.21	<p><u>3.21a One specific example of a piece of infrastructure which may come forward in future is the Rugby Parkway Railway Station Scheme. This is being led by Warwickshire County Council with a view to ensuring that the borough has the connectivity necessary to secure the long term economic and residential development of the area, served by sustainable modes of transport. The land for the Station requires safeguarding for its future success and Policy GP4 aims to provide this protection.</u></p> <p>3.22 In deciding whether development of land could be prejudicial, account will be taken of whether nearby land is allocated for development, or could be developed in the context of existing and emerging local, regional and national planning policy. Similarly, in assessing whether the provision of infrastructure could be compromised, account will be taken of known schemes and the likelihood of other schemes being prepared, in the light of existing and emerging planning policy and other guidance.</p> <p><u>3.22a The IDP is a live document which will be updated periodically to include updates to the infrastructure required. This policy allows for protection of sites for infrastructure which may be added to the IDP after the adoption of the Local Plan.</u></p>	To clarify the purpose of the policy and make explicit reference to the Parkway station.

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<p>MM11</p>	<p>Policy GP5.</p>	<p>Policy GP5: Parish or Neighbourhood Level Documents</p> <p><u>Neighbourhood Plans</u></p> <p><u>The Council will support communities in the preparation of neighbourhood plans.</u></p> <p><u>Neighbourhood plans will need to:</u></p> <ul style="list-style-type: none"> • <u>have been through an independent examination process and have been made by Rugby Borough Council;</u> • <u>be in general conformity with the strategic policies of this Local Plan;</u> and • <u>not promote less development than is set out in this Local Plan.</u> <p><u>Once made a neighbourhood plan forms part of the Development Plan for the Borough. The planning policies contained within a made neighbourhood plan will be used alongside the policies of this Local Plan to determine decisions on planning applications. Neighbourhood plans can also help to inform the requirement and scope of development contributions associated with a planning permission.</u></p> <p><u>Parish Plans and Design Guides</u></p> <p><u>Parish Plans and design guides will need to:</u></p> <ul style="list-style-type: none"> • <u>have been endorsed by Rugby Borough Council; and</u> • <u>be in general conformity with the Local Plan.</u> <p><u>Parish Plans and Design Guides do not form part of the development plan for the Borough. They will be a material consideration in determining decisions on planning applications.</u></p>	<p>To ensure the policy is effective and consistent with the NPPF and to make clear the difference between the weight given to Parish Plans and the statutory role of Neighbourhood Plans.</p>
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		<p>Where the views of a community are expressed in a Parish or Neighbourhood Plan (or equivalent), they will be taken into account in the planning system. For the views of a community to be considered, the Parish or Neighbourhood Plan will need to:</p> <p><u>Where appropriate the Council will support communities in the preparation of:</u></p> <p><u>a) Parish Plans;</u></p> <p><u>b) Parish Design Statements, and;</u></p> <p><u>c) Neighbourhood Plans.</u></p> <p><u>The preparation of the Plans and statements will need to:</u></p> <ul style="list-style-type: none"> • <u>have been endorsed/made by Rugby Borough Council;</u> • <u>be in general conformity with the Local Plan;</u> • <u>be in conformity with national policy; and</u> • <u>be regularly reviewed and updated if necessary.</u> <p><u>Once ‘made’, Neighbourhood Plans will form part of the Development Plan. Parish Plans/Village Design statements will be a material consideration in the determination of planning applications.</u></p> <p><u>The use of Parish or Neighbourhood Plans will principally inform:</u></p> <ul style="list-style-type: none"> • <u>the determination of a planning application;</u> • <u>the requirement and scope of development contributions associated with a planning permission; and</u> • <u>the assessment of schemes in the context of a need identified through the Parish or Neighbourhood Plan</u> 	
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MM12	New paragraph to be inserted after paragraph 3.25	<u>3.25a Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. For the purposes of this all of the policies contained within this Local Plan are deemed to be strategic policies.</u>	To ensure the Plan is effective in clarifying the relationship of its policies with those in Neighbourhood Plans.
MM13	New paragraph to be inserted after paragraph 3.26	<u>3.25b Parish Plans and Design Guides do not hold as much weight in decision making as a Neighbourhood Plan. However they can be a useful tool for communities in stating their preference for the future development of their communities without the requirement to embark on a more lengthy Neighbourhood Plan process.</u>	To make clear to the weight to be attached to non-statutory parish level documents and their role within the planning process.
MM14	Deletion of paragraph 3.26	3.26 However, the production of a Neighbourhood Plan may not be the right approach for a community to establish their view for their area and a non-statutory document such as a Parish Plan (or equivalent) may be more appropriate.	This has been reworded for clarity in paragraph 3.25b
Chapter 4: Development Strategy			
Ref	Policy/Paragraph No	Proposed Change	Reason for Change
MM15	Policy DS1.	<p>Policy DS1: Overall Development Needs</p> <p>The following levels of housing and employment development will be planned for and provided within Rugby Borough between 2011 and 2031:</p> <p style="padding-left: 40px;">a) 12,400 additional homes, <u>including 2,800 dwellings to meet Coventry's unmet needs, with the following phased annual requirement:</u></p> <ul style="list-style-type: none"> • <u>Phase 1 2011-2018 540 dwellings per annum</u> 	To ensure that the Plan is positively prepared and effective in setting out the development requirements of the Plan, including Coventry's unmet needs.

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		<ul style="list-style-type: none"> • <u>Phase 2 2018-2031 663 dwellings per annum.</u> <p>b) <u>208 ha of 110ha of employment land, including 98 ha to meet Coventry’s unmet needs.</u></p> <p>All new development will be sustainable and of a high quality, fully supported by infrastructure provision and environmental mitigation and enhancement as required in the policies contained within this Plan.</p>	
MM16	Paragraph 4.7	<p>The ‘Updated Assessment of Housing Need: Coventry-Warwickshire HMA’ (September 2015) sets out the objectively assessed future housing needs of the Housing Market Area and the six local authority areas within it. The report indicates that Rugby Borough’s Objectively Assessed Housing Need (OAHN) is 480 dwellings per annum, which equates to 9,600 dwellings over the plan period. However, in recognition that Coventry City Council is unable to accommodate its housing needs in full within the City boundary, the Local Plan seeks to provide for 2,800 dwellings over the plan period towards Coventry’s housing needs. Rugby Borough Council therefore aims to meet its housing requirement by providing for a minimum of 12,400 new homes between 2011 and 2031, at an indicative rate of 620 dwellings per annum during the plan period. <u>More recent housing needs evidence (2016) has analysed the 2014-based ONS subnational population projections (SNPP) and CLG (2014-based) household projections with regard to housing need in the Coventry and Warwickshire Housing Market Area (HMA). The analysis builds on information in the September 2015 Updated Assessment of Housing Need (UAoHN) which used 2012-based projection data to underpin a number of demographic and economic scenarios – ultimately leading to conclusions about housing needs across the HMA. The analysis shows across the HMA that the more up-to-date information suggests a virtually identical level of housing need (4,237 per annum compared with 4,272 previously). This updated analysis, taking account of more recent published data, does not suggest any</u></p>	<p>To ensure the Plan is positively prepared and its OAHN justified in respect of the latest population and household projections.</p>

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		<p>fundamental differences from the analysis and conclusions as set out in the <u>UAoHN of September 2015</u>. Whilst some figures for individual local authorities change slightly, it is clear, at the HMA level that the assessed level of need in the UAoHN (and linked to 2012-based data) remains sound.</p>	
MM17	Paragraph 4.8	<p>The Rugby Borough ‘Employment Land Study’ (May 2015) concludes that 96-128 hectares of employment land is required within Rugby Borough <u>to meet Rugby’s need</u> throughout the plan period (6-8 hectares per annum). This is in order to support economic growth and balance the provision of new jobs with housing provision. Work informing the Local Plan has considered the extent of sites proposed for employment development, evidence of jobs growth forecasts and labour supply figures for the plan period, and average rates of past employment land take-up over a number of recent time periods, to provide an employment land target that aligns with the housing needs of the Local Plan. The combination of these factors has led to the target of 110 hectares of gross employment land provision; <u>to meet Rugby’s need</u> being situated within the middle range recommended in the Employment Land Study. <u>Policy DS1 also identifies the unmet employment needs of Coventry that are being met within Rugby Borough, as agreed through the Memorandum of Understanding for the employment land needs of Coventry and Warwickshire which is considered to provide an appropriate level of flexibility over employment land completions trends in both over the longer term and in more recent years.</u></p>	<p>To ensure that the Plan is positively prepared and justified in meeting and Coventry’s unmet employment land requirements.</p>
MM18	Paragraph 4.10	<p>The housing requirement included within the Local Plan will be provided in two distinct phases with different annual rates of delivery. Phase 1 of the plan period is between 2011 and the point of adoption - 20187. The annual housing target in Phase 1 is 540 dwellings per annum, reflecting the adopted target contained within the previous Development Plan - the Core Strategy, June 2011. Phase 2 of the plan period is between the point of adoption and</p>	<p>To ensure the Plan is justified and effective in respect of the annual housing requirement.</p>

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		2031, i.e. 201 87 -2031. The annual housing target in phase 2 is <u>663 654</u> dwellings per annum		
MM19	Paragraph 4.12	Dwellings constructed between 1 st April 2011 and 31 st March 201 7 <u>6</u>	<u>2577</u> 2201	To reflect updated housing monitoring data and ensure the Plan is effective in setting out its housing land supply.
		Number of permitted dwellings anticipated to be completed within between 1 st April 201 7 <u>6</u> and 31 st March 2031	5,636 <u>6505</u>	
		An allowance for windfall sites in this plan between 1 st April 201 7 <u>6</u> and March 31 st 2031	<u>630</u> 645	
		Number of dwellings required to be allocated in this plan	3918 <u>2688</u>	
		Number of allocated dwellings anticipated to be completed within the plan period	<u>5,182</u> <u>4855</u>	
		Total anticipated provision in the plan period	<u>14,567</u> <u>13,664</u>	
		MM20	Paragraph 4.13	

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		<p>this trend will continue, particularly because this Local Plan allows for development within the settlement boundary of Rural Villages (as set out in Policy GP2) and because recent changes in permitted development rights will continue to enable residential development.</p>													
MM21	Paragraph 4.14	<p>Taking account of the 2201 <u>2577</u> completions within the plan period to date, anticipated delivery on committed sites and an allowance for windfall sites, the Council needs to identify sites for an additional 2,688 <u>3,918</u> dwellings within the plan period. This Local Plan identifies sites for a potential 6,290 <u>7,995</u> dwellings and, as demonstrated in the housing trajectory, 4,855 <u>5,182</u> of these allocated dwellings are anticipated to be delivered in the plan period.</p>	<p>To reflect updated housing monitoring data and ensure the Plan is effective in setting out its housing land supply.</p>												
MM22	Paragraph 4.15	<p>The proposed allocation sites therefore put additional land into supply. As required by national policy this allows for an element of flexibility against the plan target of 12,400, in the event that some sites fail to come forward or are delivered with reduced capacities than allowed for in the Local Plan. As stated in the table at paragraph 4.12, 14,567 <u>13,664</u> dwellings are anticipated to come forward within the plan period as reflected in the housing trajectory.</p>	<p>To reflect updated housing monitoring data and ensure the Plan is effective in setting out its housing land supply.</p>												
MM23	<p>Meeting the Employment Requirement</p> <p><i>[Beneath paragraph 4.16]</i></p>	<p><u>Table showing employment completions, supply and allocations to meet Rugby's Need</u></p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th></th> <th>Gross Site Area (ha)</th> <th>Employment Type</th> </tr> </thead> <tbody> <tr> <td colspan="3">COMPLETIONS</td> </tr> <tr> <td>Central Park</td> <td>6.46 <u>2.44</u></td> <td>B1/B2/B8</td> </tr> <tr> <td>Rugby Gateway</td> <td>31.36 <u>9.5</u></td> <td>B8</td> </tr> </tbody> </table>		Gross Site Area (ha)	Employment Type	COMPLETIONS			Central Park	6.46 <u>2.44</u>	B1/B2/B8	Rugby Gateway	31.36 <u>9.5</u>	B8	<p>For the purposes of clarity and to ensure the Plan is justified and effective in setting out its employment land supply to meet both the needs of Rugby and the</p>
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		TOTAL	<u>37.82</u> 11.94		unmet needs of Coventry.
SUPPLY					
Rugby Gateway		<u>4.34</u> 26.5		B8	
Central Park		<u>3.69</u> 6.23		B1/B2/B8	
Somers Road		0.7		B1/B2/B8	
Paynes Lane		2.2		B1/B2/B8	
Europark		0.4		B1 /B2/B8	
<u>Europark Extension</u>		<u>2.93</u>		<u>B2/B8</u>	
Shilton Industrial Estate		0.5		B1/B2/B8	
<u>HTA Precision Land west of A5, CV23 0AJ</u>		3.2		B1 /B2/B8	
		TOTAL	<u>17.96</u> 39.73		
ALLOCATIONS					
Coton Park East		7.5		B1/B2/B8	
Cawston Spinney South <u>West Rugby</u>		35		B8	
Rugby Radio Station_*		16		B1/B2/B8	

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		<table border="1"> <tr> <td align="center">TOTAL</td> <td align="center">58.5</td> </tr> <tr> <td align="center">OVERALL TOTAL (rounded)</td> <td align="center"><u>114.28</u> 110</td> </tr> </table> <p><u>Table showing employment completions and supply to meet Coventry's unmet need.</u></p> <table align="right"> <tr> <td></td> <td align="center"><u>Gross Site Area (ha)</u></td> </tr> <tr> <td align="center"><u>COMPLETIONS & SUPPLY</u></td> <td></td> </tr> <tr> <td><u>Ansty Park</u></td> <td align="center"><u>41</u></td> </tr> <tr> <td><u>Former Peugeot Site, Ryton</u></td> <td align="center"><u>57</u></td> </tr> <tr> <td align="center"><u>OVERALL TOTAL</u></td> <td align="center"><u>98</u></td> </tr> </table>	TOTAL	58.5	OVERALL TOTAL (rounded)	<u>114.28</u> 110		<u>Gross Site Area (ha)</u>	<u>COMPLETIONS & SUPPLY</u>		<u>Ansty Park</u>	<u>41</u>	<u>Former Peugeot Site, Ryton</u>	<u>57</u>	<u>OVERALL TOTAL</u>	<u>98</u>	
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MM24	Paragraph 4.17	It is expected that delivery of the employment land target <u>to meet Rugby's need</u> will deliver a forecast jobs growth of 6,729 FTE B use class jobs for the 2011-2031 plan period, as outlined in the Employment Land Study.	For clarity and to ensure the employment target in the Plan is justified against the evidence.														
MM25	Paragraph 4.18	The growth forecast, indicated at paragraph 4.17, which applies standard employment densities and plot ratios as set out in the Employment Land Study, creates a net land requirement for 79 hectares of employment land. However, in forming the employment land target to identify how much land to allocate in the Local Plan, a margin of 31 hectares has been added to achieve <u>past take up rates have been considered to inform</u> the 110 hectare target <u>to meet Rugby's need</u> . The addition of this margin provides a target (equating to just below 7 hectares per annum for the remainder of the plan	For clarity to ensure the employment land target is justified.														

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		period) that aligns with the Employment Land Study recommendation that 6 – 8 hectares of employment land per annum should be provided for in the period to 2031.													
MM26	Policy DS2	<p>Policy DS2: Sites for Gypsy, Travellers and Travelling Showpeople</p> <p>The Council will allocate land <u>in a separate Gypsy and Traveller Site Allocations DPD to accommodate meet the requirements for gypsy, travellers and travelling showpeople’s accommodation</u> as identified by the Gypsy and Traveller Accommodation Assessment (GTAA) 2014 <u>2017</u>, where compliant with <u>the definitions in Annex 1 of the Planning Policy Traveller Sites (PPTS)</u>. The GTAA will be updated on a regular basis and as such the pitch allocations requirements will be updated through the GTAA process.</p> <p>The requirements identified in the GTAA 2014 <u>2017</u> are as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Timeframe</th> <th>Total required pitch provision</th> </tr> </thead> <tbody> <tr> <td>2014/15 to 2018/19</td> <td style="text-align: center;">24 <u>+5 in transit</u></td> </tr> <tr> <td>2019/20 to 2023/24 <u>2017 to 2022</u></td> <td style="text-align: center;">18 <u>35</u></td> </tr> <tr> <td>2024/25 to 2028/29 <u>2022 to 2027</u></td> <td style="text-align: center;">15 <u>12</u></td> </tr> <tr> <td>2029/30 to 2033/34 <u>2027 to 2032</u></td> <td style="text-align: center;">8 <u>14</u></td> </tr> <tr> <td style="text-align: center;">Total</td> <td style="text-align: center;">65 <u>61</u></td> </tr> </tbody> </table> <p>If necessary, the pitch provision outlined above will be updated following review of the GTAA against the update to the PPTS. This update will be used as</p>	Timeframe	Total required pitch provision	2014/15 to 2018/19	24 <u>+5 in transit</u>	2019/20 to 2023/24 <u>2017 to 2022</u>	18 <u>35</u>	2024/25 to 2028/29 <u>2022 to 2027</u>	15 <u>12</u>	2029/30 to 2033/34 <u>2027 to 2032</u>	8 <u>14</u>	Total	65 <u>61</u>	To update following the production of the new 2017 GTAA and ensure it is positively prepared, effective and consistent with national policy in meeting the accommodation needs of gypsies and travellers in the borough over the plan period.
Timeframe	Total required pitch provision														
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Total	65 <u>61</u>														

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		<p>evidence in the identification and allocation of land for sites for pitches in the Gypsy and Traveller Site Allocations DPD and in the determination of applicable planning applications.</p> <p>In assessing the suitability of sites <u>for allocation</u> for residential and mixed use occupation by Gypsies, Travellers and Travelling Showpeople, and for the purposes of considering planning applications for such sites, proposals will be supported where the following criteria are met:</p> <ul style="list-style-type: none"> • The site is cumulatively appropriate and proportionate to the nearest settlements, its local services and infrastructure; • The site affords good access to local services such as schools and health facilities; • The site is not at risk from flooding <u>satisfies the sequential and exception tests for flood risk and is not</u> adjacent to uses likely to endanger the health of occupants such as a refuse tip, sewage treatment works or contaminated land; • The development is appropriate in scale compared with the size of the existing settlement <u>or nearby settlements</u>; • The development will be able to achieve a reasonable level of visual and acoustic privacy both for people living on the site and for those living nearby; • The development has appropriate vehicular access; • The development will <u>comply with Policy SDC1 in respect of design and impact on the surrounding area and amenity of existing residents</u>; provide a high quality frontage onto the street which maintains or enhances the street scene and which integrates the site into the community; • The development will be well-laid out to provide adequate space and privacy for residents; • The development will include appropriate landscape measures to avoid mitigate visual impacts and to ensure adequate levels of privacy and residential amenity for occupiers and adjacent occupiers 	
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		<p>but which avoids enclosing a site with an inappropriate amount of hard landscaping, high walls or fences;</p> <ul style="list-style-type: none"> • The development should not accommodate non-residential uses that may cause, by virtue of smell, noise or vibration, significant adverse impact on neighbouring business or residents; <u>and</u> • Adequate provision for on-site services for water supply, power, drainage, sewage and waste disposal facilities; <u>and</u> • The development complies with the other relevant policies in this Local Plan. 	
MM27	Paragraph 4.20	<p>The level of need to be contained within DS2, once adopted, will be informed by the Gypsy and Traveller Accommodation Assessment 2014. However, at the time of writing this Publication Draft, the GTAA predates the recent changes to the Planning Policy for Traveller Sites (PPTS), specifically in relation to the definition of Gypsy and Traveller.</p>	To update the Plan and ensure is justified and based on appropriate evidence following the production of the new 2017 GTAA.
MM28	Paragraph 4.21	<p>For the purposes of the PPTS the definition of “gypsies and travellers” at Annex 1 is <u>was</u> updated so that it reflects those “who lead a genuine travelling lifestyle”. <u>The latest version of the Gypsy and Traveller Accommodation Assessment (GTAA) (2017) has been produced in line with the definitions of gypsies and travellers as set out in the 2015 PPTS. As such the Council will take a view on the GTAA completed in 2014 as to whether it is consistent with the revised PPTS.</u> The assessment took into account current pitch need and demand, as well as future need, and was based on modelling of data as advocated by ‘Gypsy and Traveller Accommodation Assessment Guidance’ (DCLG, 2007). If the evidence is deemed to be out of date the Council will take a view as to the merits of updating the GTAA to inform Policy DS2 in meeting the Council’s obligation to comply with this statutory requirement.</p>	To update following the production of the new 2017 GTAA.

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<p>MM29</p>	<p>After paragraph 4.22</p>	<p><u>4.22a The Council is committed to the adoption of a Gypsy and Traveller Site Allocations Development Plan Document (DPD) in line with the Local Development Scheme. The Council has commenced the evidence gathering to inform the DPD, including a Strategic Housing Land Availability Assessment. Very few sites were submitted through the call for sites as part of the Local Plan process. Of these none were deemed to be suitable. The production of the Gypsy and Traveller DPD will ensure the Council can fully assess the options for meeting the identified need and therefore be able to better meet the aims of the PPTS.</u></p> <p><u>4.22b It is acknowledged that putting in place a strategy to meet the need for Gypsies and Travellers in a separate DPD is not in line with the aims of the PPTS which requires the identification of a supply of specific deliverable and developable sites to meet targets for the first ten years of the plan period to be included within the Local Plan. The PPTS also sets out policies on Traveller sites within the Green Belt making clear that releasing land from the Green Belt should be done through the plan-making process and that this should only be done in exceptional circumstances.</u></p> <p><u>4.22c However, given the extent of Green Belt, and the location of existing sites in the borough, the recommendations of the GTAA will be utilised in identifying sites for allocation through the DPD. This includes the expansion of existing Gypsy and Traveller sites and the creation of new small sites, as demonstrated to be the preference for Gypsy and Traveller communities. If the assessment of site options to meet the need for Gypsy and Traveller accommodation indicates the need to release land from the Green Belt to allow for the expansion of existing sites or the creation of new sites, the Council will consider whether there are exceptional circumstances to justify this via a partial review of the Local Plan including Policy DS2 to be published alongside the DPD.</u></p>	<p>To ensure the Plan is positively prepared in seeking to meet the accommodation needs of the travelling community through a Gypsy and Travellers DPD.</p>
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<p>MM30</p>	<p>After paragraph 4.22</p>	<p><u>4.22d While the forthcoming Gypsy and Traveller Site Allocations DPD will look to identify sites to meet the identified need for pitches up to 2031, there is potential to meet some of this need from existing sites, in particular the identified shortfall over the first 5 years of the plan. At June 2017, according to the 2017 GTAA, there were a total of 123 pitches across the Borough. Of these, 16 were unauthorised (where temporary permission has lapsed), 5 have temporary permission, 8 are classed as potential pitches which are currently unoccupied but could be occupied within the next 5 years and 3 are vacant. A further 18 pitches were occupied by non- gypsies and travellers. All of the existing pitches are situated within the Green Belt.</u></p> <p><u>4.22e This means that over the next 5 years there are 11 pitches that could become available (8 potential pitches and 3 vacant). Additionally many of the unauthorised and temporary permissions may be renewed or made permanent. Additional permissions may be granted for new sites or extensions to existing sites which come forward, either as temporary or permanent permissions, subject to conforming with the criteria in policy DS2 and taking into account any other material considerations, including the PPTS. Where these are in the Green Belt very special circumstances will have to be demonstrated.</u></p>	<p>To ensure the Plan is effective in identifying a 5 year supply of Gypsy and traveller sites.</p>
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MM31	Policy DS3	<p>Policy DS3: Residential allocations</p> <p>The following sites will be allocated for residential development and associated infrastructure and uses as shown on the Proposals <u>Policies</u> Map:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 10%;">Ref</th> <th style="width: 60%;">Site Name</th> <th style="width: 30%;">Dwellings</th> </tr> </thead> <tbody> <tr> <td colspan="3">Rugby Urban Edge</td> </tr> <tr> <td>DS3.1</td> <td>Coton House</td> <td>Up to 100</td> </tr> <tr> <td>DS3.21</td> <td>Coton Park East (see Policy DS7)</td> <td>Up to <u>Around</u> 800</td> </tr> <tr> <td>DS3.32</td> <td>Rugby Gateway*</td> <td>Up to <u>Around</u> 1300</td> </tr> <tr> <td>DS3.43</td> <td>Rugby Radio Station*</td> <td>Up to <u>Around</u> 6200</td> </tr> <tr> <td>DS3.54</td> <td>South West Rugby (see Policies DS8 and DS9)</td> <td>Up to <u>Around</u> 5000</td> </tr> <tr> <td colspan="3" style="padding-top: 10px;">*planning permission granted and under construction</td> </tr> <tr> <td colspan="3">Main Rural Settlements</td> </tr> <tr> <td>DS3.65</td> <td>Land at Sherwood Farm, Binley Woods</td> <td>Up to <u>Around</u> 62 <u>75</u></td> </tr> <tr> <td>DS3.7</td> <td>Land off Lutterworth Farm, Brinklow</td> <td>Up to <u>Around</u> 100</td> </tr> <tr> <td>DS3.86</td> <td>Land North of Coventry Road, Long Lawford</td> <td>Up to <u>Around</u> 1500</td> </tr> </tbody> </table>	Ref	Site Name	Dwellings	Rugby Urban Edge			DS3.1	Coton House	Up to 100	DS3.2 1	Coton Park East (see Policy DS7)	Up to <u>Around</u> 800	DS3.3 2	Rugby Gateway*	Up to <u>Around</u> 1300	DS3.4 3	Rugby Radio Station*	Up to <u>Around</u> 6200	DS3.5 4	South West Rugby (see Policies DS8 and DS9)	Up to <u>Around</u> 5000	*planning permission granted and under construction			Main Rural Settlements			DS3.6 5	Land at Sherwood Farm, Binley Woods	Up to <u>Around</u> 62 <u>75</u>	DS3.7	Land off Lutterworth Farm, Brinklow	Up to <u>Around</u> 100	DS3.8 6	Land North of Coventry Road, Long Lawford	Up to <u>Around</u> 1500	<p>To ensure the residential allocations are justified in relation to the capacity of sites and are consistent with national policy in delivering sustainable development.</p>
Ref	Site Name	Dwellings																																					
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		<p>DS3.97 Leamington Road, Ryton on Dunsmore**</p> <hr/> <p>DS3.108 The Old Orchard, Plott Lane, Stretton on Dunsmore</p> <hr/> <p>DS3.119 Land Off Squires Road, Stretton on Dunsmore 2</p> <hr/> <p>DS3.1210 Linden Tree Bungalow, Wolston Lane, Wolston</p> <hr/> <p>DS3.1311 Land at Coventry Road, Wolvey</p> <hr/> <p>DS3.1412 Wolvey Campus, Leicester Road, Wolvey</p> <hr/> <p>** Implementation of site allocation DS3.97 can only occur when adequate replacement of <u>the pitch provision and training facility is has been made</u> to the satisfaction of Rugby Borough Council and Sport England <u>and</u> in accordance with national planning policy.</p> <p><u>Garden Village New Main Rural Settlement</u></p> <hr/> <p>DS3.1513 Lodge Farm, Daventry Road (See Policy DS10) <u>Up to 1500</u></p> <hr/>	<p>Up to Around 75</p> <hr/> <p>Up to Around 25</p> <hr/> <p>Up to Around 50</p> <hr/> <p>Up to Around 15</p> <hr/> <p>Up to Around 15</p> <hr/> <p>Up to Around 85</p>	
MM32	Paragraph 4.25	As stated, Rugby town is the most sustainable location for growth in Rugby Borough and this plan therefore seeks to maximise the potential of the urban area and land immediately adjacent to it to accommodate growth. Policy DS3	To accord with amended DS3 and deleted policy DS10.	

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		is supported by further detailed site allocations for <u>two three</u> of the <u>five four</u> largest allocations (Policies DS7, <u>and DS8, and DS10</u>);	
MM33	Paragraph 4.27	Two One sites to the north of Rugby represents <u>a</u> further opportunity for sustainable expansion. The redevelopment of the Coton House site commenced in 2015 and the further allocation at this site will provide an extension to the existing approved development. Given the commencement of works on site it is anticipated that delivery in this area will take place in the first five years post adoption of the Local Plan.	To ensure the supporting text is consistent with the deletion of Coton House.
MM34	Paragraph 4.30	Whilst not allocated for development, land has been removed from the Green Belt on the Rugby Urban Edge. Land at Brownsover Road is not considered to serve the purposes of the Green Belt and this designation has therefore been removed and the Green Belt boundary amended accordingly, as shown on the Proposals Map.	There are no exceptional circumstances to justify the release of this site from the Green Belt, therefore paragraph should be deleted to ensure consistency with NPPF
MM35	Paragraph 4.31	The settlement hierarchy contained within Policy DS3 allows for development within the settlement boundaries of Main Rural Settlements. The allocations made in Policy DS3 will result in an alteration to the settlement boundaries of 7 <u>6</u> of the 9 Main Rural Settlements in the Borough in order to allow these settlements to play a supplementary role to Rugby town in helping to deliver the strategic growth targets for the Borough.	To make clear the number of settlement boundaries being changed following the deletion of the proposed Brinklow allocation.
MM36	After Paragraph 4.32	<u>Consideration must also be given to the design of the sites taking account of, amongst other issues, their historic environment (as highlighted within the Heritage Assessment Review and any subsequent assessments as part of a</u>	To reflect national planning policy

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		planning application) and natural environment, in line with the policies contained within this Plan.	
MM37	Paragraph 4.34	<p>Garden Village</p> <p>The Strategy for distributing housing development across the Borough, contained in Chapter 3, is based on the need to maximise housing delivery at Rugby town as the most sustainable location in the Borough and sustainably extend <u>some</u> Main Rural Settlements. In achieving this, smaller rural villages are protected from excessive development that would be harmful to their respective character and function, but in order to meet the overall housing requirement for the Borough further development is required. The provision of a new garden village, settlement that will later be classified as a Main Rural Settlement, provides an appropriate and effective means of meeting those needs during the current plan period and beyond.</p>	To reflect the deletion of the Lodge Farm allocation from the Plan, which has been made to ensure the Plan consistent with national policy.
MM38	Paragraph 4.35	<p>Such an approach is acknowledged in the National Planning Policy Framework (NPPF), which states that ‘the supply of new homes can sometimes be best achieved through planning for larger scale developments, such as new settlements that follow the principles of Garden Cities.’ (See NPPF Para 52)</p>	To reflect the deletion of the Lodge Farm allocation from the Plan, which has been made to ensure the Plan consistent with national policy.
MM39	Paragraph 4.36	<p>The size of the garden village allocation reflects the amount of development necessary to ensure that the viable delivery of the levels of infrastructure required to ensure the new settlement is self-sustaining and sustainable. More detail about the allocation is provided in Policy DS10</p>	To reflect the deletion of the Lodge Farm allocation from the Plan, which has been made to ensure the Plan consistent with national policy.

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MM40	Paragraph 4.37	<p>The urban boundary and some Main Rural Settlement boundaries have been altered in order to accommodate housing allocations and this has therefore released land from the Green Belt. The adoption of this Local Plan and the Proposals Map has also released land at M6 Junction 2 from the Green Belt, as evidenced by the Coventry and Warwickshire Joint Green Belt Review 2014.</p>	<p>There are no exceptional circumstances to justify the release of this site from the Green Belt, therefore proposal should be deleted to ensure consistency with NPPF</p>
MM41	Policy DS5	<p>Policy DS5: Comprehensive Development of Strategic Sites</p> <p>Proposals for the development of strategic sites of over 100 dwellings should be supported with information outlining how the specific characteristics of each site have been considered in the masterplanning, design and viability assessments of proposals.</p> <p>More specifically, proposals for strategic sites must include:</p> <ul style="list-style-type: none"> • Provision of and/or connection to a direct, high quality public transport link between the site and key transport hubs such as railway stations and the town centre; • Provision of and/or connection to a comprehensive cycle network to link residential areas with the key on-site facilities, such as schools and community buildings, and comprehensive connections to existing adjacent developed areas; • Further on-site and off-site measures to mitigate transport impact as detailed in the Infrastructure Delivery Plan, including access to the local road network as deemed necessary through the Transport Assessment and agreed by Warwickshire County Council and the Highways Agency; 	<p>To ensure the Plan is consistent with national policy on Housing Standards and to avoid duplication with Policies SDC1 and SDC4.</p>

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		<ul style="list-style-type: none"> • Provision of and/or contribution to community facilities such as schools, community buildings and sports facilities; • Comprehensive onsite Green Infrastructure Network, utilising existing habitats where possible, which links to adjacent networks; • An assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation. <p>The specific characteristics of each site will determine how these requirements will be met. This will be influenced by constraints, and the masterplanning, design and viability, where relevant policies in this Local Plan apply.</p> <ul style="list-style-type: none"> • Further onsite requirements are determined through the application of other relevant policies in this Local Plan. 	
MM42	Policy DS6	<p>Policy DS6: Rural Allocations</p> <p>This Policy will be applied to all detailed proposals relating to sites DS3.65 to DS3.1412 allocated by Policy DS3.</p> <p>Proposals for the development of rural allocations should be supported with information outlining how the specific characteristics of each site have been considered in the masterplanning, design and viability assessments of proposals.</p> <p>More specifically, proposals for rural housing sites allocated through this Local Plan must make specific consideration <u>provision</u> for the following:</p> <ul style="list-style-type: none"> • The appropriate treatment of Green Belt boundaries, where relevant, limiting the impact of the development on the Green Belt; • Density of development sympathetic to the settlement to which it will extend; • The provisions of any relevant Neighbourhood Plans in place, or extensive community engagement during the development of proposals where no Neighbourhood Plan is in place; 	<p>To ensure Policy DS6 is effective in securing sustainable development at the Main Rural Settlements and consistent with national policy in respect of the protection of heritage.</p>

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		<ul style="list-style-type: none"> • Provision, where opportunities are present, of links to existing pedestrian and cycle paths with the adjacent settlement; • Provision, where opportunities are present, for a comprehensive onsite Green Infrastructure Network, utilising existing habitats, where possible linking to adjacent networks; • Provision of and/or contribution to community facilities such as schools, community buildings and sports facilities; <u>public transport improvements and open space by means of planning obligations;</u> • Provision and/or improvement to telecommunications infrastructure, including broadband and mobile telephone services; • <u>Provision for appropriate design of the site to reflect any relevant historic environment offsite considerations.</u> <p>Further onsite <u>and offsite</u> requirements are determined through the application of other relevant policies in this Local Plan <u>and reference to Policy D4 and the Planning Obligations SPD.</u></p>	
MM43	Paragraph 4.44	Through Policy DS3, this Local Plan allocates housing sites on the edge of seven <u>six</u> Main Rural S ettlements. Although there will be commonalities with the urban extensions in how they are delivered, specific consideration is needed to address the rural location and Green Belt boundaries of each site.	To reflect the deletion of the site at Brinklow.
MM44	Policy DS7	<p>Policy DS7: Coton Park East</p> <p>This development site, as shown on the <u>Policies Proposals</u> Map, is allocated to provide <u>around</u> 800 dwellings and 7.5 ha employment land.</p> <p><u>Proposals for development within the allocation site should accord with the Coton Park East Masterplan SPD.</u></p>	In order to ensure comprehensive development, that the plan has been positively prepared to meet the development and infrastructure requirements of the borough and that it is

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		<p>Employment development at this location will <u>should</u> be provided to meet the qualitative demand for smaller units in the range of 5,000 – 50,000 sq. ft, in B1c, B2 and ancillary B8 employment uses.</p> <p><u>Within the locations identified in the Coton Park East Masterplan SPD, provision of the following facilities must be made:</u></p> <p>The development of the sustainable urban extension will be supported by the provision of:</p> <ul style="list-style-type: none"> • A local centre that contains a one form entry primary school, with flexibility to increase to two form entry if demonstrated necessary and land provision for fire and rescue as set out in the Infrastructure Delivery Plan (IDP); • <u>A local centre that contains one form entry primary school, with the flexibility to increase to two form entry if demonstrated necessary. This may be provided as part of an all-through school if the need for a secondary school on site is deemed to be necessary;</u> • A comprehensive Green Infrastructure Network, which protects, enhances and links into adjacent networks and utilises existing habitats where possible, particularly those present at the disused Great Central Railway local nature reserve; • Further on-site and off-site measures to mitigate transport impact as detailed in the Infrastructure Delivery Plan, including access to the local road network as deemed necessary through the Transport Assessment and agreed by Warwickshire County Council and Highways England; • Provision of a direct, high quality public transport link between the site, the railway station and the town centre; • Provision of a comprehensive cycle network to link residential areas with key on-site facilities and to service centres and community facilities located in existing adjacent development areas; 	<p>consistent with national policy in enabling the delivery of sustainable development.</p>
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		<ul style="list-style-type: none"> • An assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation. <p><u>Secondary school provision for Coton Park East is to be provided off-site through the expansion of existing secondary schools in Rugby to which a financial contribution will be required to provide for the school places generated by the development and pupil transportation. However, in order to safeguard provision for the eventuality that the capacity is not available at existing schools, an 8.5ha parcel of land is to be reserved on site for a combined primary and secondary school. The location of this parcel of land has been identified on the policies map. The 8.5ha parcel will be reserved for a period of 24 months from the date of Local Plan adoption. After this time if the local planning authority does not require the land for a secondary school the land will be released for provision of the primary school and for residential use.</u></p> <p><u>Further onsite and offsite infrastructure requirements are will be determined through the application of other policies in this Local Plan and in line with the requirements set out in the IDP.</u></p>	
MM45	Policy DS8	<p>A new neighbourhood of up to 5,000 dwellings and 35 ha of B8 employment land will be allocated <u>on</u> at land to the South West of Rugby, as delineated on the Proposals <u>Policies</u> Map.</p> <p>Proposals within this allocation must be built out in accordance with the South West Rugby Masterplan SPD.</p> <p><u>Provision of the following onsite services and facilities will be made within a new mixed-use district centre as indicated in the South West Rugby Masterplan Supplementary Planning Document (SPD): must be made within the four local centres as identified in the South West Rugby Masterplan SPD, and as follows:</u></p>	To ensure that Policy DS8 is positively prepared and is consistent with national policy by incorporating the necessary infrastructure requirements and mitigation measures for SW Rugby to secure the

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		<ul style="list-style-type: none"> • <u>A convenience store (Use Class A1) plus other retailing (Use Class A1 to A5) with residential or office uses provided on upper floors;</u> • <u>A 3 GP surgery, rising to 7 GP surgery, as detailed in the IDP;</u> • <u>Provision for a Safer Neighbourhood Team, as detailed in the IDP;</u> <p><u>Within the locations identified in the South West Rugby Masterplan SPD, provision of the following facilities must be made:</u></p> <ul style="list-style-type: none"> • Provision for at least one <u>One secondary school, to be co-located with a two form entry primary school, as detailed in the IDP, located alongside community facilities within the district centre;</u> • A further two <u>three primary schools, each to be two form entry, with at least one rising to three form entry, as deemed necessary by Warwickshire County Council-WCC Education, as detailed in the IDP;</u> • A 3 GP surgery, rising to 7 GP surgery, as detailed in the IDP; • Provision for a Safer Neighbourhood Team, with associated onsite facilities, as detailed in the IDP; • <u>Other local facilities, as informed by the Masterplan SPD, to be located in appropriate sustainable locations which are outside the district centre; and</u> • <u>Land for an onsite fire and rescue provision, as detailed in the IDP, must be made within the South West Rugby allocation.</u> <p><u>The site must also contain comprehensive sustainable transport links provision that integrates with existing networks and provides good connectivity within the development and to the surrounding area including:</u></p> <ul style="list-style-type: none"> • <u>An all traffic spine road network, as identified allocated in Policy DS9, the Masterplan SPD and Proposals Policies-Map,</u> 	<p>delivery of sustainable development.</p>
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		<p>connecting the site to the existing highway network, phased according to milestones identified through the IDP;</p> <ul style="list-style-type: none"> • Provision of a comprehensive walking and cycling network to link residential areas with the key facilities on the site, such as schools, health centres and <u>retail services</u> food stores; • High quality public transport services to Rugby town centre; and • Further on-site and off-site measures to mitigate transport impact as detailed in the IDP, including access to the local and <u>strategic</u> road network as deemed necessary through the <u>Strategic</u> Transport Assessment and agreed by Warwickshire County Council (WCC) and Highways England. These measures will take account of the proposals within the IDP. as they evolve. <p>In addition to these requirements, proposals must:</p> <ul style="list-style-type: none"> • Include a comprehensive Green Infrastructure Network that links to existing adjacent networks utilising existing habitats and historic landscape, in particular Cawston Spinney; • <u>Incorporate a continuous Green and Blue infrastructure corridor, as part of the wider allocation, identified in the GI Policies Map, linking to adjacent networks and utilising existing and potential habitats and historic landscape, in particular between Cawston Spinney and Cock Robin Wood;</u> • <u>Specifically regarding the wider Cawston Spinney, Provide a Woodland Management Plan setting out how woodland within the boundaries of the allocation, in particular Cawston Spinney, will be protected from potential adverse impacts of new development, including details of a comprehensive 30m buffer in accordance with Natural England’s standing advice on Ancient Woodland and</u> 	
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		<p>Veteran trees. must be identified and maintained through proposals made in the allocation;</p> <ul style="list-style-type: none"> • Include an assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation • <u>Specifically regarding the employment allocation to incorporate design and landscaping measures including structural landscaping to mitigate the impacts of the buildings on the surrounding landscape and setting of any nearby heritage and GI assets, including Thurlaston Conservation Area;</u> • <u>Not lead to a further deterioration of existing air quality, including within the Air Quality Management Area due to cumulative effects on the Rugby Town centre gyratory; and</u> • <u>Incorporate details of phasing and trigger levels for the provision of required infrastructure consistent with this policy, Policy DS9, the IDP and the Masterplan SPD.</u> <p>Development proposals shall respect and maintain the a physical and visual separation of <u>between</u> Rugby town and Dunchurch to <u>prevent coalescence and protect their individual character and identity. A significant buffer between Rugby and Dunchurch, which incorporates a Green Infrastructure Corridor from Cock Robin Wood to Cawston Spinney, as identified in the South West Rugby Masterplan SPD, must form an integral part of proposals for the site.</u></p> <p>Further onsite requirements are determined through the application of other relevant policies in this Local Plan.</p> <p>Development proposals <u>within the South West Rugby allocation</u> must come forward comprehensively and <u>also</u> be in accordance with the South West Rugby Masterplan SPD, Policy DS9 below, the <u>Policies proposals</u> Map, and the Infrastructure Delivery Plan. Rugby Borough Council will not support ad hoc <u>or</u></p>	
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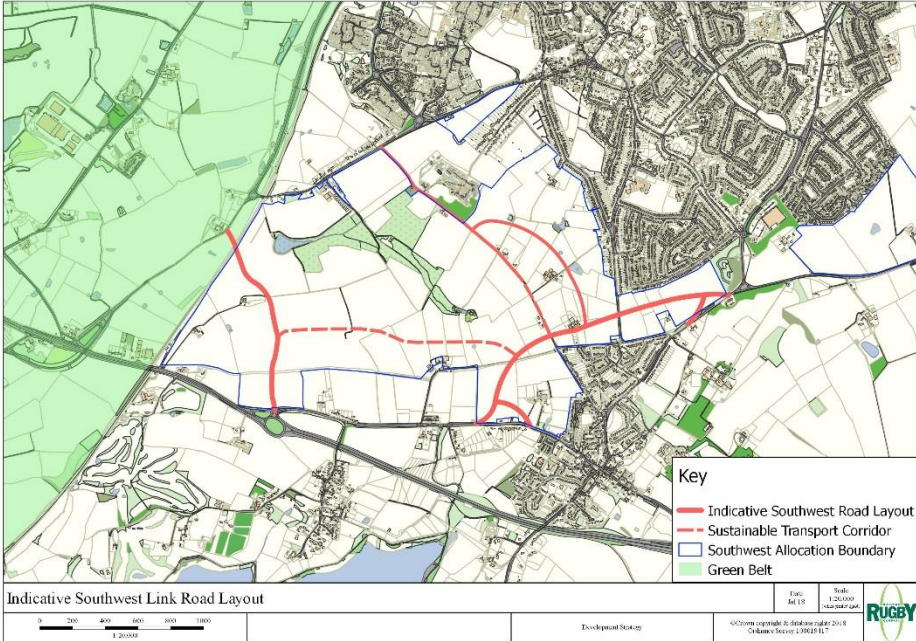
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		<p><u>piecemeal development which is contrary to the achievements aims of this Policy, or development that is inconsistent with the Masterplan for the site.</u></p> <p><u>Development proposals will require consultation with the Local Lead Flood Authority, in order to identify any potential hydrological mitigation, particularly with regard to potential hydrological impacts on Draycote Meadow SSSI.</u></p>	
MM46	Paragraph 4.53	<p>It is not expected that the site will be delivered through one single overarching outline permission, but rather by several different landowners and promoters submitting separate applications and all promoters very much see the value in working together to bring forward the South West Rugby development through a comprehensive and integrated scheme. To this end, and in partnership with the Borough Council and relevant stakeholders and service providers, a framework masterplan has been produced, as identified in the South West Rugby Masterplan SPD, which will inform all future applications for the site.</p>	To ensure the policy is effective.
MM47	Paragraph 4.56	<p>Policy DS8 also notes the requirement to provide appropriate community services and facilities of the urban extension in order to deliver a range of benefits. It is important that such services are planned as an integral part of development and are provided prior to significant occupation of the development in order to ensure that existing services in adjacent developed areas are not over-burdened. The location of local <u>facilities and services centres</u> must be consistent with the locations identified in the South West Rugby Masterplan SPD, which has been created in consultation with Warwickshire County Council to ensure that <u>schools services</u> are well distributed throughout the site for future residents.</p>	To ensure the policy is effective.
MM48	Paragraph 4.57	<p>4.57 Cawston Spinney is located in the middle of the site. This is formed of the Cawston Spinney, Fox Covert and Boat House Spinney and includes an area of ancient woodland. Although there are existing footpaths through this area, which are popular for walking, it is important that proposals</p>	To ensure the Plan is consistent with national policy and guidance regarding the

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		<p>demonstrate that development will not cause damage to this valuable asset. Therefore any development of the urban extension will need to safeguard existing valuable habitat and provide the appropriate extent of buffer to protect this green asset. This must take into consideration of the relevant Forestry Commission <u>Natural England</u> standing advice on Ancient Woodland and Veteran Trees, in consultation with Rugby Borough Council Parks and Grounds. <u>A Woodland Management Plan, details of which will also be included within the South West Rugby Masterplan SPD, will be required for the site. Relevant planning applications should use this management plan as a means of compliance with Policy DS8 and Policy NE1 regarding protection of ancient woodland and veteran trees.</u></p>	<p>protection of the woodland asset within the SW Rugby allocation.</p>
MM49	Paragraph 4.60	<p>4.60 The site is a long term commitment for the Council in meeting the growth needs of the Borough and will continue to be built out beyond the life of this Local Plan. Once built, it will create a new community within Rugby and it is thus important for the Borough Council and developers of the site to do this to the highest standard possible. An essential element of this is sustainability and the balance of housing to jobs, and as such there is the potential for the growth targets of housing and employment to be revisited as a result of changing demands for the Borough as it moves beyond the 2031 period. <u>As such an area of land is safeguarded with the South West Rugby allocation, as identified in the Policies Map to assist in meeting the borough's development needs beyond 2031.</u></p>	<p>To ensure the policy is effective.</p>
MM50	Paragraph 4.62	<p>The South West Rugby Masterplan SPD will contain the framework masterplan that will secure the comprehensive development of the site, including detail about the phasing of development and infrastructure delivery across the site. <u>Planning applications for development within the allocation area must be consistent with the content of the Masterplan SPD. A draft of that SPD will be available as part of the publication consultation on this Publication Draft document.</u></p>	<p>To ensure the policy is effective</p>

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<p>MM51</p>	<p>DS9 South West Rugby Spine Road Network Map</p>	 <p>The map displays the South West Rugby area with various planning boundaries and road layouts. A red line indicates the 'Indicative Southwest Road Layout', a dashed red line shows the 'Sustainable Transport Corridor', a blue outline marks the 'Southwest Allocation Boundary', and green shaded areas represent the 'Green Belt'. A scale bar at the bottom left shows distances up to 1800 meters. A key in the bottom right corner defines the symbols. Below the map, there is a title 'Indicative Southwest Link Road Layout', a scale of 1:20,000, and a date of July 18. The Rugby Borough Council logo is also present.</p>	<p>To ensure the Plan is justified in respect of the updated Strategic Transport Assessment evidence and further work between RBC and site promoters in development of South West Rugby Masterplan SPD.</p>
<p>MM52</p>	<p>Policy DS9</p>	<p>Policy DS9: South West Rugby Spine Road Network Road</p> <p>The Borough Council will allocates land to facilitate the full alignment of the South West Rugby spine road network to support and enable the delivery of the South West Rugby allocation, as identified on the plan below and <u>Urban Proposals Policies Map</u>.</p> <p>No <u>d</u> <u>e</u> <u>v</u> <u>e</u> <u>l</u> <u>o</u> <u>p</u> <u>m</u> <u>e</u> <u>n</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> 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<u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> <u>l</u> <u>i</u> <u>v</u> <u>e</u> <u>r</u> <u>o</u> <u>f</u> <u>t</u> <u>h</u> <u>i</u> <u>s</u> <u>i</u> <u>n</u> <u>f</u> <u>r</u> <u>a</u> <u>c</u> <u>t</u> <u>u</u> <u>r</u> <u>e</u> <u>l</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>n</u> <u>g</u> <u>o</u> <u>i</u> <u>n</u> <u>g</u> <u>o</u> <u>r</u> <u>w</u> <u>o</u> <u>r</u> <u>k</u> <u>h</u> <u>i</u> <u>s</u> <u>l</u> <u>i</u> <u>k</u> <u>e</u> <u>l</u> <u>y</u> <u>l</u> <u>y</u> <u>p</u> <u>r</u> <u>e</u> <u>j</u> <u>u</u> <u>d</u> <u>i</u> <u>c</u> <u>e</u> <u>d</u> <u>e</u> 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		<p><u>consistent with the agreed alignment as set out in this document. Full details will be provided in the supporting information to planning applications.</u></p> <p><u>The masterplanning and phasing of all Development proposals for South West Rugby must seek to enable delivery of the full spine road network as early as possible post commencement of development on site, in accordance with the phasing milestones identified in the Infrastructure Delivery Plan.</u></p> <p><u>Proposals for development that are shown to have a severe impact on the local road network, before or after the implementation of the Dunchurch Crossroads mitigation scheme, must demonstrate how they will contribute to the delivery of the spine road network, and ensure it is delivered according to the phasing milestones set out in the IDP and South West Rugby Masterplan SPD.</u></p> <p><u>Development proposals, including those outside of the South West Rugby allocation, will not be granted planning permission for implementation ahead of the delivery of the east-west Homestead Farm link (between A426 and B4429), unless demonstrated in accordance with the NPPF that any residual impacts on the highway network are not considered to be severe, to the agreement of Warwickshire County Council and Rugby Borough Council.</u></p> <p><u>Should the alignment of the spine road network be varied by agreement with the Highway Authority and Local Planning Authority in the light of further technical work, a revised alignment plan will be published o which this policy will apply.</u></p>	
MM53	Paragraph 4.63	<p>4.63 As detailed in Policy DS9, a strategic spine road network is essential to the delivery of the South West Rugby allocation. The Plan contained within Policy DS9 identifies the alignments <u>links</u> that bring the greatest <u>optimum</u> benefit to the surrounding road network, in particular at Dunchurch crossroads, which is already at capacity. As the spine road network performs such an important role</p>	<p>To ensure the Plan is justified by reflecting updated Strategic Transport Assessment evidence.</p>

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		in highways mitigation, it is imperative that it is delivered as a priority for the site.	
MM54	Underneath Paragraph 4.63	<p><u>4.63a These Primary new roads traverse the sites as three different links as shown on the indicative plan in DS9 above; the first being the east-west 'Homestead Link' between the A426, south of Cock Robin Wood and the B4429; the second from the A45/M45 roundabout to the A4071 at Potford Dam Farm; and the third from the B4642, South of the Cawston extension site connecting on to the new Homestead Link.</u></p> <p><u>4.63b The Strategic Transport Assessment, which supports the Local Plan, identifies when these three different links comprising the spine road network are required to be delivered. The Homestead Link is crucial to enabling the site and as such, the IDP and South West Rugby Masterplan SPD identify this link and this section of the overall site as coming forward first, thereby routing development traffic away from Dunchurch Crossroads and providing an alternative route for traffic. This is of particular importance in the context of the existing congestion and air quality issues at this junction.</u></p> <p><u>4.63c Development proposals to the South West of Rugby will benefit from infrastructure mitigation delivered by 2021 at the Dunchurch Crossroads junction (A426/B4429), as identified in the Strategic Transport Assessment and IDP. Once implemented, this mitigation will allow for the development of 860 dwellings in this wider area before giving rise to residual impacts on the Dunchurch Crossroads junction.</u></p>	To ensure the Plan is justified by reflecting updated Strategic Transport Assessment evidence.
MM56	Delete paragraphs 4.65 and 4.66	4.65 These primary alignments access the sites in three different locations: the first being on the A426, south of Cock Robin Wood; the second at the A45/M45 roundabout; and the third onto the B4642, south of the Cawston Extension site.	To ensure the Plan is justified by reflecting updated Strategic Transport Assessment evidence.

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		<p>4.66— An additional secondary alignment to the north of the site has been identified as necessary to achieve the maximum benefit to the local transport network. At the time of writing, highways work on the spine road has identified two potential alignment options. Both options are subject to delivery constraints that will require further detailed work as proposals for the site are developed. In light of this Policy DS9 proposes allocation of the two areas land required to deliver either alignment option.</p>	
MM57	Paragraph 4.67	<p>The first option is a spine road network is proposed through DS9 to connection across to Potford Dam Farm, on the A4071, as identified on the <u>Urban Proposals Policies Map</u>. The disused railway line running along the western edge of the site allocation forms the Green Belt boundary and this <u>alignment option connection</u> would require development in the Green Belt. <u>or Green Belt release. These are constraints to development and an alternative option has therefore been sought. The second option</u> <u>Currently the land required to deliver this alignment is outside the site allocation boundary. This alignment is required to be delivered by 2031, as identified in the IDP, and it is considered that this land will be secured by WCC within the timescales required. A separate connection can be made in place of Potford Dam, if needed, envisages a connection directly onto the B4642, which abuts the site allocation. However, safety and capacity constraints currently exist which will impact on the deliverability of this option. that prevent this option being selected over the former.</u> Detailed feasibility work is required to investigate whether an <u>connection onto the B4642 appropriate junction</u> could be accommodated here.</p>	To reflect updated Strategic Transport Assessment evidence
MM58	Paragraph 4.68	<p>At the time of writing more detailed technical highway <u>design and capacity assessment</u> work is needed to establish the optimum point of access onto the existing highway network, <u>and which requires the least highway engineering to deliver. The detailed alignment routing and specification of the road is also to be established. confirmed.</u> This work will be ongoing and the chosen alignment</p>	To reflect updated Strategic Transport Assessment evidence and ongoing work in producing a Masterplan

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		<p>option and specification will be confirmed <u>between site promoters, the Borough Council and County Council Highways department</u> as soon as possible and reflected in the Masterplan SPD or as part of highway work to support an outline planning applications. <u>Should this vary from the alignment shown in Policy DS9 and on the Urban Policies Map, a further alignment plan will be published to which the policy will apply.</u></p>	<p>SPD to guide development proposals within the SW Rugby allocation</p>
<p>MM59</p>	<p>Policy DS10: Lodge Farm</p>	<p>Policy DS10: Lodge Farm</p> <p>This development site, as shown on the Proposals Map, is allocated to provide a garden village of 1500 dwellings. This new settlement will become a self-sustaining, Main Rural Settlement of Rugby Borough, characterised by its high quality design, attractive setting and provision of new social infrastructure that will sustainably support a new and growing community.</p> <p>The development of this garden village will be supported by the on-site provision of:</p> <ul style="list-style-type: none"> ● A local centre; ● A two form entry primary school, with flexibility to increase to three form entry, if deemed necessary by Warwickshire County Council, within the local centre; ● Land for a GP surgery to be located in the local centre; ● A connected layout of functional streets and roads that ensure the on-site road network is efficient, providing an ease of movement for vehicles, pedestrians and cycles; ● A comprehensive Green Infrastructure Network, which protects, enhances and links into adjacent networks and utilises existing habitats where possible; ● Specifically regarding the areas of woodland on site, a comprehensive buffer must be identified and maintained through proposals made in the allocation; 	<p>To ensure the plan is positively prepared, justified and consistent with national policy.</p>

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		<ul style="list-style-type: none"> ● Landscaping on all site boundaries to mitigate the visual impact of the development, particularly upon the surrounding open countryside; ● Provision of a direct, high quality public transport link between the site and surrounding villages, Rugby and Daventry; ● A comprehensive cycle network across the settlement, linking residential areas with key on-site facilities and links to existing off-site cycle networks to ensure longer distance cycle connections are provided; ● A assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation; ● High quality telecommunications infrastructure, including broadband and mobile telephone services. <p>Delivery at this location is enabled as a result of infrastructure provided as part of the South West Rugby development allocation as detailed in Policies DS8 and DS9 of this Local Plan and the improvements in the capacity of the local highway network that result from the infrastructure investment detailed within those policies and the IDP. Contributions to the provision of the South West Rugby spine road will be made as part of this development, as outlined in the IDP.</p> <p>Further off-site measures to mitigate transport impact as detailed in the Infrastructure Delivery Plan, including access to the local road network as deemed necessary through the Transport Assessment and agreed by Warwickshire County Council, Northamptonshire County Council and Highways England.</p> <p>Further on and off site requirements are determined through the application of other policies in this Local Plan.</p>	
MM60	Paragraph 4.71	4.70 The overarching Vision for the new village is set out in the opening paragraph of Policy DS10. The new garden village will be a sustainable and	To ensure the plan is positively prepared,

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		vibrant new community that is inclusive and diverse with its own distinctive local identity focused, where appropriate, upon contemporary design and innovation. The design principles will draw upon the characteristics and influences of the villages of the Borough and Rugby as a market town.	justified and consistent with national policy.
MM61	Paragraph 4.72	4.72 — The Lodge Farm site is located south of Rugby town, close to the rural villages of Grandborough and Onley in Daventry District. This strategic location is situated approximately 5 miles south of Rugby town centre and 6 miles North West of Daventry town centre. It is largely bounded by the A45/Daventry Road to the north east with the southernmost boundary defined by tree cover and well established hedgerows. The proposal covers approximately 105 hectares of agricultural land. The site consists mainly of arable farmland with well-defined hedgerows, scattered trees, isolated farm buildings and an area of woodland.	To ensure the plan is positively prepared, justified and consistent with national policy.
MM62	Paragraph 4.73	4.73 — Policy DS10 details the essential onsite infrastructure required to deliver the garden village in a way that ensures the Vision for the new settlement is achieved. Given the current rural and undeveloped nature of the site it will be necessary for all required infrastructure to be introduced to the area in order to facilitate delivery. Opportunities to improve the infrastructure relied upon by existing communities in the area will be realised, where they exist.	To ensure the plan is positively prepared, justified and consistent with national policy.
MM63	Paragraph 4.74	4.74 — Policy DS10 outlines how delivery in this location is possible because of strategic infrastructure provided as part of the South West Rugby development allocation. As outlined in the IDP, this site will contribute to the provision of that infrastructure to ensure that the benefits it provides are achieved as early as possible, facilitating growth both at Rugby urban edge and in this location.	To ensure the plan is positively prepared, justified and consistent with national policy.
MM64	Paragraph 4.75	4.74 — The Infrastructure Delivery Plan details the costing and phasing for each of these on and off site infrastructure items. This has been informed by key stakeholders and service providers such as Warwickshire County Council	To ensure the plan is positively prepared,

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		Education and Highways, Highways England, Rugby Borough Council and the promoters of the land.	justified and consistent with national policy.
MM65	Paragraph 4.76	4.76— It is important that the overall vision is clearly established to help develop the community's own identity. To this end, the Council will submit an expression of interest for a locally led garden village with the support from the site promoter/developers of the new village. The input of existing local communities will also be key to the successful development of the new garden village.	To ensure the plan is positively prepared, justified and consistent with national policy.
Chapter 5: Housing			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
MM66	Policy H1	<p>Policy H1: Informing Housing Mix</p> <p>To deliver a wide choice of high quality market homes across the Borough residential development proposals must form a mix of market housing house types and sizes consistent with the latest Strategic Housing Market Assessment.</p> <p>New residential development should contribute to the overall mix of housing in the locality, taking into account the current need, particularly for older people and first time buyers, current demand and existing housing stock.</p> <p>The council will consider an alternative mix in the following circumstances where it is clearly demonstrated how the delivery of a mix <u>which</u> has regard to the SHMA, or relevant update, is compromised:</p> <ul style="list-style-type: none"> • where the shape and size of the site precludes <u>justifies</u> the delivery of a mix of housing; • the location of the site, for example sustainable and very accessible sites within or close to Rugby town centre or the train station; 	To ensure the policy is justified, effective and consistent with national policy in securing a mix of housing, together with self-build and custom build.

