

Appendix 2: South West Rugby Design Code Supplementary Planning Document (SPD) Consultation Statement

Introduction

1. This document sets out a summary of the responses received and modifications recommended to the South West Rugby Design Code Supplementary Planning Document (SPD). It is written in accordance with Regulations 11-14 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
2. The consultation on the draft SPD ran from 10 February 2025 to 10 March 2025.
3. In total 19 responses were received (including 'no comments'), all via email. Responses are summarized within this document, along with modifications recommended as a result from them. They are grouped by section of the design code, so that comments relating to each topic, page and principle can be considered together and changes made holistically.

How did we consult?

4. The consultation ran for a period of 4 weeks from 10 February 2025 to 10 March 2025.
5. The consultation details, including where to view the document and how to respond were published:
 - on the Council's website
 - in a press release
 - by press notice in the Rugby Observer and the Rugby Advertiser
 - on the Council's social media channels
6. The consultation document was published on the Council's website, and hard copies were made available for inspection at:
 - The Town Hall, Evreux Way, Rugby, CV21 2RR
 - Rugby Library, Little Elbow Street, Rugby, CV21 3BZ
 - Dunchurch Community Library, The Green, Dunchurch, CV22 6PA

7. All statutory consultees, individuals and businesses on the Development Strategy Consultation Database on 10 February 2025 were notified by email or letter of the consultation, with details of how to view the document and how to respond. In addition, local residents who registered via Eventbrite to participate in the development of the design code were notified directly by email.
8. Responses could be made by email or via post. In total, 19 responses were received, all via email.

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
General/unknown							
02	R. Basnett	Not supplied	Not supplied	2) Better & more detailed plans on community centre, who, what, where to entrust the developers are responsible for the sites to be fully funded, if not already.	This design code includes physical design principles for the urban extension as a whole, including the district centre. Land use requirements and infrastructure costs are addressed in the adopted South West Rugby Masterplan SPD	None	N/a
03	R. Basnett	Not supplied	Not supplied	3) Green spaces to be adopted by WCC, thus no more third party involvement in companies making money from land maintenance!	The adoption of green spaces will be considered as part of each proposal. It is however beyond the scope of	None	N/A

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					this design code to address who will adopt each space.		
06	R. Basnett	Not supplied	Not supplied	6) Developers need to be held accountable and reassure planners in binding contracts to ensure that the developments are adopted in a timely manner. Far too often, residents have to wait 20 years + to have their streets adopted!	The design code has been developed with input from specialist consultants and the local highway authority has been engaged, to ensure that design solutions and principles included will achieve adoptable standards.	None	N/A
07	R. Basnett	Not supplied	Not supplied	7) Access to all areas need to be adequate to accommodate the local Fire Service vehicles especially in an emergency situation. A local Fire station which would include Police & Ambulance too would be a huge benefit to the community and the developers should be made accountable to ensure that they fund this site.	The street network and street design principles aim to accommodate a wide variety of vehicles	None	N/A

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					<p>including emergency services (see 'Movement' section, page 39).</p> <p>Infrastructure to be provided on site and associated costs is detailed in the South West Rugby Masterplan SPD, and is beyond the scope of the design code.</p>		
08	C Brosnan	Not supplied	Not supplied	<p>I am writing to formally object to the proposed development at South West Rugby on the following grounds:</p> <p>1. Noise & Disturbance</p> <p>The development will cause excessive noise during construction and once completed, impacting the quality of life for residents.</p>	<p>The principle of development is established by the allocation in the adopted local plan.</p> <p>Considerate construction matters would be a matter for consideration</p>	None	n/a

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				<p>There are no clear mitigation measures for construction noise (e.g., restricted working hours or noise barriers).</p> <p>The proposed use (e.g., multiple dwellings, commercial premises) could lead to increased long-term noise pollution, affecting nearby homes.</p>	and condition at planning application stage, and is beyond the scope of the design code.		
09	C Brosnan			<p>2. Strain on Local Infrastructure</p> <p>The area is already facing pressure on schools, healthcare, and utilities.</p> <p>The proposal does not outline how additional demand on doctors surgeries, schools, or drainage systems will be managed.</p> <p>Local infrastructure is insufficient to accommodate an increase in population from this development.</p> <p>Our road quality is already poor, i have damaged my car multiple times on pot holes and deteriorating surface from sheer volume of traffic over the years.</p>	<p>The principle of development has been established by the allocation in the adopted local plan.</p> <p>Infrastructure requirements associated with the allocation are outlined in the local plan, and in the adopted South West Rugby</p>	None	N/A

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					Masterplan SPD.		
10	C Brosnan	Not supplied	Not supplied	<p>3. Environmental Impact</p> <p>The development could harm local wildlife and green spaces. An Ecological Impact Assessment should be conducted.</p> <p>Increased pollution from additional traffic and construction will negatively affect air quality and biodiversity.</p> <p>The proposal lacks provisions for sustainable design (e.g., green roofs, renewable energy sources, or tree planting).</p>	<p>The design code has been developed with specialist consultancy input regarding landscape and ecology, and Warwickshire County ecologists have been engaged as part of the drafting. This aims to ensure that appropriate safeguards and mitigations are included in the physical design of the site.</p> <p>All planning proposals will</p>	None	N/A

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					<p>have to be accompanied by relevant impact assessments, and will be subject to Biodiversity Net Gain requirements, though this is beyond the scope of the design code.</p> <p>Sustainable design is addressed in a separate borough-wide SPD. Tree planting principles are included in the design code however.</p>		
11	C Brosnan	Not supplied	Not supplied	<p>4. Traffic & Parking Issues</p> <p>The development will lead to increased traffic congestion, particularly at peak hours when it</p>	The design code sets out a vision to prioritise active travel,	None	N/a

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				<p>is already a nightmare to travel anywhere in Rugby.</p> <p>Insufficient parking provision will result in overspill parking on surrounding roads, causing inconvenience to existing residents.</p> <p>No clear measures have been proposed to improve road safety for pedestrians and cyclists.</p>	<p>whilst accommodating cars. A range of parking solutions are suggested in the design code relevant to the area types defined, and should be read in conjunction with adopted borough wide parking standards in the local plan.</p> <p>The public space section of the design code sets out how different types of streets may be designed, and all seek to prioritise active travel modes. Active travel</p>		

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					only routes are also required as part of the network.		
65	Tritax Big Box Developments	N/a	N/a	Disappointment expressed at a perceived lack of engagement in the development of the design code.	Noted	None	N/a
66	Tritax Big Box Developments	N/a	N/a	General concern about whether the design code is consistent with the development plan, and whether it introduces new policy (something an SPD cannot do).	The design code has been developed to be consistent with the development plan. It seeks to guide the physical form of development, something government specifically encourages.	None	N/a
67	Tritax Big Box Developments	N/A	N/a	TBBD query if there is a need for the Design Code, first as there is already a SPD in place for the allocation. Second in particular in respect of the employment buildings (which have been built out for Phase 1) and for Phase 2 the proposed design and heights of the buildings will flow from the design language of the approved buildings on the existing Symmetry Park. South West Rugby has so far failed to	We think there is a need for a design code. The existing SW Rugby Masterplan SPD is principally concerned with infrastructure		

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				deliver a single dwelling, and the imposition of the SPD in its proposed form has significant potential to further delay delivery.	provision, and the design code has been developed to guide the physical form of development. The Design Code SPD has to supplement the adopted local plan. Whilst there is acknowledgement of the ongoing local plan process and the proposed allocation for land referred to as 'phase 2', it is not appropriate for this SPD predetermine the outcome of that process and effectively introduce new policy. Given that the land		

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					use is not currently fixed, nor too can be the physical form.		
68	Tritax Big Box Developments	N/a	N/a	The Design Code needs to provide for flexibility and not be overly prescriptive as per the current drafting.	The design code must include a degree of prescription in order to be worthwhile. This is set out in the National Model Design Guide. We do not agree that the document is overly prescriptive, though specific points in representations about individual principles are considered on a case-by-case basis in this statement.	None	N/a
69	Tritax Big Box	N/a	N/a	In the emerging Local Plan (the Preferred Option Draft) the safeguarded land, which	The land described is	None	N/a

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	Developments			comprises the Phase 2 employment land, is now allocated for employment development (as set out in draft policies S1, S7, S8 and S9 and the Site Allocations template in the appendix to the draft local Plan). The draft Design Code needs to reflect the fact that the safeguarded land is now a confirmed employment allocation.	proposed as an employment allocation in the Preferred Option consultation. At the time of writing consultation is ongoing, and it is not the role of this document to introduce new policy. We therefore need to retain the 2 scenario approach to the safeguarded land included in the design code.		
70	Tritax Big Box Developments	N/a	N/a	Design Codes are only as good as the people who administer and interpret them, if adopted the Council will need ensure that there are the right people with the right skills in place to interpret some of the guidelines. This will add an additional resource burden and timescale on both the Council and Applicants, risking further delay in the delivery of new homes at South West Rugby.	We disagree, and believe that the design code will add greater clarity over expectations regarding coordination and quality. The	None	N/a

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					use of design codes is well established, and they have been/continue to be employed successfully on other developments in the borough.		
71	Tritax Big Box Developments	N/a	N/a	The requirements of the Design Code need to be assessed in terms of their potential impact on the viability of schemes. In terms of TBBD's residential interests, a reduced density and prescriptive house typology is set out, which does not reflect the two live planning applications and significantly reduces their viability, marketability and delivery. In terms of TBBD's employment interests, the Design Code does not acknowledge the design requirements of the buildings themselves, nor the established presence and design language of the existing phase of development.	We disagree, and this view is not replicated by other respondents. The design code is intended to provide a coordination role across multiple landownerships and over a long build out period, and to raise the overall quality. In respect of employment buildings, the	None	N/a

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					code focuses on the interaction between the allocated land and future potential of the safeguarded land.		
72	Tritax Big Box Developments	N/a	N/a	There is also a need for any Codes to align (and not contradict) with other policy requirements in the Local Plan which may impact on design, for example BNG requirements.	Agree. We have drafted the design code to align with other development plan requirements, and where specific discrepancies have been identified through the consultation, these have been rectified. We do not believe there are any outstanding conflicts. The relationship between	None	N/a

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					mandatory BNG and design code requirements is specifically considered under reference 215.		
73	Tritax Big Box Developments	N/a	N/a	In conclusion, if the Design Code is to be pursued, it is respectfully suggested that further engagement is undertaken with the developers and promoters of the South West Rugby allocation to ensure that the above concerns are appropriately reflected and overcome to ensure that a viable, successful development can come forward. As drafted, the Design Code will simply fail to deliver this.	We have sought to keep site promoters engaged in the production of the design code, though we recognise that this point is repeated by other developer interests. There has been extensive engagement with the local community and stakeholders. A meeting to set out post consultation changes has	None	N/a

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					been scheduled.		
126	Homes England	N/a	N/a	We have a general concern about the document's accordance with accessibility guidance in terms of graphical representation of information. This may therefore impact the useability of the document. For example, it is generally advised that tables are not used within accessible documents unless they are representing numerical information.	This matter has been considered internally with the communications team and the equalities officer. The principal matter is the inclusion of a number of tables which include content beyond numerical data. We have sought to keep these to a minimum, though a small number remain as this is considered the most efficient way to communicate some information.	Ensure tables with text are minimised.	N/A

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127	Homes England	N/a	N/a	<p>We would request the inclusion of additional information within the front end of the Design Code relating to committed developments. It would be beneficial for users to understand what proposed development, at the point of adoption, has been granted consent. This would provide an evidential basis for the material of the SPD.</p> <p>In this regard, we feel the codes and associated graphics throughout should be amended to reflect the ongoing (R24/0733) and approved (R22/0928) planning applications given the extensive engagement, public consultation, environmental work, and landowner negotiations which have shaped the designs.</p>	<p>We have included information on committed developments at the time of writing. This however will be a snapshot in time as at the time of writing there are applications to be determined (which are not reflected as the application process is ongoing), and information about committed developments will evolve throughout the shelf life of the design code.</p>	<p>Ensure that information reflects the latest position on committed developments, accepting that this will be a snapshot in time.</p>	<p>Homestead Link Road reflected in approved format on all plans</p>
316	Taylor Wimpey	General	N/A	<p>We would recommend the Council's detailed engagement of the development parties involved in South West Rugby on the details of</p>	<p>Noted. We have met with developers with the Consortium</p>	<p>Meet with Consortium</p>	<p>N/A</p>

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				the Design Code before it progresses any further towards adoption.	to discuss feedback to the consultation, and highlight proposed changes.		
31 6b	Taylor Wimpey	N/a	N/a	Equally, we appreciate the challenges in delivering the South West Rugby allocation. It is essential that a Design Code supports delivery and does not present further obstacles.	Noted and agreed	None	N/a
31 7	Taylor Wimpey	N/a	N/a	<p>One of the challenges to the Code – which will be evident from the comments below - is that the design process at South West Rugby is very dynamic. We have on-going design coordination, developing masterplans, live applications, imminent applications. It is essential that the Design Code is flexible in the first instance and in the short-medium term to account for this.</p> <p>There are various areas identified as “Existing Residences”, for example, which are within the allocation, including residences on large plots. It is not inconceivable that these plots could come forward for development in the future. Currently, the Design Code assumes the retention of these Existing Residences as they are, which is not unreasonable, but the Code may need to accommodate the development</p>	<p>The design code is intended to have a coordination role and a quality role. We have sought to strike a balance between expectations and flexibility.</p> <p>The ‘analysis’ chapter of the code (see p15) notes existing residences. At</p>	None	N/a

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				of these plots in the future and how they integrate into the wider masterplan.	the time of writing these are anticipated to be retained, hence acknowledgment that development proposals should respond to these. Should that position change in future, this would not preclude potential development within these plots.		
318	Taylor Wimpey	N/a	N/a	It is not clear whether the Code be regularly updated? The South West Rugby SPD is targeted for annual reviews and updates. Is the same target to be applied to the Design Code SPD?	The design code SPD will be reviewed and updated as necessary – for example it may benefit from an update post adoption of a new local plan.	None	N/a

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319	Taylor Wimpey	N/a	N/a	We would envisage the comments being the reference for detailed engagement meetings involving the Council's Design Code team and the South West Rugby development parties, to support the updating and refinement of the Code prior to its adoption.	Noted.	Met with developers to set out proposed changes to the design code and show how feedback has been incorporated	N/a
367	WCC Flood/Strategic Infrastructure + Climate Change	N/a	N/a	In terms of Social Care and Health, the design code should ensure that it promotes meeting requirements for disabled, elderly, families and neurodiverse people. We would encourage reference to Part M in building regulations and HAPPI principles for any housing being built for older people, as well as policies on standards for vulnerable road users.	Noted. The 'movement' and 'public space' and nature sections of the code seek inclusive public space accessible to all. With regards to housing standards, it is beyond the scope of an SPD to mandate these, however this is something that the Preferred Option consultation on the local plan includes.	None	N/a

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368	National Highways	N/a	N/a	<p>Based on our review of the Design Code document, we can confirm that we could not identify any information that could potentially impact the SRN that has not been already assessed through the Borough Plan consultation process.</p> <p>We note that where any of the sites either bound, or located in close proximity to, the SRN, or otherwise have a potential to impact on its safe and efficient operation, then National Highways should be consulted by way on a planning application.</p> <p>This will ensure that assessments of boundary or transport related impacts are undertaken in adherence to the appropriate standards and guidance and any issues arising are identified at the earliest possible stage.</p> <p>We consider that we have no further comments to make with regards to this consultation. Please do not hesitate to contact me if you require any more information or clarification.</p>	Noted.	None	N/a
369	R. Allanach	N/a	N/a	It would help if all the maps could be indexed eg Fig 1, Map 1 etc to make referencing easier. I	Noted and agreed	Add figure numbers to plans and drawings,	N/a
130	Homes England	N/a	N/a	Suggestion that all diagrams are clearly indicated throughout as either 'illustrative' or 'indicative' and explained as such. It is our view that this needs to be clearer as the purpose is	Agree. We will number and title all plans and drawings.	Number and label all drawings and plans	Number and label drawings

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				to inform onward development design and there is no certainty over delivery. The diagrams are helpful to explain design principles, but we do not feel they should be mandatory as they may inadvertently stifle innovative design.			
411	Consortium (Comprising Homes England, Taylor Wimpey and Catesby Estates)	N/A	N/a	<p>Whilst the Community Stakeholder Engagement Summary notes that there has been regular engagement with other stakeholders, including land and developer interests, the Draft Design Code would have benefited from more engagement with the consortium who were willing to support the Council in the preparation of the document. Whilst the Council presented some of the draft plans to the consortium at their monthly meeting in November 2024, which were very much “work in progress” at that stage, we understood that we would be invited to work alongside the Council in the refinement of the plans and the Code generally. This has unfortunately not happened.</p> <p>Whilst we were aware of the Code going to Cabinet, there were no specific consultation dates set out in the Cabinet report. We found the consultation on RBC’s website by chance.</p> <p>Notwithstanding the above, the consortium is broadly supportive of Rugby Borough Council (RBC) producing a Design Code for the entirety of the South West Rugby Allocation and are</p>	Noted. We have sought inclusive engagement.	None	N/a

