



Rugby Borough Council

Local Plan
Preferred Option Document

Consultation Questionnaire

OFFICE USE ONLY

Ref.
No:.....

- ◆ Please use further forms or continuation sheets where necessary.

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Would you prefer future correspondence to be sent to you by email?

 Yes No

If you have appointed someone as your agent, or if you are acting on behalf of someone else, please give details below. Where agent's details are given, future correspondence relating to the Local Plan will be sent to them.

Agents Details

Name
 Organisation
 Address

Postcode
 Telephone
 Fax
 E.mail

Would you like to be notified of further key stages in the Local Plan process?

 Yes No

Date

Please return completed forms to:



Development Strategy
 Rugby Borough Council
 Town Hall
 Evreux Way
 Rugby
 CV21 2RR



When responding to the Preferred Option Document please relate each response to the relevant question as set out below.

1) Context, Vision and Objectives

1a) Do you agree with the Spatial Vision and Objectives set out on pages 10 and 11? If you do not agree, please state the specific area of disagreement and your suggested amendment.

The Trust supports the vision to create strategic green infrastructure and balance sustainable growth with the protection and enhancement of natural assets.

The Trust supports the inclusion of objective 8, to protect species and natural habitats.

1b) Do you have any other comments relating to this Chapter?

2) What development does Rugby Borough Need

2a) Do you agree with the development identified for Rugby's need as set out in this chapter? If no, please state which paragraph in the document you disagree with and your suggested amendment.

2b) Is there any additional development you consider Rugby needs, or do you have any other comments on this chapter?

3) Distribution Strategy

3a) Do you agree with the approach set out in the Distribution Strategy chapter? If no, please state which paragraph in the document you disagree with and your suggested amendment.

3b) Do you have any other comments relating to this Chapter?

Parcle LL2 – Coventry Road, Long Lawford is listed as a potential Local Wildlife Site; 'Long Lawford Meadows'. The area is adjacent to a parcel of land which has been

assessed and designated as a Local Wildlife Site. This area should therefore be surveyed against Local Wildlife Site criteria as a matter of urgency, in order to determine the impact that removing this piece of land from Green Belt would have on the local habitat network.

If this area is assessed as being of county importance for nature conservation then development in this location would not be sustainable. The Trust strongly objects to development on a Local Wildlife Site.

The Habitats Biodiversity Audit team at WCC should be contacted for further information, or to arrange an assessment.

4) Directions for Growth

4a) Do you agree with the proposed site allocations and direction for growth for the urban area outlined in this chapter? If no, please state which part in the document you disagree with and your suggested amendment.

Cotton House

There are no sites designated for nature conservation within or adjacent to this proposal. The broad-leaved parkland identified on part of the site may be of moderate ecological value. There are numerous records of bat in the area. As long as these constraints are considered, avoided and mitigated for if needed, a development application should be able to demonstrate that there will be no adverse harm to the natural environment in this location.

Cotton Park East

Natural assets in this location include:

- River Avon tributary (Local Wildlife Site)
- Newton Dismantled Railway (potential Local Wildlife Site)
- Semi-improved neutral grassland (LBAP)
- Protected species (survey required)

The Trust recommends that Newton Dismantled Railway is a priority for survey by the Habitat Biodiversity Audit Team in order to confirm its importance. The above features provide both constraint and opportunity for development in this location; the Trust expects that any development application in this area would seek to protect and enhance these assets.

South West Rugby

Natural assets in this area include:

- Cock Robin Wood Local Nature Reserve
- Cawston Spinney Local Wildlife Site and ancient woodland
- Cawston Fox Covert Local Wildlife Site and ancient woodland
- Rugby-Leamington Disused Railway Local Wildlife Site
- Dunkley Lake potential Local Wildlife Site
- Semi-improved neutral grassland (LBAP)
- Protected species (survey needed)

The Trust recommends that Dunkley Lake is a priority for survey by the Habitat Biodiversity Audit Team in order to confirm its importance for nature conservation. The above features provide both constraint and opportunity for development in this location; the Trust expects that any development application in this area would seek to protect and enhance these assets.

This area also offers opportunity to improve the Green Infrastructure and ecological connectivity east to west from the Rugby-Leamington Disused Railway towards Ashlawn Cutting.

Coventry Edge – Walsgrave Hill Farm

This site lies adjacent to Combe Pool Site of Special Scientific Interest and Coombe Abbey Local Wildlife Site. Development here will therefore need to be particularly sensitive to these sites in order to avoid adverse impact. It is likely that a substantial natural buffer will be needed between any development and the designated sites.

4b) Do you agree with the proposed Rural Area allocations strategy? If no, please state which part in the document you disagree with and your suggested amendment.

It is not possible to assess the effect of this proposal on the natural environment without the details of exactly where the housing will occur within the MRS.

4c) Do you have any other comments relating to this Chapter?

The section setting out the proposed allocation for Main Rural Settlements is not clear if each listed settlement will provide 100 dwellings each, or whether 100 dwellings will be provided between them.