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		<ul style="list-style-type: none"> • sites with severe development constraints where the housing mix may impact on viability, where demonstrated through submission of viability appraisal; • where a mix of housing would compromise the ability of the development to meet a specifically identified affordable or specialist housing need; and • conversions, where the characteristics of the existing building prohibit a mix to be delivered, and • <u>where market factors demonstrate an alternative mix would better meet local demand.</u> <p>Large development proposals Sustainable Urban Extensions will be expected to <u>provide consider the contribution opportunities for self-build and custom build</u> as part of the mix and type of development.</p>	
MM67	Paragraph 5.11	This mix is included within the Housing Needs SPD in order to guide the implementation of Policy H1. Updates of the SHMA may provide evidence to alter the housing mix in future. The Housing Needs SPD will be updated as and when the publication of further evidence provides an updated preferred mix.	To ensure the Plan is consistent with national policy and established case law.
MM68	Policy H2	<p>Policy H2: Affordable Housing Provision</p> <p>Affordable housing should be provided on all sites of at least 0.36 hectares in size or capable of accommodating 11 (net) dwelling units or more (including conversions and subdivisions).</p> <p>On previously developed sites a target affordable housing provision of 20% will be sought.</p> <p>On green field sites a target affordable housing provision of 30% will be sought.</p>	To ensure the Plan is consistent with national policy and established case law.

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		<p>The tenure and mix of the affordable housing units within this percentage of provision should be in compliance with the latest SHMA guidance, contained in the Housing Needs SPD.</p> <p>The target levels will be expected to be provided unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level. Such evidence will be required to be submitted with the planning application to justify any reduced levels of affordable housing provision proposed for assessment using an open-book approach and may be subject to independent assessment (e.g. by the District Valuer Services or equivalent).</p> <p>Development should provide for the appropriate integration of affordable housing and market housing, in order to achieve an inclusive and mixed community.</p> <p><u>Affordable housing should be provided on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.</u> Further details of requirements are contained in the Housing Needs SPD which should be read in conjunction with this policy.</p>	
<p>MM69</p>	<p>Paragraph 5.13</p>	<p>Affordable housing includes <u>housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: a) affordable housing for rent; b) starter homes; c) discounted market sales housing; and d) other affordable housing routes to home ownership.</u> Detailed definitions of these categories are contained within the NPPF and Appendix 7 of this Local Plan. social rented, intermediate housing, affordable rent, and starter homes, as defined in national guidance, which is provided to specified eligible households whose needs are not met within the open market. National policy states that</p>	<p>To ensure the definition of affordable housing is in line with national policy.</p>

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		<p>affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p>									
MM70	Paragraph 5.15	<p>National policy requires that <u>policies should identify the size, type, and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families and children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their homes..</u> Local Plans plan for a mix of housing based on the needs of the population and requires that they set out the types of housing to meet this. The analysis in the SHMA has shown that there is a predominant long-term <u>marginal</u> requirement for future affordable housing to be marginally higher need for three-bed properties relative to the Housing Market Area as a whole, but in general a greater need identified for the smaller properties, as indicated in the table below. Based on the evidence pulled together, the SHMA recommends the following strategic mix of affordable housing:</p> <table style="margin-left: auto; margin-right: auto; border: none;"> <tr> <td style="text-align: center;">1-bed properties</td> <td style="text-align: center;">2-bed properties</td> <td style="text-align: center;">3-bed properties</td> <td style="text-align: center;">4+ bed properties</td> </tr> <tr> <td style="text-align: center;">30-35%</td> <td style="text-align: center;">30-35%</td> <td style="text-align: center;">20-25%</td> <td style="text-align: center;">5-10%</td> </tr> </table>	1-bed properties	2-bed properties	3-bed properties	4+ bed properties	30-35%	30-35%	20-25%	5-10%	To ensure the mix of housing needed is justified and consistent with national policy.
1-bed properties	2-bed properties	3-bed properties	4+ bed properties								
30-35%	30-35%	20-25%	5-10%								
MM71	Paragraph 5.16	<p>The Council’s preference is for the provision onsite. In some circumstances, <u>such as physical site constraints or if a Registered Provider cannot provide onsite affordable housing,</u> the Council will consider an equivalent offsite contribution where justified. Guidance about the circumstances under which the Council will consider an off-site contribution and the mechanism for calculating this is set out in the Housing Needs SPD <u>When the Council considers an off-site contribution in lieu of onsite provision it will seek to ensure that adequate finance is secured to deliver affordable housing elsewhere in the Borough to meet needs and create mixed and balanced communities. Any</u></p>	To ensure that the circumstances for and financial contribution for offsite provision is justified and that the Plan is consistent with national policy in respect of the use of SPD.								

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		<p><u>commuted sum will be equivalent to the cost of building the required number of affordable dwellings, plus the value of the land required to build them minus what would be payable by a Registered Provider. Any contributions collected by the Council may be used to purchase existing dwellings to use as affordable housing. Off-site contributions will be secured by means of a Section 106 Agreement. The formula used by the Council in calculating an off-site contribution is as follows:</u></p> <div style="border: 1px solid black; padding: 10px; margin: 10px auto; width: fit-content;"> <p align="center"> <u>TOTAL NUMBER OF AFFORDABLE DWELLINGS REQUIRED</u> <u>MULTIPLIED BY</u> <u>BUILD COST OF THE REQUIRED DWELLINGS</u> <u>PLUS</u> <u>LAND COST</u> <u>MINUS</u> <u>THE AMOUNT EQUIVALENT TO THAT WHICH WOULD BE PAYABLE BY A REGISTERED PROVIDER</u> <u>EQUALS</u> <u>THE SUM PAYABLE</u> </p> </div>	
<p>MM72</p>	<p>Paragraph 5.17</p>	<p>The specific provision and mix of a site will be informed by evidence available at the time of the application and will be negotiated at the time. However, the Council will expect the starting point of negotiation to achieve a mix of 84% either social or affordable rent and 16% intermediate products, as detailed in the 2015 SHMA (<u>or as subsequently amended</u>). Social and affordable rent are grouped together in this instance, as a result of the clear overlap between the two as products, which are likely to be targeted to the same group of households by Registered Providers. The final mix achieved on any site will be informed by the up-to-date position set out in the Housing Needs SPD, which shall take into account any change to the definition of</p>	<p>To ensure the Plan is consistent with national policy in respect of the use of SPD.</p>

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		affordable housing established via national guidance, any relevant site specific issues and evidence of local circumstances.	
MM73	Paragraph 5.18	At the time of writing, it is acknowledged that proposals for the provision of Starter Homes are being progressed by Central Government. The policies proposed as part of this Publication Draft Local Plan will be amended as certainty on this topic is established.	To ensure the Plan is consistent with national policy by deleting this paragraph as it is out of date.
MM74	Policy H3	<p>Policy H3: Housing for rural businesses</p> <p>Proposals for a permanent dwelling, either by new build or conversion, for occupation by a person engaged in an agricultural operation, or another form of use <u>rural business</u> that can only be reasonably located in within the countryside, will only be supported if all of the following criteria are met:</p> <p>a) There is a clearly established <u>essential</u> functional need for a dwelling;</p> <p>b) The need relates to a full-time worker, or one who is primarily employed in the activity to which the application relates;</p> <p>c) The <u>agricultural unit</u> and the activity <u>rural enterprise</u> concerned, are currently financially sound, and have a clear prospect of remaining so; and</p> <p>d) The functional <u>essential</u> need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned.</p> <p>The size of any such rural workers dwelling should be commensurate with the established functional <u>essential</u> requirement. Dwellings that are unusually large in relation to the needs of the unit, will not be permitted.</p>	To ensure the policy is effective and consistent with national policy.

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		<p>Any permission granted will be subject to an ‘occupancy’ condition. The variation or removal of such a condition will only be granted if it is clear that its original purpose is obsolete and no longer required.</p> <p>Proposals for the removal of occupancy conditions would only be permitted if the applicant can demonstrate that long term need for a Rural Workers Dwelling has ceased, and the Council is satisfied that the dwelling has been sufficiently marketed.</p>	
<p>MM75</p>	<p>Policy H4</p>	<p>Policy H4: Rural Exceptions Sites</p> <p>The development of affordable housing that meets the needs of local people will be permitted as a Rural Exception Site adjacent to defined rural settlement boundaries, where development is normally resisted, if all of the following criteria are met:</p> <p>ea) It is clearly demonstrated that there is a local need for affordable housing which outweighs other policy considerations;</p> <p>fb) It is demonstrated that no suitable alternative sites exist within the defined settlement boundary; <u>and</u></p> <p>g) The development consists exclusively of affordable housing;</p> <p>hc) Developments do not have an adverse impact on the character and/or appearance of settlements, their settings or the surroundings countryside and</p> <p>i) Safeguards are in place to ensure homes remain affordable in perpetuity.</p> <p>In all cases arrangements for the management and occupation of dwellings must be made to ensure that all dwellings provided will be, and will remain available for occupancy by eligible local people at an affordable cost and at a range of tenures, both initially and in perpetuity.</p>	<p>To ensure the policy is effective and consistent national policy.</p>

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		<p>In some circumstances a small proportion of open market housing may be allowed where it can be shown that the scheme will deliver significant affordable housing and viability is a key constraint.</p>	
<p>MM76</p>	<p>Policy H5</p>	<p>Policy H5: Replacement Dwellings</p> <p>The Proposals for the replacement of dwellings <u>within the Countryside and Green Belt will be only be acceptable in line with national policy and provided all of the following criteria are met:</u> permitted provided that:</p> <p style="padding-left: 40px;">a) <u>The form and bulk of the new replacement dwelling is not materially larger than the building it replaces that of the original dwelling¹ or that which could be achieved as permitted development; and for Green Belt locations is of no more than a 30% increase on the original volume, unless national policy dictates; and</u></p> <p style="padding-left: 40px;">b) Unless exceptional circumstance dictates, the siting of the replacement dwelling should have no greater impact on landscape than the original <u>the new dwelling is not more intrusive in the landscape than that which it replaces;. In Green Belt locations the replacement dwelling must not have a greater impact on the openness of the Green Belt than the original; and</u></p> <p style="padding-left: 40px;">c) Residential is the lawful use of the existing building and the use has not been abandoned</p> <p style="padding-left: 40px;"><u>c) the new dwelling has substantially the same siting as the existing; and</u></p> <p style="padding-left: 40px;"><u>d) the existing dwelling to be demolished is not of historic merit.</u></p> <p>The removal of permitted development rights by condition may be included in any approval.</p> <p><small>¹The term original dwelling means the house as it was first built or as it stood on 1 July 1948 (if it was constructed before this date)."</small></p>	<p>To ensure that the policy is effective and consistent with national policy.</p>

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<p>MM77</p>	<p>Policy H6</p>	<p>Policy H6: Specialist Housing</p> <p>The Council will encourage the provision of housing to maximise the independence and choice of older people and those members of the community with specific housing needs.</p> <p>When assessing the suitability of sites and/or proposals for the development of specialist housing such as, but not restricted to, residential care homes, extra care housing and continuing care retirement communities, the Council will have regard to the following:</p> <ul style="list-style-type: none"> • The need for the accommodation proposed, whereby the development contributes towards specialist housing need as identified within the Strategic Housing Market Assessment (SHMA); • The ability of future residents to access essential services, including public transport, shops and appropriate health care facilities. <p>Large <u>Development proposals on Sustainable Urban Extensions</u> will be expected to <u>provide</u> consider opportunities for the provision of housing to meet the housing needs of older persons, including the provision of residential care homes.</p> <p>The Council also expects developers, through the design of developments, to enable people to live independently and safely in their own home for as long as possible, consistent with the aspiration of the Council and Warwickshire County Council.</p> <p>The Council will consider the inclusion of conditions to ensure future occupation remains for the specialist housing need it was intended.</p>	<p>To ensure the policy is clear, effective and justified.</p>
<p>MM78</p>	<p>Paragraph 5.38</p>	<p>National policy and guidance recognises the need to provide housing for older people as part of achieving a good mix of housing. <u>Under the Homelessness Act 2002, local housing authorities must have a strategy for preventing</u></p>	<p>To ensure that the Plan is effective and justified in meeting the full</p>

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		<p><u>homelessness in their district. The strategy must apply to everyone at risk of homelessness, not just people who may fall within a priority need group for the purposes of Part 7 of the Housing Act 1996. Homelessness prevention means providing people with the ways and means to address their housing and other needs to avoid homelessness. Meeting housing needs through the policies of this plan, including meeting needs associated with affordable and specialist housing, is one way to assist with homelessness prevention, and link in with Rugby Council’s Homelessness Strategy.</u></p>	<p>range of specialist housing needs.</p>
MM79	Paragraph 5.46	<p>National policy allows for specialist housing for older persons, including residential care institutions which are C2, to count towards the Borough’s housing requirement. This will be clarified in the monitoring framework and housing trajectory.</p>	<p>To ensure the Plan is positively prepared and consistent with national policy in meeting the objectively assessed housing needs of the borough.</p>
Chapter 6: Economic Development			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
MM80	Policy ED1	<p><u>With the exception of any sites allocated for other forms of development in this Local Plan, A</u>all employment sites, including the major investment site at Ansty Park, eExisting sStrategically sSignificant Employment sSites, Core Strategy allocations and new Local Plan <u>employment</u> allocations, as shown on the Proposals Policies Map, will be retained for employment purposes: B1(a), B1(b), B1(c), B2 and B8. Proposals for new employment development (including expansion of established businesses and upgrading, improvement or redevelopment of existing premises) will be permitted within all employment areas subject to accordance with other policies in the Local Plan.</p>	<p>To ensure the Plan is justified against the evidence and consistent with national policy in its protection of employment land and provision for SMEs.</p>

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		<p><u>Provision should be made for the accommodation needs of small and medium sizes enterprises within both existing employment sites and new allocations.</u></p> <p>The <u>infilling or the partial or complete redevelopment</u> intensification of existing employment sites will be supported subject to the consideration of potential impacts to their surroundings against the relevant policies in the Local Plan and national policy, in particular those sites located in the Green Belt.</p> <p>All land currently or last used for employment purposes will be protected where a site continues to make a viable contribution to economic development within the borough. However, in order to ensure land used for economic development continues to provide jobs in the local economy, where a site is proven to be no longer viable for employment uses, a proposal for change of use to a non B-use class may be considered acceptable.</p> <p>For proposals that would involve the change of use or loss of any land used for employment purposes, evidence must be provided to demonstrate that the land or unit under consideration is no longer viable for a B-use class. <u>The evidence provided should consider each of the six tests listed below in order to demonstrate to a sufficient level that market signals indicate that there is no reasonable prospect of the site being used for employment purposes and/or that an alternative land use would support sustainable local communities.</u></p> <p><u>The six tests are:</u></p> <ul style="list-style-type: none"> • <u>Whether the site is allocated for employment land. Allocated sites will be given greater protection.</u> • <u>Whether there is an adequate supply of allocated employment sites of sufficient quality in the locality to cater for a range of business</u> 	
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		<p><u>requirements. This would involve an assessment of vacant units or land currently being marketed.</u></p> <ul style="list-style-type: none"> • <u>Whether the site is capable of being serviced by a catchment population of sufficient size. This may include consideration of whether there is a suitable balance between population and employment in the relevant area settlement, what the impact of employment loss on commuting patterns might be and whether there would be a detrimental impact on the local economy from loss of the employment land. This will be particularly relevant in rural locations.</u> • <u>Whether there is evidence of active marketing. For allocated sites evidence of active marketing should be submitted. This should be for a continuous period of 24 months and should be through a commercial agent with local or sub-regional practice connected to Rugby Borough, at a price that genuinely reflects the market value in relation to use, condition, quality and location of the floor space. A professional valuation of the asking price and/or rent will be required to confirm that this is reasonable.</u> • <u>Whether redevelopment of the site for employment use could be brought forward, taking account of site characteristics (including physical factors, accessibility and neighbouring uses). If employment redevelopment is not viable, whether mixed use redevelopment could be brought forward. It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs.</u> • <u>Whether firms are likely to be displaced through redevelopment, whether there is a supply of alternative suitable accommodation in the locality to help support local businesses and jobs and whether this would promote or hinder sustainable communities and travel patterns.</u> 	
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		<p>It must be demonstrated that the site has been actively marketed according to the provisions of the explanatory text accompanying this Policy, and for the following periods of time:</p> <ul style="list-style-type: none"> • On designated employment land / site: 24 months • For any other B use class land / site / unit: 12 months <p>Evidence must demonstrate that there has been no serious interest shown by a B use class occupier during the relevant period of marketing, according to the provisions of the supporting text to this Policy.</p>	
MM81	Paragraph 6.5	<p>It is important that the diverse range of industrial sectors that make-up employment provision in the borough is protected and maintained to offer choices of employment opportunities to both employers and potential employees. The most effective way to achieve this is by protecting different types of employment land, within the context of a flexible policy that is able to deal with potentially changing economic conditions over the plan period. <u>Many of the Borough’s existing strategically significant employment sites provide for smaller units in a mix of B class uses. These sites will continue to provide opportunities for a range in type and scale of employment development, including where intensification opportunities exist, along with the employment sites allocated in the Core Strategy and proposed for allocation in this Local Plan. Particular attention should be given to providing opportunities for smaller units in the range of 5,000-50,000 sq. ft. to meet the accommodation needs of small and medium sized businesses in line with the evidence of employment floorspace needs.</u></p>	To ensure the Plan is effective in meeting a qualitative employment need for accommodation for SMEs, as well as where this need is proposed to be met on new allocations.
MM82	Paragraphs 6.7-6.9	<p>6.7 To demonstrate there is no demand for a site or unit for ongoing employment use, an applicant must submit evidence <u>which shows consideration of each of the six tests outlined in the policy.</u> that the site is</p>	To ensure the Plan is justified against the evidence and consistent

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		<p>vacant and a thorough marketing exercise at a realistic price for both the land use and local market area has been sustained over the relevant time period as set out in Policy ED1. The six tests which include the requirement for two years of marketing for the release of employment land or units on designated employment sites have been selected based on evidence originally contained in the DTZ Coventry, Solihull and Warwickshire sub-regional employment land study (2007).</p> <p>6.8 This evidence was reviewed as part of the GL Hearn (2015) Rugby employment land study and the tests suggested by this evidence, to decide on proposals for the release of employment land, were considered to “remain relevant”. Consideration will be given to the other tests listed in the DTZ Study (repeated in the GL Hearn Study) where an applicant can show that these are more suitable in demonstrating that a loss of employment land would not have an adverse impact on the Borough wide supply of employment land, particularly where designated employment sites are concerned.</p> <p>6.9 Marketing of employment land or uses must be through a commercial agent with local or sub-regional practice connected to Rugby Borough, at a price that genuinely reflects the market value in relation to use, condition, quality and location of the floor space. A professional valuation of the asking price and/or rent will be required to confirm that this is reasonable. It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs.</p>		<p>with national policy in its protection of employment land.</p>
<p>MM83</p>	<p>Paragraph 6.10 <i>[Table]</i></p>		<p>Major Investment Site</p> <p>Ansty Park</p> <hr/> <p>Existing Strategically Significant Employment Sites</p> <p><u>Ansty Park</u></p>	<p>To ensure the Plan is effective and up to date in defining the role of existing employment locations.</p>

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		<p>Butlers Leap (including Arches and Avon) Industrial Estates</p> <p>Central Park</p> <p>Glebe Farm Industrial Estate</p> <p>Midland Trading Estate</p> <p>Paynes Lane Industrial Estate</p> <p>Rugby Cement Works</p> <p>Somers Road Industrial Estate</p> <p>Swift Park</p> <p>Swift Valley</p> <p>Valley Park</p> <p>Dunchurch Trading Estate</p> <p>Europark</p> <p>Lawford Heath Industrial Estate</p> <p>Former Peugeot Site, Ryton</p> <p>Rolls Royce, Ansty</p> <p>Shilton Industrial Estate</p>		
		<p>Core Strategy Allocations</p> <p>Rugby Gateway*</p> <p>Rugby Radio Station**</p>		

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		<p>New Local Plan Allocations</p> <p>Coton Park East, Castle Mound Way</p> <p>Land south of Cawston Spinney</p>	
MM84	Policy ED3	<p>Policy ED3: Employment development outside Rugby urban area</p> <p>With the exception of those sites allocated for employment purposes in this Local Plan, or with a current B use class, employment development will not be permitted outside the Rugby urban area except in the following circumstances:</p> <ul style="list-style-type: none"> • Conversion of a building for employment purposes, subject to its location and character, including historic or architectural merit, being suitable for the proposed use and it having been in existence for at least ten years; • Redevelopment, at a similar scale, of an existing building or vacant part of an existing employment site for employment purposes, where this would result in a more effective use of the site; • Small-scale <u>Sustainable</u> expansion of an existing group of buildings for business uses where the site is readily and regularly accessible by means of transport other than the private car; or • A building or structure related to agriculture, horticulture or forestry where it is genuinely required as an ancillary use for an existing rural employment development. <p>To be considered acceptable, any proposals meeting one of these exceptions must also demonstrate compliance with all other relevant policies in the Local Plan, in particular where a proposal is located in the Green Belt.</p> <p>All proposals will be subject to a thorough assessment to make sure their scale, nature and location are appropriate, including the need to:</p> <ul style="list-style-type: none"> • Limit the impact on local communities, the character of the local landscape, and the natural environment; 	To ensure the policy is effective and consistent with national policy.

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		<ul style="list-style-type: none"> • Minimise impact on the occupiers and users of existing properties in the area; • Avoid an increase in traffic generation that would have an adverse <u>severe</u> impact on the local road network, unless suitable mitigation to address the impact can be provided; • Make provision for sustainable forms of transport wherever appropriate and justified; and • Prioritise the re-use of brownfield land and existing buildings. 	
Chapter 7: Retail and the Town Centre			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
MM85	Paragraph 7.6	The enhancement of Rugby Town Centre is vital and Policy TC1 seeks to ensure that any changes improve the town centre, adding to its vitality and vibrancy, whilst retaining or enhancing important characteristics. <u>The adopted 'Town Centre Vision and Action Plan 2016-2020' has as its central vision: "A prosperous and attractive town centre which complements and connects to the retail parks on Leicester Road, offering a wide range of shops, leisure and entertainment opportunities for both residents and visitors, alongside public services and new homes for residents."</u>	To ensure the retail and town centre policies are appropriately justified as the most suitable strategy for Rugby Town Centre.
MM86	Paragraph 7.7	In assessing proposals for town centre schemes, the Council will seek to ensure that such proposals are compatible with the scale, nature and character of the town centre. This is important given the historic nature of the town centre and proposals will have to be of an appropriate scale and design quality in order to be successfully integrated. Proposals that do not meet a sufficient standard will be refused.	To ensure that Policy TC1 is clear and effective in day to day development management decisions
MM87	Policy TC2	Policy TC2: Rugby Town Centre Comparison and Convenience Floor Space Requirements New retail floor space will be provided in Rugby Town Centre as set out below:	Policies TC2 and TC3 combined to ensure the Plan is effective in managing the location

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		<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <td style="text-align: center;">2020</td> <td style="text-align: center;">2025</td> <td style="text-align: center;">2030</td> </tr> <tr> <td>Convenience (net sqm)</td> <td style="text-align: center;">266</td> <td style="text-align: center;">515</td> <td style="text-align: center;">732</td> </tr> <tr> <td>Comparison (net sqm)</td> <td style="text-align: center;">1508</td> <td style="text-align: center;">4652</td> <td style="text-align: center;">7850</td> </tr> </table> <p><u>All proposals for retail, office or leisure uses on sites not within Rugby Town Centre in excess of 500 sqm gross floor space, including extension of existing units and variation of conditions, must be accompanied by an impact assessment. This assessment must meet the requirement of national policy and established best practice and demonstrate that the proposal will not harm the vitality or viability of any nearby centres. All such proposals must also comply with the sequential approach, as set out in national policy and in this policy below, to ensure that development is on the most central site available.</u></p> <p>In order to sustain and enhance the vitality and viability of the town centre, new proposals for meeting the <u>retail</u> floor space requirements will be permitted firstly within <u>the Primary Shopping Area, and for other main town centre uses within Rugby Town Centre boundary, (as defined on the Town Centre Policies Proposals Map followed by Edge-of-Centre locations, then Out-of-Centre sites that are in accessible locations, well connected to the Town Centre and capable of generating benefits for the centre’s overall vitality and viability, through linked pedestrian trips and increased footfall or, in relation to bulky goods retailing, are located immediately adjacent to existing retail warehousing.</u></p>		2020	2025	2030	Convenience (net sqm)	266	515	732	Comparison (net sqm)	1508	4652	7850	and development of main town centre uses
	2020	2025	2030												
Convenience (net sqm)	266	515	732												
Comparison (net sqm)	1508	4652	7850												
MM88	Policy TC3	<p>Policy TC3: Directing Development in the Town Centre</p> <p>In order to sustain and enhance the vitality and viability of town centres, new proposals for town centre uses² will be permitted firstly within Rugby Town</p>	Policies TC2 and TC3 combined to ensure the Plan is effective in managing the location												

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		<p>Centre, (as defined in the town centre proposal map) followed by Edge of Centre locations, then Out of Centre sites that are, or will be, well served by a choice of sustainable modes of transport and are close to the centre or, in relation to bulky goods retailing, are located immediately adjacent to existing retail warehousing.</p> <p>All proposals for retail, office or leisure uses on sites not within Rugby Town Centre in excess of 500 sqm gross floor space, including extension of existing units and variation of conditions, must be accompanied by an impact assessment. This assessment must meet the requirement of national guidance and established best practice and demonstrate that the proposal will not harm the vitality or viability of any nearby centres. All such proposals must also comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.</p>	and development of main town centre uses.
MM89	Paragraph 7.12	<p>National guidance requires local planning authorities to apply the sequential approach to planning applications for main town centre uses that are not in an existing centre and not in accordance with an up to date Local Plan. Policy TC3 <u>TC2</u> sets out the order of sequentially preferential locations for new investment working from the core of the town centre outwards. <u>When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.</u> This approach helps maintain the vitality and core function of the town centre through directing new proposals <u>for the main town centre uses</u> to this area first which in turns supports the local economy and promotes more sustainable patterns of development.</p>	To ensure consistency with NPPF Paragraph
MM90	Policy TC4	<p>Policy TC4-TC3: Primary Shopping Area and Shopping Frontages</p> <p><u>Primary Shopping Area (PSA)</u></p>	To ensure the Plan is effective and consistent with national policy in

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		<p>Within the <u>The Primary Shopping Area (PSA), as defined on the Town Centre Proposals-Policies Map, is the overall area where retail frontages are concentrated. Within the PSA p</u>Proposals for the development, redevelopment or change of use, will be permitted where the proposed ground floor use is to be changed to retail (use class A1).</p> <p><u>Non-A1 uses proposed within the Primary Shopping Area but outside of a Primary or Secondary frontage will be assessed on a case-by-case basis in relation to future potential impact on the vitality and viability on the town centre.</u></p> <p><u>Primary Shopping Frontage (PSF)</u></p> <p>Within the PSF, as defined on the Town Centre Proposals-Policies <u>Map</u>, the change of use of ground floor Class A1 shop premises to a complementary use classes A2-A5 <u>will only</u> be permitted where the proposed use would not undermine the retail function of the town centre and it is <u>would</u> maintains and enhances its vitality and viability.</p> <p>The determination of each application will have regard to the following factors:</p> <ul style="list-style-type: none"> • the number and distribution of other existing and committed non-A1 uses within the defined primary shopping frontage should be no more than 40% of the units within the PSF (including any premises subject to current Permitted Development changes of use); • the location and prominence of the premises; • where applicable, the length of <u>any</u> vacancy of the premises and evidence of marketing for the current permitted use; • the nature and character of the proposed use; and • the design of the shop front 	<p>managing the mix of uses within Rugby Town Centre.</p>
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		<p><u>Secondary Shopping Frontage (SSF)</u></p> <p>Within the SSF, as defined on the Town Centre proposals Policies Map, proposals for main town centre uses (Use Class A1-A5, D1 and D2) will only be permitted where the proposed use maintains and enhances its vitality and viability. <u>Within the Secondary Shopping Frontage (SSF), the percentage of units in non-A1 use would typically be expected to be above 40% although there is no defined threshold.</u></p> <p>Regard will also be had to the following factors:</p> <ul style="list-style-type: none"> • coalescence and concentration of uses; and • the effect on the amenity of other surrounding properties and uses. <p>Wider Town Centre Area <u>Wider Town Centre Boundary (Outside of the Primary Shopping Area)</u></p> <p>The Council will permit retail, business, leisure, arts, cultural and tourism development within the wider town centre (areas not defined by the PSF and SSF <u>outside of the PSA</u>) provided:</p> <ul style="list-style-type: none"> • They will not harm the retail function and character of the PSA; • They will not harm on the vitality and viability of the PSA; and • Where retail uses (class A1) are proposed within the town centre, but outside of the PSA the applicant must demonstrate there are no suitable alternatives within or immediately adjacent to the PSA <u>Primary or Secondary frontages.</u> <p>Residential development is encouraged within the Town Centre, providing it does not harm the retail function and character and its' vitality and viability. For all proposals, separate access arrangements to the upper floor space, which</p>	
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		could be used for residential, community or employment use, should not be eliminated.	
Chapter 8: Healthy, Safe and Inclusive Communities			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
MM91	Policy HS2	<p><u>All major development proposals will be required to demonstrate assess their impact on the capacity of existing health services and facilities that they would not generate detrimental impacts on health and wellbeing. For all Use Class C2 developments (residential care homes and nursing homes) and Use Class C3 residential development in excess of 150 units this will take the form of a Health Impact Assessment, which will measure wider impacts on health and well-being and the demands that are placed upon the capacity of health services and facilities arising from the development. National guidance recognises that major development proposals have potentially greater impacts on health and wellbeing. As such, proposed development above the thresholds set out below will need to demonstrate that they would not generate adverse impacts on health and wellbeing:</u></p> <ul style="list-style-type: none"> • <u>All residential development of 150 units and above and where the site area is 5 hectares or above;</u> • <u>non-residential development where the area of development exceeds 1ha; and</u> • <u>development located on an industrial estate exceeding 5ha</u> <p><u>Where development proposals meet the above criteria, an assessment of potential impacts on health and wellbeing should be demonstrated through:</u></p> <ul style="list-style-type: none"> • <u>A Health Impact Assessment screening report; and</u> 	To ensure the policy is justified, effective and consistent with national policy.

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		<ul style="list-style-type: none"> • <u>A full Health Impact Assessment where the screening report identifies that significant impacts on health and wellbeing would arise from the development</u> <p>Where required, The Borough Council will require Health Impact Assessments should to be prepared in accordance with advice and best practice for such assessments as published by the Department of Health and other agencies, such as the Coventry and Rugby Clinical Commissioning Group, Public Health Warwickshire, University Hospitals Coventry and <u>Warwickshire</u> NHS Trust.</p> <p>Where significant impacts are identified it is demonstrated that a <u>development proposal would have a significant adverse impact on wellbeing, the Borough Council may require appropriate mitigation measures through planning conditions, financial or other contributions secured through planning obligations and/or the Council’s CIL charging schedule. planning permission will be refused unless infrastructure provision and/or funding to meet the health service requirements of the development are provided and/or secured by planning obligations.</u></p>	
MM92	Paragraph 8.6	<p>8.6 Health Impact Assessments (HIAs) are an important tool for to understanding the potential impacts a <u>upon wellbeing arising from development proposals will have on the existing health services and facilities. HIAs aim to both reduce adverse impacts from development on wellbeing and maximise positive effects. This is achieved through providing a holistic approach to wellbeing which seeks to complement, but not replicate, the Local Plan’s infrastructure policies. An assessment on wellbeing is required of development as allocated within this Local Plan as well as proposals promoted through the development management process to ensure more localised impacts are identified. The Council will require proposals for development over 150 units to be supported by a Health Impact Assessment, in consultation with the relevant bodies, such as Public Health Warwickshire</u></p>	To ensure the policy is justified, effective and consistent with national policy.

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		Department of Health and other agencies, such as the Coventry and Rugby Clinical Commissioning Group.	
MM93	Following Paragraph 8.6	<u>8.6a Where required, HIAs must identify the potential impact development may cause and propose relevant measures to mitigate the impacts. Screening reports and HIAs should contain a proportionate level of detail in relation the scale and type of development proposed. The Borough Council recommends that a screening report or full assessment is conducted at the earliest opportunity to ensure that wellbeing is appropriately considered. This can take the form of a standalone assessment or as part of a wider Environmental Impact Assessment (EIA). The thresholds identified within the policy are consistent with EIAs to ensure development proposals below the defined threshold are also encouraged to consider potential impacts on health through the design process, where appropriate. A HIA may identify impacts that need to be addressed by a range of mitigation measures, such as design solutions incorporating green infrastructure or measures to improve air quality including travel measures.</u>	To ensure the policy is justified, effective and consistent with national policy.
MM94	Paragraph 8.7	8.7 Such assessments must identify the potential impact their development may cause and propose relevant measures to mitigate the impacts. The threshold for undertaking a health impact assessment has been derived from the threshold as to when an EIA screening opinion is requested.	To ensure the policy is justified, effective and consistent with national policy.
MM95	Paragraph 8.8	Local life would not be the same without them, and if they closed or changed to private use , it would be a real loss to the community.	To avoid confusion over what constitutes 'private'
MM96	Policy HS4	Policy HS4: Open space, <u>sports facilities</u> and recreation A. Residential development of 10 dwellings and above, shall provide or contribute towards the attainment of the Council's open space standards set out below:	To ensure the plans open space standards are justified, to ensure it is effective in protecting open space

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					and that it is consistent with national policy in respect of the protection of sports facilities	
		Children’s Play;	0.2 ha per 1,000 pop’n	0.2 ha per 1,000 pop’n		
		Natural and Semi Natural Green Space	2.5 ha per 1,000 pop’n	2.5 ha per 1,000 pop’n		
		Parks and Gardens	1.5 ha per 1,000 pop’n	1 ha per 1,000 pop’n		
		Amenity Green Spaces	1.1 ha per 1,000 pop’n	0.5 ha per 1,000 pop’n		
		Allotments	0.865 ha per 1,000 pop’n	0.658 ha per 1,000 pop’n		
		Outdoor Sports Playing pitches	Borough wide 0.93 ha per 1,000 pop’n			
		<u>Football Pitches</u>	0.38 ha per 1000 pop’n			
		<u>Cricket Pitches</u>	0.23 ha per 1000 pop’n			
		<u>Rugby Pitches</u>	0.32Ha per 1000 pop’n			
		<p>As a default, Rugby’s average household size of 2.4 people per dwellings (Census 2011 or any subsequent update) should be used to identify the population of new developments and its subsequent open space requirement. Account will be taken of the existing open space provision within the ward or parish the development proposal is located within (contained within Appendix 4). Contributions through CIL/S106 will be sought from developments where</p>				

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		<p>the proposal would further increase an existing deficit in provision or where the proposal will result in the provision standards not being met within the ward or parish it is located within. <u>For the outdoor sports playing pitches account should be taken of the latest Playing Pitch Strategy standard to ascertain whether the demand arising from a proposed development can be met within the existing network of accessible playing pitches that are of sufficient quality, or whether new or improved quality provision will be required.</u></p> <p>Dependent upon the size and layout of the development, the provision of open space, may be required on site or may form part of a contribution towards off site provision of either new or improved facilities. In such circumstances off-site provision towards local facilities should be made in a location which adequately services the new development and a planning obligation may be used to secure this.</p> <p>Developer contributions will also be spent on built recreation facilities where justified by an increase in population.</p> <p>B. New open space should be accessible and of high quality, meeting the following criteria:</p> <ul style="list-style-type: none"> • Be appropriately maintained, if necessary, through the use of developer contributions; • Be secure and safe; • Attractive in appearance; • Enhance the natural and cultural environment; • Conveniently accessed and facilitates access to other areas of open space, including the countryside; 	
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		<ul style="list-style-type: none"> • facilitates access by a choice of transport; and • Avoid any significant loss of amenity to residents, neighbouring uses or biodiversity <p>C. Public open space, <u>sports and recreational buildings and land, including playing fields</u> assets identified within the Open Space Audit evidence and/or defined on the Proposals Policies Map <u>and/or last in sporting or recreational use will be protected from development – should not be built upon</u> unless:</p> <ul style="list-style-type: none"> • An assessment has been undertaken which has clearly shown the open space, building or land to be surplus to requirements; or • it can be demonstrated that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or • the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. <p>Planning permission will be granted for development, which enhances the quality and accessibility of existing open space providing it accords with section B of this Policy.</p>	
MM97	Policy HS5	<p><u>Policy HS5: Traffic Generation and Air Quality, Noise and Vibration</u></p> <p>Any development that results in significant negative impacts on health and wellbeing of people in the area as a result of pollution, noise or vibration caused by traffic generation will not be permitted unless effective mitigation can be achieved.</p> <p><u>Development proposals should promote a shift to the use of sustainable transport modes and low emission vehicles (including electric/hybrid cars) to minimise the impact on air quality, noise and vibration caused by traffic</u></p>	To ensure the Plan is justified, effective and consistent with national policy and best practice in dealing with the effects of development and traffic generation on air quality, noise and vibration.

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		<p><u>generation. Proposals should be located where the use of public transport, walking and cycling can be optimised. Proposals should take full account of the cumulative impact of all development including that proposed in this Local Plan on traffic generation, air quality noise and vibration. Development proposals should complement the Air Quality Action Plan.</u></p> <p>Any development that results in significant negative impacts on air quality within identified Air Quality Management Areas or on the health and wellbeing of people in the area as a result of pollution should be supported by an air quality assessment and, where necessary, a mitigation plan to demonstrate practical and effective measures to be taken to avoid the adverse impacts.</p> <p><u>Development throughout the Borough of more than 1,000 sqm of floorspace or 10 or more dwellings or development within the Air Quality Management Area (see Appendix 8) that would generate any new floorspace must:</u></p> <ol style="list-style-type: none"> 1. <u>Achieve or exceed air quality neutral standards; or</u> 2. <u>Address the impacts of poor air quality noise and vibration due to traffic on building occupiers, and public realm or amenity space users by reducing exposure to and mitigating their effects, proportionate to the scale of the development. This can be achieved using design solutions that include:</u> <ul style="list-style-type: none"> • <u>Orientation and layout of buildings, taking into account building occupiers, public realm and amenity space users;</u> • <u>Appropriate abatement technologies; and</u> • <u>Urban greening appropriate for providing air quality benefits.</u> 	
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		<p><u>3. Where air quality neutral standards are not met, measures to offset any shortfall will be required, according to the following hierarchy:</u></p> <ul style="list-style-type: none"> • <u>On-site measures; then</u> • <u>Off-site measures; then</u> • <u>Financial contributions.</u> <p>All measures required in the Policy should take full account of the cumulative impact of all development proposed in this Local Plan (and any other known developments) on traffic generation and air quality.</p>	
<p>MM98</p>	<p>Paragraph 8.17</p>	<p>Air quality is a particular issue in a number of locations within the Borough. These areas have been declared Air Quality Management Areas (AQMAs). The Air Quality Management Area (AQMA) shown in the map at Appendix 8 identifies where, in Rugby Borough, levels of air quality are below national standards. The Council seeks reduce air pollution in order to contribute to achieving national air quality objectives. Poor air quality includes high concentrations of particulate matter (such as PM₁₀ and PM_{2.5}) and nitrogen oxides (known as NO_x) which have a direct and adverse impact on the health and life expectancy of people and on the natural environment. Rugby's Air Quality Strategy and improvement plan contains measures to improve air quality in Rugby. The strategy promotes modal shift towards public transport and low and zero emission vehicles and raises awareness of air quality issues. It identifies planning policies to be a key action in improving local air quality through influencing developments, particularly within the AQMA or for roads which affect it, to consider air quality impacts. Transport is the primary cause of air quality issues in these areas. Significant <u>Major</u> development proposals, or those located within the AQMAs have the potential to add significant quantities of additional road vehicles on to the transport network which, unless addressed, is likely to have a negative impact on air quality, noise and/or</p>	<p>To ensure the Plan is justified, effective and consistent with national policy and best practice in dealing with the effects of development and traffic generation on air quality, noise and vibration.</p>

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		<p><u>vibration in general and specifically within the AQMA, either through additional traffic volumes or reduced traffic speeds. Requiring development that has an impact on air quality to deliver measures to reduce air pollution on the borough's roads will help address the areas worst affected by poor air quality.</u></p> <p><u>This is consistent with national policy which stresses the need to ensure that policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts from individual sites in local areas.</u></p>	
MM99	New paragraphs beneath 8.17	<p><u>8.17a Developments that are air quality neutral will help to minimise air pollution within the AQMA. The policy aims to ensure that air quality neutral development is supported, whilst ensuring development that has an impact on air quality within the AQMA (or major developments that can affect the AQMA) is appropriately mitigated.</u></p> <p><u>8.17b In some circumstances air quality, noise or vibration assessments will be required to quantify the effects of development and set out mitigation measures to address impacts. Mitigation may be secured by legal agreement, and will follow the mitigation hierarchy outlined in the policy. Appropriate mitigation measures and a programme of implementation (if required as part of a construction management plan) to address impacts associated with air quality, noise and/or vibration, will need to be demonstrated. This may include highway infrastructure improvements, traffic management, or support for public transport services, alterations to design or materials, and/or landscaping, together with details associated with construction management plans.</u></p>	To ensure the Plan is justified, effective and consistent with national policy and best practice in dealing with the effects of development and traffic generation on air quality, noise and vibration.
MM100	Paragraph 8.18	<p><u>8.18 The Council will be producing an Air Quality Supplementary Planning Document (SPD) which will assist in the determination of planning applications in line with the NPPF. Development proposals will be considered with regard to</u></p>	To ensure the Plan is justified, effective and consistent with national

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		the Council’s Air Quality SPD, including where necessary undertaking an Air Quality Assessment and appropriate mitigation. Appropriate mitigation measures and a programme of implementation will need to be demonstrated, for example highway infrastructure improvements or support for public transport services.	policy and best practice in dealing with the effects of development and traffic generation on air quality, noise and vibration.
Chapter 9: Natural Environment			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
MM101	Policy NE1	<p>Policy NE1: Protecting Designated Biodiversity and Geodiversity Assets</p> <p>The Council will protect designated areas and species of <u>international, national and local importance for biodiversity and geodiversity</u> as set out below</p> <p><u>Development will be expected to deliver a net gain in biodiversity and be in accordance with the mitigation hierarchy below. Planning permission will be refused if significant harm resulting from development affecting biodiversity cannot be:</u></p> <ul style="list-style-type: none"> • <u>avoided, and where this is not possible;</u> • <u>mitigated, and if it cannot be fully mitigated, as a last resort;</u> • <u>compensated for.</u> <p><u>Sites of International and European Importance</u></p> <p><u>Development that is likely to result in an significant adverse effect, on the integrity of any European site (either alone or in combination), on an International or European nature conservation designation, or a site proposed</u></p>	<p>To satisfy the requirements of the HRA.</p> <p>To ensure the policy is effective and consistent with national policy on the conservation and enhancement of biodiversity.</p>

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		<p>for such designation, will need to satisfy the requirements of the Habitats Regulations: will not be permitted unless:</p> <ul style="list-style-type: none"> • <u>there are no alternative solutions; and</u> • <u>there are imperative reasons for overriding public interest; and</u> • <u>adequate compensatory measures can be taken to ensure the overall coherence of Natura 2000 is protected.</u> <p><u>As per the requirements of the Habitat Regulations.</u></p> <p><u>Sites of International or European Importance Include: Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites.</u></p> <p><u>Sites of National Importance</u></p> <p><u>Development affecting nationally important Sites of Special Scientific Interest (SSSIs) either directly or indirectly will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the impacts on the site or species.</u></p> <p><u>Sites of Local Importance</u></p> <p>Development likely to result in the loss, deterioration, degradation or harm to habitats or species of <u>local importance to biodiversity, or geological or geomorphological conservation interests, either directly or indirectly, will not be permitted for Local Nature Reserves (LNRs); Local Wildlife Sites (LWS), Local Geological Sites (LGS), European and UK protected species, or Biodiversity Action Plan habitats unless:</u></p> <ul style="list-style-type: none"> • <u>The need for, and benefits of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity interest. All Development proposals impacting on local wildlife sites will be expected to assess the site against the ‘Green Book’¹ criteria to</u> 	
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		<p><u>determine the status of the site and to ascertain whether the development clearly outweighs the impacts on the site;</u></p> <ul style="list-style-type: none"> • It can be demonstrated that it could not reasonably be located on an alternative site that would result in less or no harm to the biodiversity interest; and • Measures can be provided (and secured through planning conditions or legal agreements), <u>according to the mitigation hierarchy as set out above.</u> <u>The level of protection and mitigation should be proportionate to the status of the habitat or species and its importance individually and as part of a wider network.</u> that would avoid, mitigate against or, as a last resort, compensate for the adverse effects likely to result from development <p>The habitats and species of importance to biodiversity and sites of geological interest considered as part of this Policy comprise:</p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSIs); • Legally protected species; • National Nature Reserves (NNRs) and Local Nature Reserves (LNRs); • Local Wildlife Sites (LWS) and Local Geological Sites (LGS) • Habitats and species of principal importance for the conservation of biodiversity in England (Sections 40 and 41 of the Natural Environment and Rural Communities Act 2006 • (NERC); • Priority habitats and species listed in the national and local Biodiversity Action Plans; and 	
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		<ul style="list-style-type: none"> • Trees, woodlands, ancient woodland (including semi-natural and replanted woodland), aged and veteran trees, and hedgerows. <p>The level of protection and mitigation should be proportionate to the status of the habitat or species and its importance individually and as part of a wider network. Development proposals should seek to avoid adverse effects on SSSIs. Development adversely affecting a SSSI, either directly or indirectly, will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the likely impacts on the site and any broader impacts on the national network of SSSIs.</p> <p>Development adversely affecting a Local Site (LNR, LWS or LGS) will only be permitted either where it can be demonstrated that the benefits of the development clearly outweigh the impacts on the site. Development proposals impacting on potential local wildlife sites will be expected to assess the site against the 'Green Book3' criteria to determine the status of the site and to ascertain whether the development clearly outweighs the impacts on the site.</p> <p><u>Ancient Woodland</u></p> <p><u>Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland, and/or the loss of aged or veteran trees found outside of ancient woodland unless the need for, and benefits of, the development in that location clearly outweighs the loss.</u></p> <p>All development proposals in the proximity of ancient woodland shall have regard to the 'Standing Advice for Ancient Woodland and Veteran Trees' published by Natural England. incorporate buffers having regard to Natural England's standing advice. As a starting principle, development must be kept as far away as possible from ancient woodland. The necessary width of any buffer zone will depend upon local circumstances and the type of development. Buffer zones should be retained in perpetuity and allowed to</p>	
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		<p>develop into semi-natural habitats. Section 6 of the Standing Advice includes guidance on mitigation measures, including buffers.</p> <p><u>Ecological Assessment</u></p> <p>All proposals likely to impact on the sites noted above will <u>require</u> be subject to an Ecological Assessment. The Ecological Assessment <u>shall</u> should include due consideration of the importance of the natural asset, the nature of the measures proposed (including plans for long term management) and the extent to which they avoid and reduce the impact of the development.</p> <p>¹<u>The Green Book: Guidance for the Selection of Local Wildlife Sites in Warwickshire, Coventry and Solihull (2015) Local Wildlife Sites Project: Habitat Biodiversity Audit for Warwickshire.</u></p>	
MM102	Paragraph 9.6	<p>The Council will use planning conditions and/or agreements to secure measures, including financial contributions, to ensure that biodiversity conservation and geological interests are protected. The sympathetic management of existing wildlife sites and the restoration and enhancement of priority habitats, particularly where it would extend or link existing wildlife sites or support the targets within the local Biodiversity Action Plans, will be sought. The Council will also encourage the maintenance and/or enhancement of the connectivity and biodiversity of residential and non-designated green space, for example by using features such as permeable barriers. <u>Ecological assessments should be consistent with the British Standard 42020: Code of Practice for Planning and Development. This British Standard promotes transparency and consistency in the quality and appropriateness of ecological information submitted with planning applications.</u></p>	To clarify this document.
MM103	Policy NE2	<p>Policy NE2: Biodiversity</p> <p>New development will be permitted provided that it protects, enhances and/or restores habitat biodiversity.</p>	Policy NE1 now incorporates the NPPF elements of this policy.

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		<p>Development proposals must:</p> <ul style="list-style-type: none"> • protect or enhance biodiversity assets and secure their long term management and maintenance; • avoid negative impacts on existing biodiversity, and • lead to a net gain of biodiversity, where possible, by means of an approved ecological assessment of existing site features and development impacts; <p>Where a development would have a negative impact on a biodiversity asset, mitigation will be sought in line with the mitigation hierarchy. Impacts should be avoided and if this is not possible, mitigated. Where there would be a residual impact on a habitat or species and mitigation cannot be provided on site in an effective manner, developers will be required to offset the loss by contributing to appropriate biodiversity projects elsewhere in the area. Where an impact cannot be fully mitigated or, as a last resort, compensated for, then planning permission will be refused.</p> <p>Proposals which will improve the environment by reclaiming and improving derelict, contaminated, vacant or unsightly land for biodiversity value will be supported.</p>	
<p>MM104</p>	<p>Paragraph 9.7</p>	<p>Helping to secure improvements to biodiversity is one of the key roles in achieving sustainable development. Government policy is aimed at halting the net loss of biodiversity and striving for gains. The Government recognises that the loss of habitats and species, whether designated sites or not, is a key issue to be addressed. In this respect the Council considers that virtually all habitats have a biodiversity value from arable to ancient woodland. <u>In the Warwickshire, Coventry and Solihull sub-region biodiversity net gain is measured through the use of locally derived Defra Metrics available from Warwickshire County Council, although other comparable measures may be considered.</u></p>	<p>To ensure the plan is effective.</p>

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<p>MM105</p>	<p>Policy NE3</p>	<p>Policy NE34: <u>Strategic Green and Blue Infrastructure Policy</u></p> <p>The Council will work with partners towards the creation of a comprehensive Borough wide Strategic Green and Blue Infrastructure Network which is inclusive of the Princethorpe Woodland Biodiversity Opportunity Areas (also known as the Princethorpe Woodlands Living Landscape), as shown indicatively on the Green and Blue Infrastructure Proposals <u>Policies</u> Map. This will be achieved through the following:</p> <ul style="list-style-type: none"> • the protection, restoration and enhancement of existing <u>and potential</u> Green and Blue Infrastructure assets within the network as shown on the proposals Policies Map <u>map</u>; and • the introduction of appropriate multi-functional <u>corridors linkages</u> between existing <u>and potential</u> Green and Blue infrastructure assets <p>Where appropriate new developments must provide suitable Green <u>and Blue</u> Infrastructure linkages <u>corridors</u> throughout the development and link into adjacent strategic and local GI networks or assets where present.</p> <p>Where such provision is made a <u>framework management</u> plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic Green/<u>Blue</u> Infrastructure network. <u>A management plan, based on delivering the framework plan and detailing how the infrastructure will be managed, may be required by condition.</u></p>	<p>To ensure the Plan is clear and effective for use in day to day development management decisions</p>
<p>MM106</p>	<p>Paragraph 9.9</p>	<p><u>9.9 Green Infrastructure includes ‘Blue’ elements such as rivers, streams and ponds. The surface water part of Green Infrastructure is referred to as ‘Blue’ Infrastructure. It is not only important to protect the existing Green and Blue Infrastructure (GI) network in its current role but also to enhance it, both in its function and where possible in its physical extent. Through new developments there is an opportunity for the enhancement of GI assets particularly through</u></p>	<p>To ensure the Plan is clear and effective for use in day to day development management decisions</p>

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		the introduction of appropriate multi-functional <u>corridors</u> linkages between them. existing GI assets.	
MM107	Paragraph 9.10	<p>9.10 Where new multi-functional linkages <u>corridors</u> between existing Green and Blue Infrastructure (GI) assets are made from a development site a <u>framework Management Plan</u> will be required which addresses how to achieve the balance of public access and the protection of the existing Green/Blue Infrastructure site's asset. The <u>framework Management Plan</u> should be informed by the GI Study and factor in the following:</p> <ul style="list-style-type: none"> • Indicative buffers for the important Green <u>and/or Blue</u> Infrastructure corridors which form part of the strategic networks such as watercourse corridors and disused railway lines; • Retain sites of historic environmental value; • Indicative buffers where <u>required</u> appropriate to protect important Green/Blue Infrastructure against adjacent developments; • Retain valued semi natural habitats; and • Set out <u>the</u> local network of Green/Blue Infrastructure and how it will be managed and developed. 	To ensure the Plan is clear and effective for use in day to day development management decisions
MM108	Paragraph 9.11	<p>9.11 The Strategic Green and Blue Infrastructure Network that runs through the Borough and connects to networks beyond the administrative boundary contains many different elements, each of which contribute to its overall achievements as a Strategic Green Infrastructure Network. The principal assets of the Strategic Green and Blue Infrastructure Network are watercourse corridors, disused railway lines and Local Sites. It is vital that those elements of the network remain intact and are able to function in their role and Policy NE3 seeks to enable this. New Green <u>and Blue</u> Infrastructure should support the</p>	Consequential modification to ensure the Plan is consistent in referring to both Green and Blue infrastructure

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		aims of the Biodiversity Action Plan and the aims of the Natural Environment and Rural Communities Act.	
MM109	Paragraph 9.12	9.12 The Sub Regional Warwickshire, Solihull and Coventry Green Infrastructure Study and Rugby Borough Green Infrastructure Study set out that there is a distinct opportunity for improvement in the west of the Borough, where a cluster of ancient woodlands and unimproved or semi improved grasslands are located near to the urban edge of Coventry. This area, identified as the Princethorpe Woodland Biodiversity Opportunity Area (also known as the Princethorpe Woodlands Living Landscape project), is significant in size and is already rich in Green Infrastructure assets. Therefore its inclusion in Policy NE3, as a focus for enhancement of the overall Strategic Green/ <u>Blue</u> Infrastructure Network, is extremely important.	Consequential modification to ensure the Plan is consistent in referring to both Green and Blue infrastructure.
MM110	Paragraph 9.13	In spite of this importance to the Strategic GI Network the location of the Princethorpe Woodland Biodiversity Opportunity Area is not in a location which will see significant growth and consequently limited developer contributions will be available for its enhancement. The Council realises that opportunities for delivery against Policy NE3 through planning applications are limited, however it considers that this strategic approach to Green <u>and Blue</u> Infrastructure should be embodied in Development Plan policy for the long term. Control of the principal assets of the Strategic Green <u>and Blue</u> Infrastructure Network rest principally with the public sector and partnership working is therefore particularly key to its success.	Consequential modification to ensure the Plan is consistent in referring to both Green and Blue infrastructure.
MM111	Policy NE4	Policy NE43: Landscape Protection and Enhancement New development which positively contributes to landscape character will be permitted.	To ensure the Plan is effective by avoiding duplication of other policies protecting

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		<p>Development proposals will be required to demonstrate that they:</p> <ul style="list-style-type: none"> • integrate landscape planning into the design of development at an early stage; • consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity; • relate well to local topography and built form and enhance key landscape features, ensuring their long term management and maintenance; • identify likely visual impacts on the local landscape and townscape and its immediate setting and undertakes appropriate landscaping to reduce these impacts; • aim to either conserve, enhance or restore important landscape features in accordance with the latest local and national guidance; • avoid detrimental effects on features which make a significant contribution to the character, history and setting of an asset, settlement or area; • address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing and expanding these features through means such as buffering and reconnecting fragmented areas; and • are sensitive to an area’s capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements. 	<p>heritage and visual amenity.</p>
<p>MM112</p>	<p>Paragraph 9.15</p>	<p>The purpose of Policy NE4 is to ensure that significant landscape features are protected from harm <u>and enhanced</u> and that landscape design is a key component in the design of new development. Planning applications will be</p>	<p>To ensure that the Plan is consistent with national policy and</p>

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		required to submit a landscape analysis and management plan in appropriate cases. This should take into account evidence on landscape including the Warwickshire Landscape Guidelines <u>and Assessment of Rugby (2006), Landscape Sensitivity Study – Main Rural Settlements (2016), Rainsbrook Valley Landscape Sensitivity Study (2017), Warwickshire Historic Landscape Characterisation Study, the Warwickshire, Coventry and Solihull Green Infrastructure Strategy and data obtained from the Warwickshire Historic Environment Record.</u>	justified by reference to relevant proportionate evidence.
Chapter 10: Sustainable Design and Construction			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
MM113	Policy SDC1	<p>Policy SDC1: Sustainable Design</p> <p>All development will demonstrate high quality, inclusive and sustainable design and new development will only be allowed <u>supported</u> where <u>the proposals are of a scale, density and design that would not cause any material harm responds to the qualities, character and amenity of the areas in which they are situated. All developments should aim to add to the overall quality of the areas in which they are situated.</u></p> <p>Factors including the massing, height, landscape, layout, materials and access should also be a key consideration in the determination of planning applications.</p> <p>The Council will consider appropriate housing density on a site by site basis with decisions informed by local context of the area in terms of design considerations, historic or environmental integration, local character, identified local need and, where relevant, a Neighbourhood Development Plan.</p>	To ensure the Plan is effective and consistent with national policy on sustainable design.

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		<p>Proposals for new development will ensure that the amenities <u>living conditions</u> of existing and future neighbouring occupiers are safeguarded.</p> <p>Proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent sites where there is potential for conflict between the uses, for example, an existing waste management site. Such proposals must be accompanied by supporting information demonstrating that the existing and proposed uses would be compatible and that the proposal has addressed any potential effects of the existing use on the amenity of the occupiers of the proposed development.</p> <p>Developers should provide adequate off-street storage space for wheeled bins, including storing recycling, to serve all new residential properties, including conversions. This requirement is particularly important in designated Conservation Areas where the visual importance of the street scene has been acknowledged and there is a duty for the area’s character and appearance to be protected <u>preserved</u> and <u>or</u> enhanced. Provision can be in the form of storage space integral to the design of the property, dedicated space externally, in a communal storage area, or in underground waste storage systems.</p> <p>Proposals relating to the enhanced energy efficiency of existing buildings will be supported in accordance with the most up to date national regulations.</p>	
<p>MM114</p>	<p>Paragraph 10.9</p>	<p>National policy requires that local planning authorities set their own approach to housing densities which reflect local character, and this Policy SDC1 does not prescribe densities which developments must adhere to. The purpose of Policy SDC1 is to ensure, through the consideration of residential development proposals, that the Council can influence what is appropriate on a site by site basis according to the contents of Policy SDC1. Bringing forward new development at the 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</p>	<p>To ensure the policy is clear and effective.</p>

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		<p>expected to be significantly higher than rural areas. Where development sites are located in or close to Rugby town centre, densities are expected to be significantly higher than the minimum rural areas.</p>	
MM115	Policy SDC2	<p>Policy SDC2: Landscaping</p> <p>The landscape aspects of a development proposal will be required to form an integral part of the overall design. A high standard of appropriate hard and soft landscaping will be required. All proposals should ensure that:</p> <ul style="list-style-type: none"> • Important site features have been identified for retention through a detailed site survey; • The landscape character of the area is retained and, where possible, enhanced; • Features of ecological, geological and archaeological significance are retained and protected and opportunities for enhancing these features are utilised (<u>consideration will also be given to the requirements of policies NE1 and SDC3 where relevant</u>); • Opportunities for utilising sustainable drainage methods are incorporated; • New planting comprises native species which are of ecological value appropriate to the area; • In appropriate cases; there is sufficient provision for planting within and around the perimeter of the site to minimise visual intrusion on neighbouring uses or the countryside; and • Detailed arrangements are incorporated for the long-term management and maintenance of landscape features. 	To ensure the Plan is clear and effective in avoiding duplication or repetition between policies.
MM116	Policy SDC3	<p>Policy SDC3: Protecting and enhancing the Historic Environment</p> <p>Development will be supported that sustains and enhances the <u>significance of</u> Borough’s heritage assets including listed buildings, conservation areas, historic parks and gardens, archaeology, historic landscapes and townscapes.</p>	To ensure the Plan is consistent with national policy on conserving and enhancing the historic environment.