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				<p>supportive of the aim to deliver a high quality and coordinated development. This document will be a useful tool for the Council to expand on the design aspirations set out within the adopted South West Rugby Masterplan Supplementary Planning Document (SPD) (December 2024) and ensure a coordinated design response across a number of landowners, developers and planning applications. To this end, Homes England, Taylor Wimpey and Catesby Estates are working closely with one another to achieve this through design coordination and collaboration on our respective masterplans and infrastructure delivery.</p> <p>However, it is essential that the Design Code SPD does not impede the delivery of the allocation nor create ambiguity or confusion and ultimately delays in the determination of planning applications. Importantly.</p> <ul style="list-style-type: none"> • The Code must be consistent with the Local Plan and the recently adopted South West Rugby SPD (December 2024); • The plans included within the Code need to be accurate and reflect real site conditions, consented schemes and live planning applications; • The requirements of the Code must be consistent with national policy and standing 	Noted	None	N/a

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				<p>guidance. Any departures need to be rational, properly evidenced and justified; and</p> <ul style="list-style-type: none"> • The Code must accept the need for flexibility in its application to accommodate site conditions, development viability and practical delivery. <p>The Council will be aware that there are challenges to the viable delivery of South West Rugby. This was made clear in the consortium's submissions on the South West Rugby SPD and Appendix K. The Council will also be aware that, following the initial consultation, the consortium was actively involved in the refinement of Appendix K working closely with the Council and Warwickshire County Council. This has provided for a more robust, viable, and deliverable Appendix K to support the SW Rugby allocation.</p> <p>The consortium recommends that a similar approach is applied to the Design Code SPD and encourages the Council to fully engage with the consortium prior to taking forward the SPD to adoption to enable the Design Code to be refined in a form that supports rather than impedes the delivery of the allocation.</p> <p>We are also aware that the MHCLG intends to update the National Design Guide and</p>	<p>The code aims to reflect site conditions and reflects consented schemes, notably the Homestead Link Road.</p> <p>However, the code does not reflect proposals which do not yet benefit from planning permission.</p> <p>We believe appropriate</p>		

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				<p>National Model Design Code in Spring this year.¹</p> <p>Given that the content of the Design Code SPD is derived from guidance contained within the National Model Design Code Parts 1 and 2, it would be prudent for the Council to wait for the outcome of this update and take the latest guidance into account before adopting the document. This would also enable further engagement with the consortium on the SPD in the meantime.</p> <p>The consortium does not object to the vision of the Code and its aspirations for high quality design and development, but the Code needs to be consistent, accurate and practical.</p> <p>The consortium would welcome a workshop with the Council to work through the Code in detail to achieve this aim. We recommend that the separate detailed commentary submitted by the consortium parties should form the basis of these discussions.</p>	<p>flexibility is built into the design code</p> <p>Officers have met with members of the Consortium to demonstrate how feedback to the consultation has informed proposed changes.</p> <p>We do not agree there is a need to await a government</p>		

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					update, which as yet is unpublished.		
Intro Analysis Vision							
128	Homes England	Introduction	p6	We request that further context is added to the definitions of ‘Must’, ‘Should’ and ‘Could’. For example, “Must” is an absolute term and indicates certainty, whereas we consider a degree of variance should be afforded to support innovation and nuances across the allocation. In some cases, it is impossible to achieve the musts, so some requirements would be better to be recategorized as set out in further detail below. It is considered that certain caveats could be included to the definition of ‘Must’, such as “Subject to the inclusion of appropriate and proportionate mitigation”.	Noted and agreed. Please refer to response to comment 12 below.	See comment 12 below	As comment 12
129	Homes England	Introduction	p1-6	Inclusion of text which explains the relationship between the RBC Design Code and site-specific design codes. This will provide clarity for the approval process of future RMAs for RBC Development Management Team. Additional wording suggested as follows: “If a subsequent site-specific design code comes forward for an area of SW Rugby and is approved as a part of a planning application, it is to take precedence over the RBC Design Code and be used to assess compliance. A	Information in an approved application can’t replace an adopted SPD for the purpose of subsequent reserved matters. Compliance with any future design code	None	N/a

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				site-specific code must ensure consistency across the allocation by broadly according with the strategic design guidance set out within the RBC Design Code relating to matters that are not subject to site-specific design codes.”	produced by applicants would be subject to approval.		
320	Taylor Wimpey	Introduction	P4	It would help for clarity to distinguish between those elements of the allocation which are built out / fully consented (e.g. Ashlawn Road) and to which the Design Code does not apply, and those elements to which the Code does apply.	Page 4 focuses on introduction and policy context. Whilst we note the general point, this would only ever be a snapshot in time as there are pending applications at the time of writing. The code cannot apply retrospectively to built or consented developments, unless in the case of the latter revised or new proposals	None	N/a

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					are submitted. (see also 370 below)		
370	R. Allanach	Introduction	P4	<p>Page 4. The map is misleading as it omits the eastern arm of the South West Rugby “Sustainable Urban Extension” which is allocated to receive roughly a fifth of all the housing and one of the three primary schools proposed for the allocation. [Incidentally Warwickshire County Council must now have picked up a significant sum of section 106 monies for this primary school from the developers. When is Rugby Borough Council going to try to shame the county council into including this school in their forward education capital budget?]. The omission of the eastern arm is ironic because the original sustainability appraisal justified including Ashlawn Fields in the SW Rugby SUE because this would support master planning for the entire allocation.</p> <p>It would help to explain why the eastern arm is not covered by this proposed SPD.</p>	<p>The Ashlawn Gardens part of the SW Rugby development is not included in the SPD as it is already largely built out and therefore cannot be subject to new design guidance.</p> <p>Taken in combination with comment 320 above, we will clarify this point on p4, under the heading ‘local plan 2011-2031’.</p>	Include some explanation regarding Ashlawn Gardens on p4, with reference to the local plan allocation.	<p>Referred to map on p11, labelled DS3.4.</p> <p>Insert new paragraph 3: <i>Part of the local plan allocation at South West Rugby was granted planning permission on appeal in 2017 for up to 860 dwellings, and is substantially built. This development is known as Ashlawn Gardens.</i></p>
12	Catesby	Introduction	p6	We recommend providing additional context to the definitions of ‘Must’, ‘Should’, and ‘Could’. For instance, “Must” is typically seen as an absolute term that signifies certainty. However,	Agree – we have included ‘must’ because we want the code	Add additional clarification, whilst maintaining clear and unambiguous	Add text to page 6 (below ‘code requirements....’):

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				<p>we believe a certain level of flexibility should be allowed to foster innovation and accommodate the nuances across different allocations. In some instances, it may be unfeasible to fully meet the ‘Must’ requirements, so reclassifying some of these requirements, as detailed below, would be more appropriate.</p> <p>It is suggested that the following wording (or similar is added) in this regard: If development proposals do not comply with design fixes, it is the responsibility of the team proposing the scheme (the developer and their design team) to explain why any mandatory (‘Must’) or recommended elements (‘Should’/‘Could’) are not met, and demonstrate that the proposals do not conflict with the overall aim of the South West Rugby Design Code.</p> <p>Departures from the Design Code will only be acceptable when a rationale for not complying with mandatory design fixes or recommended design practices can be clearly demonstrated as a positive intervention that has placemaking benefits, or responds appropriately to</p>	<p>to be clear and unambiguous about what we expect. However, we acknowledge that there may be occasions where these may not be fully achievable.</p>	<p>expectations – p6 (introduction)</p>	<p><i>If development proposals do not comply with design ‘musts’, it is the responsibility of the team proposing the scheme (the developer and their design team) to explain why any mandatory (‘Must’) or recommended elements (‘Should’/‘Could’) are not met, and demonstrate that the proposals do not conflict with the overall aim of the South West Rugby Design Code.</i></p> <p><i>Departures from the Design Code will only be considered when a rationale for not complying with mandatory design fixes or recommended design practices can be</i></p> <p><i>clearly demonstrated as a positive intervention that</i></p> <p><i>has placemaking benefits, or responds appropriately to changing legislation,</i></p>

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				<p>changing legislation, circumstances and technological advancement. It may also be necessary to depart from some aspects of the Design Code in light of unforeseen site conditions or ground investigations. Any such noncompliance will be subject to agreement with RBC.</p> <p>It is suggested that specific caveats be incorporated into the definition of 'Must', such as "Subject to the inclusion of appropriate and proportionate mitigation."</p>			<p><i>circumstances and technological advancement. It may also be necessary to depart from some aspects of the Design Code in light of unforeseen site conditions or ground investigations. Any such noncompliance will be subject to agreement with RBC.</i></p>
74	Tritax Big Box Developments	Introduction	P6	Page 6 refers to code requirement of the following forms, the first is 'Must' 'a mandatory requirement'. This is too onerous, and the word should be replaced throughout with 'should, if feasible'.	In accordance with the National Model Design Code, the draft SPD does seek to mandate some requirements. However, see response to comment 12 above	As above (12)	As above (12)

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75	Tritax Big Box Developments	Introduction	P6	Page 6 also sets out a requirement to submit a compliance tracker with applications. It is submitted it would be helpful to append a proforma of this tracker to the Design Code to guide developers as to the form of the tracker	Agree that this would be beneficial. We will seek to develop a compliance tracker.	We will develop a compliance checklist post adoption	N/a
321	Taylor Wimpey	Introduction	P6	There is reference to a “compliance tracker” to be submitted with applications. It is assumed that this applies to applications submitted after the Code is adopted. This would benefit from clarification.	As per response to 75 above	As per response to 75 above	N/a
N/a	Officer	Introduction	p6			Include text on the use of precedents throughout the document in response to comments received in respect of precedent images throughout the code.	<i>Precedents Precedent photographs are used throughout this code to illustrate ideas and principles in each section. They are intended to illustrate a particular point (as described) and it should not be assumed that replication of other features will be acceptable.</i>
322	Taylor Wimpey	Introduction	P7	In terms of engagement, it is true that the landowners and developers of South West Rugby have not been engaged in the detailed development of the Code. Please refer to the Homes England submission, which has been endorsed by Taylor Wimpey and Catesby.	Noted. See response to other comments	None	N/a
N/a	Officer	Analyses		N/a	N/a	Add Homestead Link Road red line	N/a

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						boundary to all analysis plans	
323	Taylor Wimpey	Analysis	P9	The “disused railway line to the west” referred to is now used as a Sustrans route. This would benefit from clarification.	Noted. Will refer to it as an active travel route	Add reference to role in active travel network.	Add sentence to 1 st para: “...disused railway line to the west. <i>Named the Cawston Greenway, this now forms part of the active travel network.</i>
308	Historic England	Analysis	p9	Page 9 of Section 2.1 Site Context – we welcome the inclusion of reference to Bilton Grange Registered Park & Garden (RPG) (GII), but we note that there are two RPGs next to each other, Bilton Grange and Dunchurch Lodge (GII) with multiple Listed Buildings (LBs) within these RPGs, including Bilton Grange School and Dunchurch Lodge (both GII*).	We have sought advice from the Conservation Officer on suggested text for inclusion and implemented as appropriate to enhance heritage references in the document.	Include suggested text as appropriate from Conservation officer	
309	Historic England	Analysis		Additionally, there appears to be no reference within the documents to the nearby Conservation Areas (CAs) (Dunchurch, Thurlaston or Bilton) and whilst the majority of LBs within the CAs and around the site are GII, this site is surrounded by a strong historic landscape.	Conservation areas and listed buildings are mapped on p15, we could however make stronger reference to these forming a ‘strong historic	Additional text to p15 ‘built environment’ now makes reference to Bilton Grange and Dunchurch Lodge.	There are Conservation Areas in both Dunchurch and Thurlaston. There are a handful of Listed Buildings surrounding the site, with clusters in Bilton, Dunchurch and Thurlaston. <i>There are two registered Parks and Gardens to the east of Dunchurch, the</i>

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					landscape’ and add bit more to the text on this page? We have sought the advice of the Conservation officer.		<i>grounds of Bilton Grange School and Dunchurch Lodge immediately to the south of Bilton Grange. The setting of some of these designated heritage assets extends into the wider rural landscape and potentially includes areas of the allocation.</i> <i>Any impacts from the allocation upon the heritage significance of affected heritage assets will need to be carefully considered through the design process.</i>
N/a	Officer	Analyses	p10	N/a	N/a	Key on ownership also updated to align with existing residences/farms	N/a
310	Historic England	Analyses	N/a	Therefore, HE considers that the Design Code should have regard to the historic environment, and we suggest that the ‘Analysis’ chapter of document 1 should include a specific section on heritage. We also consider that there are opportunities to make linkages to the historic environment in the document on ‘Nature’ (‘Landscape Character’ and ‘Buffers and Boundaries’ in particular), and also in the document on	No scope to add a whole section on heritage, but as above have incorporated into the built environment analysis and vision pages,	Reference to heritage assets added to ‘vision’, p21 identity subsection, at advice of conservation officer. Also added a requirement to p70 built form general	N/a

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				'Identity'; where those heritage assets immediately surrounding the site could be referenced.	and codes in the 'bult form section'	principles regarding consideration of heritage assets through the detailed design process	
371	R. Allanach	Analyses	P9	Again the area addressed and I believe the hectareage quoted is for only one portion of the SUE.	The 390ha figure is replicated from p8 of the Masterplan SPD. We have measured the areas in GIS to check this point and found the allocation area including Ashlawn Gardens (which is substantially delivered) to be less than the 390ha quoted. We are confident therefore that this figure includes the entire	None	N/a

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					allocation, including areas already delivered. We propose to keep the text as is for consistency, and because it doesn't materially impact the application of the design code.		
13	Catesby	Analysis	p10, land ownership plan	Change 'Urban + Civic' to 'Catesby Estates' on land ownership plan	Agree – factual correction	P10 – update land ownership plan	Correction
76	Tritax Big Box Developments	Analysis	p10	Page 10 acknowledges the employment development is 'already built/in progress'. The full development of 7 units is now complete. As set out above this begs the question as to whether a Design Code is required, particularly for the employment land, and if so, why the design principles approved for boundaries with neighbouring land parcels (i.e. landscaping/bunding) approved through the grant of planning permission have not been reflected.	We can update label to reflect complete status. Make text reference to these in landscape environment.	Label updated to reflect completion of employment warehouse construction on page 10. Landscape bunding added to drawing and referenced in text on page 12.	<i>The site of the completed employment buildings also</i>

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							<i>feature landscape bunds as set out in the approved plans</i>
324	Taylor Wimpey	Analysis	P10	<p>Reference to Homestead Link Road can be updated – S106 complete and Decision Notice issued.</p> <p>The Existing Residences annotation includes farm buildings, which is incorrect.</p> <p>The Phasing starts at Phase 3 and its not clear why the Phasing has been set out as it has.</p> <p>Land Ownership is also not correct. Better to call this Plan “Land Promotion”.</p>	<p>Noted.</p> <p>To change note to ‘existing residences/farms’.</p> <p>Remove reference to phasing as this now appears out of date information. Retain existing development information and safeguarded land.</p>	<p>Amend (3) in key on status of Homestead Link Road.</p> <p>Changed to ‘existing residences/farms’.</p> <p>Individual phases removed, single colour used for all residential development, label to say ‘Indicative residential development, likely to come forward in multiple phases’.</p> <p>‘Land ownership’ title changed to ‘land promotion’.</p>	
135	Homes England	Analysis	p10	<p>For the figures included on the page, the legend does not include the land coloured red, orange or green. Could these please be included for clarity.</p> <p>Removal of reference to “Phasing” within the key as it is likely to give an incomplete or</p>	<p>As above – delete phasing</p>	<p>Individual phases removed, single colour used for all residential development, label to say ‘Indicative residential</p>	<p>‘Indicative residential development, likely to come forward in multiple phases’.</p>