5) Sustainable Development

5a) Do you agree with the policies set out in the Sustainable Development chapter? If no, please state which policies you disagree with and your suggested amendment.

Yes

5b) Are there any additional policy areas that you feel need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

6) Housing

6a) Do you agree with the policies set out in the Housing chapter? If no, please state which policies you disagree with and your suggested amendment.

6b) Are there any additional policy areas that you feel need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

7) Affordable Housing

7a) Do you agree with the policies set out in the Affordable Housing chapter? If no, please state which policies you disagree with and your suggested amendment.

7b) Are there any additional policy areas that you feel need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

8) Economic Development

8a) Do you agree with the policies set out in the Economic Development chapter? If no, please state which policies you disagree with and your suggested amendment.

8b) Are there any additional policy areas that you feel need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

9) Retail and Town Centre

9a) Do you agree with the policies set out in the Retail and Town Centre chapter? If no, please state which policies you disagree with and your suggested amendment.

9b) Are there any additional policy areas that you feel need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

10) Healthy, Safe and Inclusive Communities

10a) Do you agree with the policies set out in the Healthy Safe and Communities chapter? If no, please state which policies you disagree with and your suggested amendment.

10b) Are there any additional policy areas that you feel need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

11) Natural Environment

11a) Do you agree with the policies set out in the Natural Environment chapter? If no, please state which policies you disagree with and your suggested amendment.

The Trust is supportive of the policies set out in the Natural Environment chapter. We recommend the following amendments to further strengthen or clarify the policy wording.

Policy NE1: Protecting Designated Biodiversity and Geodiversity Assets

The 'Local Wildlife Site' system has replaced the 'Sites of Importance for Nature Conservation' system and therefore the term 'Local Wildlife Site (LWS)' is now used in place of 'Site of Importance for Nature Conservation (SINC)'.

Whilst there are currently no National Nature Reserves (NNRs) in Rugby borough, or Warwickshire, the Trust recommends that NNRs are still listed in NE1 in recognition that should one be designated, it would need to be protected.

The Trust therefore recommends that the list in policy NE1 is updated as follows:

- *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 NERC Act 2006);*
- *Priority habitats and species listed in the national and local Biodiversity Action Plans;*
- *Trees, woodlands, ancient woodland (including semi-natural and replanted woodland), aged and veteran trees, and hedgerows.*

Policy NE2: Biodiversity

The Trust supports the principle of policy NE2, but feels that a few amendments to the text could help clarify what is meant. We suggest:

New development will be permitted provided that it protects, enhances and/or restores biodiversity. Development proposals will be expected to ensure that they:

- *Provide suitable ecological assessments, to the standard set out in British Standard*

42020:2013 Biodiversity – Code of practice for planning and development¹ (or as updated).

- *Where proposals affect habitats or species which are designated, protected or are of importance to biodiversity, the applicant will be expected to demonstrate that:*
 - *All reasonable efforts have been made to avoid harm to the species or habitat*
 - *Natural England’s Standing Advice² for protected species has been followed where available.*
 - *Mitigation measures follow best practice guidance and are proportionate to the level of impact.*
 - *Where a negative impact remains despite avoidance and mitigation measures, compensation will be required to ensure that the species population or habitat resource is maintained within the wider area.*

- *Where Biodiversity Offsetting is required for a development proposal to result in net gains to biodiversity, strategic areas will be prioritised for enhancement.*
- *Development proposals impacting on potential Local Wildlife Sites will be expected to assess the site against the ‘Green Book⁴’ criteria to determine the status of the site.*

Proposal which will improve the environment by reclaiming and improving derelict, contaminated, vacant or unsightly land for biodiversity value will be supported.

References

1. The British Standards Institution (2013) BS 42020:2013 Biodiversity – Code of practice for planning and development. BSI Standards Publication.
2. Natural England (2014) Protected species and sites: how to review planning proposals. Online
3. 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.

Policy NE3: Green Infrastructure Policy

The Trust supports the inclusion of this policy. The ‘Princethorpe Woodland Biodiversity Opportunity Area’ is better known as the ‘Princethorpe Woodlands Living Landscape’.

11b) Are there any additional policy gaps that need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

12) Sustainable Design and Construction

12a) Do you agree with the policies set out in the Sustainable Design and Construction chapter? If no, please state which policies you disagree with and your suggested amendment.

12b) Are there any additional policy gaps that need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

13) Viability and Deliverability

13a) Do you agree with the policies set out in the Viability and Deliverability chapter? If no, please state which policies you disagree with and your suggested amendment.

13b) Are there any additional policy gaps that need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

14) Delivery

14a) Do you agree with the policies set out in the Delivery chapter? If no, please state which policies you disagree with and your suggested amendment.

14b) Are there any additional policy gaps that need to be addressed? If so please highlight the respective NPPF policy it relates to and what you envisage its content should be.

Further comments