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		<p>Development affecting <u>the significance</u> of a designated or non-designated heritage asset and its setting will be expected to <u>preserve or enhance</u> its character, appearance and significance.</p> <p>a) Understand the Asset</p> <p>Applications affecting <u>with the potential to affect</u> the significance of a heritage asset will be required to provide sufficient information and assessment (such as desk-based appraisals, field evaluation, and historic building reports) of the 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.</p> <p>The Warwickshire Historic Environment Record, the Borough's Conservation Area Character Appraisals and Management Plans, the Local List of non-designated heritage assets, the Warwickshire Historic Towns Appraisal Study and Historic Landscape Characterisation are examples of sources of information that will be used to inform the consideration of future development including potential conservation and enhancement measures.</p> <p>Applicants should take account of the heritage assets communal, aesthetic, evidential and historical values.</p> <p>b) Conserve the Asset</p> <p>Great weight will be given to the conservation of the Borough's <u>designated</u> heritage assets. Any harm to the significance of a designated or non-designated heritage asset must be justified. and pProposals causing <u>substantial</u> harm <u>to designated heritage assets</u> will be weighed against the <u>public benefits of the proposal</u>. It must be demonstrated <u>need to demonstrate that the harm is necessary to achieve substantial public benefits sufficient to outweigh the harm or loss. Alternatively it must be demonstrated that all of the following apply:</u></p>	
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		<ul style="list-style-type: none"> • <u>the nature of the heritage asset prevents all reasonable uses of the site; and</u> • <u>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</u> • <u>conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and</u> • <u>the harm or loss is outweighed by the benefit of bringing the site back into use</u> <p>reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset, and whether the works proposed are the minimum required to secure the long term use of the asset.</p> <p><u>Where a development will lead to less than substantial harm to the significance of a designated heritage asset, this will be weighed against the public benefits of the proposal.</u></p> <p><u>In weighing applications that affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset.</u></p> <p><u>Non-designated archaeological sites of equivalent significance to scheduled monuments should be considered subject to the criteria for designated heritage assets.</u></p> <p>Scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in situ.</p>	
MM117	Paragraph 10.23	Details of Conservation Area, Appraisals and Management Plans, Historic Environment Records , Local Lists, Historic Landscape Characterisation , Heritage at Risk Register and Village Design Statements may be obtained via	To ensure the Plan is justified by reference to

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		<p>the Council’s website or contacting the Planning department for further details. <u>The Warwickshire Historic Environment Record includes Landscape Characterisation and the Warwickshire Historic Towns Project data, and can be obtained via Warwickshire County Council.</u> The Borough Council and where appropriate Warwickshire County Council will continue to maintain, update and make available these documents to help inform change and the conservation of the Borough’s heritage assets.</p>	<p>relevant proportionate evidence</p>
MM118	Policy SDC4	<p><u>Residential buildings</u></p> <p>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.</p> <p><u>Non-residential buildings</u></p> <p>All non-residential development over 1000 sqm 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>In meeting the carbon reduction targets set out in the Building Regulations and BREEAM standards the Council will expect development to be designed in accordance with the following energy hierarchy:</p> <ul style="list-style-type: none"> • Reduce energy demand through energy efficiency measures • Supply energy through efficient means (i.e. low carbon technologies) • Utilise renewable energy generation <p>Applicants must submit a Sustainable Buildings Statement to demonstrate how the requirements of Climate Change policies in this Local Plan have been met.</p>	<p>To ensure the Plan is consistent with national policy and justified and to ensure that there is sufficient evidence to require Very Good BREEAM standard.</p>

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		<p>Actual provision will be determined through negotiation, taking account of individual site characteristics and issues relating to the viability of development.</p> <p><u>The re-use and recycling of surface water and domestic waste water within new development will be encouraged.</u></p>	
MM119	Paragraph 10.24	<p>National targets for achieving zero carbon for residential development by 2016 and for non-residential development by 2019 will be taken forward through the progressive tightening of the Building Regulations.</p>	To ensure the Plan is consistent with national policy.
MM120	Paragraph 10.26	<p>The Council will require new development to meet mandatory building regulations, <u>including in relation to energy efficiency</u> and the new national technical standards for energy and water efficiency.</p>	The new national technical standards do not include an energy standard (this is covered by building regulations). The Water efficiency standard is either 125l or the 110l optional requirement which is specified in the main policy wording.
MM121	Paragraph 10.27	<p>The Water Cycle Study 2010 recommended that for water efficiency all new development should meet a minimum efficiency the equivalent of 105 litres per day (as per the Code for Sustainable Homes level 4). This measure was included in the Core Strategy 2011. Given the growth of households and population in Rugby since the study, the expected water demand and that Rugby falls within an area of ‘serious water stress’ as defined by Severn Trent, it is considered appropriate to adopt the requirement of 110 litres per person per day, in line with the national standards. The Council <u>has undertaken</u> is undertaking a Water</p>	To reflect completion of Water Cycle Study

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		<p>Cycle Study to update its evidence base and this has confirmed the Once complete this is expected to help confirm the approach taken in Policy SDC4. in advance of the Local Plan being published for consultation.</p>	
MM122	Policy SDC5	<p>Policy SD5: Flood Risk Management</p> <p>A sequential approach to the location of sustainable development will be undertaken by the Council based on the Environment Agency’s flood zones as shown on the latest Flood Map for Planning and Strategic Flood Risk Assessment. (SFRA). This will steer new development to areas with the lowest probability of flooding, in order to minimise the flood risk to people and property and manage any residual risk.</p> <p>If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where the following criteria are met:</p> <ul style="list-style-type: none"> • the vulnerability classification of the development is appropriate to the level of flood risk associated with its location with reference to the Environment Agency’s Flood Map, Rugby Borough Council’s Strategic Flood Risk Assessment (SFRA) flood zone maps and Table 3 of the NPPF Planning Practice Guide: Flood Risk and Climate Change; • it is provided with the appropriate flood risk mitigation measures (including suitable flood warning and evacuation procedures) which can be maintained for the lifetime of the development; • it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity; • all opportunities offered by the development to reduce flood risk elsewhere must be taken, including creating additional flood storage and reducing risk of flooding from the sewer network; • in the case of dwellings it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk; and 	<p>To ensure the Plan is effective and consistent with national policy in respect of flood risk management.</p>

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		<ul style="list-style-type: none"> • in the case of essential civil infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events. <p>If, following application of the sequential test, it is not possible or consistent with wider sustainability objectives for the development to be located in zones with a lower probability of flooding, then the Exception Test can be applied as set out in the NPPF. Where in the wider overall interest development is supported as an exception, applicants will need to demonstrate that it strictly complies with criteria b, c, d, e, and f of this Policy.</p> <p><u>Following the Sequential Test, and if required the Exception Test, development will only be permitted where the following criteria are met:</u></p> <ul style="list-style-type: none"> • <u>that the development does not increase flood risk elsewhere</u> • <u>Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; and</u> • <u>Development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.</u> <p>Land that is required for current and future flood management will be safeguarded from development. <u>Opportunities to reduce the causes and impacts of flooding should be taken where possible.</u></p> <p>Applicants will be required to demonstrate how they comply with this Policy by way of a site-specific Flood Risk Assessment (FRA) which is appropriate to the scale and nature of the development proposed, where the development is:</p>	
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		<ul style="list-style-type: none"> • in Flood Zone 2 or 3 as defined by the Environment Agency’s Flood Map or Rugby Borough SFRA; • minor development and change of use more than 1ha and in Flood Zone 1; • within 20m of a watercourse; • adjacent to, or including, any flood bank or other flood control structure; or • within an area with critical drainage problems. <p>The FRA must assess the flood risk from all sources and identify options to mitigate the flood risk to the development, site users and surrounding area.</p>	
MM123	Paragraph 10.35	<p>At a national level the aim is to direct development away from areas of high flood risk and avoid inappropriate development in areas at risk of flooding. Where development cannot take place in areas of low flood risk, a sequential test should be applied in which it is acknowledged that extensive areas of built development may fall into the high risk areas and that the re-use of previously developed land may be needed to avoid economic stagnation.</p>	Economic factor not directly related to considering flood risk. Remainder of paragraph covered elsewhere in policy.
MM124	Paragraph 10.36	<p>Rugby Borough Council (together with other authorities) has produced a Strategic Flood Risk Assessment (SFRA), which provides the basis for applying the sequential test. The SFRA includes mapping of Flood Zones and should be used as a reference and basis for consultation. Additional information may be obtained by contacting the Borough Council’s drainage engineers. Further information is also available via the Environment Agency, who have maps of the Flood Zones and also a Flood Map for Surface Water. The Environment Agency has produced a Flood Map for Planning (rivers and sea), which identifies flood zones, and also a Flood Map for Surface Water. These maps should be used for reference and as a basis for consultation. Additional information may be obtained by contacting the Borough Council’s drainage engineers. The SFRA maps also show flood zones in the Borough.</p>	To ensure the Plan is consistent with national policy.

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<p>MM125</p>	<p>Policy SDC6</p>	<p>Policy SDC6: Sustainable Urban Drainage</p> <p>Sustainable Urban Drainage Systems (Su<u>U</u>DS) are required in all <u>major</u> developments and all development in flood zones 2 and 3. Such facilities should preferably be provided on-site or, where this is not possible, close to the site, and:</p> <ul style="list-style-type: none"> • be designed and located <u>outside the floodplain and to integrate with Green/Blue Infrastructure functions</u>; • be appropriate for the needs of the site; • promote enhanced biodiversity; • improve water quality; • increase landscape value; and • provide good quality open spaces. <p>Infiltration Su<u>U</u>DS is the preferred way of managing surface water. The developer will carry out infiltration tests where possible and a groundwater risk assessment to ensure that this is possible and that groundwater would not be polluted. Where it is proven that infiltration is not possible, surface water should be discharged into a watercourse (in agreement with the Lead Local Flood Authority (LLFA) at pre-development greenfield run off rates or into a surface water sewer if there is no nearby surface water body.</p> <p>In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that:</p> <ul style="list-style-type: none"> • an acceptable means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation; and • contributions will be made to off-site SUDS schemes if located in an area known to suffer surface water flooding the development should seek to offer a strategic solution. 	<p>To ensure the Plan is clear and effective in respect of the requirements for SuDS.</p>
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		The re-use and recycling of surface water and domestic waste water within new development will be encouraged.	
MM126	Policy SDC7	<p>Policy SDC7: Protection of the Water Environment and Water Supply</p> <p>Developers will be expected to ensure that there is adequate water supply to serve existing and proposed developments by:</p> <ul style="list-style-type: none"> • minimising the need for new infrastructure by directing development to areas where there is a guaranteed and adequate supply of water having due regard to Severn Trent’s Water Resource Management Plan and Strategic Business Plan as well as the findings of the Water Cycle Study; and • 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>Development will not be permitted where proposals have a negative impact on water quality, either directly through pollution of surface or ground water, or indirectly through the overloading of Wastewater Treatment Works. Prior to any potential development, consultation must be held with Severn Trent Water to ensure that the required wastewater infrastructure is in place in sufficient time.</p> <p>Development will not be permitted where the sensitivity of the groundwater environment, or the risk posed by the type of development is deemed to pose an unacceptable risk of pollution of the underlying aquifer.</p>	To ensure Policy SDC7 is clear and effective for use in development management decisions
MM127	Policy SDC8	Policy SDC 8: Supporting the provision of renewable energy and low carbon technology	To ensure the Policy is effective and consistent with national policy on the best and most

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		<p>Proposals for new low carbon and renewable energy technologies (including associated infrastructure) will be supported in principle subject to all of the following criteria being demonstrated:</p> <ul style="list-style-type: none"> • the proposal has been designed, in terms of its location and scale, to minimise any adverse impacts on adjacent land uses and local residential amenity; • the proposal has been designed to minimise the <u>adverse impacts</u> (including any cumulative impacts) on the natural environment in terms of landscape, and ecology and visual impact; • there is no unacceptable impact on heritage assets and their setting; • the scheme maximises appropriate opportunities to address the energy needs of neighbouring uses (for example linking to existing or emerging District Heating Systems); • for biomass, it must be demonstrated that fuel can be obtained from a sustainable source and the need for transportation will be minimised; • for proposals for hydropower the application must be supported by a Flood Risk Assessment and Water Framework Directive assessment; • for wind turbines, the proposed development site is identified as suitable for wind energy development in a Local or Neighbourhood Plan; and • <u>for solar farms proposed on the best and most versatile agricultural land a sequential test has to be undertaken as outlined in the supporting text to this policy. Where it is proven that the use of the best and most versatile agricultural land is necessary, conditions may be applied to an approval to require the land to be restored to its previous greenfield use when the operation ceases; and</u> • following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. 	<p>versatile agricultural land.</p>
<p>MM128</p>	<p>Paragraph 10.55</p>	<p>Large scale solar farms should be focused on previously developed and non-agricultural land. Where green field sites are proposed it should be demonstrated that the use of any agricultural land is necessary and where</p>	<p>To ensure the Plan is consistent with national policy on the best and</p>

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		<p>applicable the proposal allows for continued agricultural use. <u>The economic and other benefits of the</u> Where possible <u>best and most versatile agricultural land will be taken into account. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer agricultural land should be sought in preference to that of a higher quality.</u> should be protected. Given that solar farms are temporary structures, the Council may apply planning conditions to ensure that the land is restored to its previous green field use in the event that the operation ceases. Specific consideration will be given to the effect of glint and glare on neighbouring uses and aircraft safety including additional impacts if the array follows the movement of the sun. Applicants should demonstrate that opportunities to mitigate landscape and visual impacts have been maximised for example through screening with native hedges.</p>	<p>most versatile agricultural land.</p>
MM129	Paragraph 10.58	<p>10.58 All weirs and dams associated with hydropower schemes will require the an Environmental Permit from prior written Flood Defence Consent of the Environment Agency if on a Main River and consent from <u>Warwickshire County Council</u> as the Lead Local Flood Authority if affecting an Ordinary Watercourse.</p>	<p>To clarify the requirements.</p>
MM130	Policy SDC9	<p>Policy SDC 9: Broadband and mobile internet</p> <p>Developers of new developments (residential, employment and commercial) will be expected to facilitate and contribute towards the provision of broadband infrastructure suitable to enable the delivery of broadband services across Rugby Borough to ensure that the appropriate service is available to those who need it.</p> <p>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</p>	<p>To ensure the Plan is consistent with national policy and justified against the evidence.</p>

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		<p>development at market prices and with a full choice of all available UK service providers.</p> <p>Developers are required to work with a recognised network carrier to design a bespoke duct network, wherever practicable, for the development.</p> <p>Other forms of infrastructure, such as facilities supporting mobile broadband and Wi-Fi, should be included, wherever possible and viable.</p>	
MM131	Paragraph 10.65	<p>This approach should be clearly identified within the Planning Statement that supports a relevant planning application which should outline who the intended network provider(s) will be and how the connection will be secured to each property. Every opportunity to future proof broadband provision and infrastructure should also be taken. This should ensure that ducting can be utilised to support ever increasing broadband speeds and cabling with minimum disruption to the highway network.</p>	To ensure the Plan is consistent with national policy and justified against the evidence.
Chapter 11: Delivery			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
MM132	Policy D1	<p>Policy D1: Transport</p> <p>Development will be permitted where sustainable modes of transport are prioritised and measures designed to mitigate transport impacts arising from either individual development proposals or cumulative impacts caused by a number of proposals are provided. <u>Proposals should have regard to the Sustainable Transport Strategy.</u></p> <p>All large scale developments which result in the generation of significant traffic movements, should be supported by a Transport Assessment and where</p>	To ensure the policy is consistent with national policy, effective and justified by reference to the supporting evidence on sustainable transport and mitigation measures.

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		<p>necessary a Travel Plan, to demonstrate practical and effective measures to be taken to avoid <u>mitigate</u> the adverse impacts of traffic. It must consider:</p> <ul style="list-style-type: none"> • the impact of the proposal upon existing infrastructure; • how the site will connect safely to public transport; • safe and convenient access to pedestrians and cyclists; • potential impact of heavy goods vehicles accessing the site, including during construction; <u>and</u> • the entering into of bus and/or freight partnerships with the County Council and/or third parties. • smaller scale development must be accompanied by a Transport Statement. <p><u>Smaller scale development must also be accompanied by a Transport Statement which should address:</u></p> <ul style="list-style-type: none"> • <u>opportunities for sustainable transport to serve the proposed development;</u> • <u>whether safe and suitable access to the site can be achieved; and</u> • <u>whether improvements can be undertaken that cost effectively mitigate the impacts of the development.</u> <p><u>Proposals should be considered in the light of the transport mitigation measures identified in the Infrastructure Delivery Plan, and other localised impacts as identified in the transport assessments and statements.</u></p>	
MM133	Policy D2	<p>Policy D2: Parking facilities</p> <p>Planning permission will only be granted for development incorporating adequate and satisfactory parking facilities including provision for motor cycles,</p>	To ensure the policy is promoting sustainability.

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		<p>cycles and for people with disabilities, (or impaired mobility), based on the Borough Council’s Standards included at Appendix 5 of this Local Plan.</p> <p><u>Electric and/or hybrid vehicle charging points are required to be provided as part of development as outlined in Appendix 5 unless it can be demonstrated that it is financially unviable.</u></p>	
MM134	Policy D3	<p>Policy D3: Infrastructure and Implementation</p> <p>The scale and pace of <u>The delivery of</u> new development will be dependent on sufficient capacity being available in existing infrastructure <u>and/or measures being proposed to mitigate its impact to meet the demands of new development.</u> Where this cannot be demonstrated permission for new development will only be granted where additional capacity can be released through <u>new infrastructure, or better management of existing infrastructure, or through the provision of new infrastructure.</u></p> <p>Developer contributions may be sought to fund new infrastructure <u>when required to mitigate development impacts</u> and a programme of delivery will be agreed before development can take place.</p> <p><u>Proposals should be considered in the light of the mitigation measures identified in the Infrastructure Delivery Plan.</u></p>	To ensure the Plan is positively prepared to meet its infrastructure requirements to achieve sustainable development.
MM135	Paragraph 11.12	<p>It is essential that new development is supported by the essential infrastructure it needs to function, and that new development does not increase pressure on existing infrastructure. Where new development will requires it new infrastructure the Council can require <u>infrastructure provision as detailed in the IDP (subject to the tests in the NPPF), that the developer and/or landowner contributes to,</u> as long as such requirements do not render the scheme unviable.</p>	To ensure the Plan is consistent with national policy on infrastructure.

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<p>MM136</p>	<p>Beneath paragraph 11.14</p>	<p><u>11.14a It is anticipated that capacity will be provided off-site within existing secondary schools in Rugby to meet the need arising from the allocation at Coton Park East (DS3.1 as shown on the Policies Map). However as a safeguard an area of 8.5ha land is being reserved on the Coton Park East allocation site for a combined primary and secondary school. The reserved land will be held for a period of 24 months as outlined in Policy DS7.</u></p>	<p>To ensure the Plan is positively prepared to meet its education infrastructure needs to secure sustainable development.</p>
<p>MM137</p>	<p>Policy D4</p>	<p>Policy D4: Planning Obligations</p> <p>Where it is necessary to mitigate against the impact of a development proposal, planning permission will only be granted when <u>Where it is not possible to address the unacceptable impacts of development through planning conditions, a legal agreement or planning obligation is entered into with the Council may be required</u> in line with the Community Infrastructure Levy (CIL) Regulations 2010 (as amended).</p> <p>In the first instance infrastructure contributions will be sought “on site”. However where this is not possible an off-site (commuted) contribution will be negotiated.</p> <p>The type, amount and phasing of contributions sought from developers will be <u>necessary to make related to the form and scale of the development acceptable, directly related, and fairly and reasonably related in scale and kind to the development proposed.</u> its potential impact on the site and surrounding area and the levels <u>The capacity of existing infrastructure and community facilities and</u> The the effect of obligations on the financial viability of the development may will also be <u>relevant a considerations.</u></p>	<p>To ensure the Plan is consistent with national policy on the use of planning obligations.</p>
<p>MM138</p>	<p>Beneath paragraph 11.18</p>	<p><u>11.18a Planning obligations should only be used where it is not possible to address the unacceptable impacts of development through a planning condition. Planning obligations should only be sought where they meet the</u></p>	<p>To ensure the Plan is consistent with national</p>

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		<p>tests set out in the NPPF: to ensure that the obligation is necessary to make the development acceptable in planning terms, is directly related to the development, and is fairly and reasonably related in scale and kind to the development, as well as being CIL compliant. Examples of obligations that could be appropriate as mitigation include education, affordable housing, transport, biodiversity, health, and community facilities.</p>			<p>policy on the use of planning obligations.</p>
Appendix 1 Implementation and Monitoring Framework					
MM139	Monitoring Framework Table	Policy	Indicator	Target	To remove policies which no longer exist in the main document.
		GENERAL PRINCIPLES			
		GP1	Monitor number of applications determined and decision outcome.	To be monitored through annual trends.	
		GP2	No indicator identified		
		GP3	Monitor number of dwellings completed on Previously Developed Land.	To be monitored through annual trends.	
		GP4	No indicator identified		
		GP5	No indicator identified		
		DEVELOPMENT STRATEGY			
		DS1	To monitor the completion of new homes and new employment land and report annually through the AMR.	12,400 (minimum) homes completed by 2031. 540 completed annually between 2011/12 and 2017/18. 663 completed annually between 2018/19 and 2030/2031. 110ha of employment land by 2031. 7.3 ha of employment land per annum until 2031.	

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		DS2	Monitor the supply, delivery and type of Gypsy and Traveller Pitches and report annually through the AMR.	The completion of 65 pitches (5 transit) between 2014 and 2034.	
		DS3	Monitor the supply and delivery of allocated sites and report annually through the AMR.		
		DS4	Monitor the supply and delivery of allocated sites and report annually through the AMR.		
		DS5	No indicator identified		
		DS6	No indicator identified		
		DS7	Monitor the supply and delivery of allocated sites and report annually through the AMR.		
		DS8	Monitor the supply and delivery of allocated sites and report annually through the AMR. To adopt Supplementary Planning Guidance for the South West Rugby Masterplan	Year? Adopt in <u>2019</u>	
		DS9	No indicator identified.		
		DS10	Monitor the supply and delivery of allocated sites and report annually through the AMR.		
		HOUSING			
		H1	No indicator identified		

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		H2	Monitor the supply, delivery and type of new affordable homes and report annually through the AMR. Monitor the number of relevant applications each year that contribute the full X% affordable housing contribution.	X% <u>20% affordable homes on Previously Developed Land</u> <u>30% affordable homes on Greenfield sites</u> 100%	
		H3	No indicator identified		
		H4	Monitor sites brought forward as Rural Exception sites	<u>To be noted when development comes forward.</u>	
		H5	No indicator identified		
		H6	Monitor the supply, delivery and type of new Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation and report annually through the AMR	To be monitored through annual trends.	
ECONOMIC DEVELOPMENT					
		ED1	Monitor the loss of employment land to alternative uses and report annually through the AMR.	To be monitored through annual trends	
		ED2	Monitor the supply and delivery of employment uses and report annually through the AMR.	7ha of employment land per annum until 2031.	
		ED3	No indicator identified		
		ED4	No indicator identified		

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RETAIL AND THE TOWN CENTRE		
TC1	No indicator identified	
TC2	Monitor the supply and delivery of new retail premises, the mix of retail premises and the levels of vacancy and report annually through the AMR	Completion of 12,010sqm of comparison floorspace and 1513sqm of convenience floorspace by 2030/31
TC3	No indicator identified	
TC34	Monitor the number and distribution of uses in the Town Centre	<p><u>No more than 40% non-A1 uses within the Primary Shopping Frontage.</u></p> <p><u>To identify concentrations of uses where present and to establish the vitality and viability of the Town Centre.</u></p>
HEALTHY, SAFE AND INCLUSIVE COMMUNITIES		
HS1	No indicator identified	
HS2	Monitor the number of relevant applications each that submit a HIA	100% of relevant applications
HS3	Monitor the change of use of any local community facility, shop or service and report annually in the AMR	To be monitored through annual trends
HS4	Monitor the delivery of new open spaces against the open space standards	<p>To be monitored through annual trends</p> <p>To be monitored through annual trends</p>

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			Monitor the loss of open spaces	
	HS5	To adopt Supplementary Planning Document relating to Air Quality Management		Year? <u>Adopt in 2019</u>
NATURAL ENVIRONMENT				
	NE1	Monitor the number of designated biodiversity and geodiversity assets		? No loss ? <u>To be monitored through annual trends</u>
	NE2	No indicator identified		
	NE3	Monitor the delivery of new green infrastructure		? Relate to GI strategies? <u>Where Management Plans are required for a site, relate to Green Infrastructure strategies.</u>
	NE4	No indicator identified		
SUSTAINABLE DESIGN AND CONSTRUCTION				
	SDC1	Monitor the density of new development and report annually through the AMR. Number of buildings built each year above required building standards for energy efficiency.		To be monitored through annual trends. To be monitored through annual trends.
	SDC2	No indicator required.		
	SDC3	Monitor the number of listed and locally listed buildings that appear on the at risk register nationally and locally		To establish a declining trend <u>and status of buildings.</u>
	SDC4	Monitor the number of dwellings that meet the		100% of dwellings to meet the building regulations requirement of 110litres of water/person/day

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			required water efficiency target			
			Monitor the number of non-residential buildings that achieve the required standard.	BREEAM very good, as a minimum.		
		SDC5	Monitor the amount of homes and employment land delivered within Flood Zones 2 and 3	<u>Ø Check locations of annual completions</u>		
		SDC6	Monitor the number of SUD schemes brought forward as part of new development	To be monitored through annual trends		
		SDC7	No indicator identified			
		SDC8	Monitor the delivery of renewable and low carbon energy sources in the Borough	To be monitored through annual trends		
		SDC9	Monitor the number of homes with superfast and ultrafast broadband access	To be monitored through annual trends		
		DELIVERY				
		D1	No indicator identified. <u>Monitor details of Transport Assessments submitted as part of development proposals.</u>	<u>Identify trends in transport data.</u>		
		D2	Monitor the number of applications approved that meet the parking standards	100% <u>Majority of applications approved will be in accordance with parking standards policy, although there</u>		

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				<u>may occasionally be an exception to be noted.</u>	
		D3	No indicator identified		
		D4	<p>Monitor the number of applications each year that secure planning obligations</p> <p>To monitor the amount of secured financial contribution to infrastructure each year</p> <p>To monitor the amount of money spend on new infrastructure schemes each year</p>	To be monitored through annual trends	
		D5	No indicator identified		
Appendix 2 Housing Trajectory					
MM140	Housing Trajectory	See appended schedule of individual changes to the Housing Trajectory			To ensure the trajectory is consistent with the main modifications to site allocations and to ensure the Plan is positively prepared and effective in meeting the borough's housing requirement.
Appendix 3 Infrastructure Delivery Plan					
MM141	IDP Introduction	The Infrastructure Delivery Plan – hereinafter referred to as the IDP - will seek to establish what additional infrastructure and service needs are required to support and accommodate the level of development and growth proposed in			To ensure the Plan is positively prepared, justified and consistent

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	<i>[Second paragraph]</i>	the Local Plan. Rugby Borough Council is planning to provide land for the delivery of a minimum of 12,400 new homes between 2011 and 2031, together with approximately 110 Ha of employment land over the same period of time. The Local Plan identifies strategic allocations of <u>at Coton Park East, and South West Rugby and a new settlement at Lodge Farm</u> , which allocated together with the Core Strategy allocations of Gateway Rugby (now called Eden Park) and Rugby Radio Station (now called Houlton), will accommodate the majority of the planned new growth.	with national policy in enabling sustainable development.
MM142	Transport <i>[Fourth paragraph]</i>	As each scheme is advanced in partnership with WCC Highways, the HE and site promoters, the detail of the necessary mitigation, including costs and funding, will be progressed. <u>This will include confirmation of the proportion of strategic scheme costs to be met by each development as set out in the IDP schedule. This will also include the smaller scale highway mitigation. Beyond the transport mitigations identified in this IDP to support the delivery of the Local Plan, the Council are working with WCC highways to identify additional measures that could have wider benefits to the network particularly surrounding the Town Centre.</u>	To ensure the Plan is positively prepared, justified and consistent with national policy in enabling sustainable development.
MM143	Transport <i>[After final paragraph]</i>	<u>Warwickshire County Council has indicated the need for and the benefits of an additional railway station serving Rugby. Network Rail has forecast that rail demand in Rugby will double by 2043. Although Rugby Station itself is well equipped to support such growth, the stations surroundings are considered to be a constraint on supporting growth. Rugby Parkway Railway Station- proposed for land to the south of the A428 Crick Road, opposite the former Rugby Radio Station- is required to ensure Rugby has the connectivity necessary to secure the long term economic and residential development of the area, served by sustainable modes of transport. The proposal will have considerable benefits in reducing car dependence and addressing improving air quality in the</u>	To ensure the Plan is positively prepared in terms of infrastructure requirements to achieve sustainable development.

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		<u>borough. The project will be funded by Warwickshire County Council and the Department for Transport.</u>	
MM144	Education <i>[First paragraph]</i>	Education provision within Rugby town is extremely pressured and evidence produced by Warwickshire County Council demonstrates there is no additional capacity within the town. Consequently the strategic allocations to Rugby town include onsite education provision to be phased against the growth of development. The largest of the allocations, South West Rugby will have onsite provision of an 8-9 form entry secondary school, which will be co-located with a primary school that will be a 2 form entry. In addition there will be a further two primary schools that will also be two form entry. A fourth primary school will be two form entry, with the potential to rise to a three form entry.	To ensure the Plan is justified in respect of its infrastructure requirements.
MM145	Education <i>[Second paragraph]</i>	The new settlement at Lodge Farm will have an onsite primary school that will be two form entry rising to three form entry, if identified as necessary, and a financial contribution towards secondary school provision. Finally, the extension to the north of Rugby town, at Coton Park East, will also have an onsite primary school of two form entry, and a financial contribution towards secondary provision. A site of 8.5ha will be reserved within the Coton Park East allocation for a period of 24 months for a new combined primary and secondary school. This will be defined within the Coton Park East SPD and is supported by the Statement of Common Ground (SoCG) between Warwickshire County Council and AC Lloyd.	To ensure the Plan is positively prepared and justified in respect of its infrastructure requirements.
MM146	Education <i>[Third paragraph]</i>	In addition to onsite education provision, the smaller allocations, including at Coton House and those to the Main Rural Settlements will also generate a need for additional education provision. For the Main Rural Settlements the short term/immediate impact of a development on primary provision in these settlements is likely to be the need for the Education Authority to transport pupils to the next nearest school with places in the required year group. In the	To ensure the IDP is consistent with the main modifications to the proposed housing allocations.

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		longer term there may need to be some changes in transport arrangements/routes for those on the periphery of priority areas. Temporary or permanent accommodation may need to be an option in some areas such as Brinklow , Wolvey and Long Lawford. Long Lawford needs additional accommodation to meet current demand and therefore without the currently proposed expansion of the school, further development will add to this requirement to provide additional pupil places in Long Lawford or elsewhere.	
MM147	Education, <i>[Fourth paragraph]</i>	For Coton House this will be an offsite contribution towards the primary school at Coton Park East. There will also be a need for <u>an additional off site contributions towards secondary school provision</u> to support this combined growth.	To ensure the IDP is consistent with the planned level of housing growth.
MM148	Education <i>[Fifth paragraph]</i>	<u>The off-site secondary school contributions sought from the Local Plan allocations will reimburse the Education Funding Authority (EFA,) who are funding the cost of a new build secondary school in the south of Rugby Town.</u> <u>This is as a result of Ashlawn School securing permission from the Department for Education to open a new school. The EFA are currently in the process of identifying and securing the site for the school.</u> Alongside this, a financial contribution, where appropriate, will be required to support the required pupil transportation for those sites which will not deliver an onsite secondary <u>school</u> provision.	To ensure the IDP is consistent with the planned level of housing growth.
MM149	Health <i>[Introduction Paragraph]</i>	Primary and Acute & Community Health Care-Infrastructure	To ensure the IDP uses the correct terms and names as requested by organisations.

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		This section is informed by evidence provided by the Coventry and Warwickshire CCG, NHS England and University Hospital Coventry and Warwickshire, through ongoing and positive dialogue.	
MM150	Health <i>[First paragraph]</i>	CCG response highlighted that using an average occupancy of 2.4 people per home and an average list size of 1,750 registered patients per whole time equivalent GP, each of the main rural settlements identified for growth (based on Local Plan Preferred Option proposal of 100 dwellings each) will need an additional 0.14 whole time equivalent GP, equivalent to one session a week. It was identified that the GP practices in Brinklow , Stretton-on-Dunsmore and Wolston can accommodate the very small increase in demand at those locations and the remaining additional patients can also be served by the existing GP infrastructure. Therefore no need for the development of new GP premises to provide services to the residents of the new homes planned in the main rural settlements has been identified.	To ensure the IDP is consistent with the main modifications to the proposed housing allocations.
MM151	Health <i>[Third paragraph]</i>	For the Coton Park East and Coton House development a new healthcare facility is planned to be developed at Brownsver which means that there is no need for further GP premises development to provide services for the new residents. Contributions should be sought from the site towards the new provision at Brownsver.	To ensure the IDP is consistent with the main modifications to the proposed housing allocations
MM152	Health <i>[Final paragraph]</i>	In relation to Lodge Farm discussions are currently taking place as to the requirements for the site therefore the Publication Draft identifies land for the provision of a GP surgery, if required.	To ensure the IDP is consistent with the main modifications to the proposed housing allocations

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MM153	Police <i>[Third paragraph]</i>	The police premises within the Borough already operate at capacity. Therefore additional premises will be required to accommodate the additional officers and staff needed to police the <u>South West Rugby and Rugby town-north allocations</u> . In addition to this offsite financial contributions have also been requested for other site allocations through the Local Plan. The Council will continue to work closely with Warwickshire Police to identify the financial contributions requested and the sites which will make the contributions.	To ensure the IDP is consistent with the infrastructure needs arising from the proposed housing allocations.
MM154	Fire and Rescue <i>[First paragraph]</i>	The below is based upon the ongoing discussions with Warwickshire County Council Fire and Rescue <u>following their responses</u> to the Preferred Options consultation, December, 2016 and subsequent September, 2016 update.	To ensure the IDP is consistent with the infrastructure needs arising from the proposed housing allocations.
MM155	Fire and Rescue <i>[Second paragraph]</i>	Warwickshire County Council is the fire and rescue authority for the area. They have requested a new fire and rescue station to be located on the South West Rugby allocated site. This request is based on their statutory requirement to be able to maintain their response times. In addition they have also requested a presence on the Coton Park East development site to the north of Rugby, for the same reason. By maintaining a presence in these locations, Warwickshire County Council Fire and Rescue will be able to meet their statutory response times. With a new facility on the South West allocation, Lodge Farm would also be reached. The Council will continue to work closely with Warwickshire County Council Fire and Rescue to confirm the details of the contribution requests.	To ensure the IDP is consistent with the infrastructure needs arising from the proposed housing allocations.
MM156	Waste Water and Drainage	<u>The planned future development in the Borough has been assessed with regards to water supply capacity, wastewater capacity and environmental capacity. Any water quality issues, associated water infrastructure upgrades</u>	To ensure the Plan is justified against the infrastructure requirements arising

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	<p><i>[Final paragraph]</i></p>	<p><u>that may be required and potential constraints have subsequently been identified and reported in the study.</u></p> <p><u>The Water Cycle Study identifies the relevant catchment of all the proposed allocations within this Local Plan. With regard the strategic allocations The Water Cycle Study identifies that both the proposed South West Rugby and Coton Park East allocations are within the catchment for the WwTW (Wastewater Treatment Works) at Rugby Newbold.</u></p> <p><u>Within the Borough there is generally capacity in the waste water treatment works to deal with the proposed level and distribution of growth. However, some works will require investment. No constraints to delivery have been identified. Severn Trent Water will generally fund and deliver upgrades to water supply and foul drainage networks and waste water treatment facilities, with additional funding provided by relevant site developers.</u></p> <p><u>The Water Cycle Study demonstrates that there are workable solutions to key constraints to deliver future development for all development sites (committed and allocations).</u></p>	<p>from planned development.</p>
<p>MM157</p>	<p>Infrastructure Delivery Schedule- South West Rugby</p>		<p>To ensure the Plan is positively prepared and justified in respect of its infrastructure requirements.</p>

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<i>Item</i>	<i>Lead Delivery</i>	<i>Other Partners</i>	<i>Local Plan Phase</i>	<i>Cost and percentage of total cost*</i>	<i>Funding</i>
South West Rugby Sustainable Urban Extension					
Transport					
Link A: B4642 – A4 26 link	SW Rugby Developers	WCC	Phase 2-3	TBC	Developer
Link A: B4642 – A4 26 link	SW Rugby Developers	WCC	Phase 2-3	TBC	Developer
Link C: A4071(Potsford Dam)/B4642-Link B	SW Rugby Developers	WCC	Phase 4	TBC	Developer
Improvements to Dunchurch Crossroads	South West Rugby Developers Secured through the Ashlawn Road permission gained at appeal (Ref: APP/E3715/W/16/3147448)	WCC	<u>2021</u> (Phase 2)	TBC <u>Funding already obtained</u>	Developer

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		Potential mitigation for A45/M45 corridor	South West Rugby Developers	WCC/Highways England	TBC	TBC	Developer
		<u>A45/M45/B4429 Roundabout- partial signalisation of A45/B4429 roundabout</u>	<u>SW Rugby Developers</u>	<u>WCC/Highways England</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £259,200 (total cost).</u>	
		Provision of high quality cycling network	SW Rugby Developers	WCC Highways/Sustrans	Ongoing	<u>TBC£1.2m (indicative)</u>	Developer
		High quality public transport	SW Rugby Developers	WCC/ Private Sector/Bus Operators	TBC	TBC	Developer
		Other off site work	TBC	TBC	TBC	TBC	Developer
		<u>A426/Bawmore Road/Sainsbury's roundabout</u>	<u>SW Rugby</u>	<u>WCC</u>	<u>2026 (Phase 3)</u>	<u>A proportion of £774,174 in (total cost)</u>	

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		<u>A426 Rugby Road between Ashlawn Road and Sainsbury's roundabout</u>	<u>SW Rugby</u>	<u>WCC</u>	<u>2026 (Phase 3)</u>	<u>A proportion of £778,217 (total cost).</u>		
		<u>A426 approach to Ashlawn Road roundabout</u>	<u>SW Rugby</u>	<u>WCC</u>	<u>2026 (Phase 3)</u>	<u>A proportion of £706,362 (total cost).</u>		
		<u>South West Link Road (SWLR)- Homestead Link</u>	<u>SW Rugby</u>	<u>WCC</u>	<u>2026 (Phase 3)</u>	<u>A proportion of £19,764,864 (total cost)</u>		
		<u>SWLR- Cawston Lane re-routing</u>	<u>SW Rugby</u>	<u>WCC</u>	<u>See notes</u>	<u>A proportion of £5,784,264 (total cost).</u>		
		<u>SWLR- Potsford Dam Link (including Cawston Bends and Potsford</u>	<u>SW Rugby</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £12,691,624 (total cost)</u>		

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		<u>Dam Roundabout improvements</u>						
		<u>A426/Evrex Way</u>	<u>SW Rugby and Coton Park East</u>	<u>WCC</u>	<u>2026 (Phase 3)</u>	<u>A proportion of £5000 (total cost)</u>		
		<u>Rugby Gyrotory Improvements</u>	<u>SW Rugby and Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £500,000 (total cost)</u>		
		<u>A428 Hillmorton Road/Percival Road</u>	<u>SW Rugby, and Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £411,454 (total cost).</u>		
		<u>B4429 Ashlawn Road/Percival Road (widening to provide a right turn lane)</u>	<u>SW Rugby, and Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £361,327 (total cost).</u>		
		<u>B5414 (North street/Church Street) (traffic calming</u>	<u>SW Rugby, and Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £500,000 (total cost).</u>		

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		and downgrading of the route)					
		Hillmorton Road/Whitehall Road Roundabout (widen 2 arms to provide roundabout and 2 puffin crossings)	SW Rugby and Coton Park East	WCC	2031 (Phase 4)	A proportion of £457,178 (total cost).	
		Avon Mill/Hunters Lane Improvements	SW Rugby and Coton Park East	WCC	TBC	£1,574,662	
Education							
		2- FE primary school Contribution toward new primary school as part of Ashlawn Road	SW Rugby Developers	WCC, Academy, Foundation and other schools	Phase-2 TBC	TBC	Developer

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		development					
		2 FE primary school with the potential to rise to 3FE	SW Rugby Developers	WCC, Academy, Foundation and other schools	Phase 23	TBC £6,000,000	Developer
		2 FE primary school	SW Rugby Developers	WCC, Academy, Foundation and other schools	Phase-3	TBC £6,000,000	Developer
		2 FE primary school with potential to rise to 3 FE	SW Rugby Developers	WCC, Academy, Foundation and other schools	Phase 4	TBC	Developer
		6-8 & 9 FE secondary school, co-located with one of the primary schools	SW Rugby Developers	WCC, Academy, Foundation and other schools	Phase 2 TBC	TBC £24,000,000	Developer
		Community					
		Financial contribution to library services	WCC	N/A	Phases 2-4	£109,440.00	Developer

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Emergency services							
		<p>Safer Neighbourhood Team provision for 9 posts and accommodation. The employment and deployment of 49 additional Police staff requiring-</p> <p>a) additional staff start-up cost and personal equipment</p> <p>b) additional vehicles</p> <p>c) on site premises to cater for the additional staff</p>	<p>SW Rugby Developers Warwickshire and Mercia Police</p>	<p>Warwickshire Police</p> <p>N/A</p>	<p>Phase 3-4</p>	<p>TBC</p> <p><u>£1,558,708</u></p>	<p>Developer</p>

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		Land for onsite fire and rescue presence	SW Rugby Developers	WCC Fire and Rescue Service	Phase 2	<u>£1.3 million</u> <u>£3,000,000</u>	Developer	
Health facilities								
		Land to accommodate and financial contributions to provide 3GP surgery rising to 7GP upon completion of site.	C&R CCG	Developers	Commence in phase 2, completion post plan period	£1,452,735 (3 GP) - £3,008,495 (full GP provision)	Developer	
St Cross Hospital								
		<u>UHCW – The Hospital of St Cross, Rugby. 2 additional cubicles at the Walk in Centre</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£54,600.</u> <u>Costs not yet apportioned</u>		
		<u>UHCW – The Hospital of St Cross,</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£167,500</u> <u>Costs not yet</u>		

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		<u>Rugby. One theatre</u>				<u>apportioned</u>		
		<u>UHCW – The Hospital of St Cross - 55 additional car parking spaces for each location</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£200,000 Costs not yet apportioned</u>		
		<u>UHCW – The Hospital of St Cross & University Hospital Coventry - 1 CT scanner, 1 MRI scanner, 1 endoscopy room</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£533,052 Costs not yet apportioned</u>		
		<u>Expansion A & E footprint to increase number of bays</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£1,024,800 Costs not yet apportioned</u>		

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		Utilities					
		<u>Western Power connections where necessary</u>	<u>Western Power All</u>	<u>Local Plan Allocations</u>	<u>Ongoing</u>	<u>TBC</u>	
		<u>Improving telecommunications - connections to the strategic network to be made by developers of all new premises</u>	<u>Developers</u>	<u>Broadband provider. All Local Plan Allocations</u>	<u>Ongoing</u>	<u>TBC</u>	
		<u>Rugby Newbold Waste water Treatment Works- conventional treatment progress upgrades and flow upgrades, including any water</u>	<u>Severn Trent</u>	<u>Developers</u> <u>2</u> <u>Environment Agency</u>	<u>Ongoing</u>	<u>TBC</u>	

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		supply or efficiency improvements required.						
MM158	Infrastructure Delivery Schedule- Rugby Town North	Rugby Town – North (Coton House and Coton Park East)						To ensure the Plan is positively prepared and justified in respect of its infrastructure requirements.
		Transport						
		Localised mitigation to A426/Central Park Drive/Gateway northern access	Developers	WCC	Phase 2-3	TBC	Developers	
		Localised mitigation to A426/Newton Manor Lane/Gateway Southern access	Developers	WCC	Phase 2-3	TBC	Developers	
		Localised mitigation to A426/Brownsover Lane/Bou	Developers	WCC	Phase 2-3	TBC	Developers	

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		<u>Boughton Road</u>						
		<u>Mitigation to M6 J1</u>	<u>Developers</u>	<u>WCC</u>	<u>Phase 2-3</u>	<u>TBC</u>	<u>Developer</u>	
		<u>Avon Mill/Hunters Lane Improvements</u>	<u>Coton Park East</u>	<u>WCC</u>	<u>TBC</u>	<u>£1,574,662 in total.</u>		
		<u>A426 Leicester Road/Brownsover Road/Boughton Road Roundabout</u>	<u>Coton Park East</u>	<u>WCC</u>	<u>2026 (Phase 3)</u>	<u>£1,700,000 - in total.</u>		
		<u>A426/Central Park Drive</u>	<u>Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>£551,634 in total.</u>		
		<u>Provision of high quality cycling network</u>	<u>Coton Park East</u>	<u>WCC/Sustrans</u>	<u>Ongoing</u>	<u>TBC</u>		
		<u>High quality public transport network</u>	<u>Coton Park East</u>	<u>Bus operators/WCC</u>	<u>TBC</u>	<u>TBC</u>		

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		<u>Rugby Gyratory Improvements</u>	<u>SW Rugby and Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £500,000 (total cost).</u>		
		<u>A428 Hillmorton Road/Perival Road</u>	<u>SW Rugby and Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £411,454 (total cost).</u>		
		<u>B4429 Ashlawn Road/Perival Road (widening to provide a right turn lane)</u>	<u>SW Rugby and Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>A proportion of £361,327 (total cost).</u>		
		<u>B5414 (North street/Church Street)</u>	<u>Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>£500,000 in total.</u>		
		<u>Hillmorton Road/Whitell Road Roundabout</u>	<u>Coton Park East</u>	<u>WCC</u>	<u>2031 (Phase 4)</u>	<u>£457,178 in total.</u>		
		Education						

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		2FE primary school (to be located on Coton Park East)	Developers	WCC, Academy, Foundation and other schools WCC or ESFA- In conjunction with an Academy Trust (TBC)	2021 (Phase 2)	TBC 1.2ha <u>£6,000,000</u>	Developers	
		<u>24 month reservation of land for Secondary School within the Coton Park East allocation (land defined on allocation s map).</u>	AC Lloyd	WCC	TBC	TBC		
		Pupil transportation and contributions	WCC	WCC, Academy, Foundation and other schools TBC	TBC	TBC <u>Estimated costs</u>	Developers	

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		towards new secondary school provision: school places for all phases				<u>subject to formula</u> <u>Early Year</u> <u>£502,541</u> <u>Primary</u> <u>£3,517,787</u> <u>Secondary</u> <u>£3,140,935</u> <u>Post 16</u> <u>£600,172</u> <u>Primary SEN</u> <u>£117,711</u> <u>Secondary SEN</u> <u>£239,668</u> <u>Transport</u> <u>TBC</u>		
Coton House								
		Financial contribution to support library services	WCC Library Service	None	Phase 2-3	£2,188.80	Developer	

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		Off-site GP provision contributions	C&R CCG	Developers	Phase 2-4	TBC	Developer	
Coton Park East Community								
		Financial contribution to support library services	WCC Library Service	None	Phase 2-4 <u>2031</u> (Phase 4)	£17,510.40	Developer	
		Off-site GP provision contributions	C&R CCG	Developers	Phase 2-4	TBC	Developer	
Emergency Services								
		Offsite contribution for police <u>Premises expenditure to cater for 3 staff</u>	Warwickshire Police <u>TBC</u>	N/A <u>TBC</u>	Phase 2-3 <u>50% of total contribution to be paid upon completion of the 400th dwelling (2025-26 according to housing trajectory appended</u>	TBC <u>£72,106</u>	Developer	

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					to housing background paper) and the remaining contribution to the paid on completion of the 720 th dwelling (2028-29 according to housing trajectory appended to housing background paper).			
		<u>Start up and personal equipment for 3 additional police staff</u>	<u>TBC</u>	<u>TBC</u>	<u>50% of total contribution to be paid upon completion of the 400th dwelling (2025-26 according to housing trajectory appended to housing</u>	<u>£16,758</u>		

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					background paper) and the remaining contribution to the paid on completion of the 720 th dwelling (2028-29 according to housing trajectory appended to housing background paper).			
		<u>Additional police vehicles</u>	<u>TBC</u>	<u>TBC</u>	<u>50% of total contribution to be paid upon completion of the 400th dwelling (2025-26 according to housing trajectory appended to housing background</u>	<u>£20,528</u>		

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					<u>paper) and the remaining contribution to the paid on completion of the 720th dwelling (2028-29 according to housing trajectory appended to housing background paper).</u>			
		Land for on-site fire and rescue presence	<u>Developers /WCC Fire and Rescue Service TBC</u>	<u>N/A TBC</u>	<u>TBC</u>	<u>TBC 0.4ha</u>	<u>Developers</u>	
Health Care Facilities								
		<u>Off - site GP provision contributions</u>	<u>C&R CCG</u>	<u>Developers</u>	<u>TBC</u>	<u>£214,943</u>		
St Cross Hospital								
		<u>UHCW – The Hospital</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£54,600. Costs not yet</u>		

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		<u>of St Cross, Rugby. 2 additional cubicles at the Walk in Centre</u>				<u>apportioned</u>		
		<u>UHCW – The Hospital of St Cross, Rugby. One theatre</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£167,500 Costs not yet apportioned</u>		
		<u>UHCW – The Hospital of St Cross - 55 additional car parking spaces for each location</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£200,000 Costs not yet apportioned</u>		
		<u>UHCW – The Hospital of St Cross & University Hospital</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£533,052 Costs not yet apportioned</u>		

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		<u>Coventry - 1 CT scanner, 1 MRI scanner, 1 endoscopy room</u>						
		<u>Expansion A & E footprint to increase number of bays</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£1,024,800</u> <u>Costs not yet apportioned</u>		
<u>Utilities</u>								
		<u>Western Power connections where necessary</u>	<u>Western Power All</u>	<u>Local Plan Allocations</u>	<u>Ongoing</u>	<u>TBC</u>		
		<u>Improving telecommunications - connections to the strategic network to be made by developers of all</u>	<u>Developers</u>	<u>Broadband provider. All Local Plan Allocations</u>	<u>Ongoing</u>	<u>TBC</u>		

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		<p><u>new premises</u></p> <p><u>Rugby Newbold Waste water Treatment Works- conventional treatment progress upgrades and flow upgrades, including any water supply or efficiency improvements required.</u></p>	<p><u>Severn Trent</u></p>	<p><u>Developers</u> <u>Environment Agency</u></p>	<p><u>Ongoing</u></p>	<p><u>TBC</u></p>			
MM159	Infrastructure Delivery Schedule- Rural Area MRS allocation	Rural Area - MRS allocation							To ensure the Plan is positively prepared and justified in respect of its infrastructure requirements.
		Education							
		Primary and Secondary pupil transportation cost	WCC	Private sector	Phase 2-3	TBC <u>In line with the WCC Education funding formula</u>	Developed		
Potential for longer	WCC	Academy, Foundation	Phases 2-3	TBC	Developed				

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		term temporary or permanent accommodation may need to be an option in some areas such as Brinklow, Wolvey and Long Lawford		and other schools				
		Financial contribution to secondary school provision	WCC	TBC	<u>Ongoing Phases 2-3</u>	TBC <u>In line with the WCC Education funding formula</u>	Developer	
		Community						
		Financial contribution to support library services	WCC Library Service	TBC	Phase 2-3	£15,321.60.	Developer	
		St Cross Hospital						

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		<u>UHCW – The Hospital of St Cross, Rugby. 2 additional cubicles at the Walk in Centre</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£54,600. Costs not yet apportioned</u>		
		<u>UHCW – The Hospital of St Cross, Rugby. One theatre</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£167,500 Costs not yet apportioned</u>		
		<u>UHCW – The Hospital of St Cross - 55 additional car parking spaces for each location</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£200,000 Costs not yet apportioned</u>		
		<u>UHCW – The Hospital of St Cross</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£533,052 Costs not yet</u>		

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		<u>& University Hospital Coventry - 1 CT scanner, 1 MRI scanner, 1 endoscopy room</u>				<u>apportioned</u>		
		<u>Expansion A & E footprint to increase number of bays</u>	<u>UHCW</u>	<u>All Local Plan Allocations</u>	<u>Ongoing</u>	<u>£1,024,800</u> <u>Costs not yet apportioned</u>		
Utilities								
		<u>Western Power connections where necessary</u>	<u>Western Power All</u>	<u>Local Plan Allocations</u>	<u>Ongoing</u>	<u>TBC</u>		
		<u>Improving telecommunications - connections to the strategic network to be made by</u>	<u>Developers</u>	<u>Broadband provider. All Local Plan Allocations</u>	<u>Ongoing</u>	<u>TBC</u>		

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		<p><u>developers of all new premises</u></p> <p><u>Waste water Treatment Works- where specific schemes identify a requirement for conventional treatment progress upgrades and flow upgrades, including any water supply or efficiency improvements required.</u></p>	<p><u>Severn Trent</u></p>	<p><u>Developers</u> <u>Environment Agency</u></p>	<p><u>Ongoing</u></p>	<p><u>TBC</u></p>			
<p>MM160</p>	<p>Infrastructure Delivery Structure- Lodge Farm</p>	<p>Lodge Farm</p> <p>Transport</p>							<p>To ensure the Plan is positively prepared, justified and consistent with national policy in</p>

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		Improvements to the A45, including new roundabouts to provide access to the site.	Developer	WCC	TBC	TBC	Developer	enabling sustainable development.	
		Offsite contribution to the South West Rugby Spine Road	Developer	WCC	TBC	TBC	Developer		
Education									
		Pupil transportation and contributions towards new secondary school provision	WCC	Academy, Foundation and other schools	TBC	TBC	Developer		
		New 2FE primary school provision	WCC	Academy, Foundation and other schools	Phase 2	£6-8,000,000	Developer		

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		rising to 3FE if necessary						
		Health facilities						
		Land for GP surgery within local centre	Developer	C&R CCG/RBC	TBC	TBC	Developer	
		Community						
		Financial contribution to support library services	WCC Library Service	N/A	TBC	£15,321.60	Developer	
		Emergency services						
		Offsite contribution for police	Warwickshire Police	N/A	TBC	TBC	Developer	
MM161	Infrastructure Delivery Schedule- Local Plan Infrastructure	Local Plan Infrastructure						To ensure the Plan is positively prepared and justified in respect of its infrastructure requirements.
		All Allocations						
		<u>Rugby Parkway Railway Station is required to ensure Rugby has the</u>	<u>WCC</u>	<u>DfT</u>	<u>2021 (Phase 2)</u>	<u>£11million total. Funding not yet confirmed.</u>		

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		<u>connectivity</u> <u>necessary</u> <u>to secure</u> <u>the long</u> <u>term</u> <u>economic</u> <u>and</u> <u>residential</u> <u>developm</u> <u>ent of the</u> <u>area,</u> <u>served by</u> <u>sustainabl</u> <u>e modes</u> <u>of</u> <u>transport.</u>						
		UHCW – The Hospital of St Cross, Rugby. 2 additional cubicles at the Walk in Centre	UHCW	TBC	Ongoing	£54,600	Developer	
		UHCW – The Hospital of St Cross,	UHCW	TBC	Ongoing	£167,500	Developer	

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		Rugby. One theatre						
		UHCW – The Hospital of St Cross – 55 additional car parking spaces for each location	UHCW	TBC	Ongoing	£200,000	Developer	
		UHCW – The Hospital of St Cross & University Hospital Coventry – 1 CT scanner, 1 MRI scanner, 1 endoscopy room	UHCW	TBC	Ongoing	£533,052	Developer	
		Expansion A & E footprint to	UHCW	TBC	Ongoing	£1024800	Developer	

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		increase number of bays							
		Utilities							
		Western Power connections where necessary	Developers	Western Power	Ongoing	TBC	Developer		
		Improving telecommunications – connections to the strategic network to be made by developers of all new premises	Developers	Broadband provider	Ongoing	TBC	Developer		
Appendix 4: Open Space Standards									
MM162		<u>URBAN AREA</u>							

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Ref	Parish/Ward	Population	Provision (ha)	Children's Play 0.2ha per 1,000 pop	Nat and semi natural 2.5a per 1,000 pop	Amenity Green Space 0.5 per 1,000 pop	Allotments 0.65 ha per 1,000 pop	Parks and Gardens 1.5ha per 1,000 pop
1	Admirals and Cawston Ward	7846	Current Provision	1.36	4.53	29.37	0	0.59
			Surplus /Deficit	-0.21	-15.09	20.74	-5.10	-11.18
2	Benn Ward	8203	Current Provision	0.38	1.11	1.01	0	5.07

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			Surpl us /Defi cit	-1.26	-19.40	-8.01	-5.33	-7.23	
3	Bilton Ward	6196	Curr ent Provi sion	0.12	6.85	3.79	5.95	5.08	
			Surpl us /Defi cit	-1.12	-8.64	-3.03	1.92	-4.21	
4	Coton and Bough ton Ward	6503	Curr ent Provi sion	0.4	31.39	16.6	0.00	0	
			Surpl us /Defi cit	-1.08	15.13	9.45	-4.23	-9.75	
5	Eastla nds Ward	7982	Curr ent Provi sion	0.34	21.02	4.69	5.78	14.05	

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			Surplus /Deficit	-1.26	1.07	-4.09	0.59	2.08	
6	Hillmorton Ward	5289	Current Provision	0.51	1.77	4.82	0	4.28	
			Surplus /Deficit	-0.55	-11.45	-1.00	-3.44	-3.65	
7	New Bilton Ward	8298	Current Provision	0.54	4.19	4.63	3.58	7.82	
			Surplus /Deficit	-1.12	-16.56	-4.50	-1.81	-4.63	
8	Newbold and Brownsover Ward	7594	Current Provision	0.44	49.02	20.39	1.82	2.82	

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			Surplus /Deficit	-1.08	30.04	12.04	-3.12	-8.57
9	Paddock Ward	6892	Current Provision	0.57	60.67	1.1	3.53	13.91
			Surplus /Deficit	-0.81	43.44	-6.48	-0.95	3.57
10	Rokeby and Overslade Ward	7831	Current Provision	0.54	0	19.92	0	0
			Surplus /Deficit	-1.03	-19.58	11.31	-5.09	-11.75
<u>RURAL AREA</u>								

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Ref	Parish	Population	Provision	Children's Play 0.2 per 1,000 pop	Nat and semi natural 2.5 per 1,000 pop	Amenity Green Space 0.5 per 1,000 pop	Allotments 0.8ha per 1,000 pop	Parks and Gardens (1ha per 1000 pop)
11	Anstey CP	328	Current Provision	0.02	0	0.94	0.41	0
			Surplus /Deficit	-0.05	-0.82	0.78	0.2 <u>0.15</u>	-0.33
12	Binley Wo	2,665	Current	0.026	53.78	2.74	0.91	0

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			ods CP		Provisi on						
					Surplu s /Defici t	-0.51	47.12	1.41	-0.82 -	-2.67	
									2.04		
13	Birdi ngb ury CP	324			Curren t Provisi on	0.307	<u>0</u>	0.43	0.40	0	
					Surplu s /Defici t	0.24	-0.81	0.27	0.19 <u>0.14</u>	-0.32	
14	Bou rton and Dra ycot e CP	267			Curren t Provisi on	0	0	0	0	0	
					Surplu s	-0.05	-0.67	-0.13	-0.17 -	-0.27	

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			/Deficit				<u>0.38</u>		
15	Brandon and Bretford CP	630	Current Provision	0.04	0	1.55	0	0	
			Surplus /Deficit	-0.09	-1.58	1.24	-0.41 -	-0.63	
							<u>0.91</u>		
16	Brinklow CP	1144	Current Provision	0.08	3.74	0.48	1.18	1.96	
			Surplus /Deficit	-0.15	0.88	-0.09	0.44 <u>0.26</u>	0.82	
17	Burton Hastings CP	241	Current Provision	0	0	0	0	0	

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			Surplu s /Defici t	-0.05	-0.6	-0.12	-0.16 - <u>-0.35</u>	-0.24
18	Chu rch Law ford CP	335	Curren t Provisi on	0	<u>0</u>	0.31	0.08	0
			Surplu s /Defici t	-0.07	-0.84	0.14	-0.14 - <u>-0.33</u>	-0.34
19	Chu rcho ver CP	339	Curren t Provisi on	0	0	0	0.08	0
			Surplu s /Defici t	-0.07	-0.85	0.17	-0.14 - <u>0.33</u>	-0.34

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		20	Clifton upon Dunsmore CP	1374	Current Provision	0.12	0.75	11.96	1.59	2.64	
					Surplus /Deficit	-0.15	-2.69	11.27	0.7 <u>0.49</u>	1.3	
		21	Combe Fields CP	115	Current Provision	0	0	0	0	0	
					Surplus /Deficit	-0.02	-0.29	-0.06	-0.07 <u>0.16</u>	-0.12	
		22	Copston Magna CP	24	Current Provision	0	0	0	0	0	

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			Surplu s /Defici t	<u>0.0048</u>	-0.06	-0.01	-0.02	-0.02	
23	Dun chur ch CP	306	Curren t Provisi on	0.13	18.03	1.54	1.51	2.73	
			Surplu s /Defici t	-0.48	10.36	0	-0.48 - <u>-1.43</u>	-0.34	
24	Ease nhal l CP	377	Curren t Provisi on	0	0	0.08	0	0	
			Surplu s /Defici t	-0.08	-0.94	-0.11	-0.25 - <u>0.55</u>	0.38	

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		25	Frankton CP	327	Current Provision	0	0	0.08	0	0	
					Surplus /Deficit	-0.07	-0.82	-0.08	-0.21 -	-0.33	
									<u>0.47</u>		
		26	Grandborough CP	420	Current Provision	0	0	0	0	0	
					Surplus /Deficit	-0.08	-1.05	-0.21	-0.27 -	-0.42	
									<u>0.61</u>		
		27	Harborough Magna CP	452	Current Provision	0.2	0	0	0	0	
					Surplus	0.11	-1.13	-0.23	-0.29 -	-0.45	

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			/Deficit				<u>0.65</u>		
28	King's Newnham CP	48	Current Provision	0	0	0	0	0	
			Surpluss /Deficit	-0.01	-.12	-0.02	-0.03 - <u>0.07</u>	-0.05	
29	Leamington Hastings CP	439	Current Provision	0	0	0.78	0	0	
			Surpluss /Deficit	-0.09	-1.1	0.56	-0.29 - <u>0.64</u>	-0.44	
30	Little Lawford CP	42	Current Provision	0	0	0	0	0	

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			Surplus /Deficit	-0.01	-0.11	-0.02	-0.03 - <u>0.06</u>	-0.04	
31	Long Lawford CP	3173	Current Provision	0.47	2.66	3.77	2.81	2.13	
			Surplus /Deficit	-0.16	-5.27	2.33	0.75 <u>0.27</u>	-1.04	
32	Mar ton CP	490	Current Provision	0.05	0	2.33	0	0	
			Surplus /Deficit	-0.05	-1.23	2.09	-0.32 <u>-0.71</u>	-0.49	
33	Mo nks Kirby CP	437	Current Provision	0.13	0	0.57	0	0	

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			Surplus /Deficit	0.04	-1.09	0.35	-0.28 <u>-0.63</u>	-0.44	
34	Newton and Biggin CP	415	Current Provision	0	0	0	0.91	0	
			Surplus /Deficit	-0.08	-1.04	-0.21	0.64 <u>0.58</u>	-0.42	
35	Pailton CP	512	Current Provision	0.02	0	0.2	0.56	0	
			Surplus /Deficit	-0.08	-1.28	-0.06	0.23 <u>0.15</u>	-0.51	
36	Princethorpe CP	401	Current Provision	0.13	0	0	0.48	0	

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			Surplus / Deficit	0.05	-1	-0.2	0.22 <u>0.16</u>	-0.4	
37	Ryton-on-Dunsmore CP	1813	Current Provision	0.24	32.07	0.62	0.34	24.34	
			Surplus / Deficit	0	29.12	0.03	-0.43 <u>0.61</u>	22.53	
38	Shilton and Barnacle CP	887	Current Provision	0.08	27.54	0	0	0	
			Surplus / Deficit	-0.1	25.32	-0.44	-0.58 - <u>0.58</u>	-0.02	
39	Stretton	24	Current	0	0	0	0	0	

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			Baskerville CP	Provision						
				Surplus/Deficit	0.00	-0.06	-0.01	-0.02	-0.02	
40	Stretton under Fosse CP	213	Current Provision	0	0	0	0	0		
			Surplus/Deficit	-0.04	-0.53	-0.11	-0.14 -	-0.31	-0.21	
41	Stretton-on-Dunsmore CP	1159	Current Provision	0.23	0.00	1.83	1	1.35		
			Surplus	0	-2.90	1.25	0.25 -	0.19		

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			/Deficit				<u>0.25</u>		
42	Thurston CP	331	Current Provision	0.47	0	0	0	0	
			Surplus /Deficit	0.4	-0.83	-0.17	-0.22 - <u>0.48</u>	-0.33	
43	Wibtoft CP	53	Current Provision	0	0	0	0	0	
			Surplus /Deficit	-0.01	-0.13	-0.03	-0.03 - <u>0.07</u>	-0.05	
44	Willsey CP	85	Current Provision	0	0	0	0.11	0	
			Surplus	-0.02	-0.21	-0.04	0.05	-0.09	

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			/Deficit				-		
							<u>0.07</u>		
45	Willoughby CP	458	Current Provision	0.09	0	0.3	0	0	
			Surplus /Deficit	0	-1.15	0.07	-0.3	-0.46	
							-		
							<u>0.07</u>		
46	Witby CP	289	Current Provision	0.02	0	0.17	0.02	0	
			Surplus /Deficit	-0.04	-0.72	0.03	-0.17	-0.29	
							-		
							<u>0.38</u>		
47	Wolframpton CP	267	Current Provision	0	0	0.38	0.56	0	

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			Surplu s /Defici t	-0.05	-0.67	0.25	0.39 <u>0.35</u>	-0.27
48	Wol ston CP	257 7	Curren t Provisi on	0.29	5.76	2.48	4.69	5.98
			Surplu s /Defici t	-0.23	-0.68	1.19	3.01 <u>2.63</u>	3.4
49	Wol vey CP	183 2	Curren t Provisi on	0.13	1.38	2.50	0.24	0
			Surplu s /Defici t	-0.24	-3.20	1.58	-0.95 - <u>2.18</u>	-1.83
<p>Notes: 1: Population Source: 2012 Projections from Open Space, Playing Pitch and Sports Facilities Study 2015</p>								

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		<p>2: Current provision is total area in ha.</p> <p>3: Amenity Green Space provision based on sites larger than 0.2 ha which has a recreational function (excludes incidental open space within housing developments and roadside verges)</p> <p>4: Surplus/deficit is total area figure.</p>					
Appendix 5: Car Parking Standards							
MM163	Retail Development Table	Retail Development			To ensure that parking standards are justified and consistent with national policy		
		Type	Car Parking Standard (maximum)			Cycle Standard (minimum)	
			Low Access	High Access		Long Stay – Staff	Short Stay – Visitors
		A1 Non-Food Retail and General Retail	1 space/ 20 sq. m.	1 space/ 50 sq. m.		Greater of 1 space per 6 staff or 1 per 300 sq. m.	1 stand per 200 sq. m.
		A1 Food Retail	1 space/ 14 sq. m.	1 space/ 50 sq. m.			
		A2 Financial and Professional Services	1 space/ 30 sq. m.	1 space/ 50 sq. m.			
A3 Food & Drink – Restaurants and Cafés, Snack Bars and Fast-Food Take-Away And	1 space/ 5 sq. m.	1 space/ 10 sq. m.	Greater of 1 space per 6 staff or 1 per 40 sq. m.	1 stand per 20 sq. m.			