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				potentially misleading picture given the total number of stakeholders involved. Inclusion of the enhancement of Cawston Lane and the Community Spine Road as core transport infrastructure developments fundamental to the wider area's delivery.		development, likely to come forward in multiple phases'.	
136	Homes England	Analysis	p10	In light of the changing land ownership status within the allocation, suggest this diagram is removed from the code as it may cause confusion and become out of date quickly.	Disagree with removal – acknowledge in text that this is subject to change.	Acknowledge in text that land ownership is subject to change	"...extremely important. <i>Figure X below shows land ownership at the time of writing, though this is likely to change over time.</i>
77	Tritax Big Box Developments	Analysis	p11	On page 11 it is noted that the Design Code presents two options for the safeguarded land for residential or employment, it is considered that the code, due to the draft allocation for the site (as set out above) should just refer to employment. This will require a number of amendments including the land to the east which is also no longer proposed as residential development, and the removal of the 'tertiary route' and sub-division of the site into small parcels which do not reflect its preferred use as additional strategic logistics development.	The land described is proposed as an employment allocation in the Preferred Option consultation. At the time of writing, the outcomes of the public consultation are under consideration and it is not the role of this document to	None	N/a

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					introduce new policy. We therefore need to retain the 2 scenario approach to the safeguarded land included in the design code		
14	Catesby	Analysis	p12	It is recommended that the graphic distinguish between 'Woodland' and 'Ancient Woodland'. Additionally, the plan does not accurately show the extent of the TPOs and therefore the plan needs to be revised accordingly. It may be that an additional plan is required to successfully differentiate between what is 'Woodland', 'Ancient Woodland', and the TPOs.	<p>Agree – update plan to show woodland and ancient woodland as distinct.</p> <p>TPOs shown as mapped in QGIS at the time of making the drawing.</p> <p>Additional trees have been added to drawing using aerial photography to represent an overview of the</p>	<p>P12 – update Landscape Environment plan + key for clarity.</p> <p>Additional trees added</p>	N/a

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					<p>landscape character.</p> <p>Update key for greater clarity on what is represented in the drawing.</p>	Update key	
78	Tritax Big Box Developments	Analyses	p12	The plan on page 12 needs to be updated to show the buildings that have been developed particularly in relation to the employment land, otherwise it misguidedly looks like the built out site is 'landscape'. There are also a number of historic features shown on this plan (and a number of others throughout the document) which no longer exist, and whose removal was approved as part of the grant of planning permission for the employment development.	<p>Agree and can update to show warehouses.</p> <p>We have emphasised the delivered development to show features no longer exist.</p>	<p>Update plan to show warehouses as constructed.</p> <p>Also showing bunding emphasised the delivered development to show features no longer exist.</p>	
137	Homes England		p12	We suggest that in addition to providing a summary of the area's topography, it would be beneficial to include some text on the varying drainage catchments. This would provide helpful context.	Noted. We do not have access or technical knowledge sufficient to do this justice.	None	N/a

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138	Homes England	Analysis	p12	<p>It is suggested that the graphic differentiates between ‘Woodland’ and ‘Ancient Woodland’. In general, the legibility of trees and the implied suggestion that all are TPO’d needs to be reviewed. We have concerns about the lack of clarity and potential confusion this map may create given some of the codes noted later on within the document.</p> <p>Please note the extents of the Homestead Link Road area need to be revised as it includes temporary compound areas which are for construction only.</p>	<p>Agree on distinction – to be amended.</p> <p>Clarify the drawing is intended to give an overview of existing landscape, not as a technical basis for development. Applicants will submit topographical surveys, ecological surveys etc.</p> <p>The redline boundary for the Homestead Link Road is shown. To clarify on the label</p>	<p>Show distinction between woodland and ancient woodland at Cawston Spinney.</p> <p>Add label to the HSL to say that this is the application red line boundary.</p>	<p>New first para: <i>Figure X (right) gives an overview of the existing landscape environment.</i></p> <p>Amend plan- Distinguish ancient woodland and woodland</p> <p>HSL key label updated to say ‘Homestead Link Road application red line boundary’</p>
325	Taylor Wimpey	Analysis	P15	The “frontage” annotation to the recent Bellway / Elborow Way development is not accurate. The properties adjoining the allocation on this boundary are a mix of	Disagree – the main point of this label is that these are not	None	N/a

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				frontage, dual aspect and gable aspect. There is frontage annotation on Alwyn Road where the allocation (existing field) adjoins the carriageway. This is also not “residential frontage”.	the rears of residences and so will need actively addressing by new built development.		
139	Homes England	Analysis	p16	Amend text to the following: ‘The site incorporates a number of existing homes, some of which are to be retained. In addition, there are a number of existing farm buildings that range in their quality and condition. Potential opportunities to retain the highest quality farm buildings should be further explored, particularly where these buildings present an opportunity to contribute to the character and identity of the place’.	Agree with proposed descriptive text – to amend text but not add a code requirement, eg ‘should’. This comes later in the code in BF.06 on page 70.	Amend descriptive text on page 16	The site incorporates a number of existing homes and buildings , some of which are to be retained. <i>In addition there are a number of existing farm buildings that range in their quality and condition. The existing buildings present opportunities to enhance the character and identity of the development.</i>
141	Homes England	Analysis	p18	This section misses existing connections (such as the existing bus stops and routes in the vicinity of the site) and confuses constructed infrastructure (such as that in the Tritax land), with consented infrastructure (Homestead Link Road), and future planned connections with live planning applications. The reference to proposed sustainable transport link at "the south of Cawston Lane" does not reflect the preferred arrangement for Homes England proposals.	Acknowledge changing nature of what has been consented/built – this will continue to be the case. The code only reflects	None	N/a

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				Please add reference to the existing bus routes as there are a significant number of bus routes and stops within the surroundings that get no mention here.	delivered and approved schemes. It does not reflect pre-application schemes nor undetermined planning application proposals. The 'movement' section will address bus routes.		
142	Homes England	Analyses	p18	The Graphic on Page 18 does not reflect Figure 2 of the South West Rugby SPD, Policy DS9 of the Local Plan, nor the proposed Homes England development or the details in the submitted planning application for the Community Spine Road / Cawston Lane Enhancements (R24/0733). We recommend that the Graphic is updated to align with the submitted and approved planning applications and the following should be updated to reflect Figure 1 of the adopted SPD: • The Community Spine Road should connect with the HLR application (linking it to Alwyn Road).	As above, plans throughout the code reflect only delivered or consented schemes and not undetermined proposals. Change alignment of CSR to reflect HLR.	Amend plan as required to ensure it reflects the consented Homestead Link Road in respect of connection to Cawston Lane and the diverted PRoW	Amend plan

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				<ul style="list-style-type: none"> • Cawston Lane should be updated at its southern end to remove reference to the sustainable transport link. • The Public Right of Way south of the B4429 should be re-aligned to accord with the proposals put forth in the approved Homestead Link Road Planning Application (R22/0928), or at least reference made in the text that this route will be realigned following the construction of the road. 	The southern end of Cawston Lane is shown as a Sustainable Transport Link in the adopted local plan and therefore should be retained in this plan. layout. PRoW – should be updated to reflect the consented Homestead Link		
326	Taylor Wimpey	Analyses	P18	The PROW annotation in the key and on the plan do not appear to match. This would benefit from better clarity.	This appears to be related to the scale of the lines shown in the key	Update key to drawing	Amend representation of PRoWs for clarity
372	R. Allanach	Analyses	P18	One of the sustainable transport links in the DS8 Masterplan extends to the South of the Homestead Link but this is not shown in this	The plan on p18 has been compared with	None	N/a

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				map. [An SPD cannot be used to rewrite a local development plan policy].	the spine road plan included with local plan DS9 and all routes shown in the local plan are included on this plan.		
15	Catesby	Vision	p21	For completeness add “Fox Covert” and “Boat House Spinney” to the vision text, so to read “Retained landscape features including Cawston Spinney, Fox Covert, Boat House Spinney and Cock Robin Wood”.	Agree	Add “Fox Covert” and “Boat House Spinney” to the vision text, so to read “Retained landscape features including Cawston Spinney, Fox Covert, Boat House Spinney and Cock Robin Wood”.	Retained landscape features including Cawston Spinney, <i>Fox Covert, Boat House Spinney and Cock Robin Wood</i> ”
16	Catesby	Vision	P21, para 2 line 2:	For completeness add “and Fox Covert and Boat House Spinney”	Agree	As above	As above
17	Catesby	Vision	p22	We recommend that the Framework Masterplan is updated to align with Catesby Estates’ proposals for their site, which show a more considered approach to green infrastructure provision.	The code does not reflect detail from proposals which do not yet have planning permission. Instead it sets	None	N/a

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					out a framework.		
18	Catesby	Vision	P22	Cawston Lane needs to be shown as a main route not a local road.	Cawston Lane a named route on the plan – no classification here.	Change representation of Cawston Lane on masterplan	Amend plan
19	Catesby	Vision	P22	The existing rights of way should be shown as they are an important structural element in the design proposals.	Agree with principle – add existing rights of way	Add existing rights of way to the masterplan.	Add to plan
20	Catesby	Vision	P22 Point 5	– for completeness add “and Fox Covert and Boat House Spinney”	Agree	Add “and Fox Covert and Boat House Spinney” to bullet 5	The retention of Cawston Spinney, <i>Fox Covert and Boat House Spinney.</i>
79	Tritax Big Box Developments	Vision	P22	Page 22 identifies an area of ‘Proposed open space’ to the east of the Potsford Dam link/northwest of Cawston Spinney. It may be that this is intended to be an illustration of how the principle of green/blue infrastructure connectivity already set out in the South West Rugby could be delivered. At this stage, the detailed route and design of this key infrastructure has not been defined, and this is therefore considered unduly restrictive and onerous.	This area is identified in Figure 4 (Green and Blue Infrastructure Plan) of the adopted Masterplan SPD (albeit obscured by the line of the link road). It is also indicated on the updated masterplan at Figure 2 of the same document.	None	N/a

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					As a framework, the precise extent and nature of such a space will be determined through planning proposals. This area will form part of the strategic green infrastructure corridor.		
327	Taylor Wimpey	Analyses		The “Proposed Sustainable Transport Link” does not correspond with the adopted updated South West Rugby SPD and needs to be corrected. The Spine Road alignment does not match the submitted application.	The ‘Sustainable Transport Link’ alignment does correspond with the GIS data plotted as part of the adopted local plan process. It does therefore align with the map in local plan policy DS9.	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					The Homestead Link Road alignment reflects the consented scheme. Cawston Lane and the Community Spine Road are the subject of a current planning application and yet to be determined. As such, these are not reflected in the alignments, though the final sentence on p22 anticipates that precise alignments may vary.		
328	Taylor Wimpey	Vision	P22	The Community Spine Road alignment does not match the submitted planning application and would benefit from being updated. Cawston Lane needs to be shown as a main route (bus standard) rather than a local access road for the section between the Spine Road	As above, the alignment does not reflect a planning proposal which is yet to be	None	N/a

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				and the Link Road. The Framework Masterplan presents a route for the Taylor Wimpey “access road” and a central open space which does not accord with Taylor Wimpey’s own masterplan. The Taylor Wimpey masterplan is informed by the various site considerations as well as the objectives of (1) providing a sensible block layout (2) legible circulation. There is no proposal for a throughroad connecting Rugby Road and Alwyn Road as suggested on the masterplan. There will be a ped/cycle connection but no vehicular traffic. This is to avoid this route becoming a rat-run/short cut between Rugby Road and Alwyn Road.	determined, though the text allows for variation of alignment. Cawston lane response as above. Also as above, schemes which do not yet benefit from planning permission are not specifically reflected. This does not preclude variations to alignments and size and location of features coming forward.		
373	R. Allanach	Vision	P22	One of the sustainable transport links in the DS8 Masterplan extends to the South of the Homestead Link but this is not shown in this map.	As in response to comment 372, we have compared the masterplan and	None	N/A

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				<p>DS8 also requires “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; ... “. The route to be taken by the Green and Blue infrastructure corridor is shown in the DS8 Masterplan and in the SW Rugby Masterplan SPD diagram of the South West Rugby Green and Blue Infrastructure Plan. The map on page 22 is in part ambiguous and in part positively misleading. The ambiguous portion is the belt of land between Boat House Spinney and the Homestead Link which is shown as open space [which clearly it must be] but fails to identify the specific role this open space must play to provide a Green and Blue infrastructure corridor. The misleading part is that in the East the entire block of land between Cock Robin Wood and the Homestead Link is shaded out as a residential allocation. We can see from the DS8 Masterplan that this is not true as a portion has been allocated as Green and Blue infrastructure [as indeed it must be to fulfil the DS8 policy].</p>	<p>the plan included in policy DS9 of the local plan, and cannot see a route being referred to.</p> <p>The local plan green infrastructure policies maps and the green and blue infrastructure plan (figure 4) in the Masterplan SPD are acknowledged and have been referred to (and are further referenced in the amended ‘Nature’ section. However, this masterplan is refining further and supplementing</p>		

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					<p>policy DS8 (which requires the incorporation of a continuous green and blue infrastructure corridor).</p> <p>To the east of the allocation, this masterplan reflects the consented Homestead Link Road and the green space approved alongside it.</p> <p>Green infrastructure is an inclusive term and its role as part of the strategic GI network is illustrated on the masterplan, and discussed further in the</p>		

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					'nature' section of the code.		
143	Homes England	Vision	p22	<p>The Graphic on Page 22 does not reflect the proposed development or the details in the submitted planning application for the Community Spine Road / Cawston Lane Enhancements (R24/0733). We recommend that the Graphic included is updated to align with the submitted planning application, the following is also noted:</p> <ul style="list-style-type: none"> • Graphic included doesn't match alignment of Cawston Lane / Community Spine Road planning application which is in the public domain. • Cawston Lane needs to be shown as a main route and not a local road. • Compound areas need removing from HLR application area, these are for construction purposes only. • Green Infrastructure should be changed to match emerging schemes (which are providing larger areas compared to the Framework Masterplan included within the document). • There is an inconsistency between the buffer to Cawston Spinney and no buffer being shown to Cock Robin Wood which is a Local Wildlife Site. Please see our later comments regarding suggested buffers. 	<p>As above, this application is not yet determined, and is therefore not incorporated into the code.</p> <p>Cawston Lane – to be individually labelled</p> <p>As above – label regarding application area and compounds.</p>	<p>None</p> <p>Change representation of Cawston Lane on masterplan to represent sustainable transport section.</p> <p>Compound area to schools sites (to be substation) shown in grey. Compound area to become residential development shown as such.</p>	<p>N/a</p> <p>Label Cawston Lane</p> <p>Amend plan</p>

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					Green infrastructure reflects delivered and approved schemes only at the time of production. Buffers to be addressed in the nature section and deleted from the masterplan	None None	N/a N/a
571	Homes England	Introduction	Framework masterplan	Additional drawing comments in mark-up appendix include: <ul style="list-style-type: none"> Extent of district centre – should occupy whole space between Cawston Lane and CSR 	The eastern edge has been drawn to reflect the Masterplan SPD. Any variations will be considered through planning proposals.	None	

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				<ul style="list-style-type: none"> Suggested amendment to interface with existing dwelling - HE propose this to be residential (poss older peoples housing) Routing of local access road to south requested to be more convoluted to avoid becoming a rat run Amendments requested to development parcels and open space adjacent to community spine road to reflect HE plans Request drawing amended to reflect HE proposed alignment of sustainable transport corridor 	<p>We do not think this precludes residential development in this location.</p> <p>Routes between Cawston Land CSR are indicative</p> <p>Undetermined planning proposals at the time of production are not reflected.</p> <p>This will be addressed in the 'Movement' section</p> <p>As above re uncommitted schemes not reflected</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>	

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				<ul style="list-style-type: none"> Suggest that location of bus gate is identified Amendments requested to green infrastructure and open space adjacent to Homestead Link Road to reflect HE plans Request to identify a triangle of land for development at junction between HLR and sustainable transport corridor to reflect HE proposal Request to identify small parcel of land adjacent to HLR as open space Suggestion to represent HE compound areas differently Request to show open space to boundary with rear of housing on Montague Road as proposed in HE plans. 	<p>As above – disagree.</p> <p>Proposals not yet determined.</p> <p>Agree</p> <p>As above – disagree.</p> <p>Proposals not yet determined.</p> <p>Reflected in 'Movement drawings</p> <p>See Movement</p> <p>Buffers removed</p>	<p>None</p> <p>None</p> <p>None</p> <p>Reflect compound areas on plan</p> <p>None</p> <p>See Movement</p>	

