**Monks Kirby Neighbourhood Plan**

**Pre submission consultation responses**

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| **No.** | **Page** | **Chapter/ Section** | **Policy Number** | **Respondent** | **Comment** | **Response** | **Amendment** |
| 1 | 15  23  26 | 7. Policies.  *A . Housing and the Built Environment (Paragraph )*  B The Natural, Historical and Social Environment Introduction  Policy Env 1: Local Green Spaces |  | Flood Risk Management (WCC) | We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces. | Agreed. We will reference this in the narrative. | Change to be made as indicated. |
|  | 16 | 7. Policies  *A . Housing and the Built Environment (Paragraph 2)* |  | Flood Risk Management (WCC) | It is stated that there is a requirement to provide at least 12,400 new dwellings between 2011 and 2031 across the Borough. If a site is for over 10 dwellings it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment and Surface Water Drainage Strategy must be submitted to the Lead Local Flood Authority for review. | Noted. It is not envisaged that a major development will be undertaken in the Parish. | None |
|  | 21/22 | Design |  | Flood Risk Management (WCC) | Within this section you could add a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites. As well as this it would be good to mention that all developments will be expected to include sustainable drainage systems. | Noted. Policy Env 11 on Flood Risk Resilience includes a requirement to incorporate suds into its design. | None |
|  | 43 | Flood risk resilience and climate change |  |  | It is mentioned that development will be allowed in locations susceptible to flooding from river and surface water if an alternative site isnt available. We note that large part of Monks Kirby is situated in Flood zone 2/3 and would encourage all new developments to be steered away from these areas.  If a site is over 1ha or for 10 or more dwellings it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment and Surface Water Drainage Strategy must be submitted to the Lead Local Flood Authority for review.  You could develop this point to include the SuDS hierarchy. The hierarchy is a list of preferred drainage options that the LLFA refer to when reviewing planning applications. The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable. For more information please refer to our Local Guidance document which can be found on the below link:  https://api.warwickshire.gov.uk/documents/WCCC-1039-95  You could include an additional point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length.  It is mentioned proposals to construct or modify existing ditches will be supported. Please note that any works carried out on existing watercourses (with the exception of maintenance activities) will require Ordinary Watercourse Land Drainage Consent from Warwickshire County Council as the Lead Local Flood Authority for Warwickshire. I have attached a link below for further guidance.  https://www.warwickshire.gov.uk/watercourse  In the first paragraph it is mentioned that this objective is supported by the Environment Agency draft National Flood and Coastal Erosion Risk Management Strategy for England. This can be amended to remove the ‘draft’ as this strategy has now been published. | Agreed. | Change to be made as indicated |
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|  |  |  |  | Brinklow Parish Council | Overall the Monks Kirby Neighbourhood Plan seems comprehensive, well laid-out and well presented. Considerable research has been undertaken. It might be worth considering a section on Crime Prevention, for example CCTV systems and Speed Cameras. Equally a specific policy supporting provision of further social and sports facilities could be considered, especially for older children. It is surprising that you have not used the services of AECOM, available through Locality, to survey the Parish to look for suitable sites for affordable housing. | Thank you for these considered thoughts.  However this was not highlighted as a concern for the Parish.  The issue of further sports facilities is not an issue locally and neither will the Parish attract sufficient development to warrant additional services.  It was agreed not to allocate a site specifically for affordable housing but to be supportive to the potential should need be determined in the future. | None  None  None |
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|  |  |  |  | Mark Pawsey, MP | Thank you for taking the time to contact me and for sharing the work with the Monks Kirby Neighbourhood Plan Advisory Committee has undertaken to produce a Neighbourhood Plan. I am grateful to you for sharing this with me and I was impressed by the level of detail and the amount of work which has clearly gone into forming this plan. I look forward to seeing the final publication, and please pass on my congratulations to all involved. Once again, thank you for taking the time to contact me. | Noted | None |
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|  |  |  |  | Natural England | Thank you for your consultation on the Monks Kirby Draft Neighbourhood Plan. 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. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish / Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on the Monks Kirby draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk.](mailto:consultations@naturalengland.org.uk.) Yours sincerely, Sally Wintle, Consultations Team. | Noted | None |