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		A5 Hot Food Takeaways				
		A34 Food & Drink – Wine Bars and Public Houses Drinking Establishments	1 space/ 3 sq. m.	1 space/ 10 sq. m.		
		A3 Transport Cafés and Roadside Restaurants (see notes 1 and 2)	See note 3			
		Notes: General notes:	<p>1. Where these serve Heavy Goods Vehicle's (HGV) some provision for HGV parking will be required.</p> <p>2. Motorway service areas will be included in transport cafés with additional consideration for associated facilities, parking for buses/coaches and HGV's.</p> <p>3. It is considered inappropriate to apply a standard to this form of development. Therefore, applications will be considered on their own merits and according to the suitability of the location of this type of use.</p> <ul style="list-style-type: none"> • Long Stay provision is generally considered as stays of six hours or more, particularly associated with residential overnight use, or employment locations. Short stay may be from a few minutes to a few hours. • A Transport Assessment or Green Travel Plan may be required. • Petrol Stations with a shop will be considered under the appropriate retail category, but with each pump parking space counting as one space each. 			

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MM164	Commercial Development Table	Commercial Development				To ensure that parking standards are justified and consistent with national policy	
		Type	Car Parking Standard (maximum)		Cycle Standard (minimum)		
			Low Access	High Access	Long Stay – Staff		Short Stay – Visitors
		B1(a) Office	1 space/ 30 sq. m.	1 space/ 60 sq. m.	1 stand per 150 sq. m.		1 stand per 500 sq. m.
		B1 (b) (c) High Tech/Light Industry	1 space/ 40 sq. m.	1 space/ 80 sq. m.	1 stand per 250 sq. m.		1 stand per 500 sq. m.
		B2 General Industrial	1 space/ 45 sq. m.	1 space/ 90 sq. m.	1 stand per 350 sq. m.		1 stand per 500 sq. m.
		B8 Storage and Distribution	1 space/ 60 sq. m.	1 space/ 120 sq. m.	1 stand per 500 sq. m.		1 stand per 1000 sq. m.
General notes:	<ul style="list-style-type: none"> • A Transport Assessment and/or company Green Travel Plan may be required. • Long-stay cycle parking is to be at least the greater of the spaces per GFA identified, or 1 space per 8 staff. • Proposed standards will take into account commercial development in predominantly residential areas – where demonstrable harm to local residents occurs, the provision of on-street parking controls will be considered. • These standards do not take into account commercial vehicle parking standards, which will be considered on the basis of individual planning applications. 						
MM165	Hotels and Hostels Table	Hotels and Hostels (C1)				To ensure that parking standards are justified and consistent with national policy	
		Type	Car Parking Standard (maximum)		Cycle Standard (minimum)		

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			Low Access	High Access	Long Stay – Staff	Short Stay – Visitors		
		Hotels/ Motels/ Guest Houses and Boarding Houses	1 space/ bedroom	0.5 space/ bedroom	1 stand/ 6 full-time staff	1 stand/ 10 beds		
		Hostels for the Homeless and other Special Needs Groups	Each case considered on its own merits		Each case considered on its own merits			
		General notes:	<ul style="list-style-type: none"> • Other facilities, i.e. eating/drinking, entertainment and conference facilities are to be treated separately where they are (or could be) available to non-residents. • The above standards take into account staff parking. • All new hotels and hostels or major expansions may require a Transport Assessment and Green Travel Plan to determine provision of facilities. 					
MM166	Residential Institutions Table	Residential Institutions (C2)					To ensure that parking standards are justified and consistent with national policy	
		Type	Car Parking Standard (maximum)		Cycle Standard (minimum)			
			Low Access	High Access	Long Stay – Staff	Short Stay – Visitors		
Nursing and Rest Homes	1 space/ 4 residents	0.5 space/ 4 residents						

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		Homes for Children and Adults with Learning or Physical Disabilities (see note 1)	1 space/ resident staff 0.5 space/ non-res. staff Visitor: 0.5 space/client (see note 2)	1 stand/ 6 full-time staff	Minimum of 2 stands per establishment	
		Residential Schools, Colleges or Training Centres	1 space/ 4 residents	0.5 space/ 4 residents	Each case considered on its own merits	Each case considered on its own merits
		Hospitals (see note 3)	Each case considered on its own merits		Each case considered on its own merits	Each case considered on its own merits
		Notes: General Notes:	<p>1. The parking standard for non-residential staff applies to non-residential staff on duty at the busiest time.</p> <p>2. Due to the nature of this land use, a reduction according to accessibility is not appropriate.</p> <p>3. All new establishments or major expansions require a Transport Assessment and a Green Travel Plan. The maximum car and minimum cycle parking limit for staff and visitors will be based on their outcome.</p> <ul style="list-style-type: none"> • Figures are based on the maximum client capacity of the centre. • The above standards take into account visitor parking, unless otherwise stated. 			

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MM167	Residential Dwellings Table	Residential Dwellings (C3)					To ensure that parking standards are justified and consistent with national policy	
		Type	Car Parking Standard		Cycle Standard (minimum)			
			Low Access	High Access	Long Stay – Residents/ Staff	Short Stay – Visitors		
		Dwelling Houses						
		1-2 bed units	1.5 spaces/unit	0.75 spaces/unit	1/unit secure & undercover	See note 1		
		3 bed units	2 spaces/unit	1 space/unit	1/unit secure & undercover	See note 1		
		4 bed units	3 spaces/unit	1.5 spaces/unit	1/unit secure & undercover	See note 1		
		Dwelling Apartments						
		Studio units	1 space/unit	0.5 space/unit	1/unit secure & undercover	1 loop/hoop per unit		
		1-2 bed units	1.5 spaces/unit	0.75 spaces/unit	1/unit secure & undercover	1 loop/hoop per unit		
		3 + bed units	2 spaces/unit	1 space/unit	2/unit secure & undercover	1 loop/hoop per unit		
		Dwellings for Elderly Persons						
		Category 1 Active Elderly: Without resident warden	1 space/unit	0.5 space/unit	1/unit secure & undercover	1 loop/hoop per 2 units		
Category 2 Full Care:	0.5 space/unit	0.25 space/unit	1 space per 6 staff	1 loop/hoop				

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		With resident warden				p per 2 units	
		Notes: General notes:	1	It is considered inappropriate to apply a standard to this form of development. Therefore, applications will be considered on their own merits and according to the suitability of the location of this type of use.			
				<ul style="list-style-type: none"> • The above standards are guidance figures <u>and car parking standards in this category are not expressed as a maximum.</u> • It is acknowledged that residential parking is different in nature to non-residential parking, being the trip origin. • Small scale developments will not be assessed against the standards in the table above, but will be encouraged to conform to them. • The standards do not preclude zero or minimal parking close to major transport interchanges, or for conversions of existing buildings. • Where appropriate Developers can submit transport assessments or statements to justify an alternative package of parking measures to mitigate against unacceptable impacts, decisions on alternative parking proposals will be made in consultation with the Highways Authority. • Where a garage is provided, each garage will be designated as one car space plus one cycle space. • On street parking in association with residential development should generally be discouraged through good design. 			

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			<ul style="list-style-type: none"> • Where warden or staff spaces are identified, these apply to full-time staff. • The above standards take into account visitors parking. • For nursing and care home see Care Establishments – Public and Private. • At least 1 long-term (secure/undercover) cycle space per development. 				
MM168	Non Residential Institutions Table	Non-Residential Institutions (D1)					To ensure that parking standards are justified and consistent with national policy.
		Type	Car Parking Standard (maximum)		Cycle Standard (minimum)		
			Low Access	High Access	Long Stay – Staff	Short Stay – Visitors	
		Doctors Surgery, Dentists Surgery, or Veterinary Surgery	4 spaces/ consulting room	2 spaces/ consulting room	Greater of 1 space/ 2 consulting rooms Or 1 space/ 6 staff	1 stand per consulting room	
		Health Centres	6 spaces/ consulting room	3 spaces/ consulting room			
Places of Worship/ Church Halls	1 space/ 5 fixed seats or 1 space/ 10 sq. m.	0.5 space/ 5 fixed seats or 0.5 space/ 10 sq. m.	Greater of 1 space/ 6 staff or 1 space/ 40 sq. m.	1 stand/ 20 sq. m.			
		Schools (see note 1)					

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		Staff and Visitors (see notes 2 and 3)	2 spaces/ Classroom for staff and visitors plus facilities for picking up and setting down children or as determined by Travel Plan	1 space/ Classroom for staff and visitors plus facilities for picking up and setting down children or as determined by Travel Plan	Each case considered on its own merits	Each case considered on its own merits		
		Parents (delivery and collection of children)	Zero					
		16+ Colleges & Further Education Colleges (see note 1)						
		Staff and Visitors (see notes 2 and 3)	2 spaces/ classroom for staff and visitors plus facilities for picking up and setting down children or as determined by Travel Plan	1 space/ classroom for staff and visitors plus facilities for picking up and setting down children or as determined by Travel Plan	Each case considered on its own merits	Each case considered on its own merits		
		Students and Parents	Each case considered on its own merits					
		Day Nurseries (including Day Care)/Playgroups & Crèches						

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		Staff, Visitors and Parents (see note 2)	1 space/ full-time staff member	0.5 space/ full-time staff member	1 stand/ 6 full-time staff Minimum of 2 stands per establishment	
		Day Centres for Handicapped People with Disabilities (see note 4)	0.5 space per full-time staff member Visitor: 0.5 space/client	0.25 space per full-time staff member Visitor: 0.25 space/client	1 stand/ 6 full-time staff Minimum of 2 stands per establishment	
		Any other use within Class D1 e.g. libraries, art galleries and museums.	To be considered on its own merits			

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		<p>Notes:</p> <p>General Notes:</p>	<ol style="list-style-type: none"> 1. New or major expansions of educational establishments may require a Transport Assessment and School or College Green-Travel Plan. 2. Visitor parking included in staff allocation. 3. The proposed standard for schools of 2 spaces/classroom for staff (including visitors) is based on the average of 2 staff per classroom. 4. Day centre services for older people, adults with learning or physical disabilities, must provide space for dropping off and picking up people. <ul style="list-style-type: none"> • For colleges and FE establishments any student spaces must be justified by a travel plan. • There will be a requirement for a bus/coach loading area whether provided on or off-site, for primary education and above, unless otherwise justified. • Catchment areas will be taken into account for schools. 			
<p>MM169</p>	<p>Assembly and Leisure Facilities Table</p>	<p>Assembly and Leisure Facilities (D2)</p>		<p>To ensure that parking standards are justified and consistent with national policy.</p>		
<p>Type</p>		<p>Car Parking Standard (maximum)</p>			<p>Cycle Standard (minimum)</p>	
		<p>Low Access</p>	<p>High Access</p>		<p>Long Stay – Staff</p>	<p>Short Stay – Visitors</p>
<p>Cinemas, Conference Facilities, Theatres, Concert Halls, Bingo Halls and other similar spectator facilities</p>		<p>1 space/ 5 seats</p>	<p>1 space/ 10 seats</p>	<p>Greater of 1 space per 6 staff or 1 space/ 40 sq. m.</p>	<p>1 stand per 20 sq. m.</p>	

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		Dance Halls and Discotheques	1 space/ 22 sq. m.	1 space/ 44 sq. m.			
		Bowling Centres, Bowling Greens (see note 2)	3 spaces/ lane	1.5 spaces/ lane			
		Swimming Pools, Health Clubs and Gymnasias	1 space/ 3 staff and 1 space/ 10 sq. m. hall/pool area	0.5 space/ 3 staff and 0.5 space/ 10 sq. m. hall/pool area			
		Golf Courses (see note 2)	4 spaces/ hole	See note 1			
		Golf Driving Ranges	2 spaces/ tee	See note 1			
		Marinas, Sailing and Water Based Uses (see note 2)	1 space/ 1 staff 1 space/ 2 participants	See note 1			
		Stadia	To be considered on its own merits (see note 3)		To be considered on its own merits	To be considered on its own merits	
		Ice Rinks					
		Tennis Courts/Squash Courts (see note 2)	3 spaces/ court	1.5 spaces/court	Greater of 1 space per 6 staff or 1 space/ 5 courts	1 stand per court	

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		Playing Fields (see note 2)	12 spaces per ha of pitch area	6 spaces per ha of pitch area	Greater of 1 space per 6 staff or 1 space/ 5 ha of pitch area	1 stand per ha of pitch area		
		Leisure Centres and Other Sports Facilities (see note 2)	1 space/ 3 staff and 1 space/ 30 sq. m. playing area	0.5 space/ 3 staff and 0.5 space/ 30 sq. m. playing area	Greater of 1 space per 6 staff or 1 space/ 40 sq. m.	1 stand per 20 sq. m.		
		Notes:	<ol style="list-style-type: none"> 1. It is considered inappropriate to apply a standard to this form of development. 2. Other facilities i.e. club house/bar treated separately. 3. No standards are set for stadia or ice rinks due to the small number of applications. Each application will be considered individually. 					
		General Notes:	<ul style="list-style-type: none"> • All new assembly and leisure establishments or major expansions may require a Transport Assessment or Green Travel Plan to determine provision and facilities. • The above standards, unless otherwise stated, take into account full-time staff, visitor and participant parking. • Other facilities on-site, i.e. eating/drinking establishments are to be treated separately. 					
MM170	Miscellaneous Commercial (Motor Trade Related) Table	Miscellaneous Commercial Development (Motor Trade Related)						To ensure that parking standards are justified and consistent with national policy.
		Type	Car Parking Standard (maximum)		Cycle Standard (minimum)			
			Low Access	High Access	Long Stay – Staff	Short Stay – Visitors		
Car Sales and Garage Forecourts								

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		Workshops – staff	1 space/ 45 sq. m. (see note 1)	Greater of 1 space/ 8 full-time staff or 1 space/ 250 sq. m.	1 stand/ 500 sq. m.		
		Workshops – customers	3 spaces/ service bay (see note 1)	See note 2			
		Car Sales – staff	1 space/ full-time staff (see note 1)	Greater of 1 space/ 8 staff or 1 space/ 250 sq. m.	1 stand/ 500 sq. m.		
		Car Sales – customers	1 space/ 10 cars on display (see notes 1, 2 and 3)	See note 2			
		Car Hire	See note 2				
		Notes:	<ol style="list-style-type: none"> 1. Due to the nature of this use class, a reduction according to accessibility is not appropriate. 2. It is considered inappropriate to apply a standard to this form of development. Therefore, applications will be considered on their own merits and according to the suitability of the location of this type of use. 3. This applies to the number of cars on sale in the open. 				
		General notes:	<ul style="list-style-type: none"> • A Transport Assessment and/or company Green Travel Plan may be required. • These standards do not take into account commercial vehicle parking standards, which will be considered on the basis of individual planning applications. 				

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MM171	At the end of Appendix 5	<u>Electric Charging Points</u>		A new standard aimed at improving Air Quality and related to the Air Quality Policy in the Local Plan and a new standard for Access for People with Disabilities
		<p><u>Electric and hybrid vehicle charging points are required to be provided as part of development as outlined in the table below 5 unless it can be demonstrated that it is financially unviable.</u></p>		
		<u>Development Type</u>	<u>Development Scale</u>	
<u>Residential</u>	<u>10 or more dwellings</u>	<u>1 charging point per dwelling; and 1 charging point per 10 unallocated parking spaces</u>	<p><u>Passive charging points are to be provided for dwellings. These ensure cabling is provided for owners to install the correct socket for their vehicle.</u></p> <p><u>Active charging points are required for unallocated spaces.</u></p>	
<u>Commercial, Industrial and Retail</u>	<u>Major Development</u>	<u>1 charging point per 10 spaces to include 1 charging point for every 10 disabled car parking spaces</u>		

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<u>Access for People with Disabilities: Car Parking Provision</u>	
<u>Under 50 spaces</u>	<u>1 space. Remaining provision on its merits</u>
<u>Over 50 spaces</u>	<u>4%</u>
<p><u>Reserved spaces should be clearly designated for use by people with disabilities and they should be clearly signposted. The pedestrian route from the parking spaces to the point of entry should be clearly defined and well lit.</u></p> <p><u>Pathways should be a minimum width of 1.2 metres and if possible 1.8 metres to allow wheelchairs to pass. A greater width may be required if large pedestrian flows are anticipated. Path edges should be clearly defined and slip resistant surfaces should be used. All pathways should be well lit. The use of colour contrasts can assist partially sighted people.</u></p> <p><u>The pathway system should where possible be designed to avoid crossing vehicular routes within the site. Where this is not practicable use should be made of “dropped kerbs” and textured surfaces so that so that the crossing point is suitable for both wheelchair users and people with visual impairments.</u></p> <p><u>Ramps where used should have a gradient of approximately 1:20 (maximum 1:12). Where ramps are steep (greater than 1:20) steps should also be made available. Long ramps require a level landing at 10 metre intervals. A level platform of adequate size should be provided at the entrance to the building and at the top and bottom of all ramps. Steps should have a maximum riser of 0.15 metres and a minimum tread of 0.28 metres. Handrails should extend beyond the top and bottom of the steps or ramp and should be provided with a positive safe end.</u></p>	

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		<p><u>Street furniture should be located so that it does not obstruct pedestrian pathways. Where possible such furniture should be at least one metre in height (0.8 metres minimum), with good colour contrast.</u></p>	
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Appendix 7: Glossary of Terms			
MM172	Glossary of Terms: Appendix 7 Affordable Housing	<p>Housing, for sale or rent, including social rented and intermediate housing, for those people whose needs are not met by the housing market (<u>including housing that provides a subsidised route to home ownership and/or is for essential local workers</u>); and which complies with one or more of the following definitions:</p> <ul style="list-style-type: none"> a) Affordable housing for rent: <u>meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</u> b) Starter homes: <u>is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute at the time of planning preparation or decision-making. Income restrictions should be used to limit a household’s eligibility to purchase a starter home to those who have maximum household incomes of £80,000 a year or less.</u> c) Discounted market sales housing: <u>is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</u> d) Other affordable routes to home ownership: <u>is housing provided for sale that provides a route to ownership for those who could not</u> 	To update definition of affordable housing in paragraphs 5.11, 5.15 and 5.16 in accordance with national policy.

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		<p><u>achieve home ownership through the market. It includes shared ownership, relevant equity loans, either low cost home for sale and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</u></p>	
MM173	<u>Air Quality Neutral</u>	<p><u>Emissions from the development proposal being no worse, if not better, than those associated with the previous use.</u></p>	To include all necessary definitions.
MM174	<u>Development Plan Documents</u>	<p><u>Planning policy documents which make up the Local Plan.</u></p>	To include all necessary definitions.
MM175	<u>Duty to Cooperate</u>	<p><u>A legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness.</u></p>	To include all necessary definitions.
MM176	<u>Green and Blue Infrastructure</u>	<p><u>The terms Green and Blue Infrastructure refers to a strategic network of green and blue spaces, such as woodlands, parks, amenity landscaping, ponds, canals and rivers, and the links between them.</u></p>	To include all necessary definitions.
MM177	<u>National Planning Policy Framework</u>	<p><u>This is the amalgamation of the Planning Policy Guidance (PPG), Planning Policy Statements (PPS), and various Ministerial Statements into a single, streamlined volume. A document setting out the Government's planning policies for England and how these are expected to be applied.</u></p>	To include all necessary definitions.
MM178	<u>Mitigation measures</u>	<p><u>These are measures requested/ carried out in order to limit the damage impact by a particular development/ activity.</u></p>	To include all necessary definitions.

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MM179	Public Realm	The parts of a village, town and city (whether publicly or privately owned) that are available, without charge, for everyone to use or see, including streets, squares and parks (<i>Source of definition: By Design</i>).	To include all necessary definitions.
MM180	Rural Exception Site	Sites solely for the development of affordable housing on land within or adjoining existing small rural communities, which would not otherwise be released for general market housing.	
MM181	Settlement Boundary	A planning tool, which defines the built up area of a settlement and prevents restricts development within the countryside beyond those defined boundaries.	
MM182	Supplementary Planning Document (SPD)	Formally known as Supplementary Planning Guidance – SPG These contain policy guidance to supplement the policies and proposals in Development Plan Documents.	
Appendix 8: Air Quality Management Area			
MM183	New Appendix 8	Insert Air Quality Management Area <i>[see attached map]</i>	As requested by Inspector

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	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	TOTAL	
Completions	338	456	448	425	534	376																
Land at Leicester Road (R13/1609 87 dwellings)						25	6															25
Technology Drive Zone C Phase 3 (R14/1400)						15																15
Priority Road, Wolston (R12/1194)						1																1
Land at Leicester Road (R15/2074)						5																5
Land south of Technology Drive (R15/2074)							40	40	40	40	40	40	40	-	-	-	-	-	-	-	-	231
Cawston Grange (R04/1118/2137/B)						20	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	20
Former Warwickshire College Site (R14/2229)						36	40	23	-	-	-	-	-	-	-	-	-	-	-	-	-	63
Coton House (R12/1353)						20	34	20	-	-	-	-	-	-	-	-	-	-	-	-	-	65
Upper Floors, 9 North Street, Rugby (Prior Approval)							25															34
Roof Top, 9-10 North Street, Rugby (R16/1226)						35																35
Former New Bilton Conservative Club (R13/1380)						9																9
Former Bilton Social Club (R15/2047)						8																8
Ivy Grange (R15/0651)						11	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5
Land at Draycote Water entrance, SOUTHAM ROAD (R14/1910)						7																7
41 King Edward Road, CV21 2TA (R13/2073)						4																4
7 Market Place, CV21 3DY (R15/0878)						10																10
61 Clifton Road, MANOR HOUSE, CV21 3QG (R15/0643)						10																10
1 Regent Street (Newnham Estate Agents) CV21 2PE (R15/1559)						5																5
Ridgeway Farm, Ashlawn Road (R15/2239)						4	40	52	-	-	-	-	-	-	-	-	-	-	-	-	-	96
Williams Field - Cawston Extension (R15/0540)						5	35	50	34	-	-	-	-	-	-	-	-	-	-	-	-	85
Land at Homefields, Dunchurch (R15/0507)						10	36	36	36	-	-	-	-	-	-	-	-	-	-	-	-	106
						10	25	15	-	-	-	-	-	-	-	-	-	-	-	-	-	50
							26	22	-	-	-	-	-	-	-	-	-	-	-	-	-	48

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Rugby Radio Station (R11/0699)	20	75 71	115 166	190 228	190 239	190 240	190 240	190 240	190 240	190 240	190 240	190 240	190 240	190 240	190 240	3104
Back Lane South (R12/1188)		35 37	40 45	25 30	-12	-	-	-	-	-	-	-	-	-	-	112
Former Ballast Pits (R14/1641)		16 30	30 46	30	-	-	-	-	-	-	-	-	-	-	-	76
Newbold Farm (R14/2369)		9	4	-	-	-	-	-	-	-	-	-	-	-	-	13
Tithe Farm, Montilo Drive (R13/1081)		3														250 3
Cawston Lane		40	70	70	70											240
Cawston Lane Bellway (R11/1521)		13	41	62	27	-	-	-	-	-	-	-	-	-	-	143
Cawston Lane Ashberry (R11/1521)		31	35	41	-	-	-	-	-	-	-	-	-	-	-	107
Cawston Extension (R11/0114)		20	87	87	87	87	87	63								434
Cawston Extension William Davis (R11/0114/R16/1721)		13	58	86	27											184
Cawston Extension Linden Homes (R11/0114/R16/1780)		20	52	52	52	52	18									246
Former Bilton By-pass land west of Ivy Grange (R16/0658)		14	-	-	-	-	-	-	-	-	-	-	-	-	-	14
Grange Farm Cottage Coventry Road (R12/1947)		10	-	-	-	-	-	-	-	-	-	-	-	-	-	10
263- 273B HILLMORTON ROAD		2	-	-	-	-	-	-	-	-	-	-	-	-	-	6 2
8 Hall Road, Wolvey Hall, Wolvey, LE10 3LG (R14/1897)	6	6	-	-	-	-	-	-	-	-	-	-	-	-	-	6
Land rear of 22 The Green, Bilton (R16/1722)		5	-	-	-	-	-	-	-	-	-	-	-	-	-	5
Rear of 44-50 Hilmorton Road, CV22 5AD (R15/1190)	5	-	5	-	-	-	-	-	-	-	-	-	-	-	-	5
Land rear of 87Hillmorton Road (R16/0661)	12															12
Webb Ellis Industrial Estate Woodside Park (R16/0659)		-	44	-	-	-	-	-	-	-	-	-	-	-	-	44
Webb Ellis Business Park (Prior Approval)	67	-	15	-	-	-	-	-	-	-	-	-	-	-	-	67 15
Coton Park East Phase B1 & B2 (R15/0814 and R15/0803)	30	50	50	15												145
Church Farm, Ryton (R15/0974)	6															6
95 Clifton Road, CV21 3QQ (R14/2219)	6															6
41 Wood Street (R15/1911)	5	-	6	-	-	-	-	-	-	-	-	-	-	-	-	5 6
Eden Park (Gateway SUE R10/1272)		30	70 30	70 75	70 80	70 80	70 80	70 80	70 80	70 80	70 80	70 80	70 80	70 80	37 2	907

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<u>7 Market Place, CV21 3DY (R15/0787)</u>			-	<u>10</u>	-	-	-	-	-	-	-	-	-	-	-	-	<u>10</u>			
Gateway Phase R4 (R15/2329)			20 <u>10</u>	40	40	32	-	-	-	-	-	-	-	-	-	-	<u>122</u>			
Dipbar fields, Dunchurch (R13/0690)			-	26 <u>6</u>	26 <u>30</u>	30	<u>30</u>	-	-	-	-	-	-	-	-	-	<u>86</u>			
Back Lane South, Long Lawford (R12/0114)			35	40	25	12											112			
<u>Land adjacent to 4 Princes Street (R13/0984 R14/0423)</u>			-	<u>6</u>	-	-	-	-	-	-	-	-	-	-	-	-	<u>6</u>			
<u>9 Railway Terrace (R13/0340)</u>			-	-	<u>14</u>	-	-	-	-	-	-	-	-	-	-	-	<u>14</u>			
69 TEMPLE STREET (R15/0091)			-	<u>7</u>	-	-	-	-	-	-	-	-	-	-	-	-	<u>7</u>			
Clifton Road Car Sales (R15/2528)			-	-	<u>6</u>	-	-	-	-	-	-	-	-	-	-	-	<u>6</u>			
Former Imperial Hotel, 165 Oxford St (R15/2257)			-	-	<u>14</u>	-	-	-	-	-	-	-	-	-	-	-	<u>14</u>			
The Stables, Green Lane, Brinklow, Rugby (R16/0960)			-	-	<u>7</u>	-	-	-	-	-	-	-	-	-	-	-	<u>7</u>			
<u>The former Vault Nightclub and rear of 61, 64/65, 66 and 68 Church Street Rugby(R16/2423)</u>			-	<u>5</u>	-	-	-	-	-	-	-	-	-	-	-	-	<u>5</u>			
<u>83-85 Claremont Road, Rugby (R16/2312)</u>			-	-	<u>6</u>	-	-	-	-	-	-	-	-	-	-	-	<u>6</u>			
Newton Lane, Newton (R14/1658)			-	20	20	-	-	-	-	-	-	-	-	-	-	-	<u>40</u>			
<u>26 Lawford Lane (R15/1448)</u>			<u>6</u>	-	-	-	-	-	-	-	-	-	-	-	-	-	<u>6</u>			
<u>61 Lower Hillmorton Road (R15/1412)</u>			-	-	<u>6</u>	-	-	-	-	-	-	-	-	-	-	-	<u>6</u>			
<u>Colehurst Farm, Colehurst Lane (R17/0088)</u>			-	-	<u>8</u>	-	-	-	-	-	-	-	-	-	-	-	<u>8</u>			
<u>Land adjacent 15 Parkfield Road, Newbold (R14/2338)</u>			-	-	<u>15</u>	-	-	-	-	-	-	-	-	-	-	-	<u>15</u>			
<u>50 - 52 Regent Street (R17/0513)</u>			-	<u>12</u>	-	-	-	-	-	-	-	-	-	-	-	-	<u>12</u>			
<u>Land South of Coventry Road and North of Lime Tree Avenue (R15/1816)</u>			-	-	<u>30</u>	<u>60</u>	<u>60</u>	-	-	-	-	-	-	-	-	-	<u>150</u>			
<u>Land at Lower Hillmorton Road (part of the former college site)</u>			-	<u>17</u>	-	-	-	-	-	-	-	-	-	-	-	-	<u>17</u>			
<u>Wharf Farm (R15/1702)</u>			-	-	<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>30</u>	-	-	<u>380</u>			
Windfalls			<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>45</u>	<u>630</u>			
TOTAL TRAJECTORY	338	456	448	425	534	<u>376</u>	<u>596</u>	<u>889</u>	<u>924</u>	<u>681</u>	<u>550</u>	<u>423</u>	<u>405</u>	<u>405</u>	<u>405</u>	<u>405</u>	<u>395</u>	<u>365</u>	<u>287</u>	<u>9712</u>

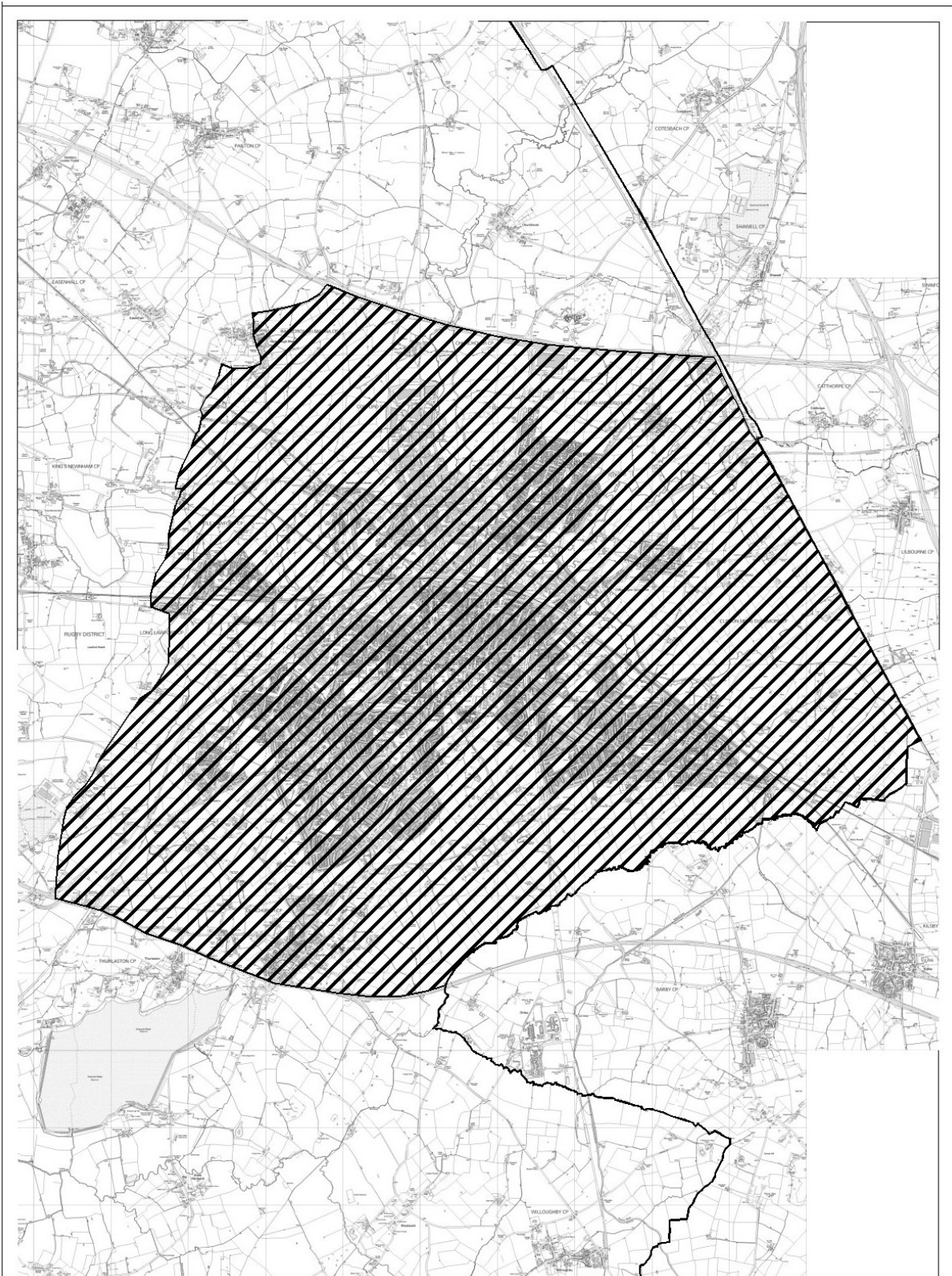
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	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31		
	PHASE 1						PHASE 2					PHASE 3				PHASE 4						
	Pre-adoption							1st Five Years of adopted plan														
Past Completions at time of adoption(Net)	338	456	448	425	534	<u>376</u>																
Anticipated Completions pre adoption							<u>596</u>															
Shortfall/Surplus against 540 dwellings per annum	-202	-84	-92	-115	-6	<u>-164</u>	<u>56</u>															
Total Shortfall/Surplus	<u>-607</u>																					
Annualised Requirement	540	540	540	540	540	<u>540</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	<u>663</u>	
																					TOTAL	
Current Housing Trajectory	338	456	448	425	534	<u>376</u>	<u>596</u>	<u>889</u>	<u>924</u>	<u>681</u>	<u>550</u>	<u>423</u>	<u>405</u>	<u>405</u>	<u>405</u>	<u>405</u>	<u>405</u>	<u>395</u>	<u>365</u>	<u>287</u>	<u>9712</u>	
Proposed Rugby Urban-Edge Allocations																						
Coton Park East Expansion									30	<u>50</u> <u>30</u>	<u>100</u> <u>50</u>	100	100	100	100	100	<u>100</u>	<u>100</u>	<u>20</u>		800	
Coton House Expansion										<u>25</u>	<u>40</u>	<u>35</u>									100	
Coventry Road, Bilton								<u>30</u>	<u>60</u>	<u>60</u>											150	
Land South of Alwyn Road									<u>30</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>		910	
South West																						
Bilton Fields, Ashlawn Road (MP)								<u>50</u>	<u>80</u>	80	80	80	80	80	80	80	80	80	80	10		860
Homestead Farm (WCC)										<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>		350	
Land South Of Dunkleys Farm (WCC) (CTF, CTF E, CTF W)										<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	430	
Land South of Montague Rd (TW)										<u>10</u>	<u>30</u>	-	-	-	-	-	-	-	-		40	
Land South of Montague Rd (RE & Sworders)										<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>30</u>	-	-	-		260	
Coventry Road (G)										<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>25</u>	-	-	-	-	-		175	
Land West of Cawston Lane (G)										-	-	-	-	<u>30</u>	<u>40</u>	-	-	-	-		70	
Land South of Alwyn Road (TW)										-	<u>10</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	370	
Land North of Dunkleys Farm (WCC)										-	-	<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>5</u>	-	235	
Deeley Land (DBS)										-	-	-	<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	310	
Land West of Cawston Lane (WCC)										-	-	-	<u>30</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>40</u>	<u>5</u>	-	-	155	
Cawston Spinney (DBS)									<u>30</u>	<u>80</u>	<u>80</u>	<u>80</u>	30	<u>80</u> <u>40</u>	<u>80</u> <u>40</u>	<u>80</u> <u>40</u>	<u>80</u> <u>40</u>	<u>80</u> <u>40</u>	<u>80</u> <u>40</u>	<u>80</u> <u>40</u>	<u>80</u> <u>40</u>	910 310
Land south of Brownsover Road									<u>10</u>	<u>40</u>	<u>50</u>										100	

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Main Rural Settlements Allocations																					
Wolvey										50	50								100		
Stretton on Dunsmore										30	45								75		
Ryton on Dunsmore									25	25	50								75		
Brinklow										50	50								100		
Binley Woods										30	32 45								62 75		
Wolston										15									15		
Long Lawford									10	40	40	40							100 150		
Garden Village Allocation																					
Lodge Farm, A45										25	80	80	80	80	80	80	80	80	825		
TOTAL TRAJECTORY	338	456	448	425	534	448	558	860	971	1314	1122	852	763	763	763	763	643	593	543	510	13667
						<u>376</u>	<u>596</u>	<u>939</u>	<u>1004</u>	<u>1146</u>	<u>1145</u>	<u>833</u>	<u>915</u>	<u>960</u>	<u>945</u>	<u>895</u>	<u>830</u>	<u>780</u>	<u>555</u>	<u>447</u>	<u>14567</u>

Air Quality Management Area Map



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Rugby Borough Local Plan Examination

Inspector: Mr Mike Hayden BSc(Hons) Dip TP MRTPI

Programme Officer: Carmel Edwards

Email: contact@carmeledwards.com Tel: 07969 631930

Vicky Chapman
Rugby Borough Council
Town Hall
Evreux Way
Rugby CV21 2RR

16 May 2018

By email via the Programme Officer

Dear Ms Chapman,

Examination of Rugby Borough Local Plan

As indicated at the close of the examination hearings on 26 April 2018, I am writing to set out my thoughts on the Rugby Borough Local Plan at this stage and the way forward for the examination. My comments are based on all that I have read, heard and seen to date. However, I emphasise that the examination is not yet concluded and consultation on main modifications is still to take place. Therefore, these comments are without prejudice to my final conclusions on the Plan.

Overall, I consider that, subject to main modifications, the Plan is likely to be capable of being found legally compliant and sound. I will set out my reasoning for this in my final report. The main modifications include changes proposed by the Council in the Table of Suggested Changes (LP54A) where I consider they should be treated as main modifications, together with the further modifications to individual policies and their supporting text as discussed at the hearings. I have invited the Council to prepare a consolidated set of these proposed main modifications for my consideration prior to public consultation on them.

In addition, after further consideration of the matters and issues discussed at the hearings, I have concluded that main modifications are necessary in respect of the following key issues in the Plan.

Lodge Farm (DS3.15)

Whilst the Plan's overall development strategy focussing the majority of new housing and employment development at Rugby, with some limited housing development at Main Rural Settlements (MRSs) to sustain the borough's rural communities, is sound, the proposed new MRS at Lodge Farm (DS3.15) would not be soundly-based as part of this strategy.

In terms of the suitability of this location for major development, the proposed site for Lodge Farm is situated around 10 kilometres (km) from the centre of Rugby and 24 km from Coventry. Paragraph 34 of NPPF expects plans to ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Even if the new village could viably support a new bus service and cycle route into Rugby, the distance and

journey times to both Rugby and Coventry by either of these modes or a combination of them would be unlikely to encourage their use. Whilst some day to day journeys to the local shops, surgery and primary school could be made on foot within the village, trips to secondary school, employment locations and main shopping and leisure destinations off-site would be largely car dependent. As such, I am not persuaded it is a location which could be made sustainable in transport terms. Whilst paragraph 34 also notes that account needs to be taken of policies for rural areas, the emphasis in paragraph 55 of the NPPF is that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It is not apparent that Lodge Farm would support existing surrounding rural communities to any significant extent, since its local facilities would be scaled to serve the needs of the new community.

Lodge Farm is also located in the countryside, within the Leam and Rainsbrook Valleys. Although not subject to a national or local designation, the landscape surrounding the site is open and attractive, visible from the surrounding valley sides including the Rainsbrook escarpment, and contains many historic features, including both designated and non-designated heritage assets. The area also has a distinctive settlement pattern, characterised by small scale villages and hamlets. It is a core planning principle in paragraph 17 of the NPPF that account should be taken of the intrinsic beauty and character of the countryside. The development of a new settlement of 1,500 dwellings in this setting, even with the inclusion of landscaping and green space, would cause significant harm to the intrinsic beauty and character of the countryside in this part of the borough.

Whilst it would provide additional market and affordable housing and support new transport and secondary school infrastructure within Rugby, Lodge Farm is not required to meet those needs. The site would deliver some 665 homes within the Plan period, which represents around 4% of the total housing land supply of 15,369 homes for the borough over the Plan period. Without Lodge Farm, the remaining housing land supply would still exceed the housing requirement of 12,400 dwellings by 18%, significantly boosting the supply of housing and meeting both the market and affordable housing needs of the borough. In terms of the 5 year housing land supply, based on the housing trajectory in the submitted plan, Lodge Farm would contribute just 25 dwellings to the Plan's first 5 years of housing land supply and therefore the borough would not be reliant on it to ensure a 5 year deliverable supply of housing sites. Neither would the loss of 80 dwellings per year, which Lodge Farm would contribute to each of the remaining years of the plan period, compromise the delivery of a rolling 5 year housing land supply.

In terms of its contribution to the borough's infrastructure requirements, the Lodge Farm development would contribute to the costs of the proposed new secondary school and spine road at South West Rugby. However, from evidence presented to the hearings, the South West Rugby development on its own would be viably able to deliver the full strategic transport and education requirements necessary to support that development, including the spine road network and Homestead link around Dunchurch. Therefore, the Lodge Farm allocation is not required to meet the development or infrastructure needs of the borough.

For these main reasons, I find that the allocation of Lodge Farm as part of the Plan's development strategy is not positively prepared, justified as an appropriate site, effective in addressing the cross-boundary unmet needs of Coventry or consistent with national policy in enabling the delivery of sustainable development. Therefore, in order to make the Plan sound, the main modifications should include the deletion of the proposed allocation at Lodge Farm, together with consequential modifications to the related policies and supporting text of the Plan.

Main Rural Settlement Allocations (DS3.6-DS3.14)

The Plan includes 9 residential allocations at 7 of the most sustainable MRSs in the borough. The Wolvey Campus (DS3.14) site would involve the redevelopment of an existing employment site in the Green Belt. Provided that the extent and scale of housing development were contained within the existing built footprint of the site and did not have a greater impact on the openness of the Green Belt or its purposes, then the development proposed by the allocation of this site would not be likely to constitute inappropriate development in the Green Belt under paragraph 89 of the NPPF.

All of the remaining MRS allocations would require the alteration of Green Belt boundaries. Paragraph 83 of the NPPF requires that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan. My report will contain my conclusions on exceptional circumstances, having regard to the benefits and harm which may arise from each site.

However, at this stage I am clear that exceptional circumstances have not been justified for the proposed allocation on land off Lutterworth Road at Brinklow (DS3.7). The Parish Council is bringing forward a neighbourhood plan which seeks to identify a range of smaller sites to meet the housing needs of the village. The site at Lutterworth Road is well outside the village boundary and poorly related to the existing form and historic features of Brinklow on its northern side. The site is open and particularly visible on the approach to the village along the Fosse Way from the north. Development of 100 homes here would represent a significant encroachment into the countryside, which would cause harm to the openness and purposes of the Green Belt, as well as to the character of the countryside and the setting of the Brinklow Conservation Area and the Scheduled Ancient Monument comprising the motte and bailey. The suggested landscape buffer would do little to mitigate this harm. As such the allocation is not justified.

The loss of 100 dwellings on this site from the housing land supply could be compensated for in part by increasing the capacities of other MRS allocations. It was agreed at the hearings based on the evidence put forward that the sites at Long Lawford (DS3.8) and Binley Woods (DS3.6) could accommodate around 150 and 75 dwellings respectively, providing an additional 63 dwellings. Further housing to meet the needs of Brinklow is also likely to come forward through the emerging neighbourhood plan.

Accordingly, to make the Plan sound it should be modified by deleting the proposed allocation DS3.7 at Brinklow and increasing the dwelling capacities of the sites at Long Lawford and Binley Woods to 150 and 75 dwellings respectively.

Coton House (DS3.1)

Policy DS3 proposes a further allocation of 100 dwellings at Coton House to the north of Rugby. This follows the residential redevelopment of the former institutional buildings surrounding the Grade 2* listed house and Grade 2 listed former stable block. However, the allocated site includes the open parkland either side of the main Lime tree avenue entrance to the estate. The proposed allocation and the current planning application have been the subject of heritage impact assessments and advice from Historic England, which demonstrate the importance of the historic parkland to the setting of the listed buildings. The Council's own assessment concludes that as a result of the allocation the entire context and interpretation of the Coton House estate would be lost. Historic England finds that, even with landscape mitigation, the proposals would suburbanise the approach to the estate and have at least a moderately serious impact on the significance of the heritage assets.

Even if this did not amount to substantial harm, paragraph 134 of the NPPF requires that less than substantial harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal. The public benefits stated at the hearings are the contribution of the site to the housing requirements and land supply of the borough and the highway improvements to the A426 which would follow from the number of houses proposed. However, given the generous surplus in the overall housing land supply of 15,396 dwellings and in the 5 year supply against the housing requirement, the contribution of the Coton House allocation to meeting housing needs would be very limited. I am not persuaded that the benefits arising from improvements to the surrounding highway network, including the addition of a roundabout on the A426, would justify or outweigh the harm either on its own or in combination with the limited housing benefit.

In addition, the site is remote from facilities in Rugby. Various measures were discussed at the hearings to improve access from the site to Rugby by sustainable modes of travel and to provide pedestrian access to facilities at the motorway service area recently approved at junction 1 of the M6. However, due to the distance and journey times from the main facilities in Rugby and the significant highway infrastructure around the site including the M6 between it and Rugby, the Coton House site is not in a location which will minimise the need to travel or maximise the use of sustainable transport modes. As a result the development would be largely car dependent.

For all of these reasons, the proposed allocation at Coton House is not justified and would not enable the delivery of sustainable development in accordance with the policies of the NPPF. Therefore, to make the Plan sound it should be modified by deleting the proposed allocation DS3.1.

Housing Land Supply

I have considered the consequences of deleting the housing allocations at Coton House (DS3.1), Brinklow (DS3.7) and Lodge Farm (DS3.15) on the housing land supply. Taking account of the increase in the capacity for the allocations at Long Lawford and Binley Woods, the cumulative impact would be a reduction in the housing land supply from 15,369 to 14,567 dwellings for the plan period and from 5229 to 5,067 dwellings for the first 5 years of the plan period. This would still provide for an overall surplus of 17% against

the housing requirement and a deliverable supply of 5.3 years. Whilst the Council's hearing evidence suggested that the proposed allocation at Ryton (DS3.9) may not come forward within the first 5 years, at the hearing the site promoter confirmed that the football club were close to confirming a relocation site for its training facility and therefore that it would deliver the housing allocation of 75 units by 2022/23. However, even if this site were not 'deliverable', the plan would still show a deliverable housing supply of 5.2 years. Accordingly, with the modifications to the residential allocations, the plan would remain sound in terms of its housing supply against the expectations of paragraph 47 of the NPPF.

Employment Land

With regard to the provision of employment land, my report will contain my conclusions on this matter, including the provision for sub-regional strategic investment sites and the treatment of the strategically significant employment sites at Ansty and ProLogis within the Green Belt. However, a further modification is required to the proposed employment allocation at South West Rugby for B8 warehousing. Whilst the site is well located to the strategic road network to support logistics uses, the scale of buildings permitted on this site should take account of the potential impacts on the surrounding landscape and the setting of any nearby heritage assets, including Thurlaston Conservation Area. Currently Policy DS8 does not provide such safeguards and, to be effective, should be modified to address this.

Policy H1 – Housing Mix

Having reviewed the wording of this policy and its supporting text in encouraging a mix of housing in the borough, I remain concerned that as drafted it is neither justified nor effective in two respects. Firstly, it is unduly restrictive on the list of circumstances in which a housing mix at variance with that set out in the latest SHMA can be considered. Paragraph 50 of the NPPF states that the mix should reflect local demand, implying that market factors should also be taken into account. Additional criteria should be included in the policy to reflect this. Secondly, the supporting text in paragraph 5.9 of the Plan suggests that future updates to the housing mix required in the borough will be included in a Housing Needs SPD. This would not accord with the role of supplementary planning documents in paragraph 153 of the NPPF in adding to policy burdens. Accordingly, main modifications should be proposed to Policy H1 and its supporting text to ensure consistency with the NPPF in both of these respects.

Policy ED1 – Protecting Employment Land

Policy ED1 seeks to protect existing employment land where it continues to make a viable contribution to economic development. This is a key component of maintaining a balance between housing and jobs and supporting growth across all sectors of business, in particular small and medium enterprises seeking lower value commercial premises. However, the NPPF is clear that plans should avoid the long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose. In such instances, it says applications for change of use should have regard to market signals. The proposed policy allows for change of use where a site is proven to be no longer viable for employment purposes, but the emphasis is on the use of a marketing exercise of up to 24 months to

demonstrate an absence of viability. As currently drafted the policy is unduly inflexible on this point. Whilst the supporting text refers to the continuing relevance of other tests for assessing the potential to release employment land these do not feature in the policy. The employment studies forming the evidence base for this policy recommend 6 tests, including evidence of active marketing for a period of 2 years. To be effective and justified, and therefore sound, Policy ED1 should be modified to apply a wider range of market signals tests to applications for change of use of employment land. This would ensure a more robust assessment of the need for the retention of employment sites.

Policy HS4 – Brandon/Coventry Stadium

I heard evidence at the hearings about the potential redevelopment and loss of the Brandon or Coventry Stadium. Notwithstanding the current condition of the site, it is evident that the stadium was until recently in active use for speedway and stock car racing. In the light of this, the absence of a policy to safeguard existing sports and recreational buildings from being built on unless surplus to requirements or replaced elsewhere, in line with paragraph 74 of the NPPF, renders the Plan unsound. Such safeguards are in place for open space and community facilities in the borough, but not sports facilities. Accordingly, main modifications should be included to apply the tests in Policies HS3 and HS4 and their supporting text to sports facilities. This would also ensure that any planning application for the redevelopment of the Brandon Stadium could be assessed against evidence for its need, viability and alternative provision.

Rugby Parkway Station

Warwickshire County Council is bringing forward a new Parkway Station at Houlton on the Rugby Radio Station site. This is one of the key transport schemes to support the growth of the town and mitigate the adverse effects of traffic, by providing an alternative point of access to rail services away from the centre of Rugby. Policy GP4 provides the basis on which to resist planning permission which would prejudice the provision of infrastructure. However, specific reference to the parkway station in the supporting text of this policy and in the IDP would make the Plan effective in providing the necessary safeguarding to the parkway station. Therefore, these should be included as main modifications.

Secondary education site at Coton Park East

The statement on secondary education submitted by Warwickshire County Council following the Stage 1 hearings forecasts a shortfall in secondary school places during the plan period in Rugby. The proposed new schools at Rugby Radio Station and South West Rugby would not provide sufficient capacity. The main area of deficiency is in the north of Rugby. The local education authority's (LEA) preference is for the expansion of existing secondary schools in the town to meet this need. However, should the capacity not be available on existing school sites, the Council has proposed the inclusion of a reserve site of 8.5 hectares for a new secondary school at Coton Park East. It has been suggested that the location of this parcel of land will be identified in the masterplan SPD for Coton Park East. However, the site should also be identified as an allocation on the Policies Map. It is important that the site is not sterilised if the capacity can be found

elsewhere, given that it would take up land otherwise forming part of the Coton Park East housing allocation. Accordingly, it is reasonable and justified for the reservation to be time limited. The LEA has advised a period of 24 months should be sufficient to either negotiate agreements for expansion of existing schools or complete the purchase of land for a school at Coton Park East. Whilst this appears optimistic it is supported by the statement of common ground between the County Council and the developer for Coton Park East. This would also allow the Council to bring forward replacement housing land should this be required to supplement the overall housing land supply. The Plan should be modified accordingly to ensure it is positively prepared in meeting the education infrastructure needs of the borough. In particular, main modifications should be made to Policy DS7, the IDP and the supporting text to Policy D3, which should reference the reserved site as an allocation on the Policies Map.