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				<ul style="list-style-type: none"> Request for local access road to east of Alwyn Road to not be a through route Suggested amendments to route shown through safeguarded land – to make unconnected routes and ensure bus gate functions as intended Requested removal of buffer to Cawston Spinney or clarification as indicative Note that currently no buffer shown to Cock Robin Wood 	Buffers will be addressed in the 'Nature' section, and should be deleted from the masterplan Noted – propose to not show one and reserve buffers for nature section	None Delete buffers around Cawston Spinney on this plan None	
312	Sport England	Vision	P22	In relation to the Framework Masterplan (page 22) it is disappointing that the South West Rugby Masterplan SPD does not appear to provide dedicated playing field provision to meet the needs of a large residential site which page 46 states that there should 8.9ha of playing field provision.	Dedicated playing field provision is proposed as part of the schools sites adjacent to the district centre, as required by SW Rugby masterplan SPD	None	N/a

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					and as noted in the key on p22. The infrastructure requirements of the allocation are beyond the scope of the design code and are addressed in existing policy.		
Context + co-ordination							
21	Catesby	Code	P24	CO.01 and CO.02 are in conflict with each other. It is not feasible to display both the existing context and neighboring schemes where information is available. We support the principle of considering the neighboring context in applications to ensure an appropriate design response. We propose that CO.01 be removed and CO.02 be retained. While the existing context is valuable for site analysis, the primary aim of this Code is to ensure coordination across the allocation, making the existing context less relevant.	The intention of these two points is different, but agree that this can be made clearer. We are keen that applicants should consider existing context in and around the allocation which are not the subject of development proposals (e.g	Make this intention clearer, specifically in CO.01	CO.01 Applicants must show existing context on all relevant drawings where <i>this comprises development surrounding the urban extension as a whole, neighbouring completed/commenced phases, and retained on site features such as Cawston Spinney.</i>

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					around the periphery of the site or around features such as the woodlands), and the content of neighbouring schemes		
144	Homes England	Code	p24	<p>Whilst we understand what the introductory text is seeking to outline, we are concerned that the document reads as though the Consortium is not already working together collaboratively, which doesn't reflect the reality of the situation. This Code is a useful tool to ensure coordination across the allocation, but it should also recognise the collaborative approach, Homes England. Catesby and Taylor Wimpey are engaging together and with RBC and WCC.</p> <p>Could this collaboration and the work done to date be clearly mentioned in the narrative as well as the extensive pre-application engagement that has been undertaken. We feel that this would benefit the deployment of the code for future developments, acknowledging the corroborators within the allocation.</p>	<p>We acknowledge the collaborative working of the Consortium, and will revisit the text to ensure this is clear.</p> <p>We also however are planning over the long term where land ownerships and relationships are subject to change, so the objective of coordination is</p>	Add text to first paragraph to clarify.	<p>“..nature of delivery. <i>Whilst it is acknowledged that collaborative working is ongoing between land interests, the code seeks set out key coordinating principles.</i></p>

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					key to the design code.		
145	Homes England	Code context and coordination	p24	<p>CO.01 and CO.02 conflict with each other. It is not possible to show the existing context and the neighbouring schemes where information is available. We agree with the principle of ensuring applications consider their neighbouring context to ensure appropriate design response. We suggest that Code CO.01 is removed and CO.02 retained. While the existing context is useful for site analysis, the purpose of this Code is ensuring coordination across the allocation and therefore the existing context is not helpful.</p> <p>We suggest Codes CO.03 is amended to be general text about approach rather than a must.</p> <p>We recommend this is accompanied by further clarification such as: "Key strategies and principles are anticipated to be coordinated as a part of outline applications with further detail on built form, materiality and landscaping coordinated as a part of Reserved Matter Applications."</p>	<p>Please see response to point 21 regarding CO.01 and CO.02.</p> <p>Disagree – a key role of the code is coordination, and therefore propose to keep as a requirement. Can however include additional text suggested.</p>	<p>As per 21</p> <p>Add suggested text to CO.03</p>	<p>As per 21</p> <p><i>Key strategies and principles are anticipated to be coordinated as a part of outline applications with further detail on built form, materiality and landscaping coordinated as a part of Reserved Matter Applications</i></p>

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329		Context + coordination	P24	To confirm that the promoters/developers (Taylor Wimpey, Homes England and Catesby) are in regular contact with one another on matters of design coordination, masterplanning and collaborative infrastructure delivery.	Noted.	None	N/A
374	R. Allanach	Context + coordination		No comment. [It would have been useful if Symmetry and L&Q had followed this precept whilst developing their competing proposals for cycle routes North and South of Coventry Road, Cawston – although not as useful as RBC actually laying down the cycle route strategy in the SW Rugby Masterplan SPD.]	Noted.	None	N/a
Movement							
01	R. Basnett	Not given - Movement	Not supplied	Please find attached my comments to be considered on the above planning application. 1) The cycle greenway needs to be updated to include full access from Cawston to Draycote water.	The active travel framework on p35 illustrates a proposed network of active travel routes (including cycling) which offer route options north-south through the South West Rugby area which connects	None	N/a

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					to National cycle route 41. This route in turn runs southward toward Draycote Water. Route options would therefore exist across the development area (the code can only influence the development area) which would link between Cawston and Draycote Water.		
05	R. Basnett	Not supplied - movement	Not supplied	5) The whole site need a better link road onto existing A45 / to M45 island. It's unacceptable the current plants, it would bottle neck all traffic onto the Rugby Rd, Alwyn Rd and towards Potford Dam rd which frankly is a poor link rd towards the A45 currently anyway.(this section of the A4071 Coventry rd) needs to be	The strategic road framework is included in adopted local plan policy, and associated information (including costs) is	None	N/A

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				improved to help cope with the expected pressure of increased traffic. There is also “NO” pedestrian access on the stretch of road and is hazardous to cyclists and by experience, seeing people attempting to walk down this road!	included in the South West Rugby Masterplan SPD. It is beyond the scope of this design code to amend the strategic road framework in adopted policy.		
315	Sport England	Not supplied	Not supplied	Sport England would encourage the authority to review design code against Sport England’s Active Design Design Code Guide February 2025, with Active Design referenced within the Masterplan SPD for the site. https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2025-02/DesignCodesChecklist-V4-03-02-25.pdf?VersionId=pdn5xlaqB8lqgY6UTm4WHmcFFgH9l2_I	Noted. Active travel has been a central focus of the development of the design code.		None
80	Tritax Big Box Developments	Movement		As a general comment, this section: • applies to highways infrastructure much of which will be adopted by WCC, if such infrastructure is to be adopted it will have to reflect various WCC adoption guidance so it is queried why this needs to be repeated in a design code; • the Introduction section also refers to other guidance e.g. and among others the	RBC has continued to engage with WCC on this document. We further recognise that there is existing guidance for	None	N/a

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				Warwickshire Design Guidance and Manual for Streets, therefore TBBB question again why further guidance in a design code required.	movement and street design. The intention of the code is to provide direction for the interpretation and use of that guidance and propose preferred design principles. If we get WCC agreement there will also be uplift.		
81	Tritax Big Box Developments	Movement		The plans throughout this section need to be updated to reflect an employment layout (as allocated in the emerging local Plan). For example, the plans throughout this section show a tertiary street going east to west going through the employment land and this is not proposed or required, nor does it meet the requirements of strategic logistics development. The proposed alignment of all routes should also be clearly shown as indicative.	The safeguarded land to which this comment is referencing is not allocated in the adopted local plan (2011-2031), which this SPD would supplement. As such, adding an employment	None	N/a

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					<p>layout would go beyond the adopted development plan - something an SPD cannot do.</p> <p>The proposed allocation in the Preferred Option Consultation Document is yet to be subject to public consultation and is not yet adopted policy.</p>		
82	Tritax Big Box Developments	Movement		As a general comment the word 'must' is too stringent; and should be replaced with 'should, where feasible'.	Disagree. The use of 'must', 'should' and 'could' is explicitly set out in the National Model Design Code. The point of the design code is to set out clear and measurable	None	N/a

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					expectations for physical development. To amend in the way suggested would undermine this.		
146	Homes England	Movement	P26 - Vision	We recommend inclusion or reference to “Active Travel” in line with Para 109.e of NPPF for a vision led approach	Agree	Insert additional bullet point	<i>Promotes active travel</i>
22	Catesby	Movement	p27	A more local or regional example should be used rather than Poundbury. Consider referencing Houlton, Rugby. Related to this point, the photographic examples used are not local to the South West Rugby. Could more local or regional examples be used as well?	WCC plus another respondent have raised the same point (ref 413 and 148) below We recognise that Poundbury is not a local example, though it does exemplify the street network principles we are seeking. We propose to add an additional more local example in the	Add Upton case study as a more local example	Add ariel image of Upton and explanatory text

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					form of Upton in Northampton.		
147	Homes England	Movement	p27	We question the accessibility of the graphic and potential confusion given the range of development types covered within the graphic associated with MO.04, and suggest it is removed, the content may be better suited in the “public space” section.	Agree delete	Delete ‘Public space’ graphic showing different enclosure scenarios.	Delete graphic
148	Homes England	Movement	p27	Could a more local or regional reference be used rather than Poundbury?	Two other respondents have raised the same point (see 22 above and 413 below). Agree to seek an alternative case study.	See response to comment 22 above	As per 22
412	WCC Highways	Movement	P27, 1 st para	Spelling - prioritization	Correct spelling	Correct spelling	Prioritization <i>prioritisation</i>
413	WCC Highways	Movement	P27 case study	Consider using a local case study	The same point is raised by two other respondents (see 22 and 148 above). Agree to seek an alternative case study.	See response to comment 22	As per 22
330	Taylor Wimpey	Movement	P28	Whilst the aspiration of delivering bus stops within 400 metres of all dwelling is supported,	400m walking distance has	None	N/a

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				<p>there will be instances where this is not physically possible owing to site conditions, alignment and viability of the bus route. It is important that the Code accepts the need for flexibility.</p> <p>For example, the Code requires that “drop kerb crossings should be placed every 100 metres”. There is no objection to drop kerb crossings but they should be located where they are needed, informed by the development, and not arbitrarily every 100 metres.</p>	<p>been supported by WCC highways. This is considered important in encouraging bus use. We understand that this may not always be feasible, in which case the applicant will need to set out why. (see also 152)</p> <p>Agree to delete reference to dropped kerbs, but crossings should be a maximum of 100m apart</p>	As per response	<p>Drop Kerb <i>Uncontrolled</i> crossings should be placed <i>at least</i> every 100m....</p>
542	WCC Highways (active travel)	Movement	P28, MO.12	change to ‘walking, wheeling and cycling’	Agree	Change text as suggested	...Walking, <i>wheeling</i> and cycling should...
149	Homes England	Movement	P28 MO.13	For MO.13, we feel there should also be a reference to equestrian users, given the number of	Add equestrian users where appropriate	Add text	User hierarchy: Streets must consider pedestrians and cyclists first <i>(and equestrian</i>

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				Bridleways in the area.			<i>users where appropriate), followed by...</i>
150	Homes England	Movement	p28, MO.15	<p>This does not reflect the need for context specific design that responds to constraints which mean that these could not be delivered in practice. DfT Inclusive Mobility specifies 2m as a minimum that should be provided, to reflect feasibility and constraints. Throughout the document, precedents do not use "conventional kerbs." We have concerns that this code, as currently written, will create future misunderstandings and is likely to limit potential innovation as detailed designs are developed. We suggest this reference is removed or revised to 'clearly demarcated' or 'demarcated by a kerb.'</p>	<p>MO.15 specifies footways of a minimum 2m width. This aligns with WCC guidance and this comment.</p> <p>Agree that the use of 'conventional kerbs can be amended to 'demarcated with a kerb'. The choice of precedent images is a recurring theme in WCC feedback and as such these have been reconsidered in places. However, precedents have been</p>	Amend MO.15 to remove use of word 'conventional'	<p>Footways must be at least 2m wide, free from obstructions and separated from carriageways with a conventional kerb demarcated from carriageways with a kerb</p>

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					<p>selected to illustrate specific principles, and should not be considered in a broader sense than this. Text is to be included in the code clarify this.</p> <p>In addition, amended text regarding specific constraints is being added to clarify how the code would apply in those circumstances (see Code Context and Coordination above)</p>		
375	R. Allanach	Movement	P28 MO.15	Whilst MO.15 correctly sets a minimum width standard for footways developers are not reminded of the minimum width standards for cycle routes set out in the Warwickshire Design	This page is looking at user requirements, and those of	None	N/a

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				Guide viz a minimum verge width of one metre segregating cycle routes from roads and for all shared use footways/cycle routes to have a minimum width of three metres. Local Transport Note 1/20 provides for a minimum cycle route width of 2 metres for a one way lane but this is not directly mentioned either. The draft SPD would be enhanced by highlighting these requirements alongside the minimum footway width.	cyclists are discussed in MO.18. Cycling may be integrated on carriageway in some circumstances and segregated in others. This is considered in further detail later in the movement section and within street types in the public space section. MO.18 does refer to LTN120 standards for segregated cycleways, so it is considered that this is addressed.		
414	WCC Highways	Movement	P28, MO.15	Use Uk spelling - meters	Correct spelling	Correct spelling	Meters metres

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415	WCC Highways	Movement	P28, MO.17	Need to add footway widening to this list.	Agree	Add footway widening to MO.17	Streets near schools, shops and community hubs must cater to vulnerable users with enhanced safety measures, such as access restriction, traffic management, <i>footway widening</i> , parking control and active travel infrastructure.
151	Homes England	Movement	P28, MO.18	South West Rugby itself cannot deliver cycle connections to the town centre or rail stations, it is limited to its own site area, therefore this should not be a mandatory requirement. It is however making contributions to those routes included within the revised Appendix K within the adopted SW Rugby SPD. We suggest the wording is revised to use more flexible language such as “towards”.	It is acknowledged that South West Rugby cannot deliver all off-site routes to the destinations list (with relevant contributions noted), however it can connect to existing routes which is what this principle is targeting. Comment ref. 376 below also challenges this principle so will	Amend MO.18 bullet 1	Safe, direct and well-lit cycle routes connecting neighbourhoods <i>to routes beyond the site and onto</i> town centres, railway stations and other key destinations.

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					reword to make it clearer.		
543	WCC highways (active travel)	Movement	P28, MO.18	please change cycle lanes to 'cycle tracks'	Agree	Amend as suggested (second bullet)	...Where traffic speeds are higher, segregated cycle lanes <i>tracks</i> ...
376	R. Allanach	Movement	P28 MO.18	“Developers must ensure: Safe, direct, and well-lit cycle routes connecting neighbourhoods to town centres*, rail stations*, and other key destinations”. I wonder whether the county council as the Highways Authority might also have a role to play here. The map on page 35 of draft SPD shows that currently there are not safe, direct and well-lit cycle routes connecting the Northern and Central neighbourhoods of the SUE to Rugby's town centre and rail station. I await the first time a report from the Head of Growth and Investment to planning committee recommends that a planning application should be rejected because the developer has failed to ensure this connection.	As noted in the above representation comment (151) and the response, it is not within the gift of the applicants on South West Rugby to physically deliver all off-site routes (albeit contributions towards movement infrastructure are noted). The map referenced on p35 does illustrate the active travel framework	Amend MO.18 bullet 1	As above (ref 151)

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					within the site and immediate connections to routes beyond the boundary. That is what this code is targeting.		
416	WCC Highways	Movement	P28, MO.18 bullet 2	'30mph and higher' should be used instead	Agree	Amend MO.18 bullet 2	"...Where traffic speeds are <i>30mph or higher</i> , segregated cycle lanes designed to LTN120 standards may be required."
152	Homes England	Movement	P28, MO.19	Best Practice guidance on Buses in Urban Developments specifically notes that there should be a degree of flexibility on walking distances to bus stops. We do not think is possible or appropriate to provide this in all locations within SW Rugby and to a large degree is outside of a developer's control. As worded, this does not appear to factor in the existing bus stops or optioneering to date on the viability of new bus routes for operators. We suggest the wording is revised accordingly to enable compliance. An important consideration is the positioning of bus stops in relation to the destinations that the bus routes are serving, we suggest some text regarding this is included within the Code. For example, we would advocate for bus stops	400m walking distance (along routes and not as the crow flies) has been supported by the WCC. (see also comment ref 330 above). We understand this may not be achievable in every case, though in those instances this must be explained.	None	N/a