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|  |  |  | HBE2 | Martin Needham, Senior Planning Officer (Development Strategy), Growth and Investment, Rugby Borough Council | **POLICY HBE 2: HOUSING MIX - New development should provide for a mixture of housing types having regard to identified local housing needs. The provision of bungalows suitable for elderly people and dwellings of up to three bedrooms will be particularly supported. The inclusion of four-bedroom or larger houses in housing developments will be supported where they are subservient in number to one, two and three-bedroom accommodation and where there is a proven housing need**  How would requirement for 4 bedroom houses to be subservient in number apply where there are say only one or two dwellings proposed? Are there circumstances where it would be exempt such as with replacement dwellings? | In circumstances where development proposals are limited to 1 or 2 dwellings, 4 bed houses will be excluded. So, 4 bed dwellings will only be considered on developments of 3+ dwellings and would need to be accompanied by evidence of housing need.  We do not envisage any exemptions as there is an imbalance in the housing stock in the parish which we are seeking to balance out. | None. |
|  |  |  | HBE3 |  | **Planning obligations will be used to ensure that the market and affordable housing is available in perpetuity for people with a local connection to the Plan area;**  Suggest adding "and Conditions" after Planning Obligations as these are often used as well to secure housing for local people in perpetuity. | Agreed | Change to be made as indicated. |
|  |  |  | HBE4 |  | **Windfall Sites b) It helps to meet the identified housing requirement for Monks Kirby Parish;**  It's acknowledged the policy seeks to provide housing for local people, although the Rugby local plan allows 'any' housing within the settlement boundary. Also it appears the policy could exclude new development if the housing need had been met. Suggest amending the wording to "the identified housing requirement for Monks Kirby is prioritised" or similar. | The purpose of this wording is to stress the need for smaller dwellings as per the policy on housing mix. The local housing requirement is for smaller dwellings, and this helps to reinforce this. | None |
|  |  |  | ENV2 |  | **2) Development proposals affecting the additional open spaces shown in figure 6.2.**  Would "additional open areas" be a clearer term in keeping with fig 6.2? | Agreed | Change to be made as indicated |
|  |  |  | ENV2 |  | **2) Development proposals affecting the additional open spaces shown in figure 6.2, which make an essential contribution to the setting and character of Monks Kirby Conservation Area, will comply with NPPF 2021 paragraphs 147-151**  This part of the policy appears to conflict with local and national policy regarding Green Belt. The wording seems to suggest that contribution to the setting and character of Monks Kirby would override the green belt consideration criteria. Suggest clarification or rewording. | The policy requires conformity with the NPPF sections on the Green Belt and makes provision for areas not covered by the Green Belt, so we believe that the policy is not in conflict with Green Belt policy. | None |
|  |  |  | ENV4 |  | **POLICY ENV 4 BIODIVERSITY AND HABITAT CONNECTIVITY– All new development proposals will be expected to safeguard habitats and species, including those of local significance, by planning for net biodiversity gain. If significant harm to biodiversity cannot be avoided (through relocating to an alternative site with less harmful impacts), adequately mitigated, or compensated for, planning permission should be refused, in conformity with paragraph 175 of the National Planning Policy Framework.**  Suggest removing reference to paragraph 175 (so end after "refused") as this refers more to plan making rather than individual decisions on applications. The policy still makes requirements clear without this reference. Could include reference to para 175 however in the supporting text as an aim of the neighbourhood plan by way of background. | Agreed | Changes to be made as indicated |
|  |  |  | ENV7 |  | **POLICY ENV 7: RIDGE AND FURROW – The areas of ridge and furrow earthworks mapped in figure 9.2 are non-designated heritage assets. Any loss or damage arising from a development proposal (or a change of land use requiring planning permission) is to be avoided; the significance of the ridge and furrow features as heritage assets must be balanced against the benefits of such development.**  As a potential development will need to be balanced against the significance of the heritage asset to determine its acceptability, suggest changing "is to be avoided" to "should be avoided". | Agreed | Change to be made as indicated |
|  |  |  | ENV14 |  | **i) Proposals for solar photovoltaic arrays avoid the best and most versatile agricultural land and deliver solar/agricultural dual land use.**  This criteria may be unduly restrictive by preventing arrays on any agricultural land. Best and most versatile agricultural land is defined in the NPPF as grades 1, 2 and 3a. Monks Kirby Parish is shown to be solely "Grade 3", and a distinction between 3a and 3b cannot be made until a specific survey of a site has been carried out. Suggested wording amendment: "Proposals for solar photovoltaic arrays should avoid the best and most versatile agricultural land where possible. Use of agricultural land should only take place where demonstrated necessary and deliver solar/agricultural dual land use. | Agreed | Change to be made as indicated |
|  |  |  | ENV14 |  | **All proposals for residential or agricultural development should incorporate an appropriate solar roofing system.**  Some developers have raised the viability of schemes as concern where solar panels have been requested and in some cases solar panels can have a significant impact on the historical character of the area. Also some agricultural developments might not require power. The use of 'appropriate' allows some flexibility but may be suitable to consider if alternative wording could be used. | Agreed. Will amend to say ‘All proposals for residential or agricultural development should incorporate a solar roofing system where appropriate.’ | Change to be made as indicated. |
|  |  |  | T1 |  | **b) Incorporate sufficient off-road parking in line with Highways requirements;**  May need to clarify the requirements - would these be the parking standards in Appendix 5 of the Rugby local plan? | Yes – we will make this reference. | Change to be made as indicated. |