Conclusion and Way Forward

This letter does not cover all of the matters and issues discussed at the hearings. However, other matters will be addressed in the proposed main modifications where these were agreed at the hearings. My report will set out my final conclusions on all of the main issues taking account of the responses to the consultation on the proposed main modifications.

If the Council is content to adopt the Plan subject to the above further main modifications, I should be grateful if you would prepare the precise wording for me to consider as part of the consolidated set of main modifications you are preparing. The main modifications would then need to be the subject of SA and HRA, insofar as this is necessary, followed by public consultation. I will need to agree the final version of the proposed main modifications before they are published for consultation. I will also need to see the draft SA and HRA before they are published alongside the proposed main modifications.

If, however, the Council does not agree with this course of action or any individual aspects of it, I would be grateful if you would advise me of the Council's position and alternatives as a matter of urgency.

I would also be grateful if the Council would arrange for this letter to be added to the examination website as soon as possible. However, I need to be clear that I am not inviting or proposing to accept comments on this letter from any other examination participants.

Yours sincerely,

Mike Hayden

INSPECTOR

DRAFT SCREENING REPORT
Habitat Regulations Assessment (HRA)
For
Rugby Borough Council Local Plan
2018



A Report for Rugby Borough Council

August 2018

Produced by

Ecological Services
Warwickshire County Council
Barrack Street
Warwick
CV34 4TH
(01926 418060)

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Non-Technical Summary

A stage 1 screening of the Habitat Regulations Assessment (HRA) process was undertaken of the Rugby Borough Council Local Plan - 2011 to 2031 (hereafter referred to as the Rugby Local Plan) by Ecological Services at Warwickshire County Council (WCC) on behalf of Rugby Borough Council (RBC) in August and September 2016. The screening exercise was updated following minor and main modifications made to the local plan following the independent examination made by the planning inspector as to if the plan *'is sound and complies with all the legal requirements'* (Rugby Borough Council's website accessed in July 2018). The screening exercise is required under Article 6 (3) of the European Commission's Habitats Directive (92/43/EEC). The exercise was undertaken following best practice guidance, principally using the Habitat Regulations Assessment Handbook (2018) produced by David Tyldesley Associates (DTA).

Rugby Borough forms part of Warwickshire and covers an area of 138 square miles on the eastern edge of the West Midlands, bordering the counties of Northamptonshire and Leicestershire to the east which are considered to form part of the East Midlands (see Figure 1).

The Rugby Local Plan sets out *'The Council's policies and proposals to support the development of the Borough through to 2031'* setting the framework *'that will manage change and growth until 2031'* (RBC 2018). This Local Plan will replace the Core Strategy June 2011 and aims to *'meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities,'* in this case Coventry City Council (RBC 2018).

Two European Sites were selected for consideration as part of this study: Ensor's Pool Special Area of Conservation (SAC) and the River Mease SAC with associated Natural England River Mease Catchment Risk Zone. Both lie within 20km buffer zone around Rugby Borough (see Figure 2).

A further three European Sites that lie close to the boundary of Warwickshire, but outside of the 20km buffer zone around Rugby Borough were considered and screened out of this HRA. Justification is provided in this report.

The potential for any impact of the Rugby Local Plan on hydrologically dependant Welsh SACs (should water to supply development in Rugby be sourced from Wales) was raised by Natural England to Warwickshire County Council in 2012 in relation to a previous HRA for neighbouring Coventry. Further consultation on this issue was also undertaken with Severn Trent Water in July 2016, who confirmed that water for the development in Rugby would be from a local source at Draycote within the borough and not from Wales. Hence any impact to Welsh SACs as a result of the Rugby Local Plan has also been screened out of this HRA.

Ensor's Pool lies in Nuneaton, Warwickshire, approximately 3.9km to the west of Rugby Borough at its nearest point. The SAC is designated for its population of white-clawed crayfish (*Austropotamobius pallipes*), and the key potential vulnerabilities from the plan are considered to be: pollution from surface water flooding, an increase in water levels and potential to introduce non-native species.

The River Mease SAC comprises a small tributary of the River Trent and lies in the counties of Derbyshire, Leicestershire and Staffordshire. A small part of its associated Natural England River Mease Catchment Risk Zone lies in Warwickshire and within a 20km buffer of Rugby Borough (see Figure 2). The River Mease SAC comprises an important habitat for the spined loach (*Cobitis taenia*), bullhead (*Cottus gobio*), white-clawed crayfish and otter (*Lutra lutra*). It has also been selected as a

SAC due to it being an example of the qualifying habitat: water courses of plain to montane levels with the habitat community *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation.

The 2016 publication draft of the Rugby Local Plan was subject to a screening assessment using the screening categories in the Habitat Regulations Handbook (DTA 2016). All of the policies in and contents of the plan were screened out. Given no Likely Significant Effects (LSE) of the plan were anticipated, it was not considered necessary to undertake an In-combination Assessment as no cumulative effects are predicted (Foster and Langton High Court Judgment 2015¹).

An initial consultation exercise was undertaken with Natural England, the Environment Agency and Severn Trent Water in July and August 2016. Their initial consultation responses ahead of the publication of version 1 of the draft HRA report are provided in [Appendix 1](#).

A public consultation on the Rugby Borough Council Local Plan 2011 to 2013 Publication Draft dated September 2016 and the Draft HRA Screening Report (dated September 2016) was undertaken between 26 September 2016 to 11 November 2016. A subsequent additional consultation was held between 30 November 2016 and 11 January 2017. Natural England were specifically contacted for their comments on the draft HRA report on 26.09.16, as were the Environment Agency and Severn Trent Water.

Natural England provided a response to the draft HRA report following the first consultation period dated 11.11.16. In this response they confirmed they were happy with the conclusions of the HRA that the plan can be screened out of any further requirements for HRA. Natural England did not provide any further comments following the second period of consultation and the Environment Agency and Severn Trent Water did not provide any further comments specifically on the HRA following either consultation. The final report dated April 2017 incorporated the responses from the statutory and public consultation. On the basis that Natural England are satisfied with the conclusions for the 2017 HRA, it was recommended that the Rugby Borough Council Local Plan could be adopted from an HRA perspective.

This is an updated report that provides the results of a re-screen of the 'Rugby Borough Council Local Plan – 2011 -2031 June 2018' including all the minor and main modifications (RBC 2018). This update report and re-screen have confirmed that the plan can be screened out of any further requirements for HRA or Appropriate Assessment. On the recommendation of Ecological Services at Warwickshire County Council and Natural England (see [Appendix 1](#)), Rugby Borough Council in July 2018 agreed to add in additional wording into Policy NE1 in the Rugby Borough Council Local Plan with respect to International and European Sites.

The main modifications to the Rugby Local Plan will be sent out for public and statutory consultation (including Natural England, the Environment Agency and Severn Trent Water) from 14th August 2018 to the 5th October 2018. Following receipt of comments from these agencies this Draft report will be updated and the template provided in Appendix 8 will be completed.

Acknowledgements

We appreciate the pre-submission advice on this HRA provided to us by Natural England, the Environment Agency and Severn Trent Water.

¹ Foster and Langton v Forest of Dean District Council [2015] EWHC 2648 22nd September

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Glossary of Acronyms and Abbreviations

AA	Appropriate Assessment
AFW	Amec Foster Wheeler
APIS	Air Pollution Information System
BAU	Business As Usual
CEcol	Chartered Ecologist
CIEEM	Chartered Institute of Ecology and Environmental Management
CJEU	Court of Justice of the European Union
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley Associates (Publishing)
EA	Environment Agency
ECJ	European Court Judgement
GIS	Geographical Information Systems
HCI/ HF	Halogens
HRA	Habitat Regulations Assessment
IROIT	Imperative Reasons of Overriding Interest Test
JNCC	Joint Nature Conservancy Council
LSE	Likely Significant Effect
MCIEEM	Full Member of the Chartered Institute of Ecology and Environmental Management
N2K	Natura 2000 / European Sites
N	Nitrogen
NH ₃	Ammonia
NO _x	Nitrogen Oxides
NPPF	National Planning Policy Framework
OLDSIS	Operations Likely to Damage the Special Interest of the Site
QGIS	Quantum Geographic Information System
P	Phosphorus
PAH	Polycyclic Aromatic Hydrocarbons
PINS	The Planning Inspectorate
PM	Particulates
RBC	Rugby Borough Council
SACs	Special Areas of Conservation
SIP	Site Improvement Plan
SO ₂	Sulphur Dioxides
SPAs	Special Protection Areas
SNH	Scottish Natural Heritage
SSSI	Site of Special Scientific Interest
STW	Sewerage Treatment Works
TBC	To be Confirmed
UEA	UE Associates
UHCW	University Hospitals Coventry & Warwickshire
VOC	Volatile Organic Compounds
WCC	Warwickshire County Council

1. Introduction

1.1. Background and Report Aim

Ecological Services at Warwickshire County Council were commissioned by Victoria Chapman at Rugby Borough Council in April 2016 to undertake a 'Habitat Regulations Assessment' of the Publication Draft of the Rugby Borough Council Local Plan – 2011 -2031, Full Council Version dated 19th July 2016 (provided to Ecological Services on 11.07.16 and 01.09.16). A public consultation of the Rugby Local Plan (Publication Draft September 2016) along with the Draft HRA Screening Report (dated September 2016) was undertaken between 26 September 2016 and 11 November 2016. A subsequent additional consultation was held between 30 November 2016 and 11 January 2017.

A public and statutory consultation of the main modifications to the Rugby Borough Council Local Plan 2011 to 2031 including this updated HRA report, will take place from the 14th August to the 8th October 2018. Following the completion of this consultation period, any comments provided will be considered and the HRA report will be updated and finalised to reflect responses.

The Rugby Local Plan sets out *'The Council's policies and proposals to support the development of the Borough through to 2031'* setting the framework *'that will manage change and growth until 2031'* (RBC 2018). This local plan will replace the Core Strategy June 2011 and aims to *'meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities'* in this case Coventry City Council (RBC 2018).

The borough itself covers an area of 138 square miles on the eastern edge of the West Midlands Region but borders Northamptonshire and Leicestershire, both of which are in the East Midlands Region. The remit of the plan in the context of adjacent counties can be found in Figure 1. The largest population centre in the borough is Rugby which currently has 102,500 residents. Villages throughout the borough *'range in size from 20 to 3000 people'* (RBC 2018).

Rugby Borough had a steady population between 1980 and 2001, but was noted to increase by 14.8% between 2001 and 2011. The local plan confirms *'the projected population increase between 2010 and 2035 is expected to be 30%, which would bring the population in excess of 130 000'*. The highest rates of projected population growth are in the groups aged 65 and over, with those aged 85 and over projected to increase by 190% by 2035.

The primary focus of new residential and employment development will be around Rugby town centre. The local plan states that *'it will be through extensions to the urban area that the vast majority of housing and jobs will be delivered up to 2031'* (RBC 2018). It is considered in the plan that *'there is insufficient capacity at Rugby town or its urban edge to deliver the entire housing target within the plan period. The Settlement Hierarchy informed the selection of further sites'* (RBC 2018).

Policy DS1 outlines that the plan will aim to deliver (between 2011 and 2031):

- a) 12,400 additional homes including 2800 dwellings to meet Coventry's unmet needs, and with the following phased annual requirement:
 - a. Phase 1: 2011 - 540 dwellings per annum;
 - b. Phase 2: 2018- 2031 – 663 dwellings per annum and
- b) 208ha of employment land including 98ha to meet Coventry's unmet needs.

Rugby's Objectively Assessed Housing need is 9600 dwellings over the plan period with the additional 2800 seeking to help neighbouring Coventry meet its housing needs (under the legal duty

to cooperate as per the Localism Act 2011). The housing will be delivered in two phases: Phase 1 (2011 to 2017) 540 dwellings per annum and Phase 2 (2017 to 2031) 663 dwellings per annum.

Table 1 below is an extract from paragraph 4.12 of the plan showing precisely how the housing requirement will be met.

Dwellings Constructed between 1 st April 2011 and 31 st March 2017	2577
Numbers of permitted dwellings anticipated to be completed within between 1st April 2017 and 31st March 2031	6505
An allowance for windfall sites in this plan between 1 st April 2017 and March 31 st 2031	630
Number of dwellings required to be allocated in this plan	2688
Number of allocated dwellings anticipated to be completed within the plan period	4855
Total anticipated provision in the plan period	14567

Table 1: Extract from the Rugby Local Plan 2018 illustrating how Rugby intends to deliver housing requirements.

Figure 1 shows the location of all the proposed sites highlighted in this plan. The figure also includes those which are in the process of being built out, but some of this development will contribute to the housing proposed in the local plan hence its inclusion. All these sites are relevant as the plan covers the period from 2011.

Completions to date are 2577. This means that the council needs to find another 2688 dwellings within the plan period. However the plan identifies sites for a potential 6290 dwellings with 4855 of these allocated dwellings anticipated in the plan period. The provision outlined in Table 1 is greater than the figure quoted in Policy DS 1 to allow some flexibility in the plan in line with recommendations made in the National Planning Policy Framework (NPPF). This flexibility is required *'in the event that some sites fail to come forward or are delivered with reduced capacities than allowed for in the plan.'* (RBC 2018).

The Rugby Local Plan comprises a total of 11 Chapters as follows:

- Chapter 1: Introduction
- Chapter 2: Context, Vision and Objectives
- Chapter 3: General Principles
- Chapter 4: Development Strategy
- Chapter 5: Housing
- Chapter 6: Economic Development
- Chapter 7: Retail And Town Centre
- Chapter 8: Healthy, Safe And Inclusive Communities
- Chapter 9: Natural Environment
- Chapter 10: Sustainable Design and Construction
- Chapter 11: Delivery

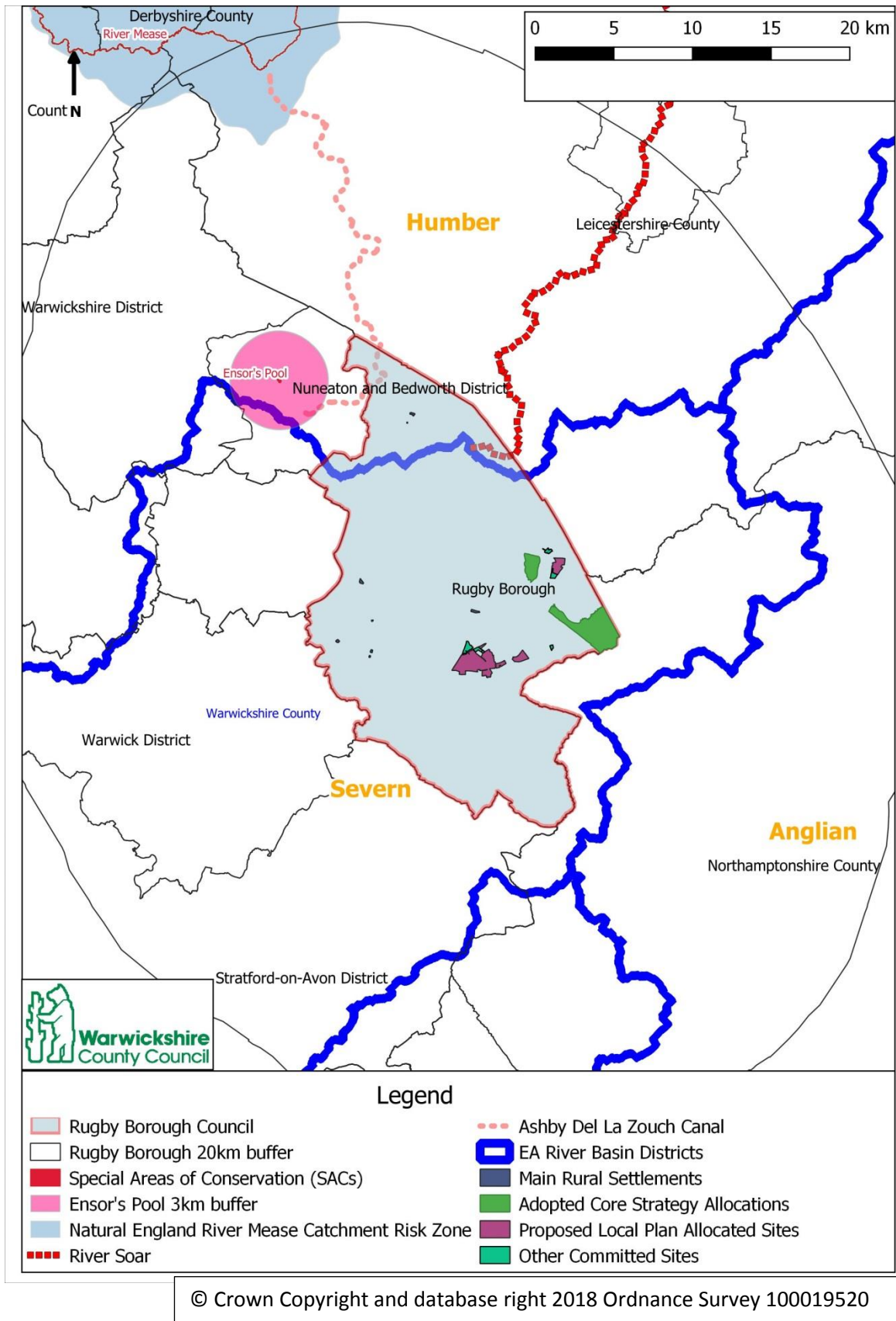


Figure 1: Rugby Borough Council Local Plan showing allocations

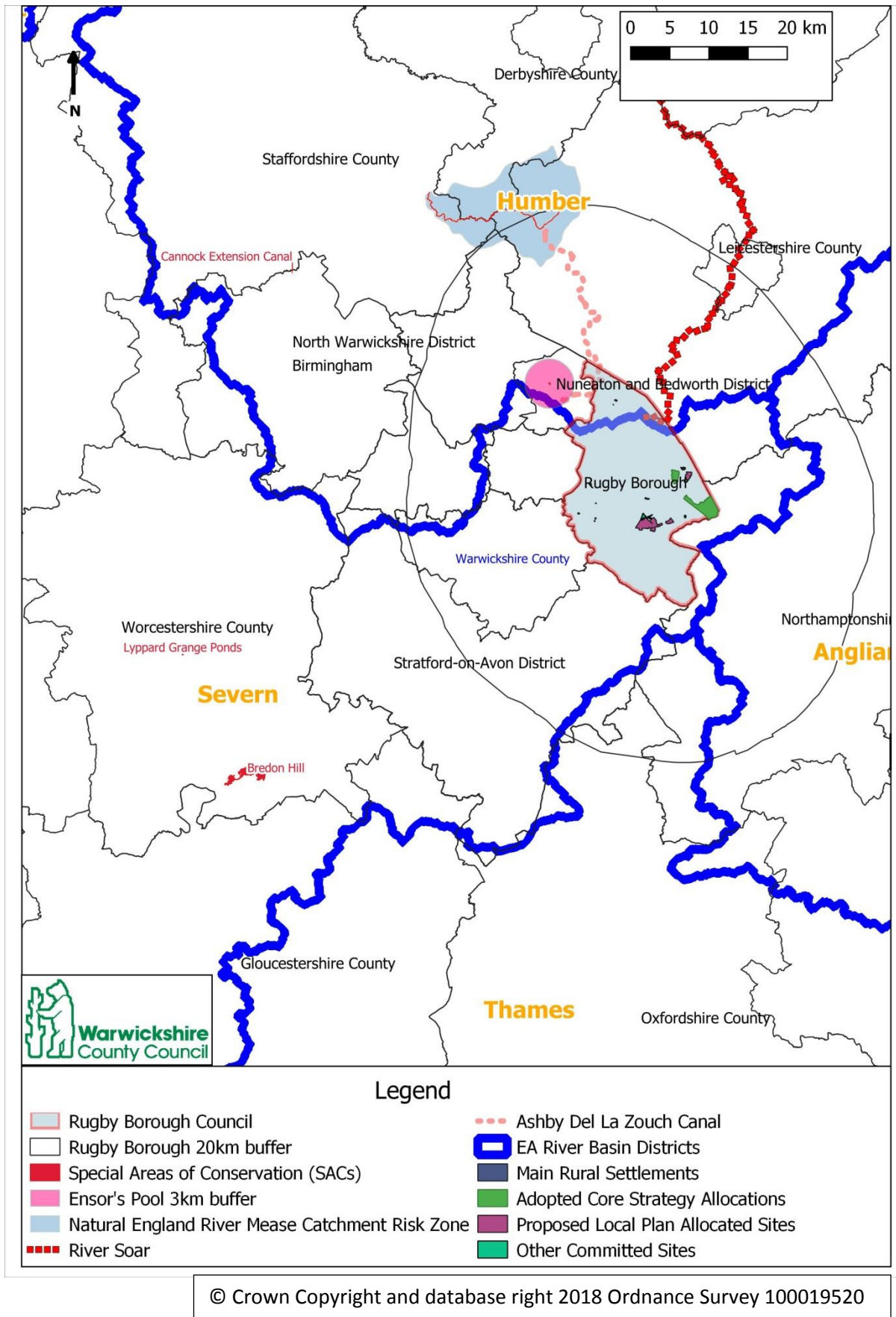


Figure 2: Location of SACs within a 20km buffer zone around Rugby

This HRA also makes reference to a previous HRA undertaken by UE Associates (UEA 2009) of the July 2009 Submission Version of the Core Strategy (RBC 2009). This Core Strategy replaced the 2006 Local Plan that covered the period of 2009 to 2026. The 2009 Core Strategy allocated 10800 dwellings and 108 ha of employment land (RBC 2009). The HRA of the 2009 Core Strategy was accepted by Natural England (see correspondence in [Appendix 1](#)).

An initial screening assessment was undertaken between July and August 2016 of the policies in the Rugby Borough Council Local Plan 2011-2031, Publication Draft dated 19.07.16. Following minor and main modifications made to the local plan in 2018, the Rugby Borough Council Local Plan 2011-2031 dated June 2018 was re-screened by Ecological Services in July 2018. This exercise allowed the consideration of if the plans, or policies within the plan could have a 'likely significant effect' (LSE) (as defined in Article 6(3) of the Habitats Directive and subsequent case law), 'either individually or in combination with other plans and projects' on the integrity of any European Sites of nature conservation importance (i.e. Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites).

Version 1 of this HRA screening report (dated September 2016) was out for public consultation alongside the Rugby Borough Council Local Plan- 2011 -2031 Publication Draft dated September 2016, between 26 September 2016 and 11 November 2016. A subsequent additional consultation was held between 30 November 2016 and 11 January 2017. The September 2016 Draft HRA report and Rugby Local Plan Publication Draft 2016 were specifically sent to Natural England on 26.09.16 and the Environment Agency and Severn Trent Water for comment. The report was also made available on Rugby Borough Council's website https://www.rugby.gov.uk/directory_record/935/local_plan as part of the public consultation.

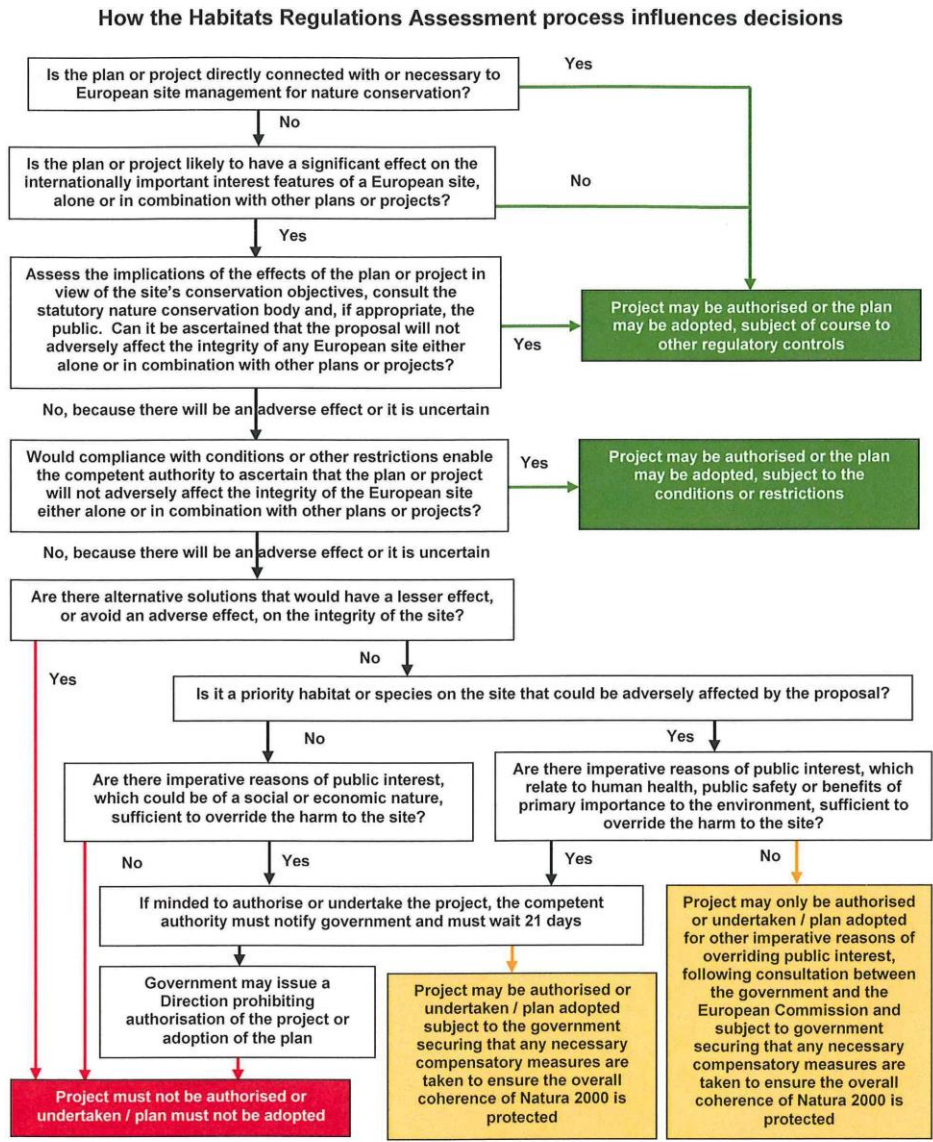
This updated Draft Report will be sent out for public and statutory consultation from the 14th August 2018 to the 5th October 2018, following receipt of responses, this report will be finalised taking the comments provided into account.

As highlighted in the Planning Inspectorate's Guidance Note on HRA (August 2013), 'HRA is an iterative process and the emphasis should be on avoiding likely significant effects (LSE)' (hereafter known as the PINS Advice Note 10).

The interpretation of a LSE is set out in case law and guidance. The Habitats Directive highlights that an Appropriate Assessment should be triggered if any plan or project could have a LSE either 'individually or in combination with other plans or projects'. In the European Court Judgement (ECJ) Ruling C-127/02, Waddenzee, the Habitat Regulations Assessment Handbook (DTA 2018, hereafter known as the HRA Handbook 2018), states that 'irrespective of the normal English meaning of 'likely', in this statutory context 'a likely significant effect' is a 'possible significant effect'; one whose occurrence cannot be excluded on the basis of objective information'. The HRA Handbook 2018 continues that 'However, to be excluded on the basis of objective information, the probability of a significant effect does not necessarily have to be zero. An effect could be excluded from assessment if the risk of it occurring would be an extremely low probability indeed for example, a risk of 1 in 0.5 million per year.' 'A significant effect is any effect that would undermine the conservation objectives for a European site. **There must be a causal connection or link between the subject plan or project and the qualifying features of the site which could result in possible significant effects on the site.** These effects may be direct or indirect and the existence and scope of possible effects must be judged on a case-by-case basis'.

If a LSE is anticipated from any aspect of the plan or in-combination with other plans and projects, then a more detailed Appropriate Assessment (AA) will be required to be undertaken with the appropriate consideration of mitigation measures and alternative solutions prior to any decision to adopt the plan. This further work if required will be 'carried forward in a focussed and tightly scoped AA' (PINS Advice Note 10).

Figure 3 below from the HRA Handbook outlines 'How the Habitats Regulations Assessment process influences decisions'.



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Figure 3: How the HRA process influences decisions (HRA Handbook 2013)

1.2. Habitats Regulation Assessments

HRAs are required under Article 6 of the European Habitats Directive (92/43/EEC on the conservation of natural habitats and of wild fauna and flora). Article 6 also covers the requirements for HRA under the Birds Directive (on conservation of wild birds 79/409/EC, now

codified directive 2009/147/EC) to the effect that only one assessment is required for all European Sites (also known as Natura 2000 sites or N2K sites) covered by both directives.

Article 6 (1) and 6 (2) of the Habitats Directive 92/43/EEC sets out the obligations of Member States on European Sites:

Article 6 (1)

'For special areas of conservation, Member States shall establish the necessary conservation measures involving, if need be, appropriate management plans specifically designed for the sites or integrated into other development plans, and appropriate statutory, administrative or contractual measures which correspond to the ecological requirements of the natural habitat types in Annex I and the species in Annex II present on the sites.'

Article 6 (2)

'Member States shall take appropriate steps to avoid, in the special areas of conservation, the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of this Directive.'

Article 6 (3) outlines when an HRA should be undertaken:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having obtained the opinion of the general public.'

Article 6 (4) discusses alternative solutions and the Imperative Reasons of Overriding Interest Test (IROIT)

'If, in spite of a negative assessment of the implications for the site in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest'

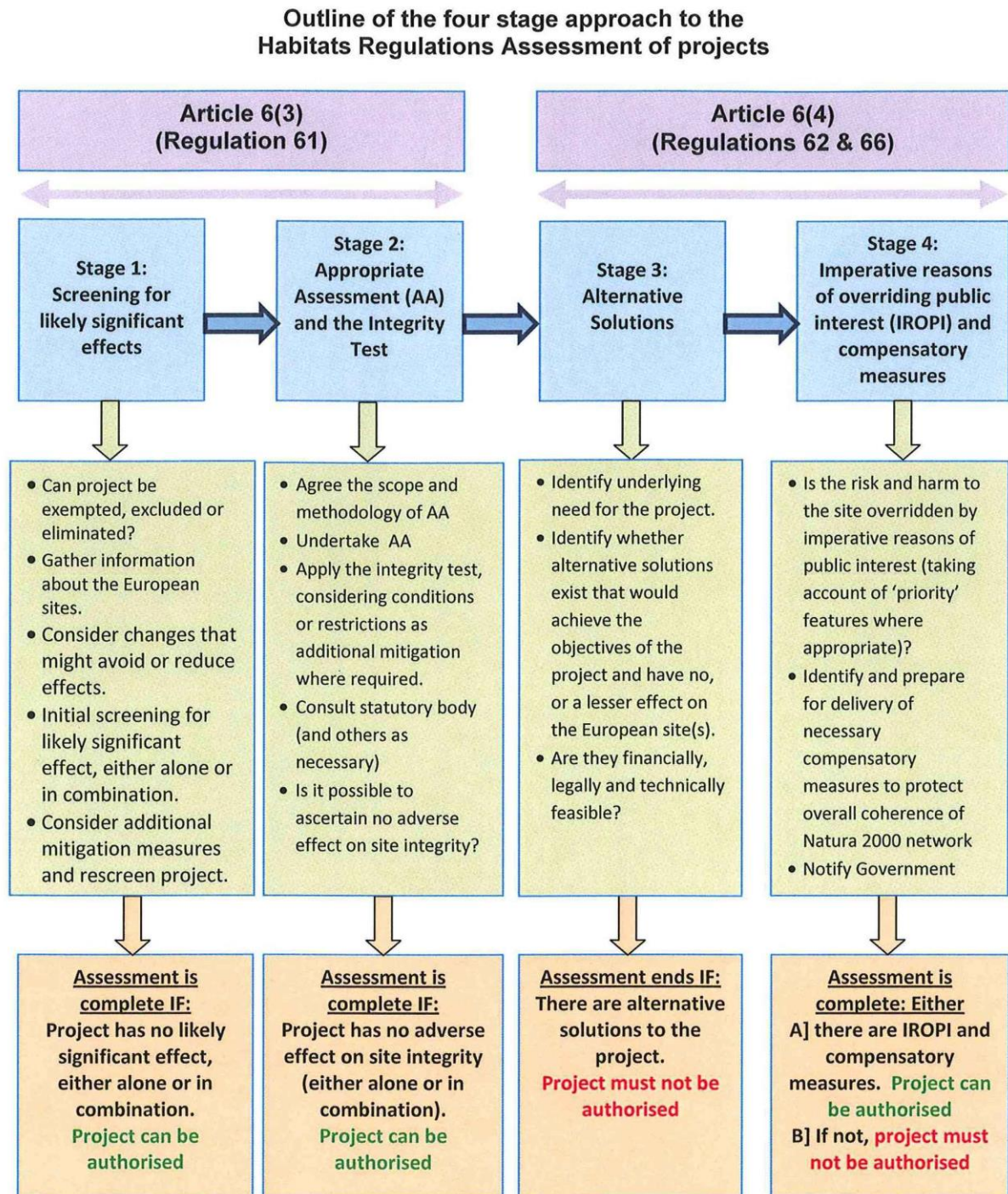
In England, all European Sites are designated by Defra and will have at least one 'qualifying feature' (a habitat, species or both) to be designated as European Sites. These designations are underpinned by the national level designation of Sites of Special Scientific Interest (SSSI). SSSI designations cover broader conservation issues than just the qualifying features of a European Site and can have different site boundaries.

A HRA deals only with negative effects on the qualifying features of European Sites. This HRA deals only with Special Areas of Conservation (SACs), as there are no Special Protection Areas (SPAs) or Ramsars within a reasonable proximity (20km, see Figure 2) to Rugby Borough that could be impacted by the Rugby Local Plan. The SSSI data for the European Sites selected, in

addition to direct consultation with Natural England has been used in order to determine the current conservation status and condition assessment of the selected European Sites.

The HRA for the Rugby Local Plan comes under the remit of Regulations 105 to 109 of the Conservation of Habitats and Species Regulations 2017 (SI 2017/1012).

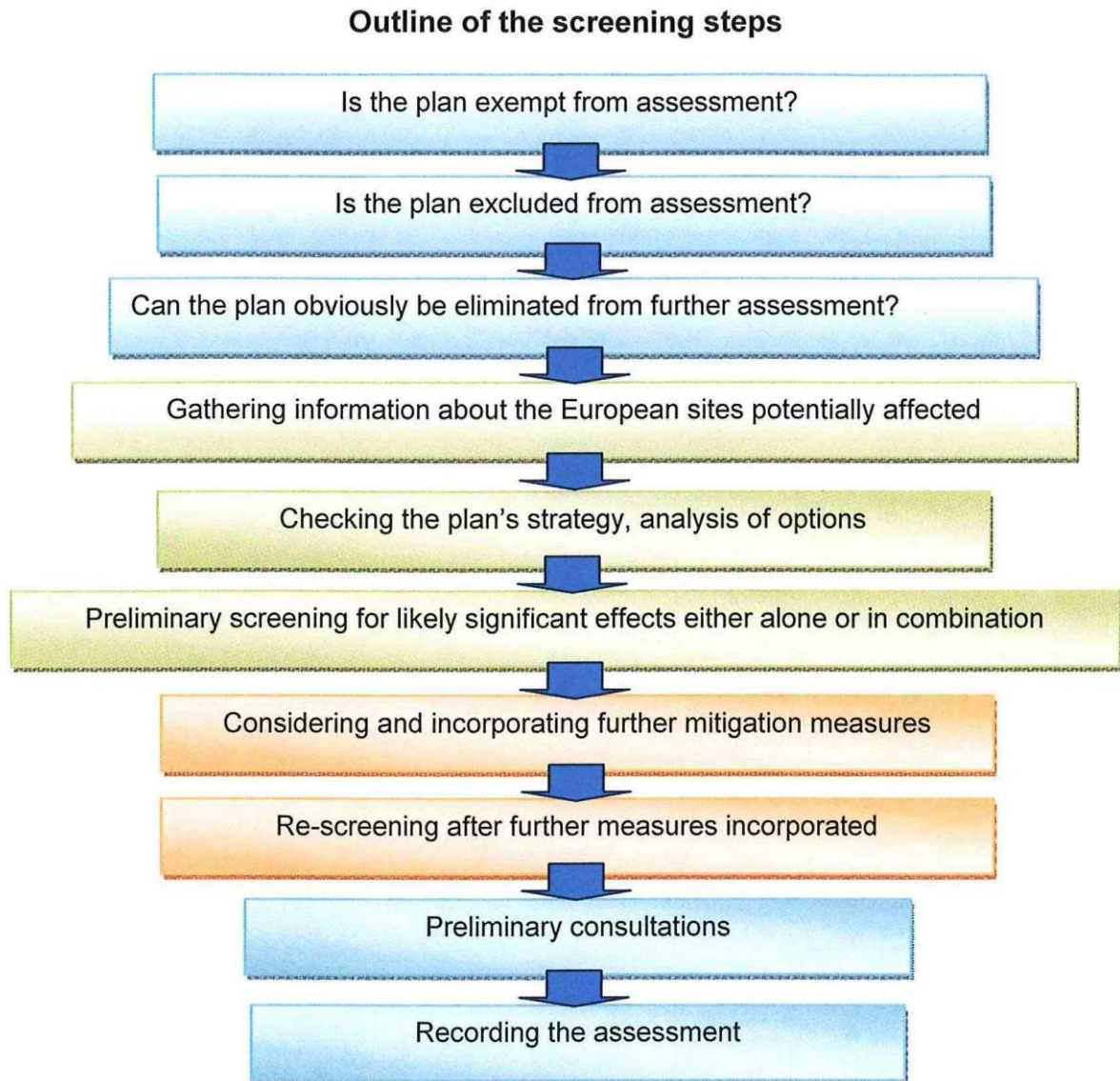
The HRA Handbook 2018 and other guidance, divides the HRA process into four distinct stages. This is illustrated in Figure 4 below.



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Figure 4: Outline of the four-stage approach to HRA (HRA Handbook 2013)

This report relates only to Stage 1 of the process which involves the screening for any LSE to ascertain if an AA will be triggered. The HRA Handbook 2018 confirms that if appropriate mitigation measures can be incorporated into the plan or project at this screening stage (known as ‘incorporated mitigation measures’), that result in no LSE when the plan is re-screened with these new measures an AA will not be required. Figure 5 below highlights the steps in Stage 1 screening for LSE covered in this report.



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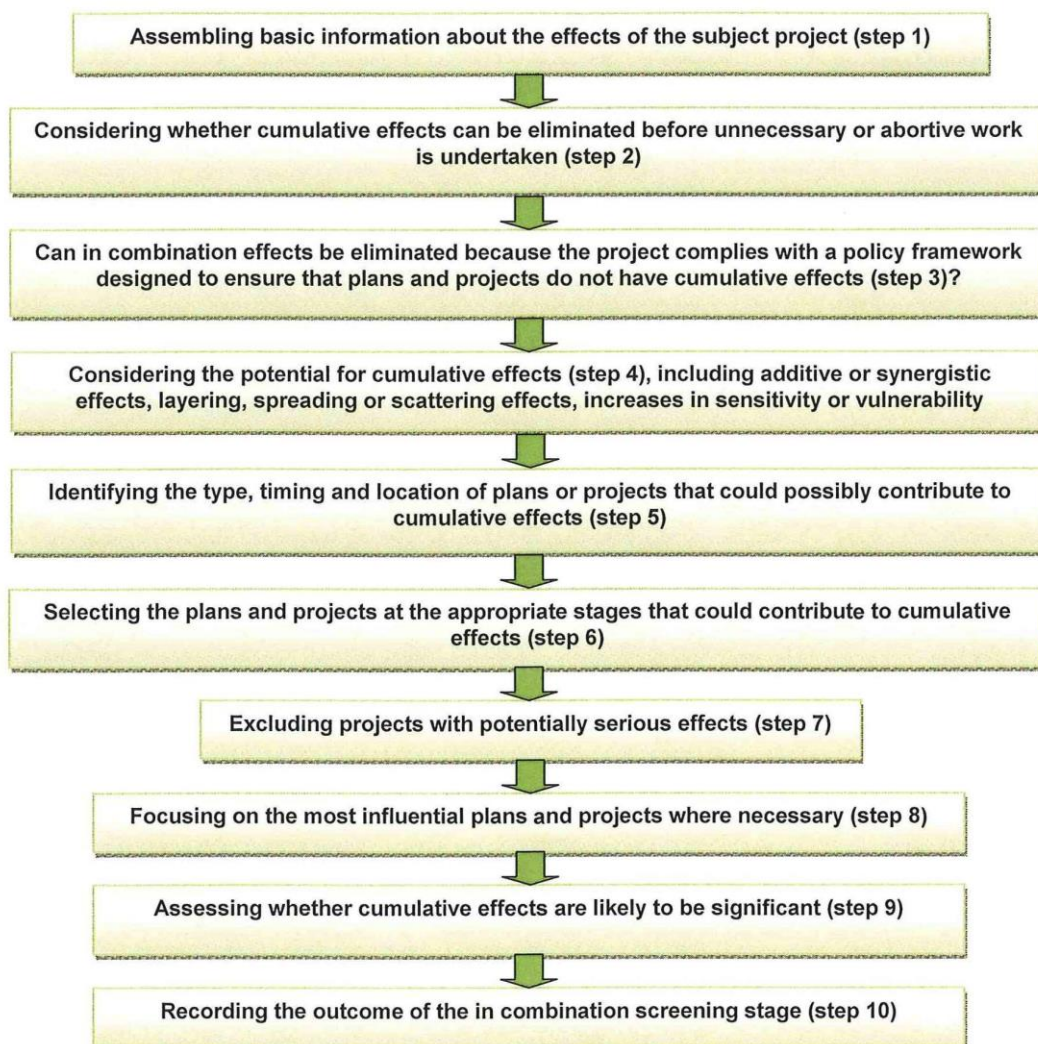
Figure 5: Outline of screening steps for Stage 1 of an HRA (from HRA Handbook 2013)

An In-combination Assessment of other plans and projects in the area is also required as part of the HRA process at both the screening and AA stage. As stated in the draft 2013 Habitat Regulations Assessment Guidance produced by Defra and highlighted in the HRA handbook 2018 ‘the effects of a plan or project must be considered both individually and in-combination with

other relevant plans and projects. This is a requirement of the Habitats Directive which helps ensure that European Sites are not damaged by the additive effects of multiple plans or projects'. As with the screening of the Rugby Local Plan, the HRA also needs to ensure that any potential impacts from other plans or projects in the area on a European Site (that could increase the impacts already identified for the Rugby Local Plan on a cumulative basis) are identified and measures are put in place to protect European Sites from these cumulative effects.

Figure 6 below outlines the ten steps in the In-combination Screening Assessment methodology as stated in the HRA handbook 2018.

Outline of the in-combination screening assessment methodology



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Figure 6: Ten steps in the screening assessment of in-combination effects (from HRA Handbook 2013)

Following the screening exercise undertaken, it was considered that an In-combination Assessment was not required, as cumulative effects were eliminated. This follows advice in the HRA handbook (see step 3 in Figure 6 above). Further details are provided in [Section 4](#).

2. Methodology

2.1. HRA Screening Guidance

The methodology used for the screening of the Rugby Borough Council Local Plan: 2011 to 2031 June 2018, is primarily based on the recommendations outlined in The Habitat Regulations Assessment Handbook 2018 by DTA publishing. Key guidance used in this screening assessment is highlighted below and in [Section 6](#).

- The HRA Handbook 2018 to which Warwickshire County Council is a current subscriber. The screening categories used in Table 2, [Section 2.3](#) are directly from the handbook;
- The PINS Advice Note 10 in August 2013 (Version 5); and
- Scottish Natural Heritage (SNH) Habitats Regulations Appraisal of Plans. Guidance for Plan-Making Bodies in Scotland (Version 2.0) August 2012 (hereafter, known as the SNH guidance).

Reference is also made to Warwickshire's HRA Screening Report of the Coventry Local Plan and City Centre Area Action Plan 2016; the Screening HRA Report for Warwickshire's Final Minerals Plan dated October 2016; the HRA for the Warwickshire Local Flood Risk Management Strategy and the updated version of the HRA for the Warwickshire Minerals Plan currently being produced (WCC 2016a; 2016b; 2016c; 2018 In Press).

2.2. Selection of European Sites

Table 3 in Section 3.1 (from the HRA Handbook), was used to help select which European Sites to consider at the screening stage. Information required for assessment on each European Site selected was obtained from Natural England's website and through direct consultation.

Initial consultation was also undertaken with the Environment Agency (14.07.16, 27.07.16 & 02.08.16), Natural England (14.07.16, 28.07.16 & 03.08.16) and Severn Trent Water (14.07.16 & 28.07.16) by email and telephone. These authorities were consulted on the scope of the assessment and the nature of any other plans and projects that would need to be considered as part of any In-combination Assessment. Further information on the current situation regarding the conservation status of Ensor's Pool SAC was also obtained.

The consultation responses from Natural England, Environment Agency and Severn Trent Water are provided in [Appendix 1](#).

A Quantum Geographical Information Systems (QGIS) project has been developed to help scope and refine the screening exercise for this HRA and enabled the production of all maps within this report (see Figures 1, 2, 7, 8 & 9).

A copy of the Draft HRA Report dated September 2016 was sent to Natural England on 26.09.16 (see [Appendix 1](#)) as well as to the Environment Agency and Severn Trent Water. A response from Natural England to the Draft HRA was provided on 11.11.16 (see [Appendix 1](#)). A response to the Local Plan was provided by the Environment Agency on 10.11.16 but did not specifically mention the HRA. Severn Trent Water were also specifically consulted on the Draft HRA and Local Plan Consultation draft, but did not provide a response.

This updated Draft HRA 2018 will be sent out with the main modifications to the RBC Local Plan dated for statutory and public consultation from the 14th August 2018 to the 5th October 2018. Following receipt of responses this report will be updated and finalised.

2.3. Screening Assessment Categories

The screening of the Rugby Local Plan has been undertaken following guidance and specific ‘screening categories’ provided in the HRA Handbook 2018, listed in Table 2 below. A summary of the results for policies only is provided in [Section 3.5](#) with full details of screening of the whole plan with full justification is provided in [Appendix 4](#).

Category	Justification	Screened In or Screened Out?
	Administrative Text – introductory text about the plan	Screened out
	The plan makers ‘vision’ or ‘general aspiration’	Screened out
	General Statements of overall goals	Screened out
	General Statements of broad objectives (implications are assessed under policy xx below)	Screened out
A	General Statement of policy / general aspiration	Screened out
B	Policy listing general criteria for testing the acceptability / sustainability of proposals	Screened out
C	Proposal referred to but not proposed by the plan	Screened out
D	Environmental protection / site safeguard policy	Screened out
E	Policies or proposals which steer change in such a way as to protect European sites from adverse effects	Screened out
F	Policy that cannot lead to development or other change	Screened out
G	Policy or proposal that could not have any conceivable effect on a site	Screened out
H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)	Screened out
I	Policy or proposal with a likely significant effect on a site alone	Screened in
J	Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination	Re-allocate to Category K or L
K	Policy or proposal not likely to have a significant effect either alone or in combination	Screened out after in-combination test
L	Policy or proposal likely to have significant effect in combination	Screened in after the in-combination effect

Table 2: The HRA Handbook 2018 screening categories

2.4. Limitations and Assumptions

This HRA is based on the latest available information on the European Sites selected, provided by Natural England at the time of writing. It is likely that in the future, the conservation status, objectives and condition of European Sites may change.

In March 2015, the Ribble case in the UK courts² has suggested the need to consider older more detailed Conservation Objectives for European Sites which are currently not published on Natural England’s website. We have obtained the 2008 Conservation Objectives for Ensor’s Pool SSSI and the 2012 Conservation Objectives for the River Mease SSSI from Natural England. These are summarised in [Appendix 2](#) of this report.

² RSPB v Secretary of State for the Environment Food and Rural Affairs, BAE Systems (Operations) Ltd and Natural England, 18th March 2015, [2015] EWHC Civ 227, referred to as the *Ribble* Case.

In a previous HRA undertaken for WCC for the Warwickshire Minerals Plan, we received correspondence from Natural England on 24 August 2015 (extract provided in [Appendix 1](#)). This stated that our 'primary focus' should be on the European Site Conservation Objectives for the relevant European Site these are all provided in Table 4 of this report.

It should also be noted that in September 2014, surveys for the population of white-clawed crayfish at the only European Site in Warwickshire (Ensor's Pool SAC), did not locate any white-clawed crayfish. The surveyor's report, published by Natural England in October 2015 states the survey in September 2014 indicates the *'once abundant population of white-clawed crayfish appears to have disappeared. The pool still appears to provide suitable habitat for crayfish and there is no indication that any other animal or plant species has been affected.'* The report goes on to suggest that crayfish plague *'seems likely to be the cause of mortality'* and recommends further surveys *'to verify the absence of white-clawed crayfish and determine whether signal crayfish are present'* (Natural England 2015).

Subsequent further surveys were undertaken in 2015, comprising a bioassay between June and September and a trapping survey in September. Natural England confirmed to Ecological Services at Warwickshire County Council on 02.12.15 that *'We conclude that the population of native white-clawed crayfish is no longer present at Ensor's Pool. Natural England is now considering these results and their implications in conjunction with our national specialists and the ecologists who undertook the surveys'* (see correspondence from Antony Muller in Section 1.1, [Appendix 1](#)).

Ecological Services at Warwickshire County Council also received correspondence from Natural England on 28.07.16 regarding the current designation and status of Ensor's Pool SAC / SSSI given the results of the above surveys. Natural England's response was as follows:

'The current status of Ensor's Pool as a Special Area of Conservation (SAC) remains and Natural England's continues to advise competent authorities and those undertaking assessment under the habitat regulations to continue on a business as usual basis (BAU).'

Natural England continued to confirm the following:

'Actions underway, including survey effort have led to a decision to amend the Site of Special Scientific Interest (SSSI) condition assessment based on fair and robust evidence base. HOWEVER, until there is agreement on the role of the site in the wider picture of the White-Clawed Crayfish population we must still operate on this BAU basis. Conversations with Defra are on-going'

Following the above advice, this HRA has been undertaken on the basis that a population of white-clawed crayfish is still present at Ensor's Pool at the levels last recorded in 2012 (when the species were considered to be 'favourable' at the site level).

On 26.03.18 in response to a consultation response relating to the Warwickshire Minerals Plan, requesting an update on the current status of Ensor's Pool for HRA purposes, Natural England confirmed *'based on the survey evidence, Natural England has concluded that the population of native white-clawed crayfish is no longer present. Natural England is now working with Defra on the way forward'* (see [Appendix 1](#)).

The European Site selection for this HRA is based on the most recent GIS data available at Warwickshire County Council, and provided by Rugby Borough Council and Natural England at the time of writing.

3. The Screening Assessment

3.1. Scanning and Selection of European Sites for Consideration

Two European Sites: Ensor’s Pool SAC (in Nuneaton, Warwickshire) and the River Mease SAC (in Leicestershire, Derbyshire and Staffordshire) are within a 20km buffer zone of the administrative area of Rugby Borough Council (see Figure 2).

A further three European Sites lie outside the 20km buffer zone around Rugby but within 20km of Warwickshire. These are: Bredon Hill, Worcestershire; Cannock Extension Canal, Staffordshire; and Lyppard Grange Ponds, Worcestershire. Further details of why these SACs have been scoped out are provided in Table 7 in [Section 3.4.2](#).

During consultation with Natural England in 2012 in relation to a former draft of the Coventry Core Strategy that forms part of the western border of Rugby District (see Figure 1), the potential sourcing of water from Wales to supply new development in Coventry was highlighted as having a potential negative impact on hydrologically sensitive Welsh SACs (e.g. rivers etc.) (WCC 2012). Given the proximity of Coventry to Rugby, details of more recent consultations with Severn Trent Water and why these European Sites have now been screened out of this HRA are provided in [Section 3.4.2.3](#) and [Appendix 1.2](#).

Table 3 below from the HRA Handbook 2018 has also been used to aid the selection process.

Scanning and site selection list for sites that could potentially be affected by the plan

Types of plan	Sites to scan for and check	Names of sites selected
1. All plans (terrestrial, coastal and marine)	Sites within the geographic area covered by or intended to be relevant to the plan.	Sites within 20km zone of Rugby Borough: Ensor’s Pool SAC and River Mease SAC
2. Plans that could affect the aquatic environment	Sites upstream or downstream of the plan area in the case of river or estuary sites	River Mease SAC has no direct connection to Rugby Borough (Figure 7 and Table 7) Welsh SACs
	Open water, peat land, fen, marsh and other wetland sites with relevant hydrological links to land within the plan area, irrespective of distance from the plan area	None
3. Plans that could affect the marine environment	Sites that could be affected by changes in water quality, currents or flows; or effects on the inter-tidal or sub-tidal areas or the sea bed, or marine species	N/A
4. Plans that could affect the coast	Sites in the same coastal ‘cell’, or part of the same coastal ecosystem, or where there are interrelationships with or between different physical coastal processes	N/A
5. Plans that could affect mobile species	Sites whose qualifying features include mobile species which may be affected by the plan irrespective of the location of the plan’s proposals or whether the species would be in or out of the site when they might be affected	River Mease SAC Ensor’s Pool SAC
6. Plans that could increase recreational pressure on European sites potentially	Such European sites in the plan area	N/A
	Such European sites within an agreed zone of influence or other reasonable and evidence-based	N/A Ensor’s Pool SAC is not considered to be a

vulnerable or sensitive to such pressure	travel distance of the plan area boundaries that may be affected by local recreational or other visitor pressure from within the plan area	'tourist attraction' and the River Mease SAC is too far from Rugby Borough to be included in this category
	Such European sites within an agreed zone of influence or other evidence-based longer travel distance of the plan area, which are major (regional or national) visitor attractions such as European sites which are National Nature Reserves where public visiting is promoted, sites in National Parks, coastal sites and sites in other major tourist or visitor destinations	N/A (see above)
7. Plans that would increase the amount of development	Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the plan area	<p>Ensor's Pool SAC – yes plan has potential to cause water abstraction but site is over the EA 3km trigger threshold for hydrological impacts (see Figure 1 and Appendix 1.3), hence not considered an issue for the Rugby Local Plan</p> <p>River Mease SAC has potential to be impacted by abstraction but is considered to be too far from Rugby Borough and the key development areas to be affected (see Table 6 and Figure 1)</p>
	Sites used for, or could be affected by, discharge of effluent from waste water treatment works or other waste management streams serving the plan area, irrespective of distance from the plan area	Ensor's Pool SAC
	Sites that could be affected by the provision of new or extended transport or other infrastructure	N/A – no transport proposed outside of Rugby Borough so this is screened out
	Sites that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic	<p>Ensor's Pool SAC – potentially yes but considered too far away (See Table 8).</p> <p>River Mease SAC – distance considered too great, see Table 8</p>
8. Plans for linear developments or infrastructure	Sites within a specified distance from the centre line of the proposed route (or alternative routes), the distance may be varied for differing types of site / qualifying features and in the absence of established good practice standards, distance(s) to be agreed by	N/A no European Sites within Rugby Borough.

	the statutory nature conservation body	
9. Plans that introduce new activities or new uses into the marine, coastal or terrestrial environment	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the new activities proposed by the plan	N/A
10. Plans that could change the nature, area, extent, intensity, density, timing or scale of existing activities or uses	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the changes to existing activities proposed by the plan	N/A
11. Plans that could change the quantity, quality, timing, treatment or mitigation of emissions or discharges to air, water or soil	Sites considered to have qualifying features potentially vulnerable or sensitive to the changes in emissions or discharges that could arise as a result of the plan	Ensor's Pool SAC River Mease SAC
12. Plans that could change the quantity, volume, timing, rate, or other characteristics of biological resources harvested, extracted or consumed	Sites whose qualifying features include the biological resources which the plan may affect, or whose qualifying features depend on the biological resources which the plan may affect, for example as prey species or supporting habitat or which may be disturbed by the harvesting, extraction or consumption	N/A
13. Plans that could change the quantity, volume, timing, rate, or other characteristics of physical resources extracted or consumed	Sites whose qualifying features rely on the non-biological resources which the plan may affect, for example, as habitat or a physical environment on which habitat may develop or which may be disturbed by the extraction or consumption	N/A
14. Plans which could introduce or increase, or alter the timing, nature or location of disturbance to species	Sites whose qualifying features are considered to be potentially sensitive to disturbance, for example as a result of noise, activity or movement, or the presence of disturbing features that could be brought about by the plan	N/A – No European Sites located in Rugby Borough.
15. Plans which could introduce or increase or change the timing, nature or location of light or noise pollution	Sites whose qualifying features are considered to be potentially sensitive to the effects of changes in light or noise that could be brought about by the plan	N/A – No European Sites located in Rugby Borough
16. Plans which could introduce or increase a potential cause of mortality of species	Sites whose qualifying features are considered to be potentially sensitive to the source of new or increased mortality that could be brought about by the plan	Ensor's Pool – changes in hydrology could impact this site but development lies outside the 3km buffer zone around Ensor's Pool provided by the Environment Agency for consideration of ground water impacts (see Appendix 1.3). River Mease SAC – not considered likely given distance from Rugby, see Table 8

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Table 3: Table used for scanning and site selection from HRA Handbook 2013

There are no European Sites within Rugby Borough itself. The nearest site is Ensor's Pool SAC that lies approximately 3.9 km to the west of Rugby Borough at its nearest point (see Figure 1).

3.2. Site Descriptions

The following section provides a description of Ensor's Pool SAC and the River Mease SAC using information sourced from Natural England, Joint Nature Conservancy Council (JNCC), WCC 2010, WCC 2016a, 2016b & 2016c. Table 4 provides the following key information for each SAC:

- Qualifying features;
- Latest Conservation Objectives;
- Favourable conservation status; and
- Condition of features.

3.2.1. Ensor's Pool SAC

Ensor's Pool was formed from an abandoned clay pit around fifty years ago. It was notified as a SSSI in 1995, designated a Local Nature Reserve in 1997 and a SAC in April 2005. It is located on the south-west fringe of Nuneaton's urban area (National Grid Reference SP348903) and covers an area of approximately 3.8ha. It comprises an elongated (220m by 50m) isolated water body with an average depth of 8m. The pool is lined by an impervious layer of clay and therefore it is assumed that it is reliant on rainwater as the main supply of water. A dye tracing exercise of the pool by the Environment Agency has confirmed Ensor's Pool is groundwater fed and is not hydraulically linked to nearby ordinary watercourses (see Environment Agency email dated 02.08.16 in [Appendix 1.3](#)).

Ensor's Pool is designated a European Site since it once provided the habitat to one of the largest populations of healthy white-clawed crayfish in England, estimated at supporting approximately 50 000 individuals at one point. The white-clawed crayfish flourished in both Britain and Europe until the commercial introduction of the signal crayfish (*Pacifastacus leniusculus*) from America in the 1970s. As well as preying on its smaller cousin, the signal crayfish carries the crayfish plague (*Aphanomyces astaci*) to which the white-clawed crayfish has no immunity. Unfortunately, the signal crayfish and other non-native crayfish have since escaped the confines of the fisheries and entered the river systems of Britain and Europe, causing the dramatic decline of the white-clawed crayfish. The isolation of Ensor's Pool from rivers created a former refuge for the white-clawed crayfish to flourish and that is why it is still of both national and European importance.

In November 2014, Natural England reported that *'two recent surveys of Ensor's Pool in Warwickshire, noted for its populations of native white-clawed crayfish, have found no sign of the aquatic invertebrates'* (Natural England 2014a, press release 08.11.14, Natural England 2015). A Natural England Site Improvement Plan (SIP) for Ensor's Pool where a key action is to *'further investigate the cause of the apparent collapse of the white-clawed crayfish population'* (See Table 5, Natural England 2014b). Given this finding, Ecological Services at WCC contacted Natural England for an official view on how Ensor's Pool should be considered for the purposes of this HRA.