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				to be located next to the Secondary School to encourage non-car travel, and close to the Mixed Use Centre.			
153	Homes England	Movement	P28, MO.20	Please revise to a “could” within the code for integration of mobility hubs, as we are not able to commit to this at bus stops across SW Rugby. See further comments on the mobility hub section, we have further explained this below at reference 4.2.24.	Mobility hubs are an aspiration for the allocation, however are not mandated by the code. In recognition of this, propose to amend MO.20 to reflect ‘where mobility hubs are included’ for clarity.	MO.20 - amend so that it is clear bus stops should only be integrated with mobility hubs where mobility hubs are included. (further amendment to MO.20 as per comment reference 417 below)	Bus stops should include shelters, seating, real-time information displays, and integration with mobility hubs (<i>where mobility hubs are provided</i>) in line with WCC quality bus corridor infrastructure
417	WCC Highways	Movement	P28, MO.20	In line with the WCC Quality Bus Corridor infrastructure	Agree – add to the end of this code (further amends to MO.20 as per comment reference 153)	Amend MO.20 to include reference (+ other amends from 153 above)	Bus stops should include shelters, seating, real-time information displays, and integration with mobility hubs (<i>where mobility hubs are provided</i>) in line with WCC quality bus corridor infrastructure
154	Homes England	Movement	P28, MO.28	Whilst we agree in principle, we are concerned by the lack of nuance within this code. Inclusive Mobility guidance specifies this as something that should be considered. Dropped kerbs should be located by need and	This requirement is to allow crossing at regular intervals	Amend MO.28 to delete reference to dropped kerbs and crossing a maximum of every 100m	As per 330 above

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				informed by the proposed development rather than solely being placed every 100 metres. Suggest the code is reviewed and the above context is added.	additional to crossings at obvious desire lines, so will should amend to make 100m a maximum distance between crossings and make reference to 'sensible' positioning within that 100m. Also delete reference to dropped kerbs	(See also 330)	
418	WCC Highways	Movement	P28, MO.27	Priority crossing points needs to be added here as WCC are providing priority crossings where appropriate.	Clarified with WCC officers that the word 'formal' should be replaced with 'priority'	Change word 'formal' to 'priority'	Formal Priority crossings must align with pedestrian and cyclist desire lines to reduce risks and encourage use.
419	WCC Highways	Movement	P28, MO.28	Use Uk spelling - meters	Agree – correct spelling	Correct spelling	Meters metres
420	WCC Highways	Movement	P28, image Nansl	How does this relate to Rugby? Consider using a local case study - e.g. Houlton. The picture is a poor example as pedestrians will be lead into the cobbled paving.	Agreed to include wording in a prominent location in the	Replace precedents	Suggest substituting for 1) <i>Image of priority cycle track crossing (Coventry)</i>

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			edan Newquay		code - see officer comment for page 6 - to reflect how precedent images should be used – i.e. that they illustrate a particular point in the code, and it should not be assumed that replication of all features pictured will be acceptable. Seek more local precedent images where possible		2) <i>side street pedestrian priority crossing Warwick</i>
156	Homes England	Movement	p29	We feel it would be beneficial if additional street types are included within the 'tertiary' category. This would support the street hierarchy principles and create a variety in the transition between the tertiary streets identified in the plan on page 34 and the	Noted. The tertiary street types align with the categories within the Warwickshire	Add text to characteristics of Category 4b streets	<u>Existing bullet:</u> Limited <i>vehicular</i> connectivity, designed for localised movement and access.

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				<p>Tertiary Street 2 (Cat 4B) which are private drives. Examples include lanes, shared surface streets, courtyards and mews streets. These typologies are also referred to within Manual for Streets.</p> <p>We suggest wording is added to the characteristics of Tertiary Street 2 (Cat 4B) to ensure these streets provide onward pedestrian connectivity is added to create a permeable network of walking routes.</p>	<p>Design Guide. At the current time, WCC inform us that shared surface streets are not supported. However, the treatment at the sides of the street – for example with the built form, boundary treatments and gardens/privacy strips. If applicants want to further define and distinguish between category 4a streets we welcome that as long as they adhere to key design principles in the code.</p>		<p><u>Add new bullet:</u> <i>Pedestrian and active travel connections should be facilitated beyond these streets where possible (refer to network diagram on p31).</i></p>

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					Agree regarding onward pedestrian connections – refer diagram p31.		
421	WCC Highways	Movement	P29 MO.30	This section should clearly state cross roads will not be accepted by WCC due to safety concerns.	Noted.	Amend text	Crossroads generally should not be used, <i>as they will not be accepted by WCC due to safety concerns.</i>
422	WCC Highways	Movement	P29 street categories (titles of boxes)	Link the Type reference of street back to the WCC Design Guide - show where the category has come from	Agree – link back more clearly to the WCC Design Guide	Add wording to strengthen category definitions and references. Make clear that categorisations come from WCC design guide.	<i>3rd para:</i> The hierarchy aligns with Manual for Streets (MfS) which defines common street types and functions. <i>Categories refer to those in the Warwickshire Design Guide.</i>
541*	WCC highways	Movement	P29 primary streets	Need to ensure there is suitable vehicle access to plots to avoid on street parking and it needs to be difficult to park on street. Any frontage development on these streets needs to have only one access point from the highway as a shared private drive for 6 dwellings. This will also prevent on street parking on a bus route - diagrams would help here to show what is required for access	Noted. Amend accordingly	Add no frontage access to bullet 1. Add extra bullet re no frontage parking. Cross reference to relevant design principles on subsequent page(s).	Limited or No frontage access to prioritise movement efficiency (new bullet 3): <i>No frontage parking to prioritise movement efficiency</i>

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423	WCC Highways	Movement	P29, Secondary Streets, characteristics	<p>They should have at least one point of access, plus additional access points determined by the number of dwellings.</p> <p>Although they principally cater for traffic movements, they must still cater for safe pedestrian movement. Therefore, design speeds of 20mph are expected in residential areas (WCC Design Guide 3.4.1).</p> <p>This would increase to 30mph on a bus route</p>	<p>Agree to keep flexibility for single connection, though largely envisage two points of access in SW Rugby.</p> <p>Add an additional bullet point regarding design speed.</p>	Amend and add to the 'characteristics' of secondary streets in the grey box.	<p>Mixed-traffic design accommodating buses, HGVs, and general traffic. Frequent junctions with tertiary streets to improve connectivity</p> <p>Streets must be continuous and connected to the <i>highway network</i> at a minimum of <i>one point, preferably two</i>, to provide flexibility in traffic routing. <i>Additional access points to be determined by the number of dwellings.</i></p> <p>All developments must ensure proximity to secondary streets, enabling a 400m maximum walking distance to bus stops for all dwellings.</p> <p><i>In residential areas, design speed should be 20mph, rising to 30mph where the street acts as a bus route.</i></p>
424	WCC Highways	Movement	P29, tertiary street 1,	Some frontage access is acceptable – there shouldn't be swathes of drop kerbs.	Noted. Amend wording	Amend wording	<i>Some direct frontage access to properties is acceptable</i>

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			characteristics, bullet 1				
425	WCC Highways	Movement	P30, 1 st para	Reference to bridleways should also be provided.	Agree this should be added. Also need to relate to plan	Add bridleways to principles on p30 – what they are and how they will be designed/used, making particular reference to safety.	<i>MO.XX Bridleways exist across the site which should be maintained for equestrian users and active travel. Bridleways could be diverted where necessary for the safety of users, where conflicts may arise with new development. (see p35)</i>
426	WCC Highways	Movement	P30, walkability text box, 1 st sentence	As well as direct - to follow desire lines	Agree. Amend text.	Amend text.	Ensure a dense and continuous network of pedestrian routes, <i>which are direct, convenient and reflect desire lines</i> , so that walking is a viable and attractive mode of travel throughout the development.
427	WCC Highways	Movement	P30, direct cycling routes	Will these be direct cycle routes? Will they follow the route of cycle/pedestrian desire lines? These routes should be shared between pedestrians and cyclists unless they are specific segregated cycling routes	Agree a stronger 'active travel' emphasis to demonstrate potential multiple active travel options (including for	Place a box around the 'walkability' and 'direct cycling' columns and title 'active travel	Include 'active travel box.

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					example mobility scooters)		
428	WCC Highways	Movement	P30, development parcels text box, 2 nd para	Highways need further clarification on this point to ensure there is sufficient access to plots.	Discussed this point with WCC officers. Discussed where 60-80m blocks had come from – rule of thumb to create usable blocks which allow for permeability. Agreed to reword to emphasise permeability point.	Reword to emphasise permeability requirement	Parcels should typically have depths of 60 to 80 metres, ensuring <i>permeability</i> , efficient use of space and logical layouts for access and frontage
159	Homes England	Movement	p31	This diagram is very theoretical and gives no sense of scale. This is concerning given the site has a significant number of existing public rights of way and site-specific landscape features. We are concerned about potential misunderstandings in the future given the theoretical nature of the diagram. We do not think it contributes meaningfully to the code and points are made on the	Disagree – this diagram has been devised to graphically represent (illustratively) principles (as written in the Warwickshire Design Guide) about how the	Add further text explanation and cross referencing. Add title to diagram	Add title to diagram: <i>Figure X: A conceptual diagram of a network based on street categories within the Warwickshire Design Guide</i> <i>This diagram is conceptual and not to scale, but serves to highlight how different</i>

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				previous page, so we recommend removing the page.	street network can be. We see this as a useful diagrammatic representation of the written principles and envisage this becoming a useful reference in discussions as schemes come forward. Letters relate to further info in public spaces.		<i>street types can connect into a network. Routes within the network need to be designed to reflect other aspects of the code and technical requirements. For example, this illustrative diagram indicates a single cycleway adjacent to a secondary street, but the provision of a single cycleway should not be assumed on this basis</i> <i>The letters on this diagram relate to street codes in the public space section.</i> <i>A – page 55</i> <i>B – page 56</i> <i>C – page 59</i> <i>D – page 60</i> <i>E – page 61</i>
N/a	Officer	Movement	p31	Diagram to be amended so that letters align with the order of 'sample layouts' in the public space section.	N/a	Amend letters on diagram	Letters move on diagram
429	WCC Highways	Movement	P31, 1 st point (walking anyw	Shouldn't this include cycling as well? It has been picked up as active travel in the illustrative diagram but not in the text..	Agree that this should have an inclusive 'active travel' focus	Text to be amended to emphasise active travel. Cross reference to further street type	Walk anywhere (<i>active travel</i>).... Radial cycling routes (<i>active travel</i>)

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			here approach)			principles on subsequent pages.	(see 159 above for cross referencing)
430	WCC Highways	Movement	P31, 2 nd point, radial cycling routes	Could this not be for walking as well?	Agree that this should have an inclusive 'active travel' focus	Text to be amended to emphasise active travel. Cross reference to further street type principles on subsequent pages.	As above add (active travel) Reference between diagram and relevant pages
431	WCC Highways	Movement	P31, final para	and cycling - active travel	Amend text to refer also to cycling	"...manageable walkable <i>and cyclable</i> neighbourhoods."	"...manageable walkable <i>and cyclable</i> neighbourhoods."
432	WCC Highways	Movement	P31, diagram	Appreciated the image is illustrative however, there are significant straight, long roads being shown and the concern is a developer will think this form of layout is acceptable. We have experienced this at Houlton where the illustrative plan was taken as the accepted plan when it should have been further designed.	To address this matter, propose adding some text beneath the diagram, to emphasise conceptual illustrative nature of the diagram, and that routes would need to be designed to reflect all other requirements of	As per 159 above	As per 159 above

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					the code and highways technical requirements		
331	Taylor Wimpey	Movement	P32 MO.34	Again, guidance as to speed limits should be applied flexibly. It needs to be an aspiration rather than a hard and fast requirement. Requirements as to MO.34 need to be consistent with WCC requirements.	Network speed reduction requirements have been developed and amended in liaison with WCC officers. It is acknowledged that there may be 'place' based requirements (e.g. around the local centre and schools) where speed reduction requirements need to be very focussed. This will be addressed under comment XX . MO.34 is to be amended in line	None	N/A

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					with WCC feedback (see comments 434-439 below).		
160	Homes England	Movement	P32, MO.33	How does this sit with intended speeds for Cawston Lane / Community Spine Road? There are existing roads which require TRO to change speed limits, a process which sits outside the planning system. The submitted planning application (R24/0733) is proposing 20mph around the Primary School and Mixed Use Centre which is also a bus route.	Existing streets which will be altered as part of SW development will be addressed on a case-by-case basis.	None	N/a
161	Homes England	Movement	P32, MO.34	Sub-criterion 1 and 6 suggests using junction types, but other code points restrict the use of different types of junctions. We recommend that sub-criterion (3) is re-written and simplified. We also question the use of 'working' in this context. Can RBC confirm WCC Highways Design are aligned with points 1-7 to ensure that the code is deliverable.	MO.34 has been amended in line with WCC feedback. Sub-criterion 3 has been deleted on their advice	None	N/a
162	Homes England	Movement	p32	Suggest Diagram is removed. Again, we are concerned by this diagram as it is very theoretical and gives no sense of scale. This is concerning given the site has a significant number of	Disagree. The diagram illustrates the written points in MO.34. It is	Add title to diagram and short explanatory text	Add title: Figure X: Conceptual diagram of suite of speed

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				existing public rights of way and site-specific landscape features. As per 4.2.15, we are concerned about potential misunderstandings this may create.	intended to be illustrative. (see below WCC comments). Propose to add a title and short explanatory text		<i>reduction measures outlined in MO.34</i> <i>Routes within the network need to be designed to reflect other aspects of the code and technical requirements.</i>
433	WCC Highway s	Movement	P32, MO.34 (2)	“Change of direction...” Will this be horizontal alignment?	Yes.	Change of direction=horizontal alignment. Change wording to clarify.	Change of direction (Horizontal deflection)
434	WCC Highway s	Movement	P32, MO.34 (2)	“...naturally slow...” This should be producing a consistent low speed through the development - 20mph or lower. For a bus route 30mph or lower	Agree	Amend wording	Change of direction (horizontal alignment): Integrate junctions or bends to produce a consistent low speed through the development while emphasising urban form to reinforce the reduced speed environment. Speeds are expected to be 20mph or lower. For a bus route 30mph or lower.
435	WCC Highway s	Movement	P32, MO.34 (3)	Remove this paragraph - WCC will not accept this.	Noted. Agree to delete	Delete MO.34 (3) Amend diagram accordingly	Priority give and take: Implement priority working to alternate traffic flows, favouring outbound traffic while creating localised

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							resistance for inbound movement.
436	WCC Highways	Movement	P32, MO.34 (4)	Design of these need to be careful as they need to be designed for buses/refuse vehicles and this can make them less effective for cars.	Agree – this principle applies to each of the speed reduction strategies, so propose including this at the beginning of MO.34	Add text to first line of MO.34 to indicate that all strategies must be appropriate for all relevant vehicle types.	MO.34 For secondary.....and should be implemented. <i>Careful design is required in consultation with the Local Highway Authority to ensure they can accommodate buses and refuse vehicles without becoming less effective for cars.</i>
437	WCC Highways	Movement	P32, MO.34 (6)	WCC have not agreed this design yet. We would be concerned about these types of junctions and this will require further internal discussions within WCC (HA). WCC Highways cannot agree this type of junction at this point in time.	Acknowledge the point, though keen to retain this principle, especially given the lifespan of this code. Following discussion of an appropriate solution, suggest a caveat about the use of these and early discussion with the LHA required	Add caveat to (6)	Dutch style roundabouts: introduce....for all users. <i>WCC do not have an agreed design for these at the time of writing, so early and detailed consultation with the Local Highway Authority will be necessary in the interim where these are proposed.</i>

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438	WCC Highways	Movement	P32, MO.34 (7)	This will not work on secondary roads/corridors due to bus routes. This paragraph needs to be removed and added to the tertiary roads section. E.g of this is Warwick Gates in Leamington Spa/Warwick.	Agree. Delete from secondary streets, and add to tertiary streets section.	Agree. Delete from secondary streets, and add to tertiary streets section.	MO.34 (7) Gateway chicanes.....in key areas MO.35 (replace 5. pinch points) 5. Pinch points: Introduce.....supporting street character 5. Gateway chicanes: <i>Repeated chicanes can create a rhythmic speed control effect in key areas.</i>
439	WCC Highways	Movement	P32 diagram	Lozenges should be used as well especially on a bus route	Agree – add	Amend diagram to include lozenge and include associated text	Amend diagram + associated text 6. Lozenges: <i>Use of horizontal deflection of each carriageway around a central reservation with tight entry and exit geometries to reduce vehicle speeds. Consider integrating with pedestrian / active travel crossings, and create visual interest through hard and soft landscaping, whilst ensuring sufficient visibility is maintained.</i>
23	Catesby	Movement	p33, MO.35	Can RBC confirm that WCC is aligned with points 1-7 to ensure the code's deliverability?	WCC has requested a number of	RBC has liaised with WCC on this matter. Further to	N/A