Despite the current lack of white-clawed crayfish in Ensor's Pool and the change in the condition assessment of the SSSI in 2016 to *'unfavourable-declining'* with a *'high condition threat risk'*, the European level SAC designation still remains. Natural England have confirmed the following: *'The current status of Ensor's Pool as a Special Area of Conservation (SAC) remains and Natural England's continues to advise competent authorities and those undertaking assessment under the habitat regulations to continue on a business as usual basis (BAU).'*' (Natural England 2016, See [Section 2.4](#) and Appendix 1 for further details).

On 28 March 2018 Natural England again clarified the latest situation with Ensor's Pool as follows:

'Surveys of Ensor's Pool in Nuneaton (most recently September 2015) have failed to find the white clawed crayfish for which the site is designated as a Special Area of Conservation (SAC).

A survey in September 2012 caught 262 crayfish however surveys for white clawed crayfish carried out in September 2014 (trapping survey), October 2014 (Dive survey), June – September 2015 (Bioassay) and September 2015 (trapping survey) caught no crayfish. Based on the survey evidence Natural England is now working with Defra on the way forward.

Whilst this work is on-going, Natural England has produced tailored Conservation Objectives, which take into account the current situation for this site. These objectives ensure that the integrity of the site is maintained, whilst recognising the current absence of the interest feature' (Natural England 2018, see full response in [Appendix 1](#)).

This HRA therefore considered these latest if draft Conservation Objectives as published on 7 February 2018 (see Table 4 below) and the targets for Ensor's Pool as per the Draft Supplementary Advice for the site (see [Appendix 6](#)).

The Environment Agency in their initial consultation response on 02.08.16 also confirmed 'We understand that Ensor's Pool SAC no longer has white claw crayfish' (see [Appendix 1.3](#)).



3.2.2. River Mease SAC

The River Mease is a small tributary of the River Trent. It is a relatively unmodified lowland river providing conditions for populations of spined loach, bullhead, white-clawed crayfish and otter. It has retained a reasonable degree of channel diversity compared to other similar rivers containing spined loach populations. It has extensive beds of submerged plants along much of its length which, together with its relatively sandy sediments (as opposed to cohesive mud) provide good habitat opportunities for the species.

The spined loach is a small bottom-living fish that has a restricted microhabitat associated with a specialised feeding mechanism. They use a complex branchial apparatus to filter-feed in fine but well-oxygenated sediments. Optimal habitat comprises a patchy cover of submerged (and possibly emergent) macrophytes, which are important for spawning, and a sandy (also silty) substrate, into which juvenile fish tend to bury themselves.

The River Mease is an example of bullhead populations in the rivers of central England. Bed sediments are generally not as coarse as other sites selected for the species, reflecting the nature of many rivers in this geographical area, but are suitable in patches due to the river's retained

sinuosity. The patchy cover from submerged macrophytes is also important for the species. The bullhead is a small bottom-living fish that inhabits a variety of rivers, streams and stony lakes. It appears to favour fast-flowing, clear shallow water with a hard substrate (gravel/cobble/pebble) and is frequently found in the headwaters of upland streams. However, it also occurs in lowland situations on softer substrates so long as the water is well-oxygenated and there is sufficient cover. It is not found in badly polluted rivers.

As well as its importance for species, the River Mease has also been selected as a SAC on the presence of the qualifying habitat: water courses of plain to montane levels with the habitat community *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation (rivers with floating vegetation often dominated by water-crowfoot).

3.3. Key Information on European Sites for the HRA

Table 4 below provides the latest information that is available via Natural England's website (as of April 2018) on the current Conservation Objectives, favourable conservation status and condition of features of Ensor's Pool SAC. [Appendix 1](#) also provides consultation responses received from Natural England to date. The key vulnerability of Ensor's Pool SAC has been taken directly from the citation for the SAC. The relevant '*Operations Likely to Damage the Special Interest of the Site*' (OLDSIS) considered relevant to the Rugby Local Plan are listed in Table 4. Further details of new draft targets for Ensor's Pool set in February 2018 following the discovery that WCC are absent from the pool are provided in [Appendix 6](#). Table 5 also highlights the current issues and threats to Ensor's Pool SAC as per the latest Natural England Site Improvement Plan (Natural England 2014b).

In addition to the current Conservation Objectives published by Natural England on their website, Ecological Services at Warwickshire County Council have also obtained the previous more detailed Conservation Objectives for Ensor's Pool SAC and the River Mease SAC (dated 2008 & 2012 respectively), which are also considered as part of this initial screening in line with HRA case law³. A summary of these more detailed Conservation Objectives and Targets are provided in [Appendix 2](#) (Natural England 2008; 2012).

³ RSPB v Secretary of State for the Environment Food and Rural Affairs, BAE Systems (Operations) Ltd and Natural England, 18th March 2015, [2015] EWHC Civ 227, referred to as the *Ribble* Case.

Name, site reference and location	Designation status, area and date of designation	Qualifying features	Conservation objectives published by Natural England	General site character ⁴	Conservation status	Condition assessment	Key vulnerability / Operations Likely to Damage the Special Interest of the Site (OLDSIS) potentially relevant to the Rugby Local Plan (see Table 11 in Appendix 5 for details)
<p>Ensor's Pool, Warwickshire</p> <p>Grid reference: SP348903</p> <p>EU code: UK0012646</p> <p>Further information provided by Natural England via letter and emails dated 28.07.16, 02.12.15 & 24.08.15 (Appendix)</p>	<p>SAC (Ensor's Pool SSSI)</p> <p>3.88 ha</p> <p>01.04.05</p>	<p>S1092: White-clawed crayfish <i>Austropotamobius pallipes</i></p>	<p>Natural England has three current Draft Conservation Objectives for Ensor's Pool. <i>'Ensure the integrity of the site is maintained, and ensure that the site retains its ability to contribute to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining;</i></p> <ul style="list-style-type: none"> <i>The extent and distribution of the habitats of qualifying species;</i> <i>The structure and function of habitats and qualifying species, and</i> <i>The supporting processes on which the</i> 	<p>Habitat Class N10 (Humid grassland, Mesophile grassland) 30% and N06 (Inland water bodies (Standing water, Running water) 70%. Total Habitat Cover 100%</p>	<p>An updated assessment made on 29.04.16 noted the results of recent surveys of the pool since 2014 and concluded that <i>'The results of these surveys indicate that it is unlikely that crayfish remain present in Ensor's Pool,</i></p>	<p>2017 Condition Assessment of the single unit of the SSSI is described as <i>'unfavourable-declining'</i>. With a <i>'High condition threat risk'</i></p>	<p>Need to protect the site's water quality from direct or diffuse pollution.</p> <p>Avoid changing the amount of water in the pool (by abstracting water from inflowing streams or raising the water level).</p> <p>Avoid increasing the sediment.</p> <p>Avoid introduction of non-native species, especially non-native</p>

⁴ General Habitat Classification codes as per Eionet European Topic Centre on Biological Diversity http://bd.eionet.europa.eu/activities/Natura_2000/reference_portal accessed on 21.03.16

<p>1 & Appendix 2) and Natural England October 2015 and 2018</p>			<p><i>habitats of qualifying species rely'</i> (Natural England 07.02.18 version 2)</p> <p>Further details of Targets within recent supplementary advice for the site are provided in Appendix 6 and Natural England 2018.</p>		<p><i>although there is no agreed level of trapping effort to demonstrate complete absence'</i> Natural England consultation responses are in Appendix 1</p>		<p>crayfish species.</p> <p>Avoid control or removal of natural aquatic vegetation</p> <p>Avoid intentional or accidental introduction of species such as bottom feeding coarse fish</p> <p>OLDSIS: 14a</p>
<p>River Mease, Derbyshire, Leicestershire, Staffordshire</p> <p>Grid reference: SK260114</p> <p>EU code: UK0030258</p> <p>Draft supplementary advice on this European Site's Conservation Objectives including a</p>	<p>SAC (River Mease SSSI)</p> <p>22.87 ha</p> <p>01.04.05</p>	<p>H3260: Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation</p> <p>S1092: White-clawed crayfish <i>Austropotamobius pallipes</i></p> <p>S1149: Spined loach <i>Cobitis taenia</i></p>	<p>30th June 2014</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural 	<p>General site character: Habitat Class N06 Inland waterbodies (Standing water, Running water) 100%. Total Habitat Cover 100%</p>	<p>In 2010 the whole site was considered to be 'Unfavourable – no change' because of drainage, inappropriate weirs dams and other structures, invasive freshwater species, siltation, water</p>	<p>Latest 2010 condition assessment all four SSSI units considered to be unfavourable – no change.</p> <p>Key reasons for unfavourable condition due to point source and diffuse phosphorus pollution,</p>	<p>Need to avoid any deterioration in water quality and quantity</p> <p>Diffuse pollution and excessive sedimentation are catchment-wide and have the potential to affect the site.</p> <p>Avoid introduction of non-native species and reduce and manage the impact of invasive species</p> <p>Minimise pollution of river from point and</p>

<p>number of new targets was published on 29.05.16 (Natural England 2016).</p>		<p>S1163: Bullhead <i>Cottus gobio</i></p> <p>S1355: Otter <i>Lutra lutra</i></p>	<p>habitats</p> <ul style="list-style-type: none"> • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site. 		<p>abstraction, freshwater pollution and pollution from agriculture / run off</p>	<p>physical modifications via over dredging, weir, other impoundment s. None native species, lack of river bank vegetation, lack of macrophyte species density and composition. Over abstraction lack of fresh water entering the river, density of designated fish species</p> <p>All units have a 'High' Condition Threat Risk</p>	<p>diffuse sources, including discharges of domestic and industrial effluent, run-off from agriculture, forestry and urban land and accidental pollution from industry and agriculture.</p> <p>Avoid / reduce siltation of river bed.</p> <p>Riparian areas and the wider catchment need to be managed sensitively to avoid excessive run-off of soil particles and nutrients into the river.</p> <p>Effluents entering the river....should be treated to reduce the levels of phosphorus contained within them...</p> <p>Improve understanding of ecological impact of</p>
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							abstractions and drainage discharges. OLDSIS: 7, 9, 14b, 16a
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Table 4: Information required to undertake a HRA

In addition to the above key vulnerabilities the currently available SIP for Ensor’s Pool SAC and the River Mease SAC outline the ‘*prioritised issues that are currently impacting or threatening the conditions of the features and the actions required to address them.*’ (Natural England 2014b & 2014c). Further more detailed Supplementary Advice on Conserving and Restoring Site Features of the River Mease SAC was also published on 31 May 2016 outlining key targets for restoring and maintaining the five qualifying habitats and species for which the SAC is designated, given its current conservation status is ‘*Unfavourable – no change*’ (Natural England 2016).

Ensor’s Pool – Current Issues and Actions

Changes in species distributions - Historically Ensor’s Pool was a stronghold for the native white-clawed crayfish with a population estimate of around 50,000 animals. Surveys in September and October 2014 found no crayfish in the pool. Natural England now consider the population of white-clawed crayfish is no longer present (see Natural England correspondence dated 28.03.18 in [Appendix 1](#)).

A number of targets for the SAC are provided in [Appendix 6](#) (Natural England 2018) and summarised below:

PROPOSED ACTIONS / TARGETS:

- Maintain: management measures for the structure, functions and supporting processes for the habitats that support white-clawed crayfish; the current extent of supporting habitat; current distribution and continuity of the supporting habitat; ability of the features supporting habitat to adapt or evolve to wider environmental change; ensure human activities to no pose a significant risk of plague transfer; absence of non-native crayfish; current extent and diversity of refuges, supporting habitat at ‘Good’ biological status; pH levels within 6.5 to 9; ammonia levels at or less than 0.6mg NH³-l-1; nitrogen levels at or below 0.2mg/l-1; that the pool in a well oxygenated state; calcium levels at or above 5mg/l; the pool’s water temperature at naturally occurring levels; fish populations low enough to avoid significant predation of juvenile crayfish.

Ensure supporting habitat is not at risk of effluent discharges from within the site’s wider catchment.

River Mease - Issues, Actions and Supplementary advice

The SIP for the site (dated 10.10.14) outlines current issues and actions in relation to the River Mease (Natural England 2014c). Five Issues with Actions are identified in the SIP and further targets are provided in the Supplementary Advice (e.g. details of maximum phosphorus concentrations as these elevated nutrient levels are a key conservation issue for the River Mease. Further more detailed targets are also provided in Natural England 2014d, 2016 and [Appendix 7](#).

PROPOSED ISSUES / ACTIONS IN THE SIP

- Actions to tackle phosphate levels (including improving technologies at (Sewerage Treatment Works (STWs), landowner training, considering road run-off).
- Actions to address current drainage issues including the currently impacted naturalised flow pattern and the river appears more ‘flashy’ with water levels rising and falling rapidly.
- Actions to tackle inappropriate weirs and dams.
- Actions to tackle increasing levels of non-native species including Himalayan Balsam (*Impatiens glandulifera*), Japanese knotweed (*Fallopia japonica*) and signal crayfish.
- Actions to reduce levels of siltation that can smother gravel beds needed for spawning bullhead and fine sand used for spawning by the spined loach.
- Actions to investigate the impacts of water abstraction on the flow pattern and ecology of the River Mease.

Table 5: Current issues and threats to Ensor’s Pool and as per Natural England’s latest SIPs and Supplementary Advice (Natural England 2014b & 2014c & 2016)

3.4. Implications of Recent Case Law

3.4.1. Moorburg

The Moorburg Case from the CJEU (Court of Justice of the European Union) (Case C-142/16, dated March 2016) has highlighted the importance of considering ‘*how existing plants that may be having on-going effects on sites should be included appropriately in the assessment of a project, irrespective of whether there are other plans and projects that may lead to the need for an in-combination assessment*’ (DTA 2018).

The DTA handbook describes these effects as ‘*unregulated activities*’ and ‘*operational consents*’ and should be considered before the In-combination Assessment. Hence potential impacts to Ensor’s Pool or the River Mease Natural England River Mease Catchment Risk Zone that lie within Warwickshire could be affected by these on-going operations.

Given that the Rugby Borough Plan relates not only to future proposed development in the borough but also retrospective development from 2011, it is considered that this HRA already considers in adequate depth any existing operations and this judgment is not considered further.

3.4.1. People over Wind

The recent HRA case known as People over Wind dated 12.04.18 (reference C323/17) suggests that contrary to previous case law it may not be appropriate to use ‘incorporated mitigation’ in order to screen out LSE at stage one of the HRA process (see Figure 4) meaning that in some circumstances an Appropriate Assessment or stage 2 could be required. However given that this HRA does not identify any LSE from the Rugby Local Plan 2018, no mitigation is deemed necessary hence this piece of case law is deemed not relevant to this HRA.

3.5. Screening of SACs

3.5.1. Current Housing Figures

An overview of the Rugby Local Plan is provided in [Section 1](#). Figure 1 illustrates the current proposed strategic sites associated with the Rugby Local Plan including known housing, employment and mixed use allocations.

The current figures for housing as provided in Policy DS3: Residential the Rugby Local Plan 2018 for each site are provided below under category headings as per Figure 1.

Reference	Site Name	Number of Dwellings	Category as per Figure 1.
Rugby Urban Edge			
DS3.1	Coton Park East (See Policy DS7)	Around 800	Proposed Local Plan Allocated Site
DS3.2	Rugby Gateway	Around 1300	Adopted Core Strategy Allocation
DS3.3	Rugby Radio Station	Around 6200	Adopted Core Strategy Allocation
DS3.4	South West Rugby (See Policies DS8 and DS9)	Around 5000	Proposed Local Plan Allocated Site
Main Rural Settlements			
DS3.5	Land at Sherwood Farm, Binley Woods	Around 75	Main Rural Settlements /

			Proposed Local Plan Allocated Sites.
DS3.6	Land North of Coventry Road, Long Lawford	Around 150	
DS3.7	Leamington Road, Ryton on Dunsmore	Around 75	
DS3.8	The Old Orchard, Plott Lane, Stretton on Dunsmore	Around 25	
DS3.9	Land Off Squires Road, Stretton on Dunsmore 2	Around 50	
DS3.10	Linden Tree Bungalow, Wolston Lane, Wolston	Around 15	
DS3.11	Land at Coventry Road, Wolvey	Around 15	
DS3.12	Wolvey Campus, Leicester Road, Wolvey	Around 85	

Table 6: Residential Allocations as per Policy DS3 of Rugby Local Plan 2018

3.5.2. Scoping of SACs with potential to be impacted by the Rugby Local Plan

The SACs for consideration as part of this HRA have been further scoped and refined by an assessment exercise that has identified if there could be any causal connection or link between the different proposals and policies set out in the Rugby Local Plan (see [Section 1.1](#)).

3.5.2.1. Ensor's Pool SAC

This site has been screened in for further consideration in this HRA. The site is vulnerable to:

- Direct or diffuse pollution that could impact the water quality of the pool (particularly increases in sediment that not only change the water quality but also have a direct physical effect on white-clawed crayfish);
- Any change in water levels. Figure 10 in [Appendix 3](#) shows that Ensor's Pool lies within the surface water flooding zone for both 30 year and 200 year events;
- Introduction of non-native species, particularly non-native crayfish species;
- Introduction of bottom feeding coarse fish;
- Removal or control of natural aquatic vegetation; and
- Physical disturbance to Ensor's Pool that could impact: the crayfish bankside refuges, the amount of bankside and marginal vegetation around the pool; the appropriate percentage of submerged macrophytes; and appropriate diversity of substrates within the pool.

Any proposed development under the Rugby Local Plan that could lead to any of the above impacts on Ensor's Pool SAC would lead to the plan having a LSE on Ensor's Pool and trigger the need for a full AA of the Rugby Local Plan to be undertaken (see Stage 2 on Figure 4).

Any hydrogeological impacts to the pool from development within 2-3km of Ensor's Pool should be considered as recommended by the Environment Agency (see letter dated 16.09.15, in [Appendix 1, Section 1.3](#)). The Environment Agency in their initial consultation response to this HRA dated 02.08.16 specifically stated that a dye tracing exercise of Ensor's Pool confirmed that the pool is groundwater fed and is 'not hydraulically linked to nearby ordinary watercourses' (see [Appendix 1, Section 1.3](#)).

3.5.2.2 River Mease SAC

Given that the River Mease lies within the 20km buffer zone around Rugby Borough and the northern section of the borough lies within the Humber River Basin District which also contains the River Mease and its associated Natural England River Mease Catchment Risk Zone, this site has been screened in for further assessment as part of this HRA.

There is potential that any ordinary water course flooding within the Natural England River Mease Catchment Risk Zone (see Figure 7) to impact the River Mease SAC. The Natural England River Mease Catchment Risk Zone has been used in this HRA, as recommended by Natural England during a telephone conversation on 03.08.16. Potential impacts include: pollution (especially from increased nutrient levels, particularly phosphorus), sedimentation and the introduction of non-native species.

3.5.2.3 Other English and Welsh SACs

All other European Sites outside the 20km buffer zone have been screened out as it has been concluded that the Rugby Local Plan will not impact these sites. Justification is provided in Table 6.

Figure 8 illustrates the proximity of other European Sites within the adjacent Severn, Humber, Thames and Anglia River Basin Districts.

In an email from Severn Trent Water dated 28.07.16, they confirmed that *'the local source supply for Rugby is Draycote'*, hence not from Wales. Correspondence with Severn Trent Water is provided in [Appendix 1, Section 1.2](#). Figure 9 shows the location of Draycote Water within Rugby Borough, to the south west of Rugby.

SAC	Screen In or Out?	Justification / Notes
Ensor's Pool	SCREENED OUT	<p>The pool lies approximately 3.9 km to the west of Rugby Borough's boundary at its nearest point. It will therefore not be directly impacted by any proposals in the Rugby Local Plan.</p> <p>Previous correspondence with the Environment Agency in relation to the Warwickshire Minerals Plan confirmed that any planning applications within 3km of Ensor's Pool should be considered for a project level HRA in relation to potential hydrogeological impacts. Given Rugby's boundary is beyond the 3km buffer around Ensor's Pool (see Figure 1), this site is screened out of this HRA on this basis. Correspondence with the Environment Agency on 02.08.16 in relation to Ensor's Pool confirmed that '<i>At present we do not consider a HRA assessment would be required to support the Rugby Local Plan</i>' due to the fact the pool appears to no longer support white-clawed crayfish, is fed by groundwater and is not hydraulically linked to nearby ordinary watercourses (see Appendix 1.3).</p> <p>During a telephone conversation with Natural England on 03.08.16, they were in broad agreement (subject to reviewing the full first draft of the HRA dated 08.09.16) that no clear functional pathway exist between Ensor's Pool and Rugby Borough. Their written response to the Draft HRA dated 11.11.16 agrees with the conclusions of the HRA.</p>
Bredon Hill	SCREENED OUT	The site is on a hill outside of Rugby Borough and beyond the 20km buffer around Rugby hence is not considered at risk from the Rugby Local Plan 2018.
Cannock Extension Canal	SCREENED OUT	The site is outside of Rugby and beyond the 20km buffer around Rugby Borough; not connected by any water courses flowing out of Rugby. On this basis the site is screened out.
Lyppard Grange Ponds	SCREENED OUT	The site is outside of Rugby Borough and it is considered too far to be impacted by the plan and there is no direct connection to water courses flowing from Rugby and this site.
River Mease	SCREENED OUT	<p>Whilst the Natural England River Mease Catchment Risk Zone (as per Figure 7) lies approximately 13.5 km to the north of the nearest part of Rugby Borough, there are no rivers that run from or through Rugby Borough into the Natural England River Mease Catchment Risk Zone either directly or indirectly. As Figure 7 illustrates, the only river that flows out of Rugby Borough northwards is the River Soar. The River Soar flows into the River Trent downstream of the River Mease. The only water body that connects Rugby Borough to the Natural England River Mease Catchment Risk Zone is the Ashby-de-la-Zouch canal. On this basis there does not appear to be any clear functional pathway between Rugby Borough and the Natural England River Mease Catchment Risk Zone. The Environment Agency on 02.08.16 stated that '<i>We do not consider the River Mease SAC to require assessment because of its distance from Rugby and lack of hydrogeological connection. The majority of Ruby lies outside of the Humber Basin... a very small % lies within the Tame, Anker and Mease management area, with some of the very north of Rugby draining towards the River Soar.</i>' (see Appendix 1.3).</p> <p>On 03.08.16 Natural England broadly agreed (subject to a detailed assessment of this report) that no clear functional pathways between Rugby Borough and the Natural England River Mease Catchment Risk Zone are present. Their written response to the Draft HRA dated 11.11.16 agrees with this conclusion.</p>

Welsh SACs	SCREENED OUT	<p>During the 2012 HRA for the adjacent authority Coventry, for the former Coventry Core Strategy (WCC 2012), Natural England had raised concerns of possible LSE on hydrologically dependant SACs in Wales. Their query related to where the proposed water supply for new development (in particular residential schemes) was to be sourced. Natural England highlighted that if Severn Trent Water were anticipating extracting or utilising water from Wales to growing Midland conurbations, including those within Rugby Borough, this could have a potential LSE on hydrologically dependant SACs in Wales (see Figure 8). Given the proximity of Coventry to Rugby which is also considered to be part of the West Midlands (see Section 1.1), Severn Trent Water were specifically consulted on if they had any concerns over this issue in relation to the proposed development as set out in the Rugby Local Plan.</p> <p>On the 28.07.16 Severn Trent Water confirmed that the local source supply for Rugby is Draycote within Rugby Borough, just to the south of Rugby (see Figure 9 and Appendix 1.3). For this reason no impact to Welsh SACs is anticipated by the Rugby Local Plan and hence these SACs are screened out.</p>
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Table 7: Further scoping of European Sites to consider in the HRA of the Rugby Local Plan

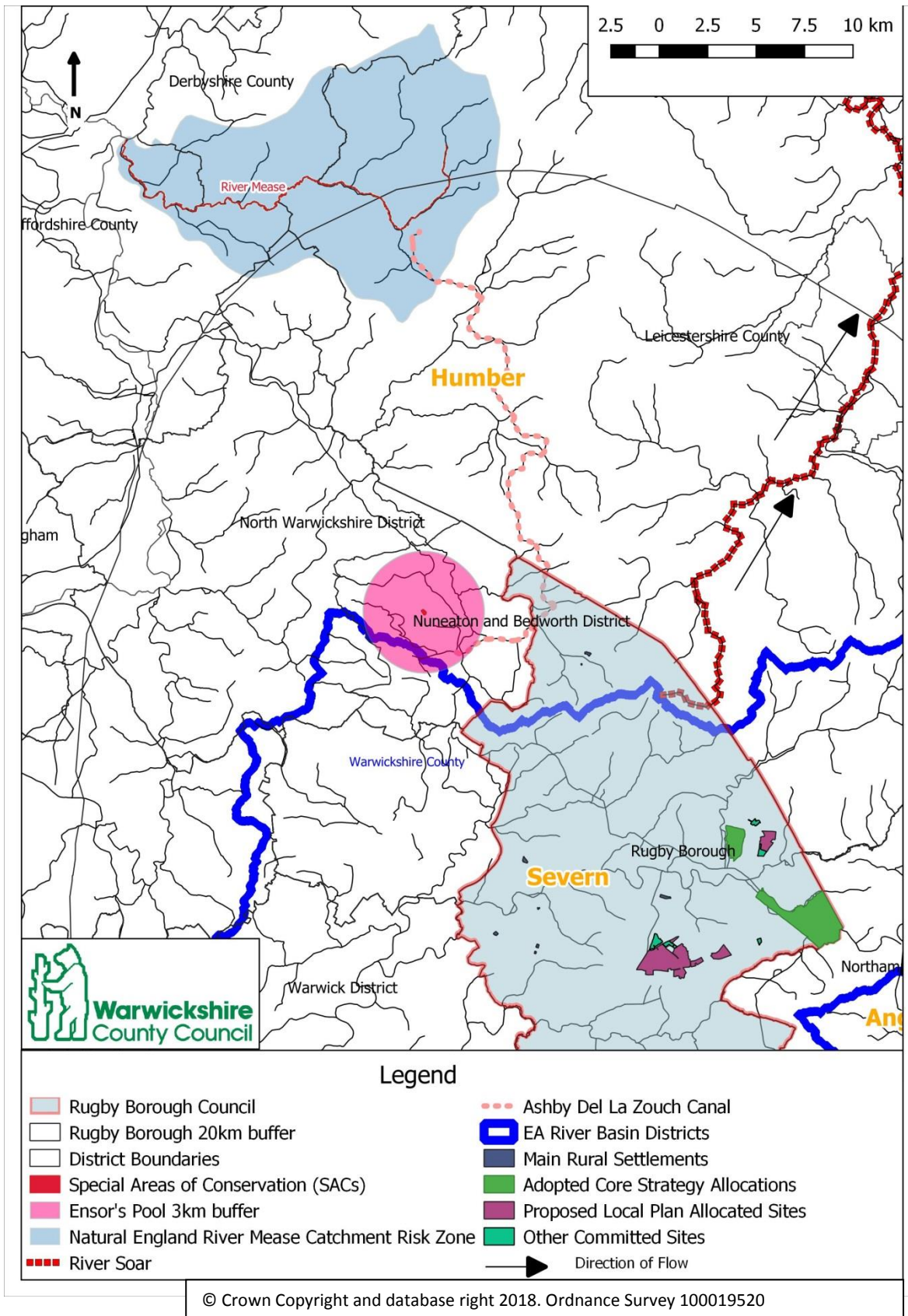


Figure 7: Proximity of the Natural England River Mease Catchment Risk Zone to Rugby Borough, the Ashby-de-la-Zouch canal and the River Soar.

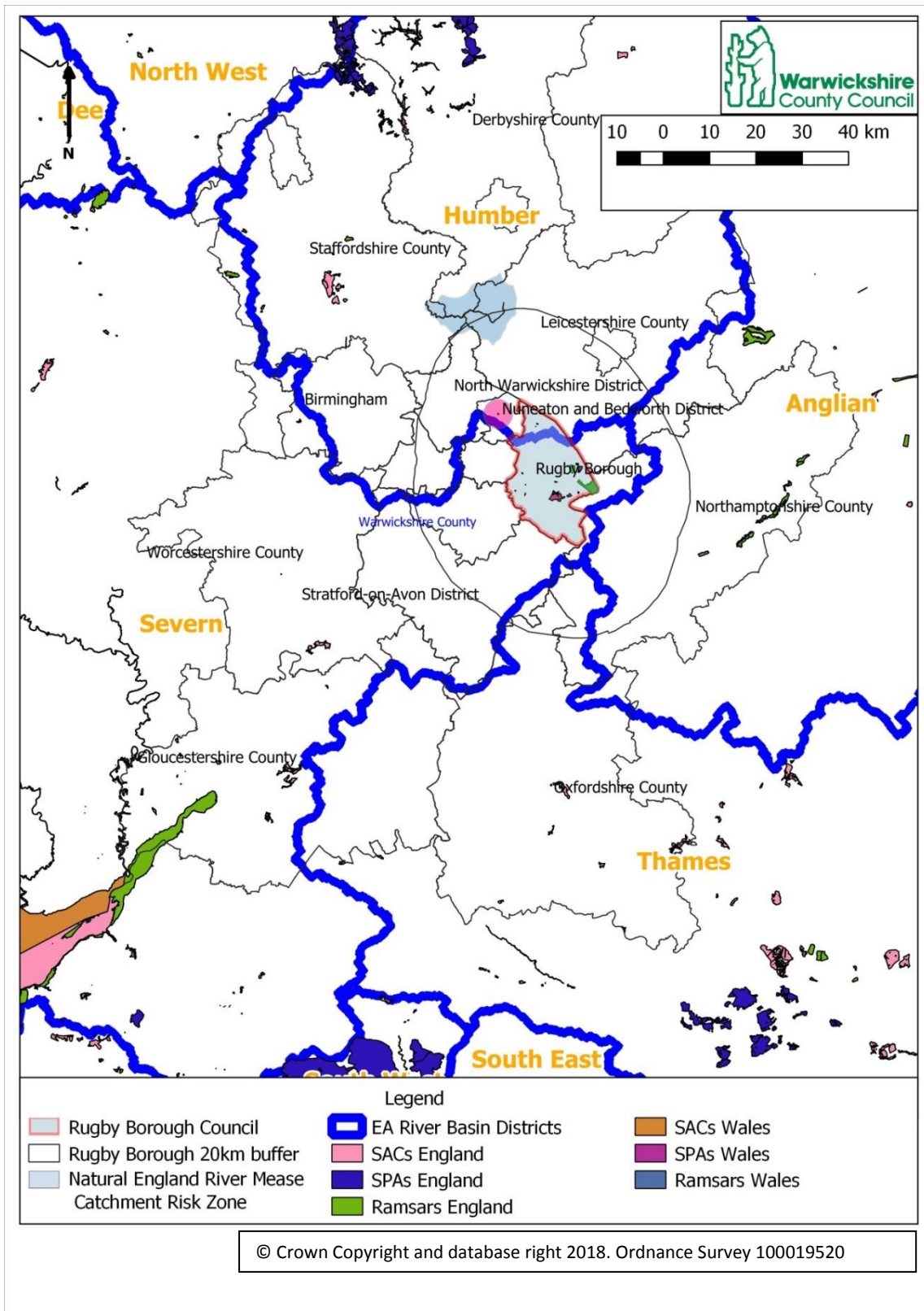


Figure 8: Proximity of European Sites within the wider area around Rugby.

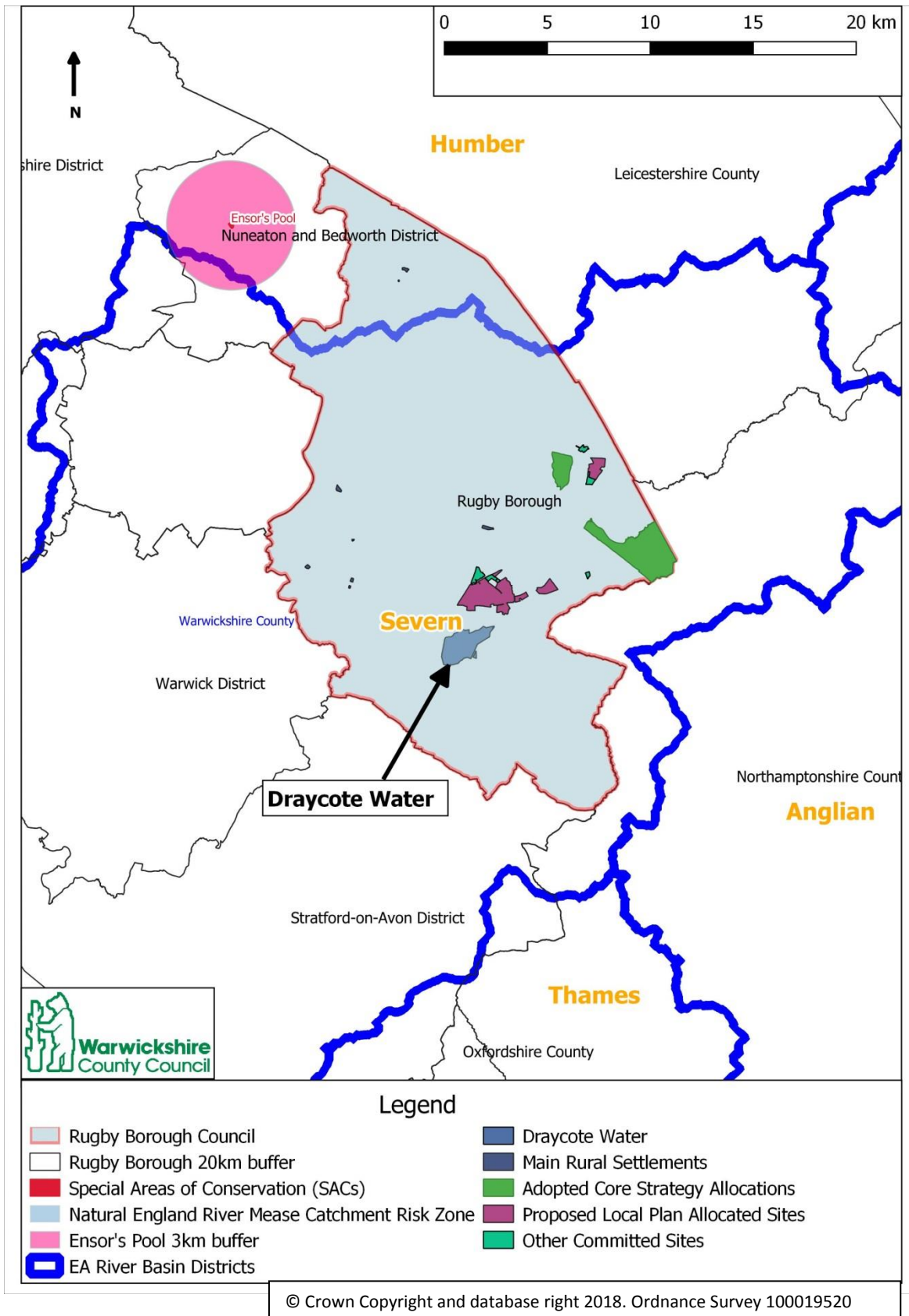


Figure 9: Location of Draycote Water within Rugby Borough

3.4.3. Potential Functional Pathways

Table 8 below highlights the key identified potential functional pathways between any likely generic impacts of development as a result of the Rugby Local Plan 2018 and the identified specific vulnerabilities and issues of concern relating to Ensor’s Pool SAC and the River Mease SAC (as per Table 4&5, [Section 3.2](#) and [Appendix 2](#)). This table draws on a similar approach used by Staffordshire County Council when undertaking their screening of allocated Sites of their new Minerals Local Plan in June 2015 (Staffordshire County Council 2015).

Potential Environmental Impact / Threat	Comment
ENSOR’S POOL	
<p>Water quality: Direct Pollution</p> <p>Pollutants could be potentially discharged from the proposed development sites either directly into an adjacent water course (as waste water run-off) or during surface water flooding events. These pollutants could increase the existing nutrient levels already present within a watercourse / catchment as well as increasing the level of sedimentation that could be detrimental to the SAC and its qualifying features.</p> <p>There is also a risk from minor fuel and oil leaks and spills during proposed development operations; this could be direct or indirect through surface or ground water pollution.</p>	<p>The Surface Water Flooding zone around Ensor’s Pool is illustrated in Figure 10 in Appendix 3. This zone only lies locally around the Ensor’s Pool which lies 3.9 km from the nearest part of Rugby Borough. Hence any impacts via unanticipated pollution incidents via surface water flooding from the Rugby Local Plan can be screened out.</p> <p>The Environment Agency have confirmed that recent studies have shown that Ensor’s Pool is ground water fed, and hence have recommended that any proposals within 3km of Ensor’s Pools should be flagged for consideration by their ground water team. The nearest part of Rugby Borough Council lies outside this 3km buffer at 3.9 km at its nearest point from Ensor’s Pool. Hence no LSE is anticipated from development as part of Rugby Local Plan from ground water or surface water pollution to Ensor’s Pool; hence this impact can be screened out.</p>
RIVER MEASE SAC	

<p>Water quality: Direct Pollution</p> <p>Pollutants could be potentially discharged from the proposed development sites either directly into an adjacent water course (as waste water run-off) or during surface water flooding events. These pollutants could increase the existing nutrient levels already present within a watercourse especially phosphorous known to be of particular concern in the River Mease SAC and associated Natural England River Mease Catchment Risk Zone as well as increasing the level of sedimentation that could be detrimental to the SAC and its qualifying features.</p> <p>There is also a risk from minor fuel and oil leaks and spills during proposed development operations; this could be direct or indirect through surface or ground water pollution.</p>	<p>The Environment Agency agreed during a telephone conversation on 27.07.16 that the River Mease SAC is only at low risk from any theoretical pollution events occurring as a result of the Rugby Local Plan as the only water body that connects the borough to the Natural England River Mease Catchment Risk Zone is the Ashby-de-la-Zouch canal (see Figure 7). The proposed local plan allocations in the northern section of Rugby in the Humber River District are also small and low risk. Should any large developments be proposed near the Ashby-de-la-Zouch canal the EA may have concerns on any pollution event potentially travelling up the canal. However for the purposes of this HRA impacts from the Rugby Local Plan can be screened out.</p>
ENSOR'S POOL SAC & RIVER MEASE SAC	
<p>Water quality: Indirect Pollution from Air Pollution</p> <p>Sedimentation impacts through air pollution via wet deposition (where pollutants are removed from the atmosphere by precipitation) or dry deposition (deposition of gases and</p>	<p>The Air Pollution Information System (APIS) website⁵ provides guidance on the main air pollutant releases associated with '<i>Road transport</i>' and '<i>Domestic combustion</i>'. These are considered to be the two most likely causes of air pollution as a result of the Rugby Local Plan. Air pollutants listed include: Nitrogen oxides (NO_x), Sulphur Dioxides (SO₂), Ammonia (NH₃), Particulates (PM), Heavy Metals, Halogens (HCl, HF), Volatile Organic Compounds (VOC) and Polycyclic Aromatic Hydrocarbons (PAH).</p> <p>APIS confirm that deposition of '<i>ammonia, nitrate and other forms of nitrogen from the atmosphere could be</i>' a significant cause of nitrogen pollution where there is limited agricultural activity such as upland areas, however this is</p>

⁵ <http://www.apis.ac.uk/> accessed August 2016

aerosols directly to the Earth's surface⁵.

not considered to be relevant to rural Warwickshire including Rugby Borough.

APIS also confirms the acidification of rivers and streams impacts 'aquatic biota at all levels of the food chain' including 'aquatic algae and macrophytes to macroinvertebrate (e.g. white-clawed crayfish), fish (e.g. spined loach and bullhead) and even water birds'. Acidification can reduce species biodiversity and lead to 'Aquatic animals (invertebrates and fish)' being vulnerable to increased aluminium, hydrogen ion and heavy metal toxicity'.

The APIS also provides a 'Site Relevant Critical Loads' tool that provides critical loads of acidity and nitrogen for every SAC in the UK. Some pollutants require consideration at the site specific level. A summary of the site relevant critical loads of each qualifying feature of both Ensor's Pool SAC and the River Mease SAC are provided below.

Feature and relevant SAC Pollutant to which habitat / species is sensitive	S1092: White Clawed Crayfish / Ensor's Pool and River Mease	S1149: Spined Loach River Mease	S1163: Bullhead River Mease	S1355: Otter River Mease	H3260: Water courses of plain to montane levels with <i>Ranuncion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation
Nutrient Nitrogen	No critical load, decision needs to be made at the site level since habitat sensitivity depends on N (Nitrogen) or P (Phosphorus) limitation. Need to consider other sources of N such as discharges to water, diffuse agricultural pollution etc.				No critical load, decision needs to be made at the site level since habitat sensitivity depends on N or P limitation
Acidity	There is insufficient knowledge to make a judgment of the impacts on this species. Decision should be made at a site specific level	Potential negative impact on species due to impacts on the species' broad habitat.			Increase Al ³⁺ conc associated with freshwater acidification, impact on invertebrate populations, toxicity to fish.
NH ₃	Critical Level is 3 (2-4 µg NH ₃ m ⁻³) (set for Higher Plants) Decision to be taken at a site specific level since habitat sensitivity depends on N or P limitation				Site specific advice should be sought
NO _x	NO _x Critical Level 30 µg NO _x /m ³ annual mean and 75 µg NO _x /m ³ 24 h- hour mean Decision to be taken at a site specific level since habitat sensitivity depends on N or P limitation				NO _x Critical Level 30 µg NO _x /m ³ annual mean and 75 µg NO _x /m ³ 24 h- hour mean
SO ₂	No critical level has been assigned for this feature, please seek site specific advice				Site specific advise should be sought Critical Level for all vegetation is 10-20 µg SO ₂ /m ³ annual mean
Nitrogen Deposition	<i>River Mease SAC</i> Kg N/ha/yr max = 12.6, min = 11.34 & average = 11.75				
	<i>Ensor's Pool SAC</i> Kg N/ha/yr max, min & average = 14.28				
Acid Deposition Nitrogen	<i>River Mease SAC</i> Keq/ha/yr max, (0.9 0.4) min (0.81 0.3) and average = (0.84 0.32)				

	<p><i>Ensor's Pool SAC</i> Keq/ha/yr max, min & average = 1.02 0.38</p>
Ammonia Concentration	<p><i>River Mease SAC</i> µg/m3 max (2.65), min (2.08) and average (2.38)</p>
	<p><i>Ensor's Pool SAC</i> µg/m3 max, min & average = 1.95</p>
NOx Concentration	<p><i>River Mease SAC</i> µg/m3 max (22.78), min (17.11) and average (18.69)</p>
	<p><i>Ensor's Pool SAC</i> µg/m3 max, min & average = 23.04</p>
SO2 Concentration	<p><i>River Mease SAC</i> µg/m3 max (3.54), min (2.06) and average (2.33)</p>
	<p><i>Ensor's Pool SAC</i> µg/m3 max, min & average = 2.84</p>
<p>No LSE anticipated. There is little information on the zone of influence of air pollutants. The Design Manual for Roads and Bridges (DMRB) considered a 2km buffer around a SAC to trigger the requirement of an HRA. Cornwall County Council cite 200m as a buffer for significant effects from the air quality impacts of increased traffic generated emissions (Parsons Brinckerhoff 2012). Given that Rugby lies approximately 3.9 km from Ensor's Pool and 13.5 km from the River Mease Natural England River Mease Catchment Risk Zone at its nearest point, any indirect impacts to Ensor's Pool SAC or the River Mease SAC via air pollution are screened out of this assessment.</p>	
ENSOR'S POOL	
Water quantity / changes in water levels / drainage	<p>River flows can be impacted by water abstraction (could reduce flow) required to supply new residential and other new development under the Rugby Local Plan. Neither Severn Trent Water nor the Environment Agency have highlighted any concerns regarding Ensor's Pool or hydrologically dependant Welsh SACs and water abstraction.</p> <p>The Environment Agency's Groundwater Team have also highlighted that any development within 2-3km of Ensor's Pool could have a hydrogeological connection to Ensor's Pool, so would require further investigation on potential impacts to the SAC including water level changes. Given Ensor's Pool lies over 3.9 km from Rugby Borough any hydrogeological impacts can be screened out.</p> <p>No proposed development within the surface water flooding zone around Ensor's Pool (see Figure 10 in Appendix 3) is anticipated as part of the Rugby Local Plan.</p>
ENSOR'S POOL AND RIVER MEASE SAC	
Introduction of invasive non-native	<p>It is considered that the introduction of invasive non-native species into Ensor's Pool is not a LSE of the Rugby Local</p>

<p>species, particularly non-native crayfish species but also bottom feeding coarse fish</p>	<p>Plan to Ensor’s Pool, given the distance from Rugby and the fact that Ensor’s Pool is not a destination likely to attract tourists for recreation.</p> <p>Given the only connection between Rugby Borough and the Natural England River Mease Catchment Risk Zone is the Ashby-de-la-Zouch canal and there are no rivers that run into the Natural England River Mease Catchment Risk Zone directly from Rugby Borough Council the risk of the introduction of non-native species to the River Mease SAC as a result of the Rugby Local Plan can be screened out.</p> <p>Hence direct introduction of non-native species is not considered further for either SAC.</p>
<p>ENSOR’S POOL</p>	
<p>Direct disturbance: e.g. removal of natural aquatic vegetation and direct physical disturbance of Ensor’s Pool</p>	<p>No LSE anticipated, Rugby Borough is at least 3.9km from Ensor’s Pool SAC.</p>
<p>Indirect disturbance: e.g. from light and noise</p>	<p>No LSE anticipated, Rugby Borough is at least 3.9km from Ensor’s Pool SAC</p>

Table 8: Key functional pathways for potential Likely Significant Effects (LSE) from the Rugby Local Plan.

3.5. Screening Assessment

The screening of the Rugby Local Plan 2018 has been undertaken following guidance and specific ‘screening categories’ provided in the HRA Handbook 2018, listed in Table 2 in [Section 2.3](#).

All the policies and wording within the Rugby Borough Council Local Plan – 2011 -2031 June 2018 were screened out in terms of having any LSE on any European Sites. A summary of the results for each policy are provided in Table 9 below, with the detailed results of the screening of all policies and wording are provided with justification text in Table 10 in [Appendix 4](#).

Content of plan	Screening conclusion	Screening Category
Spatial Vision	Screened out	A
Spatial Objective 1	Screened out	A
Spatial Objective 2	Screened out	A
Spatial Objective 3	Screened out	A
Spatial Objective 4	Screened out	A
Spatial Objective 5	Screened out	A
Spatial Objective 6	Screened out	A
Spatial Objective 7	Screened out	A
Spatial Objective 8	Screened out	D
Spatial Objective 9	Screened out	D
Policy GP1: Securing Sustainable Development	Screened out	B
Policy GP2: Settlement Hierarchy	Screened out	H
Policy GP3: Previously Developed Land and Conversions	Screened out	B
Policy GP4: Safeguarding development potential	Screened out	B
Policy GP5: Neighbourhood level documents	Screened out	B
Policy DS1: Overall Development Needs	Screened out	H
Policy DS2: Sites for Gypsy, Travellers and Travelling Showpeople	Screened out	B
Policy DS3: Residential allocations	Screened out	H
Policy DS4: Employment allocations	Screened out	H
Policy DS5: Comprehensive Development of Strategic Sites	Screened out	B
Policy DS6: Rural Allocations	Screened out	B
Policy DS7: Coton Park East	Screened out	B
Policy DS8: South West Rugby	Screened out	H
Policy DS9: South West Rugby Spine Road Network	Screened out	H
Policy H1: Informing Housing Mix	Screened out	B
Policy H2: Affordable Housing Provision	Screened out	H
Policy H3: Housing for rural businesses	Screened out	B
Policy H4: Rural Exceptions Sites	Screened out	B
Policy H5: Replacement Dwellings	Screened out	B
Policy H6: Specialist Housing	Screened out	B
Policy ED1: Protection of Rugby’s Employment Land	Screened out	B
Policy ED2: Employment development within Rugby urban area	Screened out	B
Policy ED3: Employment development outside Rugby urban area	Screened out	B
Policy ED4: The Wider Urban and Rural Economy	Screened out	B
Policy TC1: Development in Rugby Town Centre	Screened out	H
Policy TC2: Rugby Town Centre Comparison and Convenience Floorspace Requirements	Screened out	B
Policy TC3: Primary Shopping Area and Shopping Frontages	Screened out	B
Policy HS1: Healthy, Safe and Inclusive Communities	Screened out	B

Policy HS2: Health Impact Assessments	Screened out	B
Policy HS3: Protection and Provision of Local Shops, Community Facilities and Services	Screened out	B
Policy HS4: Open Space and Recreation	Screened out	B
Policy HS5: Traffic Generation and Air Quality, Noise and Vibration	Screened out	D
Policy NE1: Protecting Designating Biodiversity and Geodiversity Assets	Screened out	D
Policy NE3: Blue and Green Infrastructure Policy	Screened out	D
Policy NE4: Landscape Protection and Enhancement	Screened out	B
Policy SDC1: Sustainable Design	Screened out	B
Policy SDC2: Landscaping	Screened out	D
Policy SDC3: Protecting and enhancing the Historic Environment	Screened out	B
Policy SDC4: Sustainable Buildings	Screened out	H
Policy SDC5: Flood Risk Management	Screened out	B
Policy SDC6: Sustainable Urban Drainage	Screened out	D
Policy SDC7: Protection of the Water Environment and Water Supply	Screened out	D
Policy SDC8: Supporting the provision of renewable energy and low carbon technology	Screened out	B
Policy SDC9: Broadband and mobile Internet	Screened out	H
Policy D1: Transport	Screened out	B
Policy D2: Parking facilities	Screened out	H
Policy D3: Infrastructure and Implementation	Screened out	H
Policy D4: Planning Obligations	Screened out	B
Policy D5: Airport flightpath safeguarding	Screened out	F

Table 9: Summary of Screening Assessment for Rugby Local Plan 2018

4. In-combination Assessment

The requirement for an In-combination Assessment as part of the HRA is outlined under Article 6 (3) of the Habitats Directive. The HRA Handbook 2018 states that *'European Commission guidance and case law establishes that the underlying intention of the in combination provision is to take account of cumulative effects.'*

The ten steps in the screening assessment of in-combination effects are provided in Figure 6 in Section 1.2.

Principle 17 in the In-combination Assessment section of the HRA Handbook 2018 states that *'where a plan or project has no adverse effect on a site at all, no 'in combination' test is necessary because it cannot contribute to any cumulative effects.'* This was clarified by the recent High Court judgment: Foster and Langton⁶.

The results of the Stage 1 screening of the Rugby Local Plan concluded that the plan was not considered to have any Likely Significant Effects on any European Sites either alone or in-combination with other plans or projects. Given this conclusion, it is considered that cumulative effects can be eliminated for these plans and no In-combination Assessment is required (see step 2 of Figure 6: Ten steps in the screening assessment of in-combination effects, in Section 1.2).

⁶ Foster and Langton v Forest of Dean District Council [2015] EWHC 2648 22nd September.

5. Next Steps

This updated Draft HRA report will be sent out for public and statutory consultation along with the main modifications to the Rugby Borough Council Local Plan - 2011-2031. The consultation is due to take place from 14th August 2018 to the 5th October 2018. Once this is complete, responses received can be considered and the HRA report updated and finalised and the Recording Template from the HRA Handbook 2018 will be completed (as per [Appendix 8](#)).

6. References

- DMRB (Design Manual for Roads and Bridges). 2009. Highways Agency and partners.
- DTA (David Tyldesley and Associates). 2016. The Habitat Regulations Assessment (HRA) Handbook 2016. Accessed via <http://www.dtapublications.co.uk/handbook/browse> to which WCC are a subscriber.
- DTA (David Tyldesley and Associates). 2018. The Habitat Regulations Assessment (HRA) Handbook 2016. Accessed via <http://www.dtapublications.co.uk/handbook/browse> to which WCC are a subscriber.
- Natural England. 2008. Conservation Objectives for Ensor's Pool SSSI.
- Natural England. 2012. Conservation Objectives for River Mease.
- Natural England. 2014a. Press Release dated 08.11.14.
- Natural England. 2014b. Site Improvement Plan for Ensor's Pool. November 2014 via <file:///C:/Users/leoandlouise/Downloads/SIP141105FINALv1.0%20Ensors%20Pool.pdf>.
- Natural England. 2014c. Site Improvement Plan for River Mease. 10th October 2014.
- Natural England. 2014d. Moving towards common standards monitoring guidance targets for SAC Rivers for the River Mease.
- Natural England. 2015. White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Ensor's Pool Special Area of Conservation (SAC). Improvement Programme for England's Natura 2000 Sites (IPENS) – Planning for the Future IPENS065. 30 October 2015.
- Natural England. 2016. European Site Conservation Objectives: Supplementary Advice on Conserving and Restoring Site Features for River Mease Special Area of Conservation (SAC) Site Code: UK0030258. 31 May 2016.
- Natural England. 2018. European Site Conservation Objectives for Ensor's Pool Special Area of Conservation. Site Code: UK0012646. 07 February 2018 version 2.
- Parsons Brinckerhoff. 2012. Habitat Regulations Screening Assessment. St Austell, St Blazey and China Clay Area Regeneration Plan for Cornwall Council May 2012.
- Planning Inspectorate (PINS). 2013. Habitat Regulations Assessment. Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects. Version 5 dated August 2013 (known as PINS Advice note 10 in the text).
- Rugby Borough Council (RBC). 2009. Local Development Framework – Proposed Submission Core Strategy. July 2009
- Rugby Borough Council (RBC). 2016. Rugby Borough Council Local Plan – 2011 to 2031. Publication Draft. Full Council Version. 19th July 2016.
- Rugby Borough Council (RBC). 2018. Rugby Borough Council Local plan – 2011 -2031. June 2018.
- Scottish Natural Heritage. 2012. Habitats Regulations Appraisal of Plans. Guidance for Plan-Making Bodies in Scotland Version 2.0. August 2012.

Staffordshire County Council. 2015. The new Minerals Local Plan for Staffordshire 2015 to 2030. Habitat Regulations Screening of Allocated Sites. June 2015.

UE Associates (UEA). 2009. Habitats Regulation Assessment for the Rugby Core Strategy. Screening Statement.

Warwickshire County Council. 2010. Local Transport Plan Habitat Regulations Appropriate Assessment.

Warwickshire County Council. 2012. Coventry City Council – Core Strategy Habitat Regulations Appropriate Assessment. Screening Report. July 2012.

Warwickshire County Council 2016a. Screening Report for Habitat Regulations Assessment for Coventry Local Plan & City Centre Area Action Plan 2016. March 2016.

Warwickshire County Council. 2016b. Habitat Regulations Assessment of the Local Flood Risk Management Strategy for Warwickshire County Council. March 2016.

Warwickshire County Council. 2016c. Screening Report Habitat Regulations Assessment (HRA) for the Final Warwickshire Minerals Plan 2016. October 2016.

Warwickshire County Council. 2018. Screening Report for Revised Warwickshire Minerals Plan June 2018 in press.

Legislation, Other Policy and websites consulted.

Air Pollution Information System. www.apis.ac.uk

Conservation of Habitats and Species Regulations 2017 (SI 2017/1012)

European Birds Directive 79/409/EC

European Habitats Directive 92/43/EEC

European Codified Birds Directive 2009/147/EC

Joint Nature Conservancy Council (JNCC) Website <http://jncc.defra.gov.uk>

Localism Act 2011

Natural England (NE) website

<http://publications.naturalengland.org.uk/publication/5415467531370496?category=5134123047845888> –

National Planning Policy Framework (NPPF). Ministry of Housing, Communities & Local Government. July 2018

Rugby Borough Council's planning page <https://www.rugby.gov.uk/localplan> accessed 17.07.18

HRA Case Law:

The Ribble Case Reference: RSPB v Secretary of State for Environment Food and Rural Affairs, 'BAE Systems (Operations) Ltd and Natural England' 18th March 2015, [2015] EWHC Cv 227.

The Waddenzee Case: Ruling from the European Court of Justice (ECJ) C-1272/02 Waddenzee (Netherlands).

Foster and Langton. Reference: Foster and Langton v Forest of Dean District Council 22nd September 2015 [2015] EWHC 2648.

The Moorburg Case Judgment Reference: EC v Germany from the European Court of Justice of the European Union (CJEU) C-142/16

The POW Case Ruling Reference: People Over Wind and Sweetman vs Coillte Teoranta from the Court of Justice of the European Union (CJEU) C-323/17

Appendix 1: Key Consultation Responses

1.1. Natural England Correspondence

29/03/2018

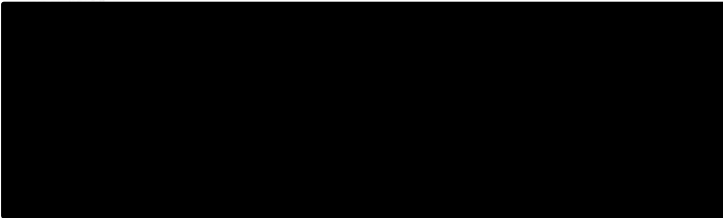
Warwickshire County Council Mail - Ensor's Pool Special Area of Conservation (SAC)



Ensor's Pool Special Area of Conservation (SAC)

1 message

26 March 2018 at 17:54



The following advice outlines the current situation regarding Ensor's Pool SAC and related Habitats Regulations Assessment (HRA) of plans and projects:

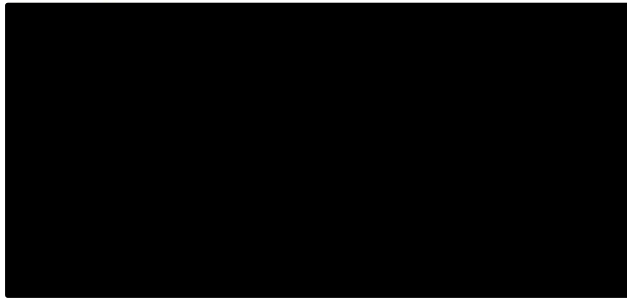
Surveys of Ensor's Pool in Nuneaton (most recently in September 2015) have failed to find the white clawed crayfish for which the site is designated as a Special Area of Conservation (SAC).

A survey in September 2012 caught 262 crayfish however surveys for white clawed crayfish carried out in September 2014 (trapping survey), October 2014 (Dive survey), June – September 2015 (Bioassay) and September 2015 (trapping survey) caught no crayfish. Based on the survey evidence, Natural England has concluded that the population of native white-clawed crayfish is no longer present. Natural England is now working with Defra on the way forward.

Whilst this work is ongoing, Natural England has produced tailored Conservation Objectives, which take into account the current situation for this site. These objectives ensure that the integrity of the site is maintained, whilst recognising the current absence of the interest feature.

Link - <http://publications.naturalengland.org.uk/publication/6577286383927296?category=5134123047845888>

With regard to update information including 'in combination effects' Natural England does not routinely hold details of plans and projects within the meaning of the Habitats Regulations. You will need to consult with the decision makers for the types of plans/projects with scope to impact on this SAC (e.g. including Local Planning Authorities, Environment Agency and/or Local Lead Flood Authority)



Date: 11 November 2016
Our ref: 197172 and 197698
Your ref: No Ref



Development Strategy
Rugby Borough Council

localplan@rugby.gov.uk

Customer Services
Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY



Rugby Local Plan – Publication Draft – Sustainability Appraisal and Habitats Regulations Assessment (HRA)

Thank you for your consultation. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Summary of Response:

- Response to HRA – Natural England concurs with assessment
- Sustainability Appraisal - Negative impacts to the natural environment and the opportunity to do more through plan policies
- Specific advice on plan policies including green infrastructure policy improvements and a lack of policy on soils

Habitat Regulations Assessment (HRA)

The Conservation of Habitats and Species Regulations 2010 (as amended)

Natural England has reviewed the draft HRA provided for this publication draft of the Rugby Local Plan. The assessment provided concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of information provided, Natural England concurs with this view.

Sustainability Appraisal (SA)

Natural England has had discussions with Rugby Borough Council and is aware of the challenges faced in allocating sites from the full mix assessed. As a result of this understanding we acknowledge the reasons for allocating some sites with potentially significant impacts on SA objectives 9 and 16.

The remaining level of uncertainty to the natural environment, resources and the ecosystem services they provide is indicated in paragraph 6.13 of the latest SA document. Natural England acknowledges the balance proposed from assessing all proposed sites and the need to accept what can be reasonably established at this stage. That said the level of potentially negative affects to the natural environment is a concern for this local plan.