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					amendments to MO.35. We have made these amendments as detailed in this report.	amendments requested (see comments 440-445 below), we believe this will satisfy WCC's requirements	
163	Homes England	Movement	P33, MO.35	Can RBC confirm WCC are aligned with points 1-7 to ensure that the code is deliverable.	See response to comment 23 above	As above (ref 23)	None
164	Homes England	Movement	p33	Suggest Diagram is removed in line with comments above (4.2.15)	Disagree. The diagram illustrates the written points in MO.35. It is intended to be illustrative. (see below WCC comments)	Add title to diagram and clarify that it is illustrative	Add diagram title: <i>Figure X: Conceptual diagram of a tertiary street network and illustrate the points in MO.35.</i> <i>Routes within the network need to be designed to reflect other aspects of the code and technical requirements.</i>
24	Catesby	Movement	P33 MO.35	Suggest Diagram is removed. This diagram appears overly theoretical and lacks a sense of scale, which is concerning given the wider site's numerous existing public rights of way and site-specific landscape features. We are worried about the potential for misunderstandings this could cause.	As set out in response to 164 above.	As above (164)	As above (164)
440	WCC Highways	Movement	P33, MO.35 (1)	Visibility needs to be in accordance with the design speed of the road	Noted. Add sentence to the	Add sentence.	"...pedestrian safety. <i>Visibility must be designed</i>

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					end of (1) to highlight this		<i>in response to the design speed of the street.”</i>
441	WCC Highway s	Movement	P33, MO.35 (3)	Radii to be a min of 6m for adoptable areas. Need to safely accommodate the refuse vehicle	Agree to add text that radii are subject to vehicle tracking and adoption standards – for clarity in this case it refers to ‘bend’ in the street and not a junction (as per diagram)	Add text	Tight corner radius:...pedestrian friendly scale. <i>Radii are subject to vehicle tracking and adoption standards.</i>
442	WCC Highway s	Movement	P33, MO.35 (4)	Who has priority? Appears to be dangerous and WCC would not support this.	There could be priority markings on the ground and conventional kerbs. This would need to be considered on a case-by-case basis and need to caveat that applicants would need early discussion with the LHA.	Add a sentence to (4) setting out that whilst acceptable in principle, early engagement with the LHA required.	Urban form:...enhance placemaking. <i>Applicants must enter early engagement with the Local Highway Authority to allow detailed consideration of the case-by-case conditions.</i>

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443	WCC Highways	Movement	P33, MO.35 (5)	WCC don't support pinch points or build out as speed reduction on roads with low traffic flow - see previous comments	Replace 'pinch points with 'gateway chicanes' as set out in response to 438 above	As per 438	As per 438
444	WCC Highways	Movement	P33, MO.35 (6)	Could use soft landscaping or raising this type of crossing. Details of surfacing need to be agreed with WCC S38	Noted – amend text to reflect.	Amend text.	"Cycle crossings/pinches: Highlight crossings using methods such as raised and/or textured or coloured crossings, or soft landscaping to ensure active travel modes are clearly prioritised."
445	WCC Highways	Movement	P33, MO.35 (7)	Needs to ensure these spaces don't become car parks - need to provide suitable level of parking and these areas need to be designed to discourage parking. However if parking is sympathetically designed into these spaces this could be a possibility - clever design is required for this.	Agree – add note to this effect.	Add text.	<i>Parking may be sympathetically designed into these spaces, though should not dominate.</i>
446	WCC Highways	Movement	P33 image of Sherford, Plymouth (left)	Vehicles are still likely to park in these spaces. Also who has priority in these spaces? Is this supposed to be a roundabout and what is the direction of travel within this space? In terms of surfacing this would not be accepted for adoption on the Highway. This is not a suitable example.	Image given as an example, but understand the questions raised. Would some introductory text re the use	Substitute precedents where possible	

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					of precedent images address concerns about some precedent images?		
447	WCC Highways	Movement	P33 image of Sherford, Plymouth (right)	WCC does not accept pinch points and this example should be removed.	We will substitute local precedent images where possible	Substitute where possible	
25	Catesby	Movement	P34	The naming of the street typologies are inconsistent with those on the Framework Masterplan. The Framework Plan refers to the street running through Catesby Estate's site as a 'local access road', whilst the Street Network plan on page 34 refers to it as a 'tertiary' street. The naming of these street should be consistent. The B4642 Coventry Road should be reclassified as an existing Primary Road.	All routes identified as 'local access roads' on the Framework masterplan (p22) are identified as 'tertiary streets' in the movement section – agree we can harmonise the references.	Ensure consistent referencing	Update referencing on the Framework Masterplan (p22) to align with categories in this section Check Coventry Road classification

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					Coventry Road to be shown as an existing primary street.	Ensure Coventry Road is shown as an existing primary street.	
544	WCC highways (active travel)	Movement	P34, MO.37	not sure that MO.37 makes sense – it talks about the primary street network but includes non-primary roads? Should it say, 'the street network...'?	Agree – suggest 'principal street network'	Substitute 'primary' for 'principal'.	The primary <i>principal</i> street network....
26	Catesby	Movement	P34, MO.38	The 'main street network' is undefined. Further clarity is required to define this.	This refers the principal network illustrated on this page.	Rephrase to principal street network	MO.38 These streets <i>The principal streets</i> must establish at least two connections to the main street network <i>within the principal street network</i> , forming the backbone for a future grid of tertiary 2 streets (not depicted in the framework).
545	WCC highways (active travel)	Movement	P34, MO.38	It's not clear what 'these streets' refers to	Agree – links to above. These streets refers to principal street network highlighted on this page.	Clarify reference to principal street network.	Covered in point above
333		Movement	P34	The plan is incorrect in various forms (1) it shows a through route to Elborow Way which isn't being promoted (2) Cawston Lane as a continuous route through the Link Road buffer which contradicts the planning consent (3) The Spine Road alignment does not match the	1 – Agree as far as motorised traffic is concerned, though it may be beneficial to	1-show as potential active travel link on p34. Delete tertiary street beyond the loop	<i>Amend diagram as outlined</i>

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				submitted planning application (4) There is no proposal for a vehicular connection between Rugby Road and Alwyn Road as indicated (5) The connections between the Spine Road and Cawston Lane - adjoining the Local Centre – are inconsistent with both the Homes England and Taylor Wimpey masterplans.	consider an active travel connection. 2 – Correct and agree. 3 – Noted. However the design code is not seeking to replicate applications which are not yet determined. The plans are illustrative with precise alignments and geometry to be considered through applications. 4 – Noted. Show modal filter 5 – HE + TW schemes are not approved – the code cannot	2 – amend plan 3 – None Show modal filter 5 – none	

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					align with these as above.		
165	Homes England	Movement	P34, MO.36 & MO.37	<p>We are concerned by the definitive nature of the wording here and in the text in MO.37 below, in addition to the illustrative diagram and associated wording. Suggest text is reviewed and the use of the words ‘must’ and ‘mandatory’ amended to ‘should’</p> <p>Our comments on the graphic are as follows:</p> <ul style="list-style-type: none"> Route 4 shows Cawston Lane as one continuous street from Dunchurch northwards to Cawston. This will not be the case as established by the HLR approved planning application and the SW Rugby adopted SPD masterplan. There will be a pedestrian / cycle connection between Cawston Lane south and the Homestead Link Road. Considering the above change to Cawston Lane the diagram should reflect the fact that the southern part of Cawston Lane will more likely be a tertiary street and should not imply that proposals will be upgrading the southern part of Cawston Lane next to the Dunchurch. Tertiary streets shown on Safeguarded land is unhelpful. If the Safeguarded Land is developed as employment it would enable HGVs to bypass the bus gate (Route 7) which would negatively impact the agreed transport 	<p>Disagree – a degree of flexibility is included in the design requirements for street typologies.</p> <p>Route 4 - Cawston Lane – agree this should be amended in line with the HLR Add a modal filter to the plan.</p> <p>We acknowledge</p>	Route 4 – amend plan	

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				<p>strategy as part of the Local Plan and SPD assessments. It would defeat the purpose of including a bus gate on Route 7 and preventing through traffic as per WCC's original requirements. It also negatively impacts landscape and ecological constraints between Homes England and safeguarded land.</p> <ul style="list-style-type: none"> • The connections between Cawston Lane and Community Spine Road on both sides of the indicated Mixed Use Centre are inconsistent with our emerging proposals and may encourage rat runs / cut throughs that would undermine the transport strategy. For further information, please see the accompanying Framework Plan Mark-Ups. 	<p>the point regarding the route through the safeguarded land, and propose to add a modal filter. We feel it is important to include east/west route through this area.</p> <p>The principle of a connection or connections between these routes is established. The alignment and geometry may be subject to further refinement</p>		
572	Homes England (appendix)	Movement	p34	<p>Additional drawing comments in mark-up appendix include:</p> <ul style="list-style-type: none"> • Downgrade of route to east of Alwyn Road to tertiary • Alignment of bus trans route to reflect HE application 	This street has been categorised as secondary to future proof it for bus use,	None	N/a

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				<ul style="list-style-type: none"> Alignment of route from CSR to TW land should be checked and aligned with TW plans. 	<p>even though it is not proposed immediately as a bus route (see new bus route plan in this section)</p> <p>Alignment to other schemes – as before disagree.</p>		
166	Homes England	Movement	P34, MO.38	<p>We do not understand this code as currently worded. What is the 'main street network' defined as?</p> <p>Please could further clarity be added to the code and/or the text rewritten. It states tertiary streets are not depicted in the framework, but the associated plan shows tertiary streets.</p>	<p>Agree more clarity would be useful. – see above Catesby response (ref,26).</p>	As per 26 above	As per 26 above
377	R. Allanach	Movement	P34	<p>The map shows a modal filter to support the East-West Sustainable Transport Link but does not show the modal filter needed to support the North-South Sustainable transport Link. This omission should be rectified.</p> <p>Paragraph 19.23 of the SW Rugby Masterplan SPD states “Opening the east-west STL as a through route to all traffic would be likely to have the following undesirable implications: - It would encourage HGVs to route via the residential parcel to the east of the proposed</p>	<p>Agree - update to reflect Sustainable Transport Corridor in DS8</p> <p>Agree – include modal filter to prevent east-</p>	<p>Update to reflect Sustainable Transport Corridor</p> <p>Include modal filter and reflect on new (separate) HGV plan.</p>	

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				<p>employment allocation and other residential areas which would have detrimental environmental, road safety and amenity implications. - It would encourage traffic, including HGVs, to route via other established residential areas in Rugby via A426 Dunchurch Road which feeds onto Rugby Gyratory where there is a recognised air quality problem. - It would reduce the potential use of the Potsford Dam Link (as the key north/ south corridor through the site) and the A4071 Rugby Western Relief Road thus preventing HGVs and general traffic to avoid Rugby Gyratory where opportunities for further capacity improvements are limited”.</p> <p>The road network shown on page 34 would not allow private cars or HGVs to travel the entire length of the of the east-west STL however the tertiary road shown without traffic restrictions would enable them to by-pass the modal filter and move between the Potsford Dam Link and Symmetry’s warehouses on the one hand and the allocation, Dunchurch, Rugby and its Gyratory on the other. This creates a rat run and negates some of the argument for establishing an East-West STL in the first place. Either the tertiary road should not be allowed to continue all the way from the Potsford Dam Link to the East-West STL or it too should have a modal filter.</p>	west through route		

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448	WCC Highways	Movement	P34, Mo.37 route 1	No frontage access on the Homestead Link Road	Noted. This page does not suggest that there would be frontage access from the Homestead Link Road. However, this could refer to p29 which notes principles of no frontage access on primary streets and p86 which looks at the edge condition to the HSL	Refer back to P29	Route 1: New primary streets (Homestead Link Road) (<i>refer to p29</i>)
449	WCC Highways	Movement	P34, Mo.37 route 4	Note this road is very straight and traffic calming measures need to be introduced to reduce vehicle speeds to 30mph or lower and 20mph or lower around the school/local community centre.	Noted, though this is the existing Cawston Lane. 'Link and place' approach suggested on Cawston Lane and CSR, to highlight area with higher	Add note regarding increased 'place value' on plan	Note higher 'place' value around local centre, suggesting different treatment

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					place function and particular speed reduction requirements on drawing.		
450	WCC Highways	Movement	P34, Mo.37 route 5	The alignment of this does not reflect what is shown in the Home England application. Also, the plan should show the bus gate at the western end of the link	Whilst the design code seeks to reflect committed development, it does not include information in respect of current planning applications or schemes at pre-application stage (as these are yet to be fully considered). The code states (p22) that the precise geometry and alignment of components...will be addressed	Under subheading 'purpose' on page 26, (and reference at beginning of p34) add: "Street networks/frameworks outlined in this section are illustrative, and the precise geometry and alignment will be considered and determined through detailed proposals."	Under subheading 'purpose' on page 26, (and reference at beginning of p34) add: "Street networks/frameworks outlined in this section are illustrative, and the precise geometry and alignment will be considered and determined through detailed proposals." Added 'Refer to 'Purpose' on page 26 for intended use of illustrations'

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					in detailed proposals.” This is the case with routes identified here. However, this can be restated for clarity within the movement chapter.		
451	WCC Highways	Movement	P34 MO.37 - numbering	Is there a route 6?	Agree – needs correcting – PJA to correct plan drawing	Correct numbering – plan and text	Renumber
452	WCC Highways	Movement	P34, MO.38	The tertiary streets as shown in the illustration need to be confirmed and match what has been agreed in the Homestead England applications.	As above, streets on the network/framework drawings are illustrative, and will be determined more precisely through planning proposals.	None	N/A
453	WCC Highways	Movement	P34, diagram	This diagram needs to correlate with the agreed details as submitted as part of SWR development. The number of roads shown in the plan appear straight and this will do little to reduce vehicle	As above, streets on the network/framework drawings are illustrative,	None	N/A

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				speeds. Redesign/Traffic Calming needs to be provided on these roads to reduce vehicle speeds to 30mph or lower or 20mph or lower in sensitive areas	and will be determined more precisely through planning proposals. Design speed is addressed in the code on p32, and will be considered in detail through planning proposals.		
454	WCC Highways	Movement	P34 diagram	Concerns there will be limited opportunities to provide suitable quality bus stops on Coventry Road therefore buses may need to route through what is noted as a tertiary road. This would have to be a secondary road/public transport route. THIS MUST NOT BE A THROUGH ROUTE FOR GENERAL MOTORISED VEHICLES.	Agree that this should not be a general through route. A modal filter to be indicated.	Indicate modal filter	N/a
455	WCC Highways	Movement	P34 diagram	This diagram needs to correlate with the agreed details as submitted as part of SWR development.	As above, streets on the network/frame work drawings are illustrative, and will be determined	None	N/A

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				For the Potsford dam link the tertiary street should be a secondary street	more precisely through planning proposals. Agreed. This link should include a modal filter	Include modal filter on tertiary route indicated between Potsford Dam and Coventry Road (north west of site)	Amend plan
456	WCC Highways	Movement	P34 diagram	Tertiary road creates a through route and this should be removed as a through route for motor vehicles. This may likely be a secondary street but not a through route. (referring to street between Potsford Dam link and STC)	Agree. A modal filter should be included on the plan.	Insert modal filter on plan	N/a - change to plan
457	WCC Highways	Movement	P34 diagram	Either traffic calming may be needed to stop vehicles using this as through route or a connection between the tertiary road and the other development should not be provided for general motorised vehicles. Elborow Way - appears to be a bus route - is this due to a change of previous plans?	A tertiary route is shown on the plan up to the boundary with Elborow Way. Agree this lacks clarity, and should be shown as a potential active travel	Amend plan to indicate potential active only connection to Elborow Way.	Amend plan

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					connection only.		
458	WCC Highways	Movement	P34 diagram	This should not be a through route between secondary/primary streets. (referring to tertiary street between Cawton Land and Coventry Road in the south of the site)	Agree. Show a modal filter	Amend plan to include a modal filter	Amend plan
167	Homes England	Movement	p35	<p>There is no associated code reference to secure the active travel framework (MO.??)</p> <p>Criterion (2) on the corresponding plan appears to be associated with an existing bridleway rather than footpath.</p> <p>Criterion (5) - we request that some text is added to provide a degree of flexibility for diverting footpaths for the purpose of delivering development (as outlined in the SW Rugby SPD). For example, slight diversions might be required to allow widening of routes to retain existing trees and hedgerows, or to enable suitable development areas to come forward.</p>	<p>Agree – add code reference.</p> <p>Noted – correct reference</p> <p>This page shows existing footpaths. There is no suggestion that the routes may not be diverted as per the Masterplan SPD.</p>	<p>Add code reference</p> <p>Correct reference to show currently a bridleway (see also WCC comment 459 below)</p> <p>None</p>	<p>Insert MO.XX reference</p> <p><i>MO.XX - proposals must incorporate the active travel framework, to provide connections across the whole of south west Rugby, and integrate with external connections beyond.</i></p>
573				<p>Additional drawing comments in mark-up appendix include:</p> <ul style="list-style-type: none"> Reflect re-alignment of PROW associated with HLR 	Agree	Alter drawing	

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378	R. Allanach	Movement	P35	Unfortunately the map illustrates an idyllic Rugby which does not exist. You cannot transition between Northampton Lane and the Cawston Greenway by the A45 as shown in the map. [Or rather you can but it involves both trespass and scrambling down a steep railway embankment]. I have frequently suggested that the position shown on the map be achieved in reality, including in my comments on R16/2569, but sadly my proposals have never been taken up by councillors. It would be good if the draft SPD were to include this possibility as a desirable outcome but given that the employment site has achieved planning permission I am not sure what levers RBC could now bring to bear to make it happen.	We have raised this point with officers from the Active Travel Team at WCC. Whilst the cutting and associated embankments are acknowledged, their advice is to retain this connection on the plan noting that the are good examples of graded ramps elsewhere that may be possible.	None	N/a
459	WCC Highways	Movement	P35, active travel routes (2)	If this is the proposed bridleway thought the local centre the HA continue to raise safety concerns trying to safeguard this route though the local service centre. This equestrian route needs to be realigned away from this part of the development.	Concerns regarding the bridleway through the local centre noted. Propose to leave the option for this to be diverted.	Note option to divert bridleway	<i>Add *consider for diversion</i>

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334	Taylor Wimpey	Movement	P36	The plans needs to be updated to reflect the Spine Road alignment.	Spine road alignment not approved as yet - the code cannot align with these as above.	None	N/a
335	Taylor Wimpey	Movement	P36	Also a bus route is not proposed north of the Link Road connecting Rugby Road and Alwyn Road. The plans would benefit from being split between (1) HGV Network and (2) Bus Network.	Agree. HGVs and buses to be split out on separate plans (see also 168 and 460 below)	Produce separate plans for buses and HGVs	Separate plans
168	Homes England	Movement	p36	We have significant concerns and disagree with this diagram as shown. Our view is that this page needs separating into two. The bus network is different to the HGV network as HGVs won't be able to pass through the bus gate on the sustainable transport link. The HGV plan needs to reflect the HGV routing strategy approved as part of the Tritax employment scheme and as agreed within the Local Plan assessment process. In addition, we note that buses also will not be passing though the land east of Alwyn Road. They will	Agree and this reflects comment 335 above and 460 below	Produce separate plans for buses and HGVs	<i>Separate plans</i>

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				go down Alwyn Road and rejoin the HLR as per WCC's original plans, approved Homestead Link Road strategy and as set out within the Local Plan assessment. If helpful we can share the original plan.			
575				Additional drawing comments in mark-up appendix include: <ul style="list-style-type: none"> Route east of Alwyn Road should not be a bus/HGV route 	Agree – this will be corrected on the separate plans to be produced in line with 168, 335 and 460	Create separate plans and correct	Separate plans and correct
379	R. Allanach	Movement	P36	This map fails to show the extension of the STL South of the Homestead Link as shown in the DS8 Masterplan.	Agree – the proposed separate bus route plan (see comments above) will rectify	Create separate bus route and include relevant route south of Sustainable Transport Corridor	Separate plan and correct
460	WCC Highways	Movement	P36, Bus and HGV network	These diagrams need to be separate	Agree as per comments 168, 335 and above.	Produce separate plans for buses and HGVs	Separate plans
461	WCC Highways	Movement	P36	Longer distance buses will be routed via the Homestead Link Road and this should be shown on the diagram. Coventry Road to the south of the development also runs buses and	Show bus route south along HSL and onto Coventry Road on new	Show routes on new separate bus route plan.	Plan changes

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				<p>this will serve the southern portion of the development.</p> <p>HGV's will also use the whole length of the Homestead Link Road and the southern Coventry Road towards to A45</p> <p>Two separate plans for buses and HGV's should be provided with the HGV's showing connections for the A45/M45, Rugby Western Relief Road and A426.</p>	<p>separate bus route plan (see above)</p> <p>Noted. Amend new separate (see above) HGV plan</p> <p>Agreed as set out above.</p>	<p>Show HGV route described on new separate HGV plan.</p> <p>Show HGV route described on new separate HGV plan.</p>	
169	Homes England	Movement	P37, MO.33	<p>MO numbering error - MO.33 is already used on p32. The mobility hub coding is overly prescriptive.</p> <p>We suggest these codes are removed or integrated into a broader section on public transport & mobility.</p> <p>If included, it is our view that all of these codes should be amended to "should" or "could" because defining mandatory requirements at this stage is overly prescriptive.</p> <p>We are concerned by the suggestion that there will be multiple Mobility Hubs. To date, we have explored a single hub within the Mixed-Use Centre. Suggest edit to "Mobility hub(s) should provide a choice..." this would enable a focus on the clustering of different modes of transport.</p>	<p>Noted – to amend numbering.</p> <p>The design code is not seeking to mandate the inclusion of mobility hubs. This content defines principles for mobility hubs if included. Do not agree therefore that all 'musts' should be</p>	<p>Amend numbering</p> <p>Amend MO.35 from 'must' to 'could'.</p>	<p>MO.35 A primary community hub must <i>could be located</i> in the local centre and should <i>could be</i></p>

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					amended on this basis. However, agree MO.35 is in need of amendment as this appears to mandate a hub in a particular location.		supplemented by smaller 'mini mobility hubs at key nodes, including employment locations and all bus stops.
170	Homes England	Movement	P37, MO.35 & MO.38	<p>We suggest the use of "should" for the primary community mobility hub and reference to the smaller supplementary mini hubs is removed or amended to be included as an aspiration (could) as their presence or deliverability has not been discussed or tested to date.</p> <p>The delivery of the hubs is dependent on others, so this is not something a developer can commit to so it is not realistic for the drafting of the code.</p> <p>We are concerned by the use of "car club vehicles" in combination with MO.35 as there are a number of complications with delivering on-street car club bays in proximity to "all bus stops."</p>	<p>As above, propose whole principle is amended to a 'could' to allow greater flexibility</p> <p>'All bus stops – remove all.</p>	<p>As above</p> <p>Delete 'all' (already included in proposed amendment to 169)</p>	<i>As above</i>
171	Homes England	Movement	P37, MO.39	Whilst we understand what is being sought here, we feel individual elements should have an	Noted.	Change text as below.	MO.39 The Any central mobility hub at the local

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				<p>appropriate degree of flexibility at this early stage of masterplanning. If RBC consider it important that individual elements are referenced in this code, we feel this should be done as an aspiration (could) only at this stage to allow further discussion between developers, RBC and WCC to understand the requirements and delivery potential.</p> <p>To support further coordination on this, please see more detailed comments on the wording of a number of the bullet points:</p> <ul style="list-style-type: none"> • Bullet Point 1 to be amended to "Proximity to a bus stop" • Bullet Point 2 to be amended to " Nearby Car Club Parking" • Bullet Point 3; remove “including electric and cargo bike hire” as we cannot commit to this at this time. We could support more general guidance around cycle and cargo bike hire as an aspiration. • Bullet Point 5; remove “accessible 24/7” as we cannot commit to this at this time. 	<p>In line with potential for mobility hub at the local centre as per above comments and amendment refer to ‘any’ hub proposed, and the must becomes should.</p> <p>Agree change to bullet 1 Agree change to bullet 2 Change to ;should’ provides flexibility on bullet 3, so no change required. No change to bullet 5 as ‘should’ provides flexibility.</p>		<p>centre must <i>should</i> conform to the following principles:</p> <p>Bus integration – <i>proximity to a bus stop including a bus interchange</i></p> <p><i>Nearby car club parking</i> Neighbourhood car club</p>

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					Rejig order – MO.35+MO.39, follow with Mo.38 + second half of MO.35. MO.37 becomes MO.39.		
172	Homes England	Movement	P37, MO.42	Covered cycle parking cannot be a requirement for all cycle parking as implied by this code. Sheffield types of stands are typical and recommended as per code MO.46. Covered parking could be included as an aspiration	We think this section would benefit from having cycle parking principles grouped according to land use, and principles related accordingly	Regroup cycle parking under subheadings – residential and communal (renumber accordingly)	<i>MO.41 general</i> <i>MO.43-MO.44 residential</i> <i>MO.42, MO.45 and MO.46 communal/shared</i>
546	WCC highways (active travel)	Movement	P37, MO.42	could be altered to be clearer – maybe something along the lines of ‘long-stay cycle parking, including at the primary community mobility hub, must be covered and accessible’?	Agree and links to above comment (172).	Amend as suggested	tt <i>Long-stay cycle parking, including at the primary community mobility hub, must be covered and accessible.</i>
547	WCC highways (active travel)	Movement	p37	should also reference that cycle parking standards are set out in the Rugby District Council Local Plan	Agree	Add sentence above principles under heading of cycle parking	<i>Please refer to the Rugby Local Plan for cycle parking standards</i>

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173	Homes England	Movement	P37, MO.43	We agree with the principle of promoting this but it may not be possible in every case and therefore recommend this revised to “should”.	Agree -amend.	Amend from ‘must’ to ‘should’.	
174	Homes England	Movement	P37, MO.44	We find this code confusing and therefore should be rewritten or removed. It is not clear which front entrances or side access points are being referred to.	This code is referring to residential cycle parking. Agree this could be clarified	Regroup cycle parking under subheadings – residential and communal (renumber accordingly)	<i>MO.41 general</i> <i>MO.43-MO.44 residential</i> <i>MO.42, MO.45 and MO.46 communal/shared</i>
175	Homes England	Movement	P37, MO.45	We agree with the principle of promoting this but it may not be possible in every case and therefore recommend this revised to “should”.	Agree – make a ‘should’ in respect of power supply	Amend to ‘should’ in respect of power supply	Enclosures must accommodate various cycle sizes and <i>should</i> include power for electric bike charging
176	Homes England	Movement	P37, MO.46	We agree with the principle of promoting this but it may not be possible in every case and therefore recommend this revised to “should”. Notwithstanding the agreement in principle, it is unclear what is meant by provided at “key nodes”. In the context it is assumed “key nodes” are suggesting good visibility and passive surveillance of cycle stands to support their use. Also unsure of the specification of Sheffield style stands, rather than context specific solutions depending on the users, duration of stay etc.	Agree should Key nodes to be better defined. Agree about context specific solutions. Sheffield style is one example.	Amend must to should Key nodes for example key public spaces, key junctions and areas in non-residential use.	Visitor and staff cycle parking must <i>should</i> be provided at key nodes <i>such as key public spaces, key junctions, and in areas of non-residential use.</i>

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462	WCC Highways	Movement	P37, mobility hub	Who will be responsible for managing this?	The design code as amended will not mandate the inclusion of mobility hubs, but highlight the opportunity. Management will need to form part of the discussion about the potential inclusion of these features. We do not propose to specifically address in the design code.	None	N/a
463	WCC Highways	Movement	P37, cycle parking	Has this been discussed with WCC Active Travel?	Yes, see comments 546 and 547 above	None	N/a
313	Sport England	Movement		Sport England are supportive of the requirement for mobility hubs at the local centre alongside mini mobility hubs. Though within the hubs (or at least the local centre) toilet provision should be included which would improve access and inclusivity for all users from young to old, not having such	Support for mobility hubs noted. A cafe is the type of use likely to be	None	N/a

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				provision could deter users. Similarly, the provision of a café could encourage users to undertake active travel opportunities by having a destination to visit whilst breaking up a trip.	included within a local centre. The desirability to provide toilets is noted, though this matter (i.e. provision of public toilets beyond those provided in cafes for example) is a detailed matter for consideration within proposals. Management and maintenance of such facilities would need to be addressed.		
314	Sport England	Movement	P37	Sport England consider that cycle parking must be placed at the front entrance or side access point, this provides an area that is safe and viewable which would allay safety concerns of users not being hidden at a perceived risk of being attacked for their	We agree. We think this is reflected in the principles as amended.	None	N/a

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				possession or the bike being stolen due to no surveillance.			
83	Tritax Big Box Developments	Movement	MO.53	This should be deleted. For logistics units, it is far better that parking areas address street frontages, with entrances positioned fronting onto streets. If they are required to be at the rear of plots, then service yards/HGVs would by default need to be positioned fronting streets, which surely is not the intention of the requirement.	The design code is referring to land uses within the allocation at South West Rugby. As the currently allocated employment land has already been built out, this is unaffected. MO.44 also refers to 'where possible' so the specifics of the type of use described could be justified.	None	<i>Na</i>
177	Homes England	Movement	P38, MO.48, MO.50, MO.51, MO.52	We agree with the principle, but it just replicates the principles set out in the National Model Design Code (in the case of MO.48, this is an exact word for word replication of M.3.i. para 44 of the part 2 guidance notes).	Disagree – sets out positive general principles. We do not consider repetition an issue where locally relevant.	None	<i>N/a</i>

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				MO.52 contradicts the NMDC guidance, which uses normally, so would be a should, rather than a must.	MO.52 refers to locally specific requirements, so does not need to replicate national guidance.		
178	Homes England	Movement	P38, MO.53	Semi-basement or decks are not currently viable nor should be committed too. We consider that aspirational language here would be much more suitable, such as 'encouraged to' or 'could', given the viability challenges the project is already facing. In the second sentence, we recommend an amendment of “must” to “should” as achieving this is largely dependent on a final agreement to parking quantum. The above changes would enable flexibility to provide shared residential parking at surface level, in basements or decks.	‘Should’ does not represent a commitment, and the code does say ‘where possible’ Agree to amend must to should	None Amend must to should	<i>N/a</i> Surface level parking must <i>should....</i>
179	Homes England	Movement	P38, MO.56	We question the reference to only perpendicular bays and not parallel or echelon parking. It is currently assumed all of these types could be delivered on-street, so would question the inclusion of this code. Alternatively include reference to all options.	Agree – make reference to other parking types	Include ‘or echelon’	MO.56 Perpendicular <i>or echelon</i> layouts could be considered where street width allows

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180	Homes England	Movement	p38, MO.57	Please could further clarity be included on what “bay” this code is referring too.	It is referring to on street parking bays	Add word ‘parking to beginning of sentence	<i>Parking</i> bays should.....
181	Homes England	Movement	P38, MO.58	We suggest that this code is amended to “should” rather than “must” and the figure of 12 is uplifted to 20 in accordance with the council's current parking standards. We also suggest that “overlooked” is amended as parking courts are often reliant on both active and passive surveillance.	Disagree - Rugby’s adopted parking standards (in the Local Plan 2011-2031) make no reference to sizes of parking courts.	None	N/a
182	Homes England	Movement	P38, MO.59	We agree with the principle of promoting this, but it may not be possible in every case and therefore recommend this revised to “should”.	Soft landscaping is a must, street furniture a should.		Front parking courts should only be used on Tertiary T2 streets, must include soft landscaping and should include street furniture.
183	Homes England	Movement	P38, MO.60	We have concerns about the level of prescription and use of the word “must” as there may be solutions that fall in between side and front parking. We suggest this is amended to “should”.	Fine to change to should.	Amended from ‘must to ‘should’.	