We advise that the policies in this local plan provide significant opportunities to address the impacts highlighted under SA objective 16 through mitigation and enhancement of ecological networks at a landscape scale and through quality sub-urban biodiversity habitat provision. We are supportive of the positive approach taken in the natural environment policies, but advice there are opportunities to go further particularly given the strategy Rugby has taken to address the challenges faced. In our

specific comments on the policies proposed we provide detail as to measures that will improve the ability of these policies to further protect and enhance the natural environment.

Local Plan Policies

Soils

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our well-being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. Natural England is concerned at the lack of policy assurance within this plan to protect soils. It is clear that this has been considered through the SA of the allocation process but this does not seem to have influenced a strong policy within the plan apart from certain types of development. Natural England has provided more detailed guidance in the appendices to this response.

Policy DS3 and DS5 Residential Allocations: Sub-Urban Green Infrastructure

Natural England believes that necessary housing growth should be accommodated with minimum impact on the natural environment and delivers maximum benefits for the natural environment and people together.

Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently, it needs to be delivered at all spatial scales, from regional, sub-regional, local and neighbourhood levels, through to smaller scale elements of sub-urban design.

The Natural White Paper¹ (2010), sets out the Government's response to the *Making Space for Nature*² review (2010). A key element of this delivery is through the planning system by encouraging greener design and enabling development to enhance natural networks for the benefit of people and the environment. At the sub-urban and local level this should also help local residents and the wider community to understand the multiple benefits of the natural environment.

We encourage the authority to push for ecologically sensitive design and landscaping within this local plan policies and supporting text. This should support integration of housing within the sites blue and green infrastructure provision (green way linkages and Sustainable Urban Drainage Systems (SUDs)) to provide multi-functional green infrastructure of high value for nature and people. This is particularly relevant to the Rugby Local Plan given the scale of development and the opportunity to contribute to ecological networks through the upfront master planning process. Interventions could include:

- Stepping stone habitat for Farmland Birds and Pollinators
- Green roofs
- Rain water gardens

DS8 South West Rugby

Natural England is in general support of this relatively strongly worded policy. We are pleased to see outline master plans and the intention of a Supplementary Planning Document (SPD) to guide development within this allocation. In addition we are pleased to see the issues outlined in paragraphs 4.28 and 4.42 are specifically dealt with in the policy for this allocation. The multiple ownership alongside the important role of green infrastructure for this site makes these tools extremely important to ensure the natural environment is protected and enhanced in a strategic way. Our comments on Sub-Urban Green Infrastructure are of particular relevance for this allocation.

We are however, concerned at the lack of reference to the proximity of this allocation to Draycote Meadows SSSI, in both the SA and the Local Plan itself. Natural England advised of this in our previous response to the preferred options consultation. There will be a need for proposals coming forward to adequately ensure there are no hydrological impacts to the SSSI as a result of any

development taking place. We are unclear that this has been considered.

DS9 South West Rugby Spine Network

Natural England notes that of the proposals an option appears to cut through an area of ancient – semi-natural woodland central to this proposed allocation. We refer you to our previous response (174443) which provided advice in regards to ancient woodland. It is important that in the planning of this site this area of important habitat is not only protected according to its status as ancient woodland but is connected as part of the retained and enhanced ecological networks, a policy vision set out in the proposed plan.

Policy DS10 – Lodge Farm Garden Village

This allocation represents a departure from the development strategy put forward at the proposed options stage. Natural England is disappointed to see that the Green Infrastructure Proposals Map in the supporting documentation for the plan does not acknowledge this site and its potential role in the connection of existing ecological networks and its proximity through to the Oxford Canal. Our comments on Sub-Urban Green Infrastructure are of particular relevance for this allocation.

We are pleased to see outline master plans and the intention of a Supplementary Planning Document (SPD) to guide development within this allocation and would wish to be consulted on the development of this document.

Natural Environment Policies (NE1 – NE3)

Natural England supports the advice from Warwickshire County Ecology Unit to add 'International and European Sites' to the bullet list of habitats and species of importance. This policy covers all future development over the plan period some of which may not be covered by the HRA assessment of this plan and its allocated sites.

Natural England supports a stand-alone blue and green infrastructure policy. We advise given the large scale development proposed at a number of sites, the issue of multiple ownerships and the relevance of this to delivering functional green infrastructure should be acknowledged in the supporting text of this policy.

We also refer you to earlier comments in regards to sub-urban green infrastructure. Large scale developments, regardless of density offer opportunities to provide stepping stone habitat and bring people closer to the natural environment. Natural England feels strongly this is a unique opportunity for Rugby given the delivery strategy proposed and would be very keen to see this included where possible within the family of Natural Environment Policies.

Sustainable Design and Construction Policies (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.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Yours Faithfully



South Mercia Team

Appendix A

Soil and Agricultural Land Quality

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our well-being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:

1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The [Natural Environment White Paper](#) (NEWP) *'The Natural Choice: securing the value of nature'* (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:
 - A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).
 - Safeguarding our Soils: 'Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60).
 - 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).
2. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework](#) (NPPF), particularly in paragraphs 109 and 112. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example to:
 - Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
 - To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
 - Ensure soil resources are conserved and managed in a sustainable way.
3. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan
4. General mapped information on soil types is available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.
5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better

protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.



clean, green, safe

Letter Sent by Email

26th September 2016

consultations@naturalengland.org.uk

Dear Sir / Madam,

**Re: Habitat Regulation Assessment (HRA) for Rugby Borough Council Local Plan
Publication Draft: Draft Screening Report**

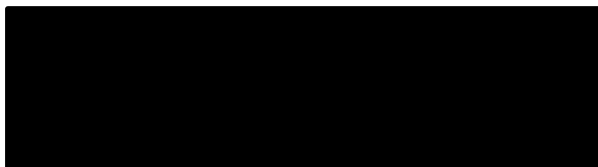
I am writing to you to request a written screening opinion on the potential impact of the Rugby Borough Council Local Plan Publication Draft on 'European sites' within the vicinity.

A Stage 1 Screening exercise of the HRA process in relation to the Rugby Local Plan has been undertaken as required under Article 6 (3) of the European Commission's Habitats Directive (92/43/EEC).


Enclosed with this letter are copies of the Rugby Local Plan Publication Draft Report (September 2016) and the HRA Draft Screening Report (2016). These documents along with Local Plan appendices and other published evidence are also available online at https://www.rugby.gov.uk/directory_record/935/local_plan

Please could a written response be provided on the Local Plan HRA Draft Screening Report by **Friday 11th November 2016**. I would however be extremely grateful if you were able to do this at your earliest opportunity. If you need to discuss the attached report, please don't hesitate to contact me using the details below.

Yours sincerely,



Rugby Borough Council
Town Hall, Evreux Way, Rugby, CV21 2RR
Tel: (01788) 533533 www.rugby.gov.uk



The current status of Ensor's Pool as a Special Area of Conservation (SAC) remains and Natural England's continues to advise competent authorities and those undertaking assessment under the habitat regulations to continue on a business as usual basis (BAU). Actions underway, including survey effort have led to a decision to amend the Site of Special Scientific Interest (SSSI) condition assessment based on fair and robust evidence base. HOWEVER, until there is agreement on the role of the site in the wider picture of the White-Clawed Crayfish population we must still operate on this BAU basis. Conversations with DEFRA are ongoing on this matter.

My thoughts in regards to your preparation of the HRA for Rugby Local Plan:

The only water body that connects Rugby Borough Council to the NE River Mease Catchment Risk Zone is the Ashby de-la-Zouch canal (see attached plan). On this basis there does not appear to be any clear functional pathways between Rugby Borough Council and the River Mease Catchment Risk Zone and we would welcome your comment on this initial assessment.

On the understanding that I have not seen any detail of where sites are allocated in the latest version of the Local Plan I would concur with this assessment based on the catchment zones for the River Mease.

I am currently considering if an in-combination assessment is necessary following the initial screening of the plan. I would however, be interested to know if there are any specific plans or projects that we should be aware of whilst undertaking this HRA.

Possibly the Warwickshire Minerals Plan, I also understand Nuneaton and Bedworth are looking again at their site allocations which with one next to Ensor's Pool may need to be taken into account?



Confidential consultation - HRA of Rugby Borough Local Plan

1 message

14 July 2016 at 16:08

I write in reference to another HRA I am undertaking of the Rugby Borough Council Local Plan 2011 to 2031 Publication Draft on behalf of Rugby Borough Council. The Local Plan sets out the Council's policies and proposals to support the development of the Borough through to 2031 and will be out for public and statutory consultation in September, along with the draft HRA for your comment.

At this stage I am contacting you at an early stage of my HRA work on a confidential basis to determine if there are any issues or concerns about this new plan in relation to European Sites that you wish to raise at this screening stage?

I attach a confidential plan providing the location of development sites associated with the Local Plan in the context of the two European Sites within a 20km buffer of the Rugby District Council boundary.

You will see that Ensor's Pool and its 3km buffer (as advised by the Environment Agency for triggering project level HRAs), lies outside of Rugby Borough Council.

The Natural England River Mease Catchment Risk Zone lies within the 20km buffer, but there are no rivers that run from or through Rugby Borough Council into the River Mease Catchment Risk Zone either directly or indirectly. The only river that flows out of Rugby Borough Council northwards is the River Soar, that flows into the River Trent downstream of the River Mease. The only water body that connects Rugby Borough Council to the NE River Mease Catchment Risk Zone is the Ashby de-la-Zouch canal (see attached plan). On this basis there does not appear to be any clear functional pathways between Rugby Borough Council and the River Mease Catchment Risk Zone and we would welcome your comment on this initial assessment.

I am currently considering if an in-combination assessment is necessary following the initial screening of the plan. I would however, be interested to know if there are any specific plans or projects that we should be aware of whilst undertaking this HRA.

I have contacted Antony Muller at Natural England separately regarding the current status of Ensor's Pool SAC.

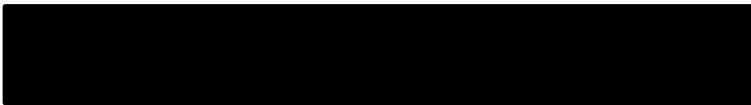
To provide some background, a previous HRA (by UE Associates) of the Submission Version of the Core Strategy for Rugby in 2009 used a 20km buffer for the HRA. This HRA was accepted by Natural England on 16.08.09 as not having any obvious pathways for significant effects on the European Sites identified. In line with this, and our recent HRA for Coventry, we will also be using a 20km buffer around Rugby for the purposes of this HRA.

The 2009 Core Strategy highlighted the need for 10 800 additional homes in Rugby DC (6000 to be allocated through the LDF) and 108ha of employment land required (with around 66ha delivered through the LDF) between 2009 and 2026. This new draft Rugby Borough Council Local Plan for 2011 to 2031 proposes 12400 additional homes and 110ha of employment land.

We will also be consulting the Environment Agency and Severn Trent Water in relation to this HRA.

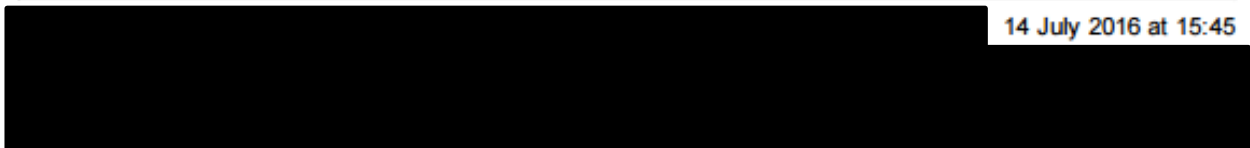
I look forward to hearing from you.

Sincerely



Ensor's Pool SAC - Consultation Request Advice on HRA

14 July 2016 at 15:45



I hope you are well. I am writing to ask for an update on the current status of Ensor's Pool SAC in relation to a Habitats Regulations Assessment (HRA) I am currently undertaking for the Rugby Borough Council Local Plan 2011 to 2031.

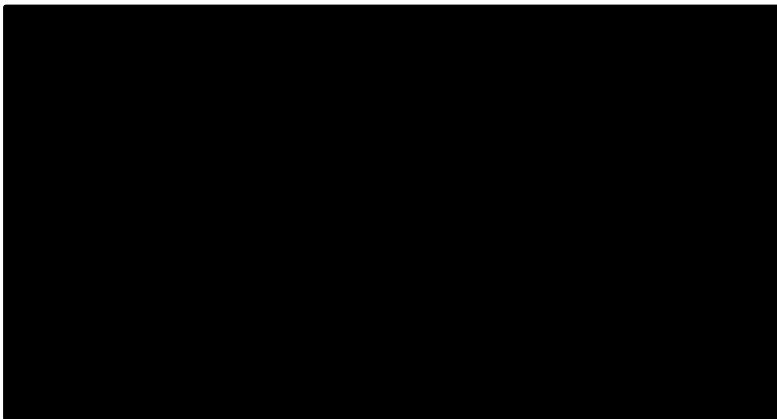
Our last correspondence was in December 2015, when you confirmed that there had been no change in the SSSI/SAC designation for Ensor's Pool and that we should continue on a **'business as usual'** approach to the HRA in relation to this SAC. However, having recently checked your SSSI Conditions Assessment information on-line, I now see that a new assessment was undertaken on 29.04.16 by Helen Trapp in which the assessment for Ensor's Pool SAC/SSSI has now been updated to **'Unfavourable-Declining'** from the previous assessment from 2012 of being **'Favourable'**, following the negative surveys in 2014 and 2015.

Are you able to confirm if this has changed the actual designation for the SSSI/SAC for HRA purposes please?

Also do you have any new information on Ensor's Pool and or details of any proposals for re-introduction of white-clawed crayfish to this site in the future?

We look forward to hearing from you, please do feel free to call me if you have any queries.

Kind Regards





Ensor's Pool SAC update

2 December 2015 at 16:48

Our reference 171168

Thank you for your email dated 10 November 2015. I've set out your questions below together with our responses:

We would be interested to know if:

1) There has been any change in SSSI/SAC designation of Ensor's Pool since our last correspondence (your email dated 24.08.15 and letter dated 03.07.15) in relation to a Habitats Regulation Assessment (HRA).

No change.

2) If the new anticipated 'supplementary information' for Ensor's Pool has been produced yet? If it has we would like to have a copy. If not, it would be helpful to have an indication of likely publication date, to ensure we can take any revisions into account when undertaking further HRA work over the next few months.

No, the 'supplementary information' for Ensor's Pool SAC has not been produced. The SAC is not on the priority list for the supplementary information package to be written.

3) Do you have any further information on the work you conducted on assessing the current status of the WCC population at Ensor's Pool this autumn? We assume the results of this study will be available shortly and would be good to have this information and an idea of when it might become available.

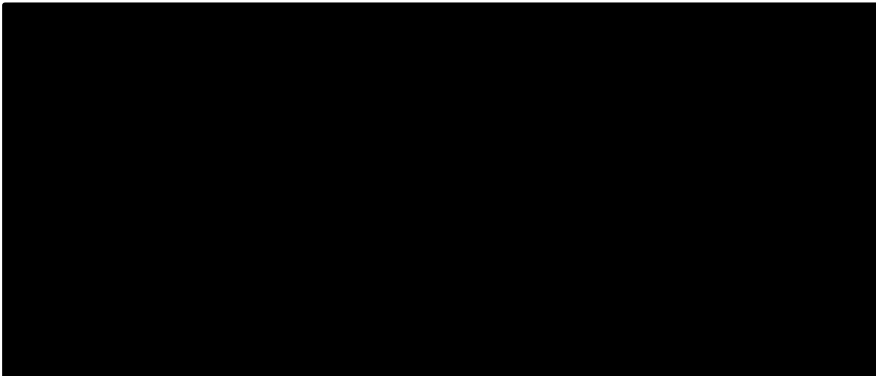
Surveys for white clawed crayfish were carried out in September 2014 (trapping survey), October 2014 (Dive survey), June – September 2015 (Bioassay) and September 2015 (trapping survey). Natural England has now received the results of the latest survey. We conclude that the population of native white-clawed crayfish is no longer present at Ensor's Pool. Natural England is now considering these results and their implications in conjunction with our national specialists and the ecologists who undertook the surveys.

Natural England is committed to ensuring that our advice is based on the best available information and we aim to keep you up to date with progress accordingly. Please get in touch if you have any further questions that arise from the information above.

Kind regards



HRA of Warks Minerals Plan - update



24 August 2015 at 17:10

HRA process

Happy to discuss this over the phone but in essence:

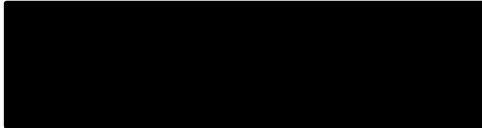
The favourable condition table document provides information based on using common standards monitoring. This is for use when assessing the condition of designated sites. Although to some extent you can use the FCT as part of your HRA thought process I would advise that your approach in the context of a development plan is very likely to need a wider consideration of potential impacts/ pathways that the FCT tables won't help with. Nonetheless I appreciate that in the context of the Ribble case it makes sense to ensure you take account of relevant information, such as the FCT document, as an interim measure.

The primary focus for your attention should be on the 'European site conservation objectives' for the relevant N2k site. Link to list of relevant docs here:

<http://publications.naturalengland.org.uk/category/5134123047845888>

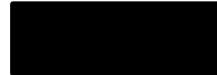
As you may be aware work is in hand to supplement these updated conservation objectives with 'supplementary information'. Although this information has not yet been produced for Ensor's Pool SAC I attach a copy of our new operational standard which provides a full description of the revised approach.

In terms of the way forward, until such time as the supplementary information for relevant N2k sites is available we would encourage an iterative approach whereby you keep in touch with us as you carry out HRA of development plans. We propose that as you identify candidate impact 'pathways' that generate a need for environmental information to complete the thought process (and that might in the fullness of time be included in the forthcoming 'supplementary information' document) you can contact us to agree next steps. We envisage a 'light touch' here.



Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

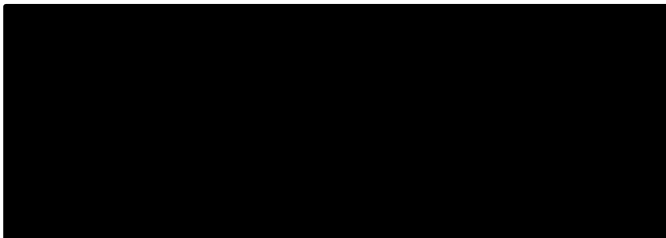
Natural England
Block B
Government Buildings
Whittington Road
WORCESTER
WR5 2LQ



**Re: Habitat Regulation Assessment for Rugby Borough Core
Strategy: Screening Statement**

Thank you for your letter of 16/08/09 requesting Natural England's opinion on the above.

After consideration of the HRA screening assessment report submitted by UE Associates dated June 2009, Natural England is of the opinion that, at this stage, there aren't any obvious pathways for significant effects on the European Sites identified within a 20km boundary of Rugby.



1.2. Severn Trent Water Correspondence

7/26/2016

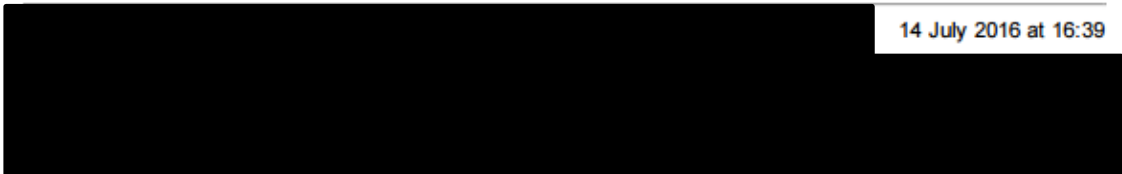
Warwickshire County Council Mail - Confidential Consultation - HRA of Rugby Borough Local Plan



Confidential Consultation - HRA of Rugby Borough Local Plan

1 message

14 July 2016 at 16:39



I write further to our previous correspondence with STW in relation to a series of HRAs we have been undertaking for districts and boroughs in Warwickshire and Coventry. On this occasion I am contacting you on the HRA I am undertaking for Rugby District Council on their Local Plan 2011 to 2031.

We previously contacted you about HRAs for the adjacent Warwick District and Coventry Borough. This was in response to previous concerns raised by Natural England during the HRA process some years ago regarding the proposed water supply for proposed development in the area. Previously Natural England and the the Countryside Council for Wales (CCW) (now Natural Resources Wales) (NRW) had highlighted concerns that if STW were anticipating extracting or utilising water from Wales to growing Midland conurbations (including Rugby District) this could potentially impact hydrologically dependent Welsh SACs (Special Areas of Conservation - European Sites).

In an email from you last year dated 26.11.15 you confirmed that the current source of water for Coventry is from local sources and not from Wales. Are you able to confirm that water to supply new proposed development in the Rugby Local Plan will also come from local sources and not from Wales?

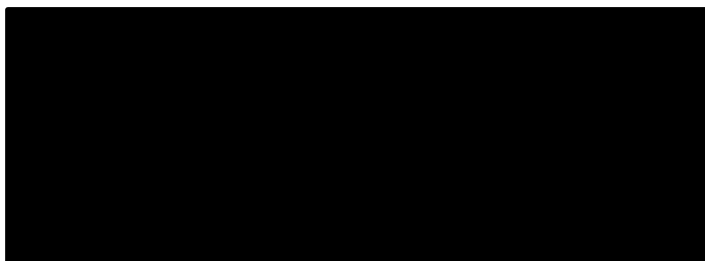
This new draft Rugby Borough Council Local Plan for 2011 to 2031 proposes 12400 additional homes and 110ha of employment land. The previous 2009 Core Strategy highlighted the need for 10800 additional homes (6000 to be allocated through the LDF) and 108ha of employment land required (with around 66ha delivered through the LDF) between 2009 and 2026.

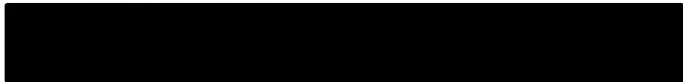
In addition to your proposals for water supply, we would also be interested in where it is proposed that the water water from development as part of the Rugby Borough Council Local Plan will go?

I attach a confidential plan providing the location of development sites associated with the Local Plan in the context of the two European Sites within 20km of the Rugby District Council boundary to provide you with some context for your response.

We look forward to hearing from you.

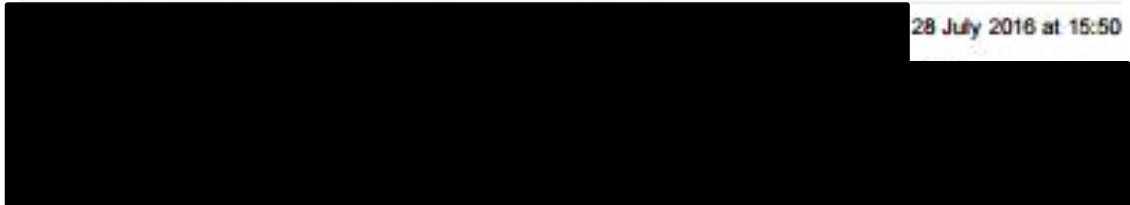
Kind Regards





RE: Confidential Consultation - HRA of Rugby Borough Local Plan

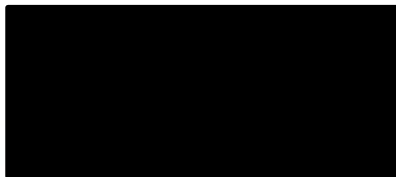
1 message



28 July 2016 at 15:50

I can confirm the local source supply for Rugby is Draycote.

Hope this helps



Growth & Water Efficiency Analyst



1.3. Environment Agency Correspondence

██████████ Forward Planning and
Economic Development Manager
Rugby Borough Council
Development Control
PO Box 16
Rugby
Warwickshire
CV21 2LA

Our ref: UT/2007/101479/CS-
13/SB1-L01

Your ref:

Date: 10 November 2016

██████████

Rugby Local Plan - Submission Document

Thank you for consulting the Environment Agency in relation to the submission document, having carefully reviewed it, we have the following comments to make:

Policy SDC1: Sustainable Design

We strongly support the proposed modification to this policy in line with our advice in our formal response to your previous consultation.

We believe the inclusion of the following text has made it a more robust policy that carefully considers the impact of neighbouring development on amenity and considers the impact that it may have on future occupants.

'Proposals for new development will ensure that the amenities of existing and future neighbouring occupiers are safeguarded.

Proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent sites where there is potential for conflict between the uses, for example, an existing waste management site. Such proposals must be accompanied by supporting information demonstrating that the existing and proposed uses would be compatible and that the proposal has addressed any potential effects of the existing use on the amenity of the occupiers of the proposed development.'

This reinforces our advice that our experience as a regulator of former industrial sites, which often come forward in a piecemeal approach for housing development it has the potential to give rise to nuisance complaints. Waste management companies that have been operating in accordance with their permit without any complaints while located next to similar uses are frequently subjected to complaints when that neighbouring use changes. There needs to be careful consideration that new

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Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

development does not have a detrimental impact upon employment and commercial developments.

There are inherent impacts for more sensitive developments when co-located next to existing waste management facilities, and there is only so much mitigation an operator can provide to neighbouring development. For example, they cannot prevent large vehicular movements to their sites, or avoid the occasional release of odours or dust resulting in complaints and requests to 'tighten' environmental permits issued by the Environment Agency even when the sites are operating in line with best practice.

The existing NPPF for Waste does not include any specific measures to prevent incompatible co-location of uses.

Policy SDC5: Flood Risk Management

We provided detailed comments in relation to policy recommendations in response to your previous consultation. We note that some of our recommendations have been included within the submission documents, however we would like to request further amendments to address our concerns.

Rugby has experienced several significant flood events in the last 15 years, both from fluvial and surface water flooding. It currently benefits from a number of flood defences, and assets which are maintained and operated by both the Lead Local Flood Authority and the Environment Agency.

We support the changes in wording in the first paragraph of this policy to reflect our advice in relation to guide developers to the most up to date information available to assess flood risk and the reference to our Flood Map for Planning which is reviewed and updated on a quarterly basis.

'A sequential approach to the location of suitable development will be undertaken by the Council based on the Environment Agency's flood zones as shown on the latest Flood Map for Planning and Strategic Flood Risk Assessment (SFRA). This will steer new development to areas with the lowest probability of flooding, in order to minimise the flood risk to people and property and manage any residual risk'.

We also strongly support the modification of the policy as outlined below, as it provides a more robust and aspiration approach to managing flood risk.

'If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where the following criteria are met:

- the vulnerability classification of the development is appropriate to the level of flood risk associated with its location with reference to the Environment Agency's Flood Map, Rugby Borough Council's Strategic Flood Risk Assessment (SFRA) flood zone maps and Table 3 of the NPPF Planning Practice Guide: Flood Risk and Climate Change;*
- it is provided with the appropriate flood risk mitigation measures (including suitable flood warning and evacuation procedures) which can be maintained for the lifetime of the development;*
- it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;*
- all opportunities offered by the development to reduce flood risk elsewhere must be taken, including creating additional flood storage and reducing risk of flooding from the sewer network;*

Cont/d..

- *in the case of dwellings it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk; and*
- *in the case of essential civil infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.*

We would like to see the following policy requirements added to the above bullet points to further strengthen the policy.

- Developers must contribute financially to any flood reduction schemes or environmental assets that benefit their development.
- Surface water management proposals (Including SuDS) must be located outside the floodplain
- Proposals must include proposals to restore and enhance watercourses and include a minimum 8 metre easement from the top of bank or toe of a flood defence consent and meet the requirements of an Environmental Permit to be granted planning permission.

Environment Agency flood risk management assets and flood defences require a regular program of maintenance to ensure that they function adequately and protect homes, businesses and infrastructure. The Environment Agency has seen a reduction in funding to maintain these assets in recent years, and without securing developer contributions it may not be possible to ensure that they will continue to function during the lifetime of a new development.

By securing funding from developers to support new flood risk management schemes or to support the maintenance program of existing assets we can ensure that new developments are appropriately safeguarded from flood risk.

Sustainable drainage schemes that are located within the floodplain can not function appropriately if they are already inundated with fluvial flood water. This could prevent surface water from discharging from a development site, with the consequence of causing surface water flooding to the new development or to third party land, or to provide unattenuated flows into flood waters increasing fluvial flooding.

Because floodplain is often used to support any public open space requirements within a new development, planning applications frequently include SuDS schemes within the floodplain, which results in us raising and objection to a planning application. We therefore consider that the policy wording would significantly reduce the number of planning applications we object to, and support the council in meeting the required targets for determining planning applications.

The Environment Agency knows that our Byelaws are not regularly consulted by developers proposing to develop land adjacent to watercourses. Planning applications that include built development within our 8 metre easements are objected to because it could obstruct the access we require to undertake emergency works to the watercourse to stabilise the bank, provide / maintain flood defences, or undertake emergency works to remove blockages. We therefore consider that the policy wording would significantly reduce the number of planning applications we object to, and support the council in meeting the required targets for determining planning applications. The Environment Agency will not grant environmental permits which are contrary to our byelaws, and if our objection is overruled the development

Cont'd..

would not be able to proceed without the grant of an environmental permit, and could result in the reapplication of planning permission from a developer.

We still recommend that you include a brief description of the main Risk Management Authorities in the Local Plan, something along the lines of:

Environment Agency

- The Environment Agency has a strategic overview of all sources of flooding and coastal erosion (rivers, the sea, groundwater, reservoirs and surface water).

- We are responsible for the delivery of FCERM activities on Main Rivers and the coast, regulating reservoir safety, and working in partnership with the Met Office to provide flood forecasts and warnings.

Lead Local Flood Authorities

- Lead Local Flood Authorities (LLFAs) are responsible for managing flooding from local flood risk (surface water, ordinary watercourses and groundwater).

Water Companies

- The water and sewerage companies in England are responsible for managing the risks of flooding from their surface water and foul or combined sewer systems.

This is to provide clarification to developers and landowners as to who has responsibility for different areas of water management. This could facilitate pre application discussions and support the correct gathering of information to support a planning application.

Policy SDC6

We support the proposed policy and believe that it provides a clear set of objectives to developers to support the multifunctional benefits of incorporating sustainable drainage within new developments.

Policy SDC8

We support the proposed policy, we are aware from recent discussions with Severn Trent PLC that they are implementing a substantial program of improvements to their waste water treatment works to ensure that the proposed growth as outlined in this plan is adequately served with both the water supplies and sewerage services required to support their delivery.

This policy requires developers to engage with Severn Trent PLC to ensure that the new infrastructure will be delivered in a phased approach that will prevent any delay to the completion or occupation of their development.

We trust that you will find these comments useful. Should you have any questions please do not hesitate to contact me on the number provided below.

Cont/d..

In conclusion

Subject to the inclusion of the three additional bullet points, and the description of the organisations that manage water within Rugby Borough (which we would consider to be a minor modification) we believe that the Publication version of the Rugby Local Plan is 'Sound'.

We agree that it is:

- **Positively prepared** – the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the Local Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the Local Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the Local Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF framework.

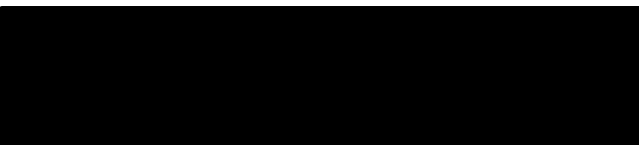
During the development of the emerging Local Plan we have found that Rugby B.C. have worked positively with us to develop policies that will support sustainable development, protect and enhance the environment, whilst contributing to social and economic objectives.

We would like to confirm that we consider that you have met the 'Duty to Co-operate' requirements at all stages of the process.

We trust that you will find these comments useful. Should you have any questions please do not hesitate to contact me on the number provided below.

Yours sincerely


Sustainable Places Planning Specialist

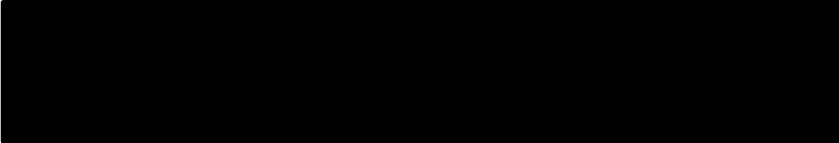


End

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**FW: Confidential consultation - HRA of Rugby Borough Local Plan**

1 message



2 August 2016 at 11:58

Further to our telephone conversation last week, I would like to confirm the following points:

We understand that Ensor's Pool SAC no longer has white claw crayfish.

We understand that it was likely that an American Signal Crayfish was deposited within the SAC by an RSPCA officer, which is the likely cause of their absence from the SAC. <http://www.telegraph.co.uk/news/uknews/1520234/RSPCA-blunder-puts-deadly-predator-into-crayfish-haven.html>

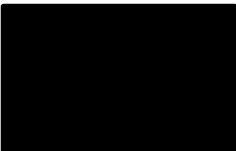
Having undertaken further works to assess the pool in 2014 we can confirm that we could not find any evidence of White Claw Crayfish within the pool, and it may have been affected by Crayfish Plague / American Signal Crayfish.

We understand that the pool is fed by groundwater and is not hydraulically linked to nearby ordinary watercourses, and that this was confirmed by the Environment Agency when we undertook a dye tracing exercise while we were investigating the loss of white claw crayfish at Ensor's Pool.

We note that NE have now described the SAC as unfavourable, and considering the proposed growth adjacent to it (as proposed on the Nuneston & Bedworth Local Plan, there is a question mark about its future use as an ark site as increased interactions from local residents may make it less suitable as an 'ark site'

At present we do not consider a HRA assessment would be required to support the Rugby Local Plan, because of the above issues.

We do not consider the River Mease SAC to require assessment because of its distance from Rugby and the lack of hydrogeological connection as they are located within separate River Basin Management Areas (Rugby within the River Severn RBMP and the River Mease SAC is within the River Humber RBMP).





RE: FW: Confidential consultation - HRA of Rugby Borough Local Plan

2 August 2016 at



The majority of Rugby lies outside the Humber Basin, I have attached a screen print that shows that even within the Humber Catchment a very small % of the area lies within the Tame Anker and Mease management area, with some of the very north of rugby draining towards the river soar.

I hope the map below is helpful,





Confidential consultation - HRA of Rugby Borough Local Plan

1 message

14 July 2016 at 16:30

Following our correspondence last year on the Coventry Local Plan, I am writing to you in relation to another HRA I am undertaking for the Rugby Borough Council Local Plan 2011 to 2031.

I have permission from Rugby Borough Council to send you the attached map on a confidential basis that illustrates the location of development sites associated with the Local Plan in the context of two European Sites within the 20km buffer zone around Rugby District Council boundary.

You will see that there are two European Sites within the 20km buffer around Rugby District Council.

1) Ensor' Pool. This lies in the Humber River District as does the northern part of Rugby District Council. Further to our correspondence with you in September 2015, in relation to the Warwickshire County Council's Minerals Plan, you highlighted that your Groundwater Team would wish to be alerted for any proposals within 2-3km around Ensor's Pool. As you can see from the attached map, Rugby Borough Council lies beyond this 3km buffer zone and hence we are not anticipating any Likely Significant Effects to Ensor's Pool as a result of the Local Plan. Can you confirm that you are in agreement with this?

2) The Natural England River Mease Catchment Zone lies within the 20km buffer (see attached map), but it appears there are no rivers that run from or through Rugby Borough Council into the River Mease Catchment Risk Zone either directly or indirectly. The only river that flows out of Rugby Borough Council northwards is the River Soar, that flows into the River Trent downstream of the River Mease. The only water body that connects Rugby Borough Council to the NE River Mease Catchment Risk Zone is the Ashby-de-la-Zouch canal (see attached map). On this basis there does not appear to be any clear functional pathways between Rugby Borough Council and the River Mease Catchment Zone. We would welcome your comments on this initial assessment.

To provide you with some background, the 2009 Core Strategy highlighted the need for 10 800 additional homes (6000 to be allocated through the LDF) and 108ha of employment land required (with around 66ha delivered through the LDF) between 2009 and 2026. An HRA of this Core Strategy was undertaken in 2009 and was accepted by Natural England where it concluded there were no obvious pathways for significant effects on the European Sites identified within a 20km boundary of Rugby. This new draft Rugby Borough Council Local Plan for 2011 to 2031 proposes 12400 additional homes and 110ha of employment land.

We would be grateful for an initial response from you on if there are any specific issues you consider need to be addressed as part of the HRA we are currently undertaking. I have already contacted Natural England and Severn Trent Water in relation to issues around water supply and where it is proposed that waste water from development as part of the Rugby Local Plan will go. Our consultation for our previous HRA for Coventry and Warwick District local plans raised concerns over potential impacts to hydrologically dependent Welsh SACs by extracting or utilising water from Wales to growing Midland conurbations.

I am currently considering if any in-combination assessment is required as part of the HRA process and this would involve the need to consider other plans and projects in the area that would increase the likelihood or significance of any effects on European Sites that are identified in the HRA. The aim of the in-combination assessment is to protect European Sites from cumulative effects of more than one project when effects of projects action on the site alone would not be likely to be a significant. I would welcome your views on any specific plans or projects that we should consider in this assessment if we decide it is necessary to undertake one.

We look forward to hearing from you. Should you have any queries, please do not hesitate to get in touch.

Warwickshire County Council
Department Of Planning Transport &
Economic Strategy
PO Box 43
Warwick
Warwickshire
CV34 4SX

Our ref: UT/2008/104606/OR-
03/PO1-L01
Your ref:
Date: 16 September 2015



HABITAT REGULATIONS ASSESSMENT FOR WARWICKSHIRE MINERALS PLAN

Thank you for your recent enquiry in relation to the above document.

With reference to the potentially sensitive receptors, we only consider that Ensors Pool and The River Mease catchment has the potential to be impacted by the proposed minerals sites.

Looking at the 30 potential site options, there are only 2 that are in close enough proximity to impact the sensitive receptors, so only these have been looked at in further detail. These are the Polesworth Site on the River Mease Catchment and Burton Hastings on Ensors Pool.

Polesworth and the River Mease

Upon closer inspection, the potential site at Polesworth drains into the River Anker catchment, running west towards Tamworth initially, instead of north to the River Mease. The Anker then joins the River Tame and finally the Trent, just upstream of the River Mease confluence with the River Trent. We can therefore conclude that there is no linkage between potential quarry site and the River Mease SAC.

Burton Hastings and Ensors Pool

Ensors Pool lies approximately 7km west of the potential site at Burton Hastings. It is again in close proximity to the headwaters of the River Anker, but it does not run closely enough to Ensors Pool to have any effect on it. Our Groundwater Team have reviewed the potential for Hydrogeological linkages between the quarry option and the pool and have found that there is no potential for impact upon Ensors Pool from the Burton Hastings site due to the underlying geology being completely different in the two locations. It may be also worth noting that for future reference, our Groundwater Team have stated that it is only worth flagging up sites within about 2-3 km of a sensitive

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9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
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www.gov.uk/environment-agency
Cont/d..

receptor for checking.

However, we note that the 9 preferred sites do not include either location and therefore we are unlikely to have any further comments to make at any later stage of this particular process.

We are not aware of any plans or programmes that need to be considered as part of this assessment.

Yours faithfully



End

2

Appendix 2: Summary of Former Detailed Conservation Objectives and Targets

Below is a summary of the former detailed Conservation Objectives and Targets for both Ensor’s Pool SAC (dated 2008) and River Mease SAC (dated 2012) as provided by Natural England.

Ensor’s Pool – Summary of Detailed Conservation Objectives and Targets dated 2008
<ul style="list-style-type: none"> ■ To maintain the designated habitats in favourable condition, which is defined in part in relation to a balance of habitat extent (extent attribute). Favourable condition is defined at this site in terms of the following site-specific standards: On this site favourable condition requires the maintenance of the extent of each designated habitat type. Maintenance implies restoration if evidence from condition assessment suggests a reduction in extent. The estimated extent in 2008 was 1.89 ha of Standing Open Water. The site specific target is to have no artificial reduction in the wetted area. ■ To maintain the native crayfish population at Ensor’s Pool SSSI in favourable condition with reference to the following on-site specific standards. These include ensuring the population of native white-clawed crayfish is at least moderately high abundance, an absence of individuals infected with crayfish plaque and porcelain disease (Thelohianiasis) should not affect more than 10% of the population. ■ To maintain the standing open water habitat that supports the native crayfish at Ensor’s Pool in favourable condition. Favourable condition of the supporting habitat is defined at this site in terms of the following site-specific standards. Biological Water Quality should be equivalent to Biological GQA Class b and should be equivalent to at least Chemical GQA Class: B. The extent and diversity of bankside refuges should be maintained. Overhanging vegetation should be present intermittently along the east, north and west banks throughout the year. This should cover 60% of the bank length, distributed in patches along the bank. The southern bank is open grassland. A fringe of marginal vegetation 1-4m wide should be present along at least 10% of the bank sides and submerged macrophytes should cover 10 to 20% of the pool from June to September. The extent and diversity of the site’s substrates should be maintained and non-native crayfish species should be absent from the waterbody and their catchments.
River Mease SAC – Summary of Detailed Conservation Objectives and Targets dated 2012
<ul style="list-style-type: none"> ■ To maintain the designated features in favourable condition, which is defined in part in relation to a balance of habitat extents. On this site favourable condition requires the maintenance of the extent of each habitat type. In this instance the habitat features is Rivers and streams and the estimated extent in 2012 was 22.87ha. The target is to have no reduction in area and any consequent fragmentation without prior consent. ■ To maintain the designated species in favourable condition. This is defined at this site in terms of requiring the maintenance of the population of each designated species or assemblage. Species or assemblage present include: bullhead, spined loach, otter, white-clawed crayfish. ■ Specific Targets of species are as follows: <ul style="list-style-type: none"> ■ Bullhead <ul style="list-style-type: none"> ● No reduction in densities from existing levels (no less than 0.5m⁻² in lowland rivers) ● Young –of-year fish should occur at densities equal to adulates ● Four age classes with 0+ individuals at least 40% of population ● Largest females attain a fork length > 75mm ● Species should be present in all suitable reaches. As a minimum no decline in distribution from current. ■ Spined loach <ul style="list-style-type: none"> ● At least three year-classes should be present at significant densities. At least 50% of the population should consist of 0+ fish ● Largest females attain a fork length of > 85mm ■ Otter <ul style="list-style-type: none"> ● Otters present on site and the population maintained or increasing ■ White-clawed crayfish <ul style="list-style-type: none"> ● Population at least moderate abundance ● Berried females should be present during the period November to April

- Porcelain disease (Thelohaniasis) should not affect > 10% population
- Absence of individuals infected with crayfish plaque
- To maintain Rivers and Streams in the River Mease in favourable condition. At this site favourable condition relates to site-specific standards and a number of targets have been set that apply to the river and marginal vegetation only. A summary of the targets are provided below
- Siltation: No excessive siltation. Maximum silt content <20% in top 10cm of mid-channel gravels. Channel should be dominated by clean gravels. For spined loach sand fractions in finer substrates should reach at least 20% sand and no more than 40% silt. For bullhead no excessive siltation on the surfaces of coarse substrates
- Channel Form: should be generally characteristic of river time with predominately unmodified planform and profile. In-channel natural features present at frequent intervals (such as riffle / pool sequences, pools, slacks and submerged tree root systems).
- A sufficient proportion of all aquatic macrophytes should be allowed to reproduce in suitable habitat, unaffected by river management practices. *Ranunculus* should be able to flower and set seed.
- Blanketweed, epiphytic or other algae, *Potamogeton pectinatus* or *Zannichellia palustris*: cover values over 25% should be considered unfavourable and should trigger further investigation. Cover values should not increase significantly from an established baseline.
- There should be no impact on native biota from alien or introduced macrophyte species and these species should not be present at levels likely to be detrimental to the characteristic biological community.
- No artificial barriers should be installed that significantly impact migratory species from essential life-cycle movements
- Species Composition: At least 60% of species with abundance V or IV in the constancy table should be present AND at least 25% of species with abundance III should be present. Loss of Species: 60% of species with cover of over 1 in the baselines should be at least present along with dominant species in the baseline survey. Abundant species: At least 25-35% of species recorded as dominant in baseline survey should still be dominant.
- There should be no artificial release of fish unless agreed this is in the interests of the population and only with local stock. Any fish introductions should not interfere with the river to support self-sustaining and healthy populations of characteristic species
- Targets for EA standard protocols include the following: Biological GQA: Class A or B. Chemical GQA: Class A or B. Un-ionised ammonia ,0.021 mg L-1 as a 95-percentile. Suspended solids: No unnaturally high loads, Spined Loach and bullhead:, 25mg;/litre annually. Orthophosphate levels: ,0.06mg/litre as an annual mean.
- Bank and Riparian zone vegetation structure should be near-natural. Woody debris removal should be minimised and restricted to essential activities such as flood defence. Weed cutting should be limited to nor more than half of the channel width.
- Maintain the characteristic physical features of the river channel, banks and riparian zone
- Non-native crayfish should be absent and if present, measures taken to control numbers
- For otters: Fish biomass should stay within expected natural fluctuations. No increase in pollutants potentially toxic to otters. Otter populations not be significantly impacted by human induced kills. No significant change to river or bankside usage. No significant development. No overall permanent decrease
- Flow regime should be characteristic of the river. Levels of abstraction should not exceed the generic thresholds laid down for moderately sensitive SSSI rives by national guidance.

Appendix 3: Flooding Map

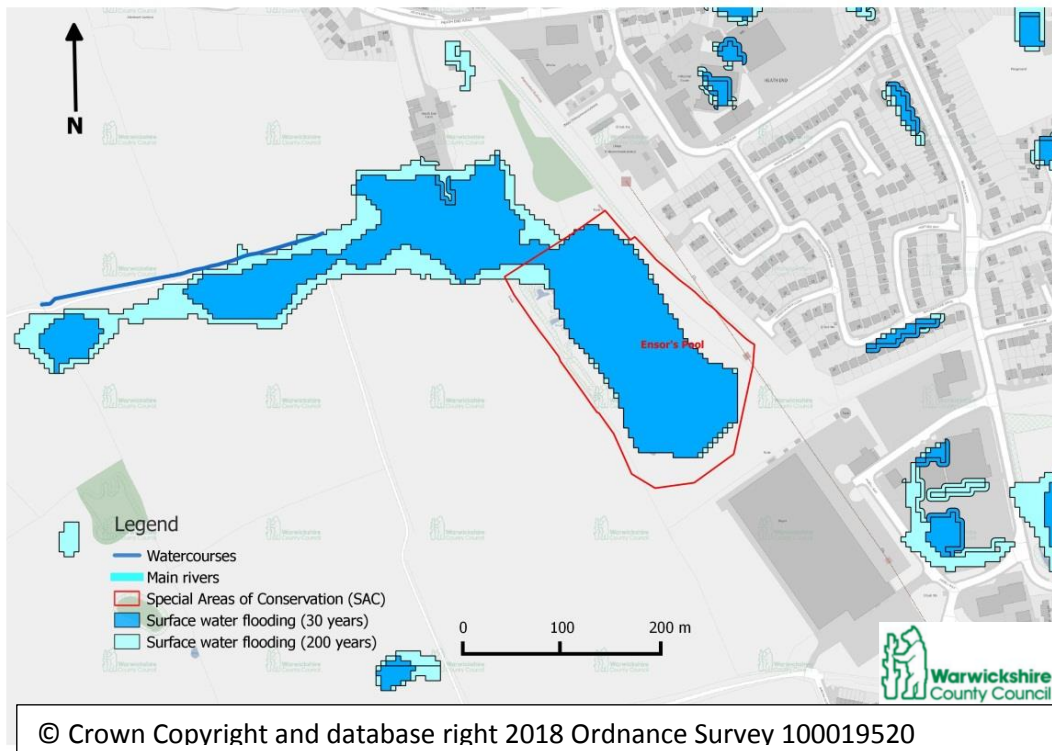


Figure 10: Ensor's Pool and surface water flooding predictions for 30 years and 200 years

Appendix 4: Results of the Screening of Policies in the Rugby Local Plan 2018

Content of plan	Screening conclusion	Screening Category	Justification
Chapter 1	Screened out	Administrative Text	Introductory text about the plan
Chapter 2 Sections 2.1 to 2.22.	Screened out	Administrative Text	Introductory text about the plan
Spatial Vision	Screened out	A	General Statements of policy / general aspiration
Para 2.23	Screened out	Administrative Text	Introductory text about the plan
Spatial Objective 1	Screened out	A	General Statements of policy / general aspiration. Implications are considered under specific policies later in this table
Spatial Objective 2	Screened out	A	General Statements of policy / general aspiration. Implications are considered under specific policies later in this table
Spatial Objective 3	Screened out	A	General Statements of policy / general aspiration. Implications are considered under specific policies later in this table
Spatial Objective 4	Screened out	A	General Statements of policy / general aspiration. Implications are considered under specific policies later in this table
Spatial Objective 5	Screened out	A	General Statements of policy / general aspiration. Implications are considered under specific policies later in this table
Spatial Objective 6	Screened out	A	General Statements of policy / general aspiration. Implications are considered under specific policies later in this table
Spatial Objective 7	Screened out	A	General Statements of policy / general aspiration. Implications are considered under specific policies later in this table
Spatial Objective 8	Screened out	D	Environmental Protection / site safeguard Policy.
Spatial Objective 9	Screened out	D	Environmental Protection / site safeguard Policy.
Section 2.24 and Rugby Key Diagram	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects).
Chapter 3 Sections 3.1 to 3.3	Screened out	Administrative Text	Introductory text about the plan
Policy GP1: Securing Sustainable Development	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 3.4 to 3.6			Background information to Policy GP1

Policy GP2: Settlement Hierarchy	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the hierarchy for proposed development within the plan. Given that no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Sections 3.7 to 3.16			Background to Policy GP2
Policy GP3: Previously Developed Land and Conversions	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals. It is of note that this policy highlights potential impact on biodiversity assets being a consideration during the redevelopment of previously developed land
Sections 3.17 to 3.20			Background to Policy GP3
Policy GP4: Safeguarding development potential	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 3.21 to 3.23			Background to Policy GP4
Policy GP5: Neighbourhood level documents	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 3.24-3.25b			Background to Policy GP5
Chapter 4 Sections 4.1 to 4.6	Screened out	Administrative Text	Introductory text about the chapter
Policy DS1: Overall Development Needs	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the precise levels of housing and employment development provided by the local plan between 2011 and 2031. This comprises a) 12400 additional homes (including 2800 dwellings to meet Coventry's unmet needs, and b) 208ha of employment land (including 98ha to meet Coventry's unmet needs). Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Sections 4.7 to 4.15			Introductory text including proposed housing numbers etc.
Sections 4.16 to 4.19			Introductory text on employment

			allocations with supporting evidence
Policy DS2: Sites for Gypsy, Travellers and Travelling Showpeople	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 4.21 to 4.24			Background text to policy DS2
Policy DS3: Residential allocations	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the precise number of dwellings proposed in each of the allocated settlements.. Given that no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Sections 4.25 to 4.37			Background to policy DS3
Policy DS4: Employment allocations	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the precise area of proposed employment allocations for this plan. Given that no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Sections 4.38 to 4.41			Background to policy DS4
Policy DS5: Comprehensive Development of Strategic Sites	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 4.42 to 4.43			Background to policy DS5
Policy DS6: Rural Allocations	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 4.44 to 4.46			Background to Policy DS6
Policy DS7: Coton Park East	Screened out	B	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines proposals at Coton Park East. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Sections 4.47 to 4.51			Background to Policy DS7. Paragraph 4.49 that can be classified as category D:

			Environmental protection / site safeguard policy as it highlights the potential for the area to be improved by habitat protection
Policy DS8: South West Rugby	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines proposals at South West Rugby. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Section 4.52 to 4.62	Screened out	D	Section includes background text for policy DS8 in addition to the following paragraphs: 4.57 and 4.58 that can be classified as category D: Environmental protection / site safeguard policy as they make a commitment to a Woodland Management Plan for protecting area of ancient woodland on-site as well as a green infrastructure corridor
Policy DS9: South West Rugby Spine Road North Network	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines proposals for a Spine Road to the south west of Rugby. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Section 4.63 to 4.69			Background text to Policy DS9.
Chapter 5: Housing Sections 5.1 to 5.6	Screened out	A	General Statement of Policy / general aspiration
Policy H1: Informing Housing Mix	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Section 5.7 to 5.12			Background text to Policy H1
Policy H2: Affordable Housing Provision	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines targets for affordable housing targets within sites proposed for development. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Section 5.13 to 5.22	Screened out		Background text to Policy H2 including a

			commitments to seek to deliver for some of the housing needs emanating from Coventry City which cannot be met within its own boundaries under the Duty to Corporate
Policy H3: Housing for rural businesses	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 5.23 to 5.29	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals outlining circumstances where an exception to the general policy of housing restraint in the countryside could be considered
Policy H4: Rural Exception Sites	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 5.30 to 5.35	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals provided further background text to Policy H4
Policy H5: Replacement Dwellings	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 5.36 to 5.37	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy H6: Specialist Housing	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 5.38 to 5.47			Background text to Policy H6
Chapter 6: Economic Development Sections 6.1 to 6.2	Screened out		Introductory text to Chapter 6
Policy ED1: Protection of Rugby's Employment Land	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 6.3 to 6.9	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Section 6.10	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This section lists the designated employment sites in Rugby Borough Council. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Policy ED2: Employment development within Rugby urban area	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals

Sections 6.11 to 6.14	Screened out		Background text to Policy ED2
Policy ED3: Employment development outside Rugby urban area	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 6.15 to 6.18	Screened out		Background text to Policy ED3
Policy ED4: The Wider Urban and Rural Economy	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 6.19 to 6.21	Screened out		Background text to Policy ED4
Chapter 7: Retail and The Town Centre Sections 7.1 to 7.5	Screened out		Background to chapter 7
Policy TC1: Development in Rugby Town Centre	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the proposed development in Rugby Town Centre. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out
Sections 7.6 to 7.7	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy TC2: Rugby Town Centre Comparison and Convenience Floorspace Requirements	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 7.8 to 7.15			Policy listing general criteria for testing acceptability / sustainability of proposals including background text to Policy TC2
Policy TC3: Primary Shopping Area and Shopping Frontages	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 7.16 to 7.20	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals including background text to Policy TC3
Chapter 8: Healthy, Safe and Inclusive Communities Section 8.1 to 8.3	Screened out		Background introductory text for Chapter 8
Policy HS1: Healthy, Safe and Inclusive Communities	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals. It is of note that this policy highlights the need to improve the quality and quantity of green infrastructure networks

Sections 8.4 to 8.5			Background information to Policy HS1
Policy HS2: Health Impact Assessments	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 8.6 to 8.6a	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals. It is of note that the text makes reference to the value of incorporating green infrastructure to help address any health issues is such as improved air quality
Policy HS3: Protection and Provision of Local Shops, Community Facilities and Services	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 8.8 to 8.13	Screened out		Background to Policy HS3
Policy HS4: Open Space and Recreation	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Section 8.14 to 8.16	Screened out		Background to Policy HS4
Policy HS5: Traffic Generation and Air Quality, Noise and Vibration	Screened out	D	Environmental Protection / site safeguard Policy. This policy relates to avoiding air pollution
Section 8.17 to 8.18			Background to policy HS5
Chapter 9: Natural Environment Sections 9.1 to 9.3			Background to Chapter 9
Policy NE1: Protecting Designating Biodiversity and Geodiversity Assets	Screened out	D	Environmental Protection / site safeguard Policy. Policy NE1 has been updated to clarify the HRA process
Sections 9.4 to 9.8	Screened out	D	Environmental Protection / site safeguard Policy.
Policy NE3: Blue and Green Infrastructure Policy	Screened out	D	Environmental Protection / site safeguard Policy.
Sections 9.9 to 9.14	Screened out	D	Environmental Protection / site safeguard Policy.
Policy NE4: Landscape Protection and Enhancement	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals. It is of note that policy NE 4 also highlights the ' <i>importance of habitat biodiversity features</i> '
Sections 9.15 to 9.16	Screened out		Background information for Policy NE4
Chapter 10: Sustainable Design and Construction Sections 10.1 to 10.3	Screened out		Background to Chapter 10

Policy SDC1: Sustainable Design	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 10.4 to 10.11	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy SDC2: Landscaping	Screened out	D	Environmental Protection / site safeguard Policy. It is of note that this policy makes a commitment to retain and protect features of ecological significance in this policy and the linkage to policy NE 1
Section 10.12			Background to Policy SDC2
Section 10.13	Screened out	D	Environmental Protection / site safeguard Policy. The commitment to ideally plant indigenous trees and consider wildlife and ecological benefits in proposed landscaping is noted.
Sections 10.14 to 10.16	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy SDC3: Protecting and enhancing the Historic Environment	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 10.17 to 10.23	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy SDC4: Sustainable Buildings	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the proposed threshold for water supply per person per day. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Sections 10.25 to 10.33	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy SDC5: Flood Risk Management	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 10.34 to 10.37	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 10.38 to 10.40	Screened out	D	Environmental Protection / site safeguard Policy.
Section 10.41	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Section 10.42	Screened out	D	Environmental Protection / site safeguard Policy.
Policy SDC6: Sustainable Urban Drainage	Screened out	D	Environmental Protection / site safeguard Policy.
Sections 10.43 to			Background information to Policy SDC6

10.45			
Policy SDC7: Protection of the Water Environment and Water Supply	Screened out	D	Environmental Protection / site safeguard Policy.
Sections 10.46 to 10.50			Background information to Policy SDC7
Policy SDC8: Supporting the provision of renewable energy and low carbon technology	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals. It is of note that this policy also commits to ensuring proposals are designed to minimise adverse impacts to the natural environment and ecology.
Sections 10.51 to 10.59	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy SDC9: Broadband and mobile Internet	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the plan's policy on the provision of Broadband and mobile internet services to new developments. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Sections 10.60 to 10.65			Background information for Policy SDC 9
Chapter 11: Delivery. Sections 11.1 to 11.2			Background text to Chapter 11
Policy D1: Transport	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Sections 11.3 to 11.8	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy D2: Parking facilities	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the plan's policy on car parking facilities within development. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Section 11.9			Background information for Policy D2
Sections 11.10 to 11.11		B	Policy listing general criteria for testing acceptability / sustainability of proposals
Policy D3: Infrastructure and	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot

Implementation			undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the plan's policy on new infrastructure required to facilitate new development. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Sections 11.12 to 11.17	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). These sections outline policies relating to education provision, transport mitigation, water supply and GP or Secondary Health Care provision. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Policy D4: Planning Obligations	Screened out	B	Policy listing general criteria for testing acceptability / sustainability of proposals
Section 11.18			Background to Policy D4
Section 11.18a	Screened out	D	Environmental Protection / site safeguard Policy.
Sections 11.19 to 11.20			Background to Policy D4
Policy D5: Airport flightpath safeguarding	Screened out	F	Policy that cannot lead to development or other change
Section 11.21	Screened out		Background to Policy D5
Appendix 1: Implementation and Monitoring Framework	Screened out		This monitoring and implementation strategy / framework have been screened out and is categorised as general Statements of broad objectives (implications are assessed under the relevant policies in the plan and provided in the screening assessment above).
Appendix 2: Housing Trajectory	Screened out	H	Background information for the plan
Appendix 3: Infrastructure Delivery Plan	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines ' <i>what additional infrastructure and service needs are required to support and accommodate the level of development and growth proposed in the Local Plan</i> ' (RBC 2018).

			Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out. The only infrastructure that will fall outside of the borough is improvements to the existing University Hospitals Coventry and Warwickshire (UHCW) located in adjacent Coventry. As is illustrated in Figure 1 none of the Coventry Metropolitan Borough lies within the buffer zone around Ensor's Pool that would trigger the requirement for a project level HRA and hence this Appendix is screened out.
Appendix 4: Open Space Provision Tables	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the proposed open space within Rugby Borough. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Appendix 5: Car Parking Standards	Screened out	H	Policy or proposal the (actual or theoretical effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the plan's policy on new infrastructure required to facilitate new development. Given no functional pathways to impact European Sites have been identified (see Table 7 and Section 3) this policy can be screened out.
Appendix 6: Airport Safeguarding Flight Plan	Screened out		Background information
Appendix 7: Glossary of Terms	Screened out		Administrative text
Appendix 8: Air Quality Management Area	Screened out		Background information for Policy HS5 that has been assessed above as being an Environmental Protection Policy hence is screened out.

Table 10: Screening matrix for the Rugby Local Plan 2018

Appendix 5: Key to Operations Likely to Damage the Special Interest of the Site (OLDSIS)

Operations Likely to Damage the Special Interest of the Site (OLDSIS) considered relevant to the Rugby Local Plan as per Table 4 in Section 3.3.

Reference Number	Type of Operation	Relevant European Site
7	Dumping, storage, spreading or discharging of any materials or substances (including effluent disposal) (N.B Abstractions and discharges, and certain alterations of water levels, are subject to regulation by the Environment Agency through byelaws, licences and consents.)	River Mease
9	The release into the site of any wild, feral, captive bred or domestic animal (includes any mammal, reptile, amphibian, bird, fish or invertebrate), plant, seed or micro-organism (including genetically modified organisms).	River Mease
14a	The changing of water levels and tables and water utilisation (including irrigation, storage and abstraction from existing water bodies and through boreholes).	Ensor's Pool
14b	Water impoundment, storage and alterations to water levels and tables. Abstraction from surface and ground water bodies and water utilisation including irrigation flooding**.	River Mease
16a	The introduction of and alterations to freshwater fish rearing and production for fishing or food.	River Mease

Table 11: Table of Operations Likely to Damage the Special Interest of the Site (OLDSIS) for the River Mease and Ensor's Pool

Appendix 6: Summary of Targets for Ensor's Pool as per Draft Supplementary Advice 2018

The following is a summary of the Targets that have been set for Ensor's Pool as per Natural England's Draft Supplementary Advice on Conserving and Restoring Site Features (Natural England 2018).

- Maintain those management measures (either within and / or outside the site boundary as appropriate) which are necessary to maintain the structure, functions and supporting processes of those habitats able to support white-clawed crayfish;
- Maintain the current extent of the supporting habitat(s) (standing open water with marginal vegetation) associated with white-clawed crayfish;
- Maintain the current distribution and continuity of the feature's supporting habitat across the site;
- Maintain the ability of the feature's supporting habitat to adapt or evolve to wider environmental change, either within or external to the site;
- Ensure human activities within or around the site do not pose a significant risk of plague transfer;
- Maintain an absence of non-native crayfish within the site;
- Maintain the current extent and diversity of shoreline refuges associated with the water body, such as submerged roosts, bank crevices and marginal vegetation;
- Maintain supporting habitat at 'Good' biological status (i.e. compliance with relevant Environmental Quality Standards) in order to provide the necessary conditions to support a population of white-clawed crayfish;
- Maintain pH levels at within the range of 6.5 to 9;
- Maintain ammonia levels at or less than $0.6\text{mg NH}_3\text{l}^{-1}$ throughout the site;
- Maintain nitrogen levels typically at or below 0.2 mg/l-1 ;
- Maintain the pool in a well oxygenated state (typically with a dissolved oxygen standard of >70%);
- Ensure supporting habitat is not at risk of effluent discharges from within the site's wider catchment;
- Maintain calcium levels at or above 5mg/l ;
- Maintain the pool's water temperature at naturally occurring levels; and
- Maintain fish populations at densities low enough to avoid significant predation of juvenile crayfish which may be present.

Appendix 7: Summary of Targets for River Mease SAC as per Supplementary Advice 2016

The following is a summary of the Targets that have been set for Ensor's Pool as per Natural England's Draft Supplementary Advice on Conserving and Restoring Site Features (Natural England 2016a).

For H3260: *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation (H3260).

- Restore the total extent of the Water courses of plain to montane levels with *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation (H3260).
- Restore the extent and pattern of typical in-channel and riparian habitats to that characteristic of natural fluvial processes associated with this river type.
- Restore a patchy mosaic of natural woody and herbaceous (tall and short swards) and riparian vegetation. The riparian zone should be sufficiently wide to act as a healthy and functional habitat zone within the river corridor.
- Restore the presence of coarse woody material within the structure of the river channel. In smaller watercourses, temporary material dams should be a feature of channel dynamics.
- Restore a patchy mosaic of natural woody and herbaceous (tall and short swards) and riparian vegetation. The riparian zone should be sufficiently wide to act as a healthy and functional habitat zone within the river corridor.
- Restore the presence of coarse woody material within the structure of the river channel. In smaller watercourses, temporary material dams should be a feature of channel dynamics.
- Restore the natural flow regime of the river, with daily flows as close to what would be expected in the absence of abstractions and discharges.
- Restore the natural supply of coarse and fine sediment to the river.
- Restore a natural thermal regime to the river ensuring that water temperatures should not be significantly artificially elevated.
- Ensure the movement of river wildlife characteristic of *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation at this state is not significantly artificially constrained.
- Ensure any non-native species categorised as 'high-impact' in the UK are either rare or absent but if present are causing minimal damage to *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation.
- Restore the abundance of the typical species listed below to enable each of them to be a viable component of *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation.
- Maintain fish densities at a level at or below the natural environment carrying capacity of the river.
- Restore grazing activity in the riparian zone and in the river channel at or to suitably low levels.
- Maintain a sufficient proportion of all aquatic macrophytes to allow them to reproduce in suitable habitat and unaffected by river management practices
- Restore any supporting riverine habitats beyond the site boundary upon which the *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation (H3260) feature of the site depends.
- Restore a natural nutrient regime to the river Mease, with any anthropogenic enrichment above natural/background concentrations limited to levels at which adverse effects on characteristic biodiversity are unlikely.
- Restore organic pollution to published levels (Natural England 2016a)
- Maintain (or restore where resilience is degraded) the *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation (H3260) ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either with or external to the site.
- Achieve at least 'Good' chemical status by 2021.
- Maintain the management or other measures necessary to restore the structure, functions and supporting processes associated with *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation (H3260).

S1355 Otter *Lutra lutra*

- Restore the quality of supporting river habitat features, based on the advice for the *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation feature, based on natural river function, which provides characteristic habitats for otters.
- Restore the quality of supporting waterway habitat.
- Maintain fish biomass within the expected natural levels for the supporting habitat (subject to natural fluctuations).
- Restore and abundance of natural breeding and resting sites within the SAC.
- Restore an abundance of dense bankside vegetation to limit significant disturbance to otters.
- Restore the natural flow regime of the river to that close to what would be expected in the absence of abstractions and discharges (the 'naturalised' flow).
- Restore river water quality and quantity to a standard which provides the necessary conditions to support otter.
- Reduce the presence of pollutants within the SAC, which are potentially toxic to otters.
- Ensure there are no significant artificial barriers to the safe passage and movement of otters into, within and away from the SAC.

- Restore then maintain a continued presence of an activity-breeding otter population within the SAC, whilst avoiding deterioration from its currently level as indicated by the latest mean peak count, estimate or equivalent.
- Restrict levels of otter mortality as a result of anthropogenic (man-made) factors so that they are not adversely affecting the overall abundance and viability of the otter population.

S1092 White-clawed crayfish *Austropotamobius pallipes*

- Restore the presence of a moderate level of abundance of the white-clawed crayfish population, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.
- Restore the absence of non-native crayfish species from within the SAC and the catchment surrounding the site
- Restore the absence of individuals within the site infected with crayfish plague or porcelain disease.
- Ensure human activities within or around the SAC do not pose a significant risk of plague transfer to the crayfish population.
- Restore the physical structure of the river channel and its banks to a natural state.
- Restore an abundance of naturally-occurring cobbles, rubble and boulders on the river bed.
- Restore an abundance of large woody material within the river channel
- Restore the extent of submerged and marginal vegetation within the river channel
- Increase the extent of bankside tree cover including their root systems to 30%.
- Restore the extent and diversity of shoreline refuges associated with the river channel, such as submerged tree roots, bank crevices and marginal vegetation.
- Restore supporting habitat to 'good' biological status, throughout the site.
- Maintain freshwater pH levels at within the range of 6.5 to 9.
- Reduce ammonia levels to less than 0.6mg NH³ l⁻¹ throughout the site.
- Restore levels typically at or below 0.2mg.l⁻¹ NO² suggested as reflecting the EPA limit for salmonid waters
- Maintain supporting habitat in a well-oxygenated state, typically within a dissolved oxygen standard of >70%.
- Maintain an annual mean level of typically less than 25 mg/l of suspended solids throughout the river.
- Maintain river calcium levels at or above 5mg/l
- Restore the quality of any supporting habitat present beyond the site boundary upon which the white-clawed crayfish population of the site depend.
- Ensure the movement of white-clawed crayfish within the site is not artificially constrained.
- Maintain water temperature at naturally-occurring levels
- Maintain fish population at densities low enough to avoid significant predation of juvenile crayfish.

S1149 Spined loach *Cobitis taenia*; S1163 Bullhead *Cottus gobio*

- Restore juvenile densities at those expected under un-impacted conditions throughout the site, taking into account natural habitat conditions and allowing for natural fluctuations. For spined loach, at least 40% of the population should consist of 0+ fish.
- Restore the abundance of the populations to the levels below, which are similar to that expected under un-impacted conditions throughout the site whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.
- For spined loach adult population densities who should be greater than 0.2/m², with at least three year-classes should be present at significant densities. At least 40% of the population should consist of 0+ fish and the largest females attach a fork length >85mm. For bullhead, densities should be not less than 0.5m² and young-of-year fish should occur at densities at least equal to adults. There should be four age classes with 0+ individuals at least 40% of population and the largest females attain a fork length .75mm.
- Ensure fish stocking/ introductions do not interfere with the ability of the river to support self-sustaining populations of spined loach and bullhead.
- Restore the natural nutrient regime in the river, with any anthropogenic enrichment above natural / background concentrations limited to levels at which adverse effects on the feature are unlikely.
- Maintain management or other measures necessary to restore the structure, functions and supporting processes associated with the feature and/or its supporting habitat.

Appendix 8: Draft Recording the Conclusion of the Habitat Regulations Assessment.

Template for recording the conclusion of the Habitat Regulations Assessment

This template is directly from the HRA Handbook **will be completed in full following the public and statutory consultation in 2018.**

Extract from the HRA Handbook 2013

RECORD FOR A PLAN WHICH WOULD NOT BE LIKELY TO HAVE A SIGNIFICANT EFFECT ON ANY EUROPEAN SITE, EITHER ALONE OR IN COMBINATION WITH ANY OTHER PLAN OR PROJECT

Introduction and conclusion of the assessment

The Rugby Borough Council Local Plan – 2011-2031 was considered in light of the assessment requirements of regulation 61 of the Conservation of Habitats and Species Regulations 2010 by Rugby Borough Council which is the competent authority responsible for adopting the plan and any assessment of it required by the Regulations.

Having carried out a ‘screening’ assessment of the plan, the competent authority has concluded that the plan would not be likely to have a significant effect on any European site, either alone or in combination with any other plans or projects (in light of the definition of these terms in the ‘Waddenzee’ ruling of the European Court of Justice Case C – 127/02) and an appropriate assessment is not therefore required.

Natural England was consulted on this conclusion and.... Any relevant written responses are appended and referred to below (and in Appendix 1).

Information used for the assessment

A copy of the list used to scan for and select European sites potentially affected by the plan is appended as Table 3 in Section 3.1 of this report.

A summary of the information gathered for the assessment is presented in the Information Required for Assessment table, which is appended as Section 3.3 of this report in particular Table 4.

The screening of the plan

A summary of the outcomes of the screening process is given in the screening schedule below (and re-screening schedule where relevant), which is appended as Table 9 in Section 3.5 and Table 10 in Appendix 4.

Mitigation measures

In reaching the conclusion of the assessment the competent authority took the following mitigation measures into account:

No specific mitigation measures required. Information on ‘International and European Sites’ have been added to Policy NE1 as suggested by Ecological Services at Warwickshire County Council and agreed by Natural England in 2016 .

Assumptions and limitations

The screening conclusion necessarily relies on some assumptions and it was inevitably subject to some limitations. Most of the assumptions and limitations would not affect the conclusion but the following points are recorded in order to ensure that the basis of the assessment is clear.

Limitations and Assumptions are provided in Section 2.4 of this HRA report.

References and reports

In reaching the conclusion of the assessment the competent authority took the following documents into account:

References used in this HRA report are provided in Section 6.

Further supplementary information is provided in this report: Draft Screening Report Habitat Regulations Assessment (HRA) for Rugby Borough Council Local Plan July 2018.

Dated: **TBC**

Copy sent to Natural England on **TBC**

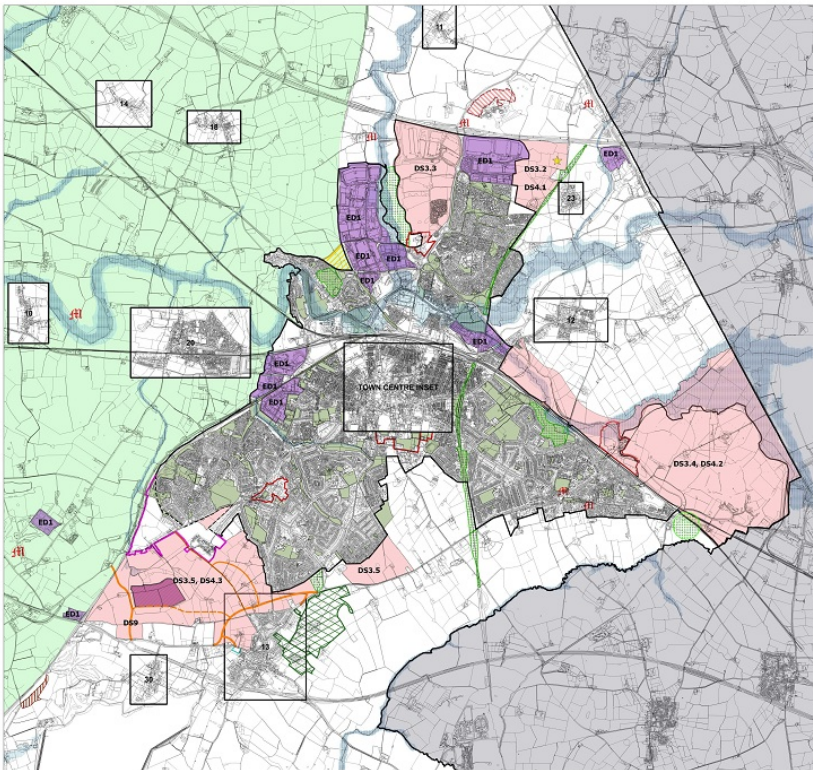
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Local Plan Post Hearings Main Modifications consultation – APPENDIX 5

Proposed Policies Map Modifications		
Ref	Policy/paragraph No.	Proposed Change /Reason for Change
P1	Proposals Map - General	Change all titles from 'Proposals Map' to 'Policies Map'
P2	Urban Proposals Map	New indicative layout of Southwest Link Road now shown.
P3	Urban Proposals Map	Policy Reference for South West Link Road added.
P4	Urban Proposals Map	Small parcel of South West allocation south of Coventry Road removed – previously shown in error.
P5	Urban Proposals Map	Southwest safeguarded area now shown.
P6	Urban Proposals Map	Urban boundary amended by Cawston and Lime Tree village.
P7	Urban Proposals Map	Mast Site Allocation amended from DS4.1 to DS4.2
P8	Urban Policies Map	Removal of proposed Coton House Allocation (DS3.7)
P9	Urban Policies Map	Insertion of symbol to illustrate indicative location of Coton Park East Combined School as recommended by Inspector.
P10	Urban Policies Map	Triangular area to the South of Brownsover Road highlighted to show not coming out of Green Belt and no alteration to the Urban Edge at this location (not highlighted on previous modifications map).
P11	Town Centre Proposals Map	Revised Town Centre boundary to include Clifton Road shops.
P12	Town Centre Proposals Map	Existing nearby Local Wildlife Site now shown.
P13	Rural Proposals Map	Existing SSSI and Flood Zones in Coombe Abbey now shown (previously hidden by layer).
P14	Rural Proposals Map	Key amended to specify employment sites are in the Green Belt for clarity.

Local Plan Post Hearings Main Modifications consultation – APPENDIX 5

P15	Rural Proposals Map	SSSI areas given alternative style to make clearer.
P16	Rural Policies Map	Removal of proposed allocation Lodge Farm, Daventry Road (DS3.15)
P17	Dunchurch Village Inset Map	New map, not part of the Publication Draft documents. South West Allocation and South West Link Road now shown
P18	Brandon Village Inset Map	New map, not part of the Publication Draft documents. Existing Area of Open Space now shown at junction of Main Street and Rugby Road.
P19	Brinklow Village Inset Map	Existing Area of Open Space now shown South of George Birch Close
P20	Brinklow Village Inset Map	Removal of proposed allocation Land off Lutterworth Road, Brinklow (DS3.7).
P21	Green Infrastructure Map	Blue Infrastructure displayed on map.
P22	Green Infrastructure Map	Area of Potential G.I Corridor altered to include Cock Robin Wood and extend along north side of Rainsbrook Valley to Ashlawn Cutting.
P23	Green Infrastructure Map	Draycote Water highlighted as Blue Infrastructure instead of Green.
P24	Green Infrastructure Map	Green Infrastructure corridors extending outside of Borough boundary ‘trimmed’ as outside of Authority limits and not necessary to display.



Key **Policy Number**

	Urban Edge	
	Allocated Sites	DS3, DS4
	Conservation Area	SDC3
	Employment Site	ED1
	Flood Zone 2	SDCS
	Flood Zone 3	SDCS
	Green Belt	GP2
	Local Wildlife or Geological Site	NE1
	Open Space	HS4
	Registered Park and Garden	SDC3
	SSSI	NE1
	Scheduled Ancient Monument	SDC3
	Inset Maps	

Modifications

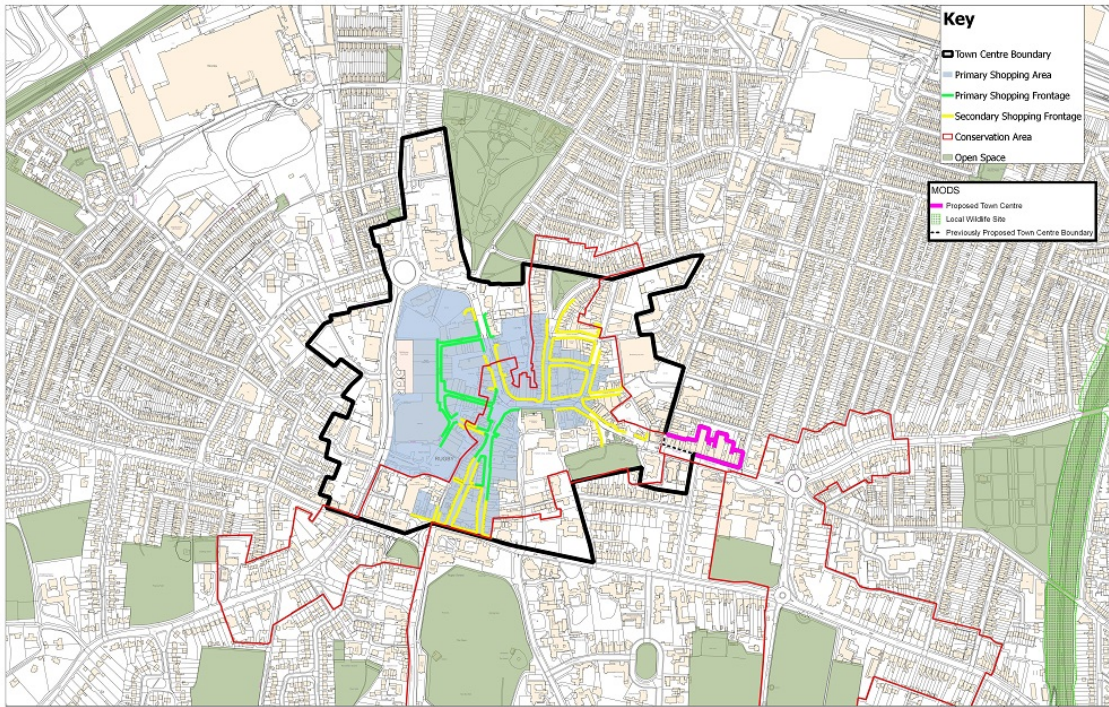
- Proposed Urban Edge Boundary Extension
- 2011 Core Strategy Urban Edge (Cawston Area Only)
- Southwest Allocation Safeguarded Area
- Southwest Allocation Amendment (Removal of Area)
- Revised Indicative Southwest Link Road Layout
- Brownscover Road Amendment (Removal of Proposal to take out of Green Belt and alter Urban Edge boundary)
- Cotton House Allocated Site Removal (DS3.1)
- Indicative Site for Proposed Combined Primary and Secondary School (Cotton Park East)

Note: Air Quality Management Areas and County Airport Flight Paths and Diversion (shown) Refer Technical Site Subgrouping 'Core' rules to the map



Scale 1:20,000 at A1





Key

-  Town Centre Boundary
-  Primary Shopping Area
-  Primary Shopping Frontage
-  Secondary Shopping Frontage
-  Conservation Area
-  Open Space

MODS

-  Proposed Town Centre
-  Local Wildlife Site
-  Previously Proposed Town Centre Boundary

Town Centre - Proposed Extension to Town Centre Boundary

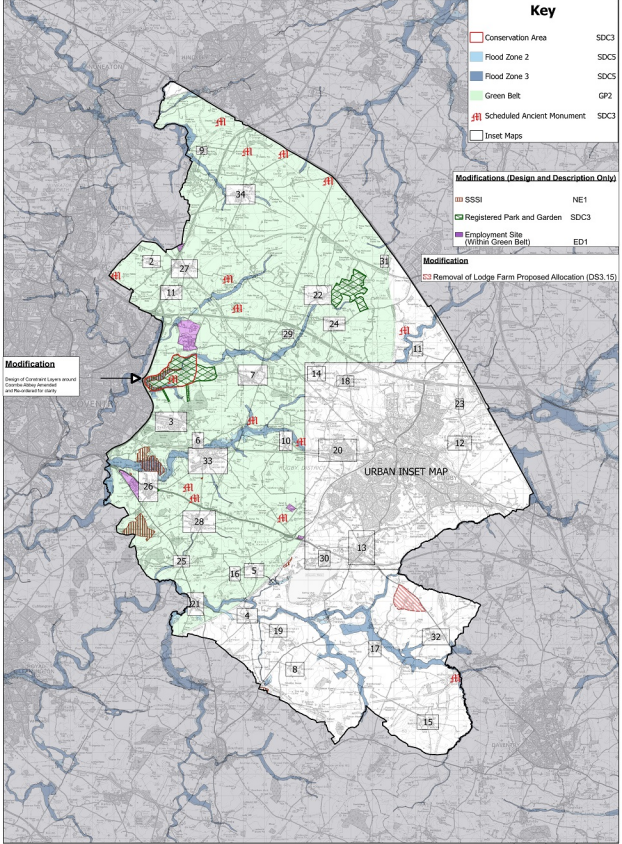


Key

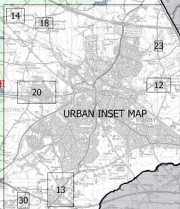
	Conservation Area	SDC3
	Flood Zone 2	SDC5
	Flood Zone 3	SDC5
	Green Belt	GP2
	Scheduled Ancient Monument	SDC3
	Inset Maps	

Modifications (Design and Description Only)		
	SSSI	NE1
	Registered Park and Garden	SDC3
	Employment Site (Within Green Belt)	ED1

Modification	
	Removal of Lodge Farm Proposed Allocation (DS3,15)



Modification
 Design of Conservation Layers around Corbridge Abbey awarded and Resubmitted for study



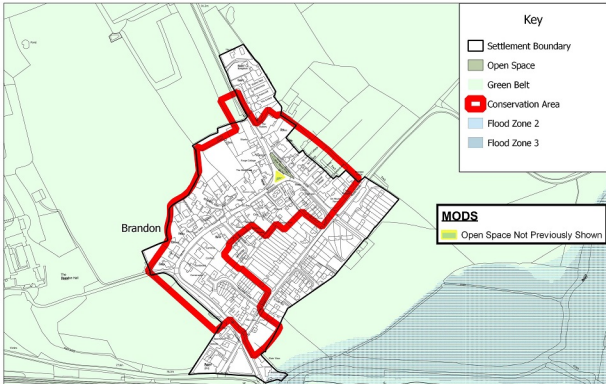
Rural Policies Map - Modifications



Development Strategy

Date: July 2018
 Scale: 1:50,000 (approximate)
 Ordnance Survey 2008 Plan 7





Key

-  Settlement Boundary
-  Open Space
-  Green Belt
-  Conservation Area
-  Flood Zone 2
-  Flood Zone 3

MODS

-  Open Space Not Previously Shown

Brandon

Brandon



Local Plan Information System

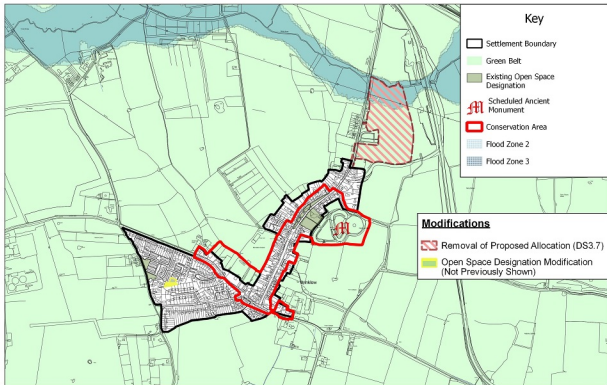
Development History

3/4/17

Scale
1:4,000
(see also grid)

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Ordnance Survey 100019167





Brinklow - Open Space Designation and Removal of Proposed Allocation Modifications



Local Plan

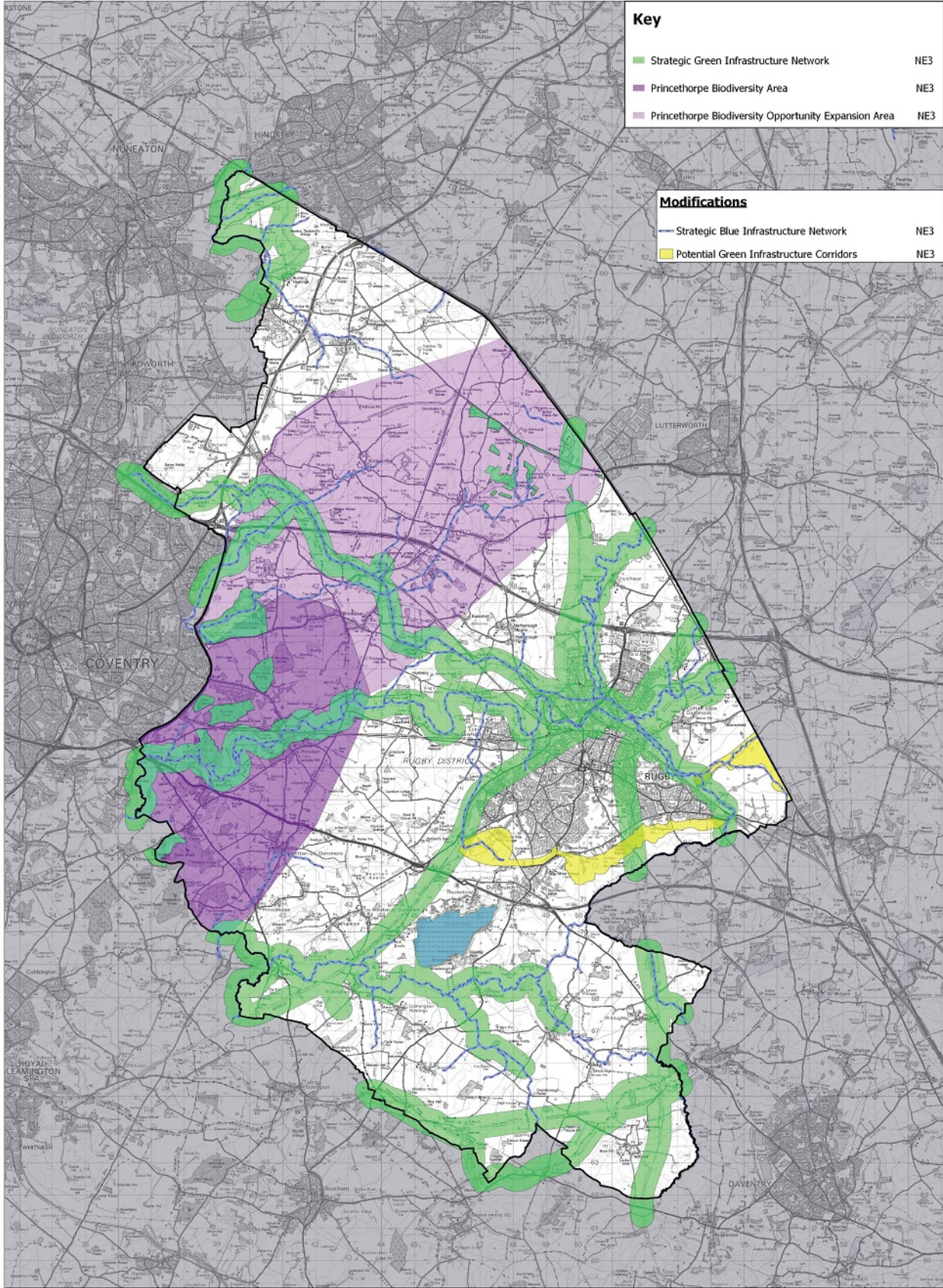
Development Strategy

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Ordnance Survey 100019467

July 18

Scale
1:10,000
(see page 10)





Key	
■ Strategic Green Infrastructure Network	NE3
■ Princethorpe Biodiversity Area	NE3
■ Princethorpe Biodiversity Opportunity Expansion Area	NE3

Modifications	
— Strategic Blue Infrastructure Network	NE3
■ Potential Green Infrastructure Corridors	NE3

Green and Blue Infrastructure Policies Map



Development Strategy

Date: Jun 2015
 Scale: 1:50,000
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 Ordnance Survey 100049417



Local Plan Post Hearings Main Modifications – APPENDIX 6

Document title: Local Plan post-hearings main modifications consultation.	
Nature of Plan being prepared	This document is a schedule of main modifications to be made to the Rugby Local Plan Publication Draft. The Publication Draft document was submitted to the Secretary of State in July 2017 and is undergoing an examination by the appointed Inspector. The full Local Plan document, that these modifications are amending, covers Rugby Borough for the years 2011-2031. It sets out the Council's policies and proposals to support the development of the Borough through to 2031.
Purpose of consultation	The main modifications to the Rugby Borough Local Plan Publication Draft have been prepared under the Planning and Compulsory Purchase Act 2004. The Council is seeking representations on the "soundness" of the main modifications contained within this schedule under the Town and Country Planning Regulations 2012. The responses to the consultation will be considered by the Planning Inspector who will subsequently write his final report drawing his conclusions on the Local Plan.
Nature of issues that need to be consulted upon	The Main Modifications include those recommended by the Inspector in his letter to the Council on the 16 th May 2018. They also include modifications put forward by the Council both prior to and during the examination.
Who should be consulted	All individuals and organisations on the Register of Consultees database are being consultee directly either via email or letter. The consultation will also be publicised in the local newspaper and on the Rugby Borough Council website.
Why are we consulting	The consultation is to obtain a broad range of views and input from members of the public, statutory consultees and interested parties on the main modifications.
When will the consultation take place	Consultation will take place between Tuesday the 14 th August and Friday the 5 th October 2018.
Accessible Inclusive Consultation	Notifications will be made in the local newspaper, online and by email and post. Electronic copies of the documents will be available to download with hard copies available in local libraries. Hard copies can also be provided to individuals on request. Representation can be received in several formats; via an online form, via email or my post.
How comments will be taken into account	All comments received will be given full consideration by the Planning Inspector.
How will comments be reported	Responses received will be considered by the Inspector and will be a consideration for his final report. The representations will be made public by the Council following the close of the consultation.

Local Plan - Table of Minor Modifications – APPENDIX 7

Key

New text proposed to be added: underlined text

Previous text proposed to be deleted: ~~strikethrough text~~

Comments in *[italics]*

Chapter 1: Introduction			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
1	Appendices	<u>8. Air Quality Management Area</u>	To add appendix 8 on the Air Quality Management Area
2	Index of Policies	Delete: DS10: Lodge Farm TC4: Primary Shopping Area and Shopping Frontages Add: TC3: Directing Development in the Town Centre <u>TC3: Primary Shopping Area and Shopping Frontages</u> NE2: Biodiversity NE32: Blue and Green Infrastructure Policy NE43: Landscape Protection and Enhancement	
3	Paragraph 1.1	The Council has a statutory duty to prepare, monitor and review a Development Plan for the Borough. This document is Rugby Borough Council’s Publication Draft for the Local Plan. It sets out the Council’s policies and proposals to support the development of the Borough through to 2031. The Local Plan is the foundation and most important component of the wider Development Plan which will also include a Community Infrastructure Levy (CIL) Charging Schedule, A Gypsy and Traveller Site Allocations <u>Development Plan Document</u> and a collection of Supplementary Planning Documents.	Minor update of text.

Minor Modifications

4	Paragraph 1.3	The Local Plan will replaces the Core Strategy June 2011 and the policies saved from the Rugby Borough Local Plan 2006.	Minor update of text
5	Paragraph 1.4	This Local Plan has been prepared under the Planning and Compulsory Purchase Act 2004. The Council is seeking representations on the “soundness” of the proposals contained within this Publication Draft under regulations 19 and 20 of the Town and Country Planning Regulations 2012, prior to submitting it to the Secretary of State for an independent examination by an Inspector. This document has therefore been published for the purpose of public consultation.	Minor update of text
6	Paragraph 1.12	This document outlined the then current position in relation to the performance of the Core Strategy against its housing target and in the context of the NPPF. The recently undertaken Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) was also introduced and its implications for Rugby outlined. The implications of these factors on the Council’s adopted housing targets and land supply were outlined and it was proposed that the Core Strategy be replaced by a new Local Plan.	Minor update of text
Chapter 3: General Principles			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
7	Paragraph 3.3	The Local Plan has been written to provide the starting point for guiding growth and creating and delivering sustainable development. This echoes the approach of Government guidance set out in the National Planning Policy Framework (March 2012).	Minor text update due to forthcoming NPPF
8	Policy GP2	Development will be allocated and supported in accordance with the following Settlement Hierarchy, as defined on the Proposals Policies Map: Rugby town Main focus for all development in the Borough. Developme permitted within existing boundaries and as part of allocate Sustainable Strategic Urban Extensions.	To reflect correct terminology

Minor Modifications

9	Paragraph 3.8	The Spatial Strategy <u>Settlement Hierarchy</u> has informed the site allocations introduced in Policies DS3 and DS4 and <u>is</u> set out in more detail in policies DS7- DS10 <u>DS9</u>	For clarity.
10	Paragraph 3.18	Policy GP3 seeks to support the redevelopment of previously developed land but maintains that any redevelopment does not result in an unacceptable impact.	Minor grammatical change
11	Paragraph 3.19	The purpose of Policy GP3 is to ensure that the conversion of buildings, in particular rural buildings, are done sympathetically to their surroundings. The buildings should be substantial and good quality buildings, which are capable of conversion with little change to their character, appearance and setting. The building should require little in the way of alteration, extension or rebuild for its conversion. Its is acknowledged that the sensitive conversion of traditional rural buildings may result in either bringing a new <u>an old</u> building back into use or the conversion to a more suitable use.	Grammatical correction.
12	Paragraph 3.20	Policy GP3 must be considered in context with other policies in the Development Plan, mainly in terms of sustainable development and the provision of the necessary infrastructure to support any redevelopment. Where redevelopment of previously developed land or conversion of existing buildings is within the Green Belt, guidance is provided on the appropriateness in national policy. Policy GP3 is worded in the context of the provisions for prior approval as contained within the Town and Country Planning (General Permitted Development) (England) Order 2015 (<u>as amended</u>) for the conversion of existing buildings.	To reflect subsequent regulation changes
13	Paragraph 3.24	The Localism Act brought into force the ability of a neighbourhood to create a Neighbourhood Plan. Unlike other previously produced parish level documents, a Neighbourhood Plan forms part of the Development Plan and sits alongside the Local Plan. Decisions on planning applications will be made using both the Local Plan and the Neighbourhood Plan (alongside other material considerations). It is therefore not necessary to have a policy relating to Neighbourhood Plans in the Local Plan as they form part of the development on their own.	Removal of sentence inserted in error.

14	Paragraph 3.26	However, the production of a Neighbourhood Plan may not be the right approach for a community to establish their view for their area and a non-statutory document such as a Parish Plan (or equivalent) may be more appropriate. Policy SD6 above details the context in which such documents can inform decision making.	Removal of sentence inserted in error.
Chapter 4: Development Strategy			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
15	Paragraph 4.3	As established through the Settlement Hierarchy outlined at Policy GP2, Rugby town is the most sustainable location for growth in Rugby Borough. As detailed later in this chapter a significant quantity of development has been approved on the Rugby urban edge. However, further allocations are required as part of this Local Plan. In identifying the proposed strategic sites the Council was informed by the sustainability appraisal process in combination with the evidence collected and national guidance. The Strategic Housing Land Availability Assessment (SHLAA) identified the deliverability of further sites on the Rugby urban edge to accommodate a significant proportion of the development required, however, there is insufficient capacity at Rugby town or its urban edge to deliver the entire housing target within the plan period. The Settlement Hierarchy informed the selection of further sites.	
16	Paragraph 4.8	The Rugby Borough 'Employment Land Study' (May 2015) concludes that 96 - 128 hectares of employment land is required within Rugby Borough throughout the plan period (6 – 8 hectares per annum) in order to support economic growth and balance the provision of new jobs with housing provision. Work informing the Local Plan has considered the extent of sites proposed for employment development, evidence of jobs growth forecasts and labour supply figures for the plan period, and average rates of past employment land take-up over a number of recent time periods, to provide an employment land target that aligns with the housing growth needs of the Local Plan. The combination of these factors has led to the target, of 110 hectares of gross employment land provision, being situated within the middle of the range recommended in the Employment Land Study, which is considered to provide an	Sentence duplicates reference to consideration of employment land completions/past take-up already included in para.4.8, and is therefore unnecessary.

		appropriate level of flexibility over employment land completions trends in both over the longer term and in more recent years.	
17	Paragraph 4.11	This 'step change' in delivery is considered appropriate. Until adoption of this Local Plan it would be perverse to retrospectively apply a higher housing target to past years than is required to meet the needs of Rugby Borough, or has been adopted in local planning policy. Upon adoption, the housing target will has been increased to take account of shortfall arising in Coventry City and the annual housing target is therefore increased to reflect this. The housing trajectory appended to the Local Plan demonstrates how the housing target will be achieved whilst and complying with the requirements of national planning policy, particularly those relating to land supply. met	Minor update and typographical change.
18	Paragraph 4.22	The criteria set out within Polciy DS2 are consistent with the Planning Policy for Traveller Sites (PPTS) and will help guide future planning applications and site allocations. The approach of the Local Plan is to preferably locate residential development in sustainable locations that are well served by services and facilities. Whilst Rugby Borough has only one urban area, the requirement to locate sites adjacent to urban boundaries may equally be satisfied through its proximity to the administrative areas of Coventry, Nuneaton or Hinckley. It is acknowledged that approximately two thirds of Rugby Borough is designated Green Belt and therefore the Council can assist in the requirement to assess locations that do not fall under this designation.	Minor change
19	Policy DS3	Policy DS3: Residential allocations The following sites will be allocated for residential development and associated infrastructure and uses as shown on the Proposals Policies Map:	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728
20	Paragraph 4.29	The combination of these Sustainable Strategic Urban Extensions and development sites results in an over allocation of growth to the town when considered against the housing target. The Council anticipates delivery of the Rugby Radio Station and South West Rugby in particular will continue into the next plan period, and there are	Minor typographical correction.

		clear benefits in allocating these sites as opposed to allowing the potential for piecemeal development to come forward in an unsustainable way. Each Sustainable Urban Extension is supported by a comprehensive masterplan to ensure the timely delivery of the necessary infrastructure to support the needs of future residents and minimise the impact on existing services. The type, amount and timing of the infrastructure is outlined in the remaining policies contained within this chapter.													
21	Paragraph 4.37	The urban boundary and some Main Rural Settlement boundaries have been altered in order to accommodate housing allocations and this has therefore released land from the Green Belt. The adoption of this Local Plan and the Proposals <u>Policies</u> Map has also released land at M6 Junction 2 from the Green Belt, as evidenced by the Coventry and Warwickshire Joint Green Belt Review 2014.	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728												
22	Policy DS4	<p>Policy DS4: Employment allocations</p> <p>The following sites will be allocated for employment development and associated infrastructure and uses as shown on the <u>Policies</u> Proposals-Map:</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Site name</th> <th>Allocation</th> </tr> </thead> <tbody> <tr> <td>DS4.1</td> <td>Coton Park East</td> <td>7.5 ha</td> </tr> <tr> <td>DS4.2</td> <td>Rugby Radio Station*</td> <td>16 ha</td> </tr> <tr> <td>DS4.3</td> <td>South West Rugby</td> <td>35 ha</td> </tr> </tbody> </table> <p>*planning permission granted and construction commenced</p>	Ref	Site name	Allocation	DS4.1	Coton Park East	7.5 ha	DS4.2	Rugby Radio Station*	16 ha	DS4.3	South West Rugby	35 ha	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728 and factual update.
Ref	Site name	Allocation													
DS4.1	Coton Park East	7.5 ha													
DS4.2	Rugby Radio Station*	16 ha													
DS4.3	South West Rugby	35 ha													
23	Paragraph 4.38	58.5 ha of employment land will be provided as part of the <u>Sustainable Strategic</u> Urban Extensions allocated in this plan at Coton Park East, Rugby Radio Station and South West Rugby.	Minor typographical correction.												
24	Paragraph 4.30	Land at Brownsover Road is not considered to serve the purposes of the Green Belt and this designation has therefore been removed and the Green Belt boundary amended accordingly, as shown on the Proposals - <u>Policies</u> Map.	Minor change to accord with Planning Practice												

Minor Modifications

			Guidance paragraph 001 Ref ID: 12-001-20170728
25	Paragraph 4.43	The Any masterplan masterplan SPD, and or subsequent development briefs <u>will</u> clearly demonstrate how the mix of uses and infrastructure requirements set out in Policies DS3 (residential allocation) and DS4 (employment allocation), and articulated within the Infrastructure Delivery Plan and on the <u>Policies Proposals</u> Map, will be planned for and delivered to ensure the development is sustainable and meets the Policies set out elsewhere in this Local Plan.	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728
26	Paragraph 4.51	Policy DS7 contains what is considered to be the maximum approximate development capacity of the site whilst ensuring the sustainable delivery of the extension. The specific infrastructure requirements are detailed in the Infrastructure Delivery Plan contained in Appendix 3 which has been informed by service providers such as Warwickshire County Education, Highways Agency, Rugby Borough Council and the promoters of the land.	Minor typographical corrections.
27	Policy DS7	This development site, as shown on the Proposals <u>Policies</u> Map, is allocated to provide up to <u>around</u> 800 dwellings and 7.5 ha employment land.	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728
28	Policy DS8 8 th paragraph	Development proposals must come forward comprehensively and be in accordance with Policy DS9 below , the Proposals <u>Policies</u> Map, and the Infrastructure Delivery Plan.	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728
29	Pararagph 4.58	However, this Policy DS8 also seeks to be mindful of the proximity of this proposed development to Dunchurch... ...and the second is to act as an important green infrastructure corridor, connecting Cawston Spinney to Cock Robbin Wood.	Correct typo Correct typo
30	Policy DS9 First ParagraphSouth West Rugby spine road network to support and enable the delivery of the South West Rugby allocation, as identified on the plan below and <u>Urban</u> Proposals <u>Policies</u> Map.	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728

31	Paragraph 4.67	The first option is a spine road network is proposed through DS9 to connection across to Potsford Dam Farm, on the A4071, as identified on the Proposals Policies- Map	Minor change to accord with Planning Practice Guidance and to add clarity.
32	Paragraph 10.58	All weirs and dams associated with hydropower schemes will require <u>an Environmental Permit from the prior written Flood Defence Consent of the Environment Agency</u> if on a Main River and consent from <u>Warwickshire County Council</u> as the Lead Local Flood Authority if affecting an Ordinary Watercourse.	Flood Defence Consents are now a part of Environmental Permitting Clarification of WCC as LLFA added for guidance.
Chapter 5: Housing			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
33	Paragraph 5.5	Whilst not exclusively restricted to the rural area a further exception to the general policy of restraint outside of Rugby town relates to development that directly addresses the needs of Gypsies and Travellers. Gypsies and Travellers are a diverse group and have different origins, traditions and ways of travelling in comparison with the settled community. Gypsies are recognised as a minority ethnic group and as such are protected by the Race Relations Act 2000. In addition to the needs of Gypsy and Travellers, Government guidance makes provision for the needs of Travelling Show peoplemen , who have similar, but distinct accommodation needs to that of Gypsies. As detailed below recent change in the Planning Practice for Traveller Sites requires the council to take stock of current evidence, the duty on Local Authorities remains to meet the accommodation needs of Gypsy and Travellers and Travelling Show peoplemen .	Minor change to update text.
34	Paragraph 5.8	It is therefore important that the Local Plan provide enough homes to meet the aspirations of local people and to house new people moving to the area in order to support economic objectives. In addition to ensuring that sufficient housing is delivered, the Local Plan must ensure that the housing needs of different types of households are fulfilled by providing the right types and mix of housing within the Borough. Providing the right types of homes is essential to ensuring that development does not compound the existing housing problems, such as affordability, and to ensure that we provide for current and future residents. It is	Minor update of text

		expected that the mix of housing will vary site-by-site and will be informed by local evidence provided by the Coventry and Warwickshire joint Strategic Housing Market Assessment, 2013 <u>and its 2015 update</u> (SHMA), or relevant future SHMA updates commissioned by the Council.	
35	Paragraph 5.26	Where there is insufficient evidence of the financial soundness of a business, for example in the case of a new rural enterprise, temporary permission may be granted for a period of 3 years provided that criteria a), b), <u>and d)</u> and e) in Policy H3 are met.	Text correction as there is no criteria e) in policy H3.
36	Paragraph 5.30	Policy H4 provides an exception to the spatial strategy and provides the opportunity for the delivery of small numbers of rural housing on land outside but adjoining the development limits of Main Rural Settlements and Rural Villages that may not fulfil all the criteria set out in Policy H4 <u>other policies in the Local Plan</u> .	Minor rewording of text to improve meaning of sentence.
37	Paragraph 5.41	The SHMA provides an indication of the levels of demand expected in the Borough over the course of the plan period as indicated in the table below. This shows the annual requirement for market Extra Care provision of 72 units and 22 affordable Extra Care units. The SHMA recommends that of the total 94 units required 23% should be affordable. The <i>Viability and Deliverability</i> Section details the viability work that will inform the submission <u>Local Plan</u> . The affordable element <u>is</u> indicated in the table below; will be tested as part of this work .	Minor update of text.
38	Paragraphs 5.42 and 5.43	5.42 As with market housing national guidance requires that Local Plans inform the tenure of supported care housing, which Policy H6 and the table in paragraph 5.40 2 seeks to do. 5.43 Although the Borough already benefits from a good range of different types of care, both publically and privately maintained, the table in paragraph 5.40 2 demonstrates that the need is clearly growing.	Minor renumbering reference in text.
Chapter 6: Employment			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change

39	Paragraph 6.1 Second sentence	Rugby Borough's economy has performed strongly in the past and fared the most recent UK recession relatively well. Unemployment levels are currently below 4% and the Borough has a strong skills profile amongst its residents, with average earnings as a result above both national and regional (West Midlands) levels. This level of economic performance is important in supporting continued population growth in the Borough and providing the jobs needed to support the delivery of new housing through the Local Plan.	Minor grammatical change for consistency
40	Paragraph 6.10	In relation to the provisions of Policy ED1, designated employment sites in Rugby Borough are shown on the Proposals <u>Policies</u> Map and are listed as follows:	Minor change to accord with Planning Practice Guidance paragraph 001 Ref ID: 12-001-20170728
Chapter 7: Retail and the Town Centre			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
41	Paragraph 7.3	The study also reviewed the Town Centre Boundary, Primary Shopping Area (PSA) and introduces P primary and S secondary S shopping F frontages in accordance with the NPPF.	Minor grammatical change for consistency
42	Paragraph 7.4	The primary shopping frontages are identified within the Primary Shopping Area (PSA), as identified on the Town Centre <u>Policies Map</u> , and these areas include a high proportion of retail uses which may include food, drinks, clothing and household goods.	Minor grammatical change for consistency
44	Policy TC1	Policy TC1: Development in Rugby Town Centre Proposals for the redevelopment and refurbishment of the existing natural and built environment and public space, including new development proposals, within the town centre (as defined on the Town Centre Policies <u>Proposals</u> Map) will demonstrate ...	Minor terminology change for consistency
45	Paragraph 7.16	TC4-TC3 seeks to protect and enhance the primary shopping area, with the PSF as the focus for retail uses. The intention is to attract people to the town and place a strong emphasis on the protection of the core of retail activity at the heart of the town centre. Change of use away from A1 to other complementary main town centre uses can occur within the PSF. However, proposals will need to be considered on a	Re-number of Policies after removal of an earlier Policy

		case by case basis in terms of the impact on the retail character and function and also on the vitality and viability of the town centre.	
Chapter 8: Healthy, Safe and Inclusive Communities			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
46	Policy HS1 Third bullet point	Support will be given to proposals which: <ul style="list-style-type: none"> design and layouts that development to minimise the potential for crime and anti-social behaviour and improve community safety; 	Minor textual change
47	Policy HS3 First Paragraph	Proposals that would result in a significant or total loss of <u>a</u> site and/or premises currently or last used for a local shop, post office, public house, community or cultural facility or other service that contributes towards the sustainability of a local settlement or the urban area will not be permitted except where the applicant demonstrates that:	Minor textual change
48	Paragraph 8.14	The Open Space Audit, Built Facilities and Playing Pitch Strategy 2015 (and any subsequent updates) has helped informed the open space standards contained within Policy HS4. The standards will underpin future decisions around existing and proposed new open spaces and sport and recreation facilities across the borough <u>and, together with the factors set out within the Open Space Audit, Built facilities and Playing Pitch Strategy-include such as</u> accessibility standards and <u>the</u> types of improvements sought. The current open space provision standard is contained within Appendix 4 and will be periodically updated within the Planning Obligations SPD.	Minor grammatical change
Chapter 10: Sustainable Design and Construction			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
49	SDC5 Para 10.36	The Environment Agency has produced a Flood Map for Planning (rivers and sea), which identifies flood zones, and also a Flood Map for Surface Water. These maps should be used for reference and as a basis for consultation. Additional information may be obtained by contacting the <u>Borough</u> Council's drainage engineers.	Clarification as suggested by WCC LLFA

50	Paragraph 10.38	Development proposals that lie adjacent to a canal, river or tributary should ensure that the natural features and functions of the watercourses and its wider corridor are retained, or where possible reinstated and that appropriate habitats buffers are established.	Minor grammatical change.
51	Paragraph 10.41	Finished floor levels for both residential and commercial buildings must be set a minimum of 600mm above the 1% Annual Exceedance Probability (1 in 100 year) plus climate change flood level. Single-storey residential development will not be permitted in Flood Zone 3 as they offer no opportunity for safe refuge on upper floors. <u>For developments requiring a Flood Risk Assessment, further information is available in the national Planning Practice Guidance (DCLG), which includes a checklist for site specific assessments.</u>	Further guidance as suggested by the LLFA
52	Policy SDC6	Policy SDC6: Sustainable Urban Drainage	Updated terminology and not necessarily restricted to urban developments.
53	Policy SDC6	Sustainable Urban Drainage Systems (Su UDS) are required in all developments. Such facilities should preferably be provided on-site or, where this is not possible, close to the site, and:	Updated terminology
54	Policy SDC6	Infiltration Su UDS is the preferred way of managing surface water. The developer will carry out infiltration tests where possible and a groundwater risk assessment to ensure that this is possible and that groundwater would not be polluted. Where it is proven that infiltration is not possible, surface water should be discharged into a watercourse (in agreement with the Lead Local Flood Authority (LLFA) at pre-development greenfield run off rates or into a surface water sewer if there is no nearby surface water body.	Updated terminology

55	Paragraph 10.43	SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site, compared with traditional drainage approaches which can cause problems of flooding, pollution or damage to the environment, and may not be not sustainable in the long term. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. <u>Proposals should include details of future maintenance of SuDS</u> . Warwickshire County Council is the 'Lead Local Flood Authority' with responsibility for developing, maintaining and monitoring a Local Flood Risk Management Strategy in partnership with other relevant bodies in the area.	Grammatical correction re: SuDS. Reference to future maintenance of SuDS as requested by the LLFA.
56	Paragraph 10.45	Discharge into the Grand Union Canal or the Oxford Canal will require a separate agreement and licence from the Canal & River Trust and be subject to assessment. <u>Discharging or building structures such as outfalls into an ordinary watercourse requires consent from Warwickshire County Council as the Lead Local Flood Authority.</u>	Advice of LLFA
57	Paragraph 10.57	In the case of hydro power, the applicant should undertake early engagement with the <u>Borough</u> Council and the Environment Agency to identify any potential planning issues and any proposal should normally be accompanied by a flood risk assessment.	Clarification as suggested by WCC LLFA
58	Paragraph 10.57	In the case of hydro power, the applicant should undertake early engagement with the Council and the Environment Agency to identify any potential planning issues and any proposal should normally be accompanied by a Flood Risk Assessment.	Grammatical correction

59	Paragraph 10.61	Key to this Local Plan is ensuring that new developments deliver broadband services that meet the ambition of the governments Digital Communications Infrastructure Strategy and the European Digital Agenda for Europe. The Digital Communications Infrastructure Strategy predicts that by 2017, superfast coverage will have reached 95% of premises and expect mobile operators will have achieved 4G coverage to 98%. The stated ambition is that ultrafast broadband of at least 100Mbps should become available to nearly all UK premises.	Update of text as it is outdated.
Chapter 11: Delivery			
Ref	Policy / Paragraph No	Proposed Change	Reason for Change
60	Paragraph 11.1	National policy is clear that development which is identified in the local Local Plan must be deliverable, paying particular regard to viability. Therefore, sites and scale of development should not be subject to obligations or policy burdens which would threaten the viability of development.	Minor typographical change
61	Paragraph 11.4	Transport Assessments, prepared in line with National Guidance, are required alongside planning applications for major development to demonstrate that they contribute positively to the objectives of this Local Plan. Transport Assessments will be required for all large developments.	Minor typographical change
62	Paragraph 11.6	National Guidance states that a Transport Statement may be required for developments that have relatively small transport implications; this will be decided on a case by case basis and should be discussed as part of pre-application enquiries. Where proposals are likely to have an impact on the trunk road network, Highways England should be consulted to establish what level of transport appraisal is appropriate.	Minor typographical change
63	Paragraph 11.8	Travel Plans will be required for all non-residential developments in line with National Guidance or any subsequent revisions or replacement guidance. They should ideally form part of the Transport Assessment and be submitted alongside the planning application. Development proposals in areas where public transport is limited, e.g. where services operate with frequency levels of less than one an hour, may also be required to submit Travel Plans. Furthermore, the	Minor typographical change

		significant development of education facilities will be expected to produce a Travel Plan.	
64	Paragraph 11.9	The provision of car parking needs to be carefully balanced to ensure that sufficient provision is made to meet needs. Less provision may be needed whilst recognising that where there is good public transport provision, easy access to shops and services and <u>opportunities for walking and cycling which in turn promotes desire to lead healthier lifestyles.</u> lives, less provision may need to be made. Achieving this balance is crucial as failure to provide sufficient parking can lead to indiscriminate parking that not only looks unattractive but can be unsafe or lead to neighbour disputes. The NPPF has introduced greater flexibility to take account of the particular nature and setting of development.	Minor typographical change and rewording of paragraph.
65	Paragraph 11.11	The value of cycling as a sustainable mode of transport is appreciated and the S standards at in Appendix 5 contain minimum levels of cycle parking provision for different land uses, to encourage this mode of travel. Guidance for the parking of <u>cars, motor cycles, heavy goods vehicles, and provision for people with disabilities, and electric charging is also included. as well as the design of facilities, is also provided by the Standards. Further guidance on the standards and how they are applied is included in the Planning Obligations SPD.</u>	Minor typographical changes Note to Inspector: The parking standards themselves will be appended to the Local Plan (Appendix 5). The Council can confirm that details on the application of the standards will be contained within the Planning Obligations SPD.
66	Paragraph 11.12	It is essential that new development is supported by the essential infrastructure it needs to function, and that new development does not increase pressure on existing infrastructure. Where new development will require new infrastructure...	Minor typographical change
67	Paragraph 11.13	The infrastructure required will vary from site to site. The type of infrastructure may include, but not be limited to the following areas:;	Minor grammatical change.

68	Paragraph 11.14	<p>In relation to primary schools, representations made by Warwickshire County Council (WCC) Education <u>identifies, as part of the planning application process, education impacts when</u> there is currently very-limited available capacity across many of the town's primary schools. Further housing development, resulting from population growth, will create additional requirements and as a result additional school places (through the extension of existing schools or provision of new schools) will need to be provided. However, WCC Education has also indicated that over time the impact will also be felt on secondary schools. As a result, consideration will need to be given as to whether it is also appropriate/necessary to seek additional financial contributions towards secondary school places. The Council is continuing to work with WCC Education to ensure that the Infrastructure Delivery Plan will identify the necessary education provision required to support the housing allocation proposed through the Local Plan.</p>	Update of text and minor rewording
69	Paragraph 11.16	<p>The Council has is undertaking a Water Cycle Study to update its evidence base. This work will be completed in advance of this document being published for public consultation and its findings are reflected in the IDP and policies.</p>	Update of text and minor rewording.
70	Paragraph 11.19	<p>The Council intends to introduce a 'Community Infrastructure Levy' which would apply a flat rate contribution for infrastructure for larger developments. The timetable for production is contained within the Local Development Scheme, as adopted in December 2015. In the meantime contributions will be secured through the use of planning obligations, where compliant with the CIL Regulations, 2010 <u>(as amended)</u>.</p>	To update text to reflect the update of both the LDS and CIL regulations.
Appendix 1			
71	Paragraphs 2 and 3	<p>The Council will produce and publish an Annual <u>Authority</u> Monitoring Report containing information on the implementation of the Local Development Scheme and on the extent to which policies set out in the Local Plan are performing.</p> <p>The table below shows a set of indicators and targets related to the policies of the Local Plan. Further development plan documents will contain their own indicators and</p>	To be consistent with national policy.

		targets and the results will be brought together in the Annual Authority Monitoring Report							
Appendix 3 Infrastructure Delivery Plan									
72	Transport First Paragraph	Highways England (HE) is responsible for operating, maintaining and improving the strategic road network in England on behalf of the Secretary of State for Transport. The council needs to demonstrate that the proposals in the Local Plan will not have a significant detrimental impact on the strategic road network.	Clarification						
73	Transport Seventh Paragraph	Finally Local pedestrian and cycle links, will generally either be negotiated as part of a S106 (if the need can be linked to a particular development), or they may be identified through the Neighbourhood Plan process.	Grammatical change						
74	Waste Water and Drainage	Rugby Borough Council in partnership with North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council and Warwick District commissioned consultants to undertake a Water Cycle Study to inform the impact on water usage and water quality from the local plan growth. Both the Environment Agency and Severn Trent were liaised <u>with</u> from the beginning of the commission. This document is currently in draft format, but once complete will inform this section of the Infrastructure Delivery Plan and if necessary infrastructure is identified the Infrastructure Delivery Schedule will be updated.	To update the Plan.						
75	Infrastructure Delivery Schedule Table Headings	<table border="1"> <thead> <tr> <th>Item</th> <th>Lead Delivery</th> <th>Other Partners</th> <th>Local Plan Phase</th> <th>Cost and percentage of total cost*</th> <th>Funding</th> </tr> </thead> </table>	Item	Lead Delivery	Other Partners	Local Plan Phase	Cost and percentage of total cost*	Funding	To match the main table.
Item	Lead Delivery	Other Partners	Local Plan Phase	Cost and percentage of total cost*	Funding				

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