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184	Homes England	Movement	P38, MO.61	Whilst we generally understand the principle of this code, we have concerns about the level of prescription and use of the word “must” and suggest this is replaced with “should”. We also have concerns with the reference to screening and would request this is amended or removed as the inclusion of landscaping could be done in different ways than only the suggested hedge. It is quite restrictive in terms of what would be possible to deliver.	Agree – to clarify.	Clarify this is referring to parking in front of a residential property (as opposed to the side), and depth must be a minimum of 6m with examples of appropriate screening.	<i>Parking</i> at the front of the property must be at least 6m deep set back at least 6m from the pavement with screening through <i>such as</i> hedges or bin stores.
464	WCC Highways	Movement	P38, MO.50	Don't disagree however, when this has been raised previously with developers this hasn't been agreed as unallocated parking does not sell plots.	Noted.	None	<i>N/a</i>
465	WCC Highways	Movement	P38, MO.57	This should be 2.5m wide and even that can be too narrow by today's standard for cars (e.g. an SUV).	Agree – amend to 2.5m	Remove reference to different bay sizes according to street type.	Bays should be at least 6m long and 2.5m wide on secondary streets, while tertiary streets should allow for 6m x 2.0m bays..
466	WCC Highways	Movement	P38, MO.58	If not properly design this can lead to on street parking. The parking courts need to be desirable to use and it has to be undesirable to park on street.	Agree.	Add word ‘desirable’ to the principle	These must be overlooked for safety <i>and desirable...</i>
467	WCC Highways	Movement	P38, MO.63	Garages if they need to be internalised need to be wide and long enough to accommodate a parked car and allow suitable access in and out of the car. Permitted development rights for internalised garages need to be taken away.	We acknowledge this point, though the parking standards in the	Include internal dimensions for garages – refer to 3.9 of the Warwickshire Design Guide –	<i>MO.XX Garages should achieve as a minimum the internal dimensions as set out in the Warwickshire Design Guide (Part 3, p15, 3.9) to ensure adequate</i>

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				Garages for the most part are not used for parking.	adopted local plan state that “where a garage is provided each garage will be designated as one car space and one cycle space”. As a result, they may be included in the parking spaces (though the local plan does not state these as maximums).	additional separate principle.	<i>space to park a car and a bicycle.</i>
468	WCC Highways	Movement	P38, Kingsworthy image	Is the car parked in front of the garage space?	Substitute for local precedents where possible	Substitute for local precedents where possible	
469	WCC Highways	Movement	P38 general	Good local case studies within Warwickshire should be used for parking examples.	Substitute for local precedents where possible	Substitute for local precedents where possible	
185	Homes England	Movement	P39, MO.62	We recommend that this code is rewritten to re-read: "Parking in rear gardens should carefully	Disagree – consider these points covered.	None	<i>N/a</i>

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				consider passive surveillance, nighttime safety and potential impacts on private amenity space."			
186	Homes England	Movement	P39, MO.69	It is unclear what 'these requirements' are, how they differ from the requirements already set out in Building Regs and other design guidance., it is our view that guidance is to be referenced as a "should" and not made into mandatory requirements via this design code.	The requirements refer to the points above.	Amend to clarify	The requirements <i>above</i> must align with the Warwickshire Design Guide.
187	Homes England	Movement	P39, MO.71- MO.75	<p>We appreciate these outline best practices, but these are very prescriptive and fix solutions when using 'must'. Suggest they are all amended to be 'should'.</p> <p>Specific code comments as follows:</p> <ul style="list-style-type: none"> • On MO.71 - front of properties should also be allowed if appropriately integrated. • On MO.72 – suggest changing to a should. If terraced housing is used in the Mixed Use Centre where vehicle access is limited, houses could also use communal bin stores (which will already be in place due to apartment buildings). • On MO.73 - we do not agree that these need to be within the building footprints and in some places blank elevations may be required to deliver these. Communal bin stores could be in a separate building or high-quality ancillary structure and allowance within the wording of the code should be left for these options to be 	<p>MO.71 – agree and to amend</p> <p>MO.72 – intention of this code is to prevent convoluted rear passage arrangements, so can clarify and add suggestion for resi in central area.</p> <p>MO.73 – agree and will clarify. Integrates is first preference, make design</p>		<p>MO.71 Detached/semi-detached housing: bins must <i>should</i> be placed to the side or rear of properties. <i>Bin storage placed at the front must be carefully designed and integrated.</i></p> <p>MO.72 ...property. <i>Long routes around to the rear of terraced properties for bin storage must be avoided.</i></p> <p>MO.73 Communal....building footprints <i>as first preference, or located in</i></p>

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				<p>explored. Principles around their location, for example in well-lit and overlooked locations to avoid Anti Social Behaviours would be welcomed.</p> <ul style="list-style-type: none"> • MO.75 – This is more complicated with apartment or mixed use buildings in a pedestrian priority area, request amendment to should. (Also correct spelling error of 'al' to 'all') 	<p>requirements about that.</p> <p>MO.75 – this point refers mostly to houses, not apartments – distinction to be made between the two. Access from private drives.</p>		<p><i>well-designed freestanding structures...</i></p> <p>MO.75 Refuse collection points for all dwellings, notably those <i>on private drives</i>, must ...</p>
470	WCC Highways	Movement	P39, MO.72	But not within the limits of the public highway. It must not obstruct the public highway.	Noted. Suggest amendment to text.	"...in front of the property. <i>Bin stores must not obstruct the public highway.</i>	"...in front of the property. <i>Bin stores must not obstruct the public highway.</i>
471	WCC Highways	Movement	P39, MO.74	Finding it difficult to visualise this - examples of this would help	The premise of this point if to avoid as far as possible a bin lorry needing to reverse, therefore streets in a loop pattern enable the lorry to proceed in a forward gear	None	N/a

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472	WCC Highways	Movement	P39, MO.76	Subject to them meeting the adoptable standards.	Agree	“...should be adopted by Warwickshire County Council as Highway Authority <i>where they meet adoptable standards.</i>	“...should be adopted by Warwickshire County Council as Highway Authority <i>where they meet adoptable standards.</i>
473	WCC Highways	Movement	P39, MO.78 3 rd bullet	Capitalise ‘Local Highway Authority’	Agree – capitalise	Local Highway Authority	<i>Local Highway Authority</i>
474	WCC Highways	Movement	P39 Nansledan image	This would be unlikely to be adopted by Warwickshire Highways and should not be shown as an example.	We will substitute for local precedents where possible	Substitute precedent images where possible	<i>N/a</i>
Nature							
360	WCC Ecology	Nature	General	We have looked at this section and we are broadly in agreement with and supportive of the content.	Noted.	None	N/a
361	WCC Flood/Strategic Infrastructure + Climate Change	Nature	Not specified	We are encouraged by the points included in the Nature Section whereby Sustainable Drainage Systems (SuDS) must be included in applications.	Noted.	None	N/a
363	WCC Flood/Strategic Infrastructure +	Nature		We would recommend a point on watercourse crossings. Access routes over watercourses should be clear span in preference over culverts for flooding, wildlife and water quality reasons. Culverts proposed will be subject to	Noted, however we have been unable to find an appropriate code location	None	N/a

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	Climate Change			Land Drainage Consent from the Lead Local Flood Authority.	for this to be added.		
04	R. Basnett	Nature	Not supplied	4) Detailed actions to safeguard Cawston ancient woodland	The ancient woodland and its protection has been considered as part of the design code, with input from specialist consultants in this area. The buffers and other measures included build upon the minimum buffer and Woodland Management Plan included in the South West Rugby Masterplan SPD. Detail of how these principles have been incorporated	None	N/A

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					will be expected as part of any planning applications.		
131	Homes England	Nature	General	<p>Whilst we support the inclusion of a chapter focusing on Nature and we recognise its importance in delivering a successful place, we are concerned that the current draft wording lacks the clarity that is required and may restrict suitable development across South West Rugby and therefore impact deliverability.</p> <p>Additional information is required to support some of the statements to ensure appropriate interpretation by future applicants and the RBC Development Management team. For example, we agree with the principle of retaining existing trees and hedgerows, however, the diagrams suggest that all hedgerows are to be retained across the site which is not possible to achieve alongside the delivery of circa 4,000 homes, a Mixed Use Centre, Primary and Secondary Schools and associated infrastructure. Please refer to the individual code comments outlined in section 4.3 of this response document. The purpose of these amends is to ensure there is an appropriate balance between retention and protection of existing habitats and the delivery of new</p>	Noted – responses to specific points as below.	Specific actions to points below	N/a

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				multifunctional green and blue infrastructure that is responsive to up-to-date environmental surveys and futureproof designs.			
380	R. Allanach	Nature	General	<p>Three general points. There are numerous occasions in this section where the wording clashes with the local development plan policy SDC2 “... All proposals should ensure that ... New planting comprises native species which are of ecological value appropriate to the area...”. An SPD cannot rewrite a local development plan.</p> <p>Whilst DS8 requires a Green and Blue Infrastructure corridor to run across the allocation this section does not repeat the local development plan policy NE2 requirement “ ...Where appropriate new developments must provide suitable Green and Blue Infrastructure corridors throughout the development and link into adjacent strategic and local Green and Blue Infrastructure networks or assets where present. Where such provision is made a framework plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic Green and Blue Infrastructure network ...”.</p> <p>RBC failed to conduct an ecological analysis of this area before designating it as a “Sustainable Urban Extension”. Where I comment below on species which are present</p>	<p>Agree. We have reviewed this chapter with our appointed landscape consultants and deleted non-native species. Where possible we have sought to include further native species.</p> <p>It is not necessary for the SPD to repeat local plan policy. However, we agree that a more conceptual/diagrammatical approach to highlighting the strategic green and blue</p>	<p>Delete references to non-native species, and include further native species as appropriate.</p> <p>Include a conceptual diagram of the strategic green and blue infrastructure corridors across the site.</p> <p>None</p>	<p>Detailed further through comments below.</p> <p>Include concept diagram</p> <p>N/a</p>

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				and not present in the area I am drawing on my own observations, the patchy and sometimes incorrect ecological/aboricultural assessments submitted by developers and various studies of Cawston Spinney.	infrastructure corridor across the site would be beneficial. Relevant ecological assessments will be required at the planning application stage.		
84	Tritax Big Box development	Nature	General	The maps on these pages are confusing, as they use historic mapping layers on this are confusing, for example the Phase 1 employment has now been building and the farmhouse and a number of hedgerows have already been approved for removal through employment. The plans need to be updated throughout. On Page 43 map it states that i there an existing PROW along the west of the Phase 1 employment site, this is the proposed new bridleway which has not been implemented yet. The plans throughout should be amended to reflect these points.	The plans in this section will be amended	Amend plans	Amend plans
336	Taylor Wimpey	Nature	P40, 48	With respect to long-term management, there is reference to the outlining and agreement of funding and management arrangements (NA.40 and NA.55). The Code needs to be clear that landscape management arrangements are	Having reviewed this section, and feedback in the round, we will leave	Delete NA.40 and NA.55	NA.40, NA.55

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				secured by a S106 agreement and/or condition to be discharged at the detailed planning stage.	management for consideration in applications.		
337	Taylor Wimpey	Nature	P41	Key requires correcting and updating e.g. Cawston Farm Phase 1 – RTG; R22/0928 Homestead Link Road consented.	Noted. Having reviewed this section holistically in light of all feedback received we will consolidate the land parcel plan and the landscape character plan in a simplified format. This will not include planning applications and status, as this information is likely to quickly be out of date.	Consolidate land ownership plan and landscape character plan and simplify	Consolidate and simplify plans
N/a	Officer	Nature	p41	N/a	N/a	Amend title in grey box to reflect amendments in this section and for clarity	Landscape Character and Landholdings Landscape Context and Vision

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188	Homes England	Nature	p41	These paragraphs use “must”, but are not labelled as specific codes. As these are narrative text describing the vision and intended approach, we'd suggest the document would be more legible and avoid potential misunderstandings if areas, like this, providing descriptive guidance avoid the use of words "must" and "should". This text is useful in setting the scene for the chapter.	Agree on clarity re using the word ‘must’ where not in a numbered requirement – to amend.		‘must’ <i>will need to</i> ‘should’ <i>is expected to be</i> Could <i>may</i>
189	Homes England	Nature	p41	Unfortunately, we cannot read or understand this diagram. Is this diagram work in progress? Is it a repeat of the prior Land Ownership Diagrams?	The objective of showing land ownership information and landscape character information (on p42) was to illustrate that they do not directly align and that any land ownership parcel may incorporate multiple landscape characters.	Create a single diagram where land ownership and landscape character areas are overlaid to make this point clearer	Create new diagram.
381	R. Allanach	Nature	P41	The map repeats the problem previously encountered with the map on page 22. Whilst there is a reference to movement corridors inspection reveals that it is only human	The purposes of the plans on pages 41 and 42 are set out in	Include a concept diagram of strategic green and blue infrastructure	Include new diagram (content from p45 also to be moved up the order of content)

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				movement that is addressed. I believe that an introductory map to a nature section should also show the Green and Blue infrastructure corridor required by DS8.	the RBC response to comment 189 above. However, as per the response to comment 380 we agree that a concept diagram of strategic green and blue infrastructure corridors should be include.	corridors across the site.	
N/a	Officer	Nature	P42, NA.01	N/a	N/a	Update and reword key features of landscape character to be maintained for greater clarity.	<p>NA.01 Key features of the landscape character which must should be maintained or reflected include:</p> <ul style="list-style-type: none"> • Tree avenues in the wider urban landscape which are a feature on the skyline. These createing character for the urban fringe. • <i>Landscape framed by hedgerows and</i>

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							<p><i>woodland blocks in the eastern zones (parcels 20e, 20d, and 20h)</i></p> <ul style="list-style-type: none"> • <i>Open character surrounded by the strong landscape framework in the western zones 20n and 22a. The landscape framework includes Cawston Greenway, Cawston Spinney and mature trees, which must be protected and enhanced.</i> • <i>Mature trees within hedgerows, such as in zone 20d, should be preserved, maintained and promoted using new planting where trees are not prevalent.</i>

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							<ul style="list-style-type: none"> • PRoWs which link landscapes and create access to landscape features. These are strong landscape features and are expected to must be retained or realigned. They should also be enhanced with additional landscape features to provide better connectivity for communities, supporting recreational use. • Views to landscape and features, particularly Cawston Spinney.
28	Catesby	Nature	p42, NA.02	While we generally support the aspiration, we are concerned by the wording and level of prescription implied by "All landscape features must be retained...". This is overly restrictive. Additional wording should be added to recognise that some hedgerow removal may be	Agree. We have reviewed this section with the appointed landscape consultants	NA.02 to be deleted from this page which then can focus solely on landscape character.	Delete NA.02-NA.07 from p42. These matters will be addressed instead under 'landscape features'.

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				required to facilitate access to and between development parcels, and that where this is necessary compensatory planting should be provided.	with a view to clarifying the definition of important landscape features, and the approach to be taken in considering retention.	Landscape features to be addressed on p43 and to clarify what is meant and an approach to assessing features for retention.	
29	Catesby	Nature	p42, Landscape character plan	Key text font size is too small. Parcel 20i should be sub-diverted further, as not all of it is woodland.	Agree – make key text more legible on any revised plan (see comment 189 – this plan will be presented in a revised format) The landscape character parcels have been taken from a Landscape Character Assessment of South West Rugby which was produced by WCC in 2017	Resize key on amended plan	N/a - resize key

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					but never published. For consistency, we will retain as drawn, but acknowledge that the whole parcel is not woodland.		
338	Taylor Wimpey	Nature	P42	It is not clear the source of the plan but clearly it is out of date. Several of the parcels (e.g 20h) have been developed or have consented developments.	The source of the plan is a landscape character assessment (see response to 29 above). The parcels on this plan refer to landscape character zones which, even if developed or with consented schemes, build up an important overall picture of the site.	As per 29 and 189 above. The new composite plan to include reference to consented schemes and other fixed uses	Include committed developments, and existing retained uses on the new composite plan.
85	Tritax Big Box Developments	Nature	P42, NA.01	Due to the form of the proposed employment development on the site which tends to include large floorplate buildings which require a level plateaued site, it may not be feasible to	The Design Code is not specific about the future use of	NA.01 is to be re-worded as per other comments.	N/a

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				<p>retain all existing landscape features, for NA.01 the suggested amendment is as follows: NA.01 Key features of the landscape character which should must be where possible be, maintained include:</p> <ul style="list-style-type: none"> • Tree avenues in the wider urban landscape are a feature on the skyline. Creating character for the urban fringe. • Mature trees within hedgerows should where possible must be preserved, maintained and promoted using new planting where trees are not prevalent • Woodland blocks that frame the landscape and break the plateau • Hedgerows as boundary treatments throughout. • The landscape within the eastern zones is typically framed by hedgerows and woodland blocks • PRowWs link landscapes and create access to landscape features, they must be retained or realigned and enhanced with additional landscape features to provide better connectivity within communities and support recreational use. • Maintain views to landscape and features, in particular Cawston Spinney. • The west of the site has an open landscape character surrounded by strong landscape framework of the Cawston Greenway, Cawston 	<p>the 'safeguarded land' as in the adopted local plan it is not allocated. However, as it is centrally located within the site, and in guiding physical development, the code has to consider how development on the allocated and safeguarded land may interact.</p>		

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				Spinney and mature trees which must be protected and enhanced			
191	Homes England	Nature	NA.02	<p>While we are generally supportive of the aspiration, we are very concerned by the wording and level of prescription of "All landscape features must be retained...", implies. This is overly prescriptive given the complexity and scale of the development. While we are supportive of the principle of retaining the key landscape features within the site, it may not be possible to retain all landscape features in their entirety given the proposed development (the allocation) and the infrastructure required. Figure 2 of the adopted SPD demonstrates this point as it does not retain all existing landscape features / shows breaks will be required in hedgerows. We feel the wording and clarity of this code (and the entire section) needs to be reviewed to ensure it has the flexibility to support the long-term delivery of the allocation. Our view is that references to "must" like this need to be changed to "should."</p> <p>In addition, it is not clear within this section what is to be retained. Over the course of the past year, Homes England and their design team have been very clear at Pre-Application Meetings and Design Review Panels, that given the extent of hedgerows within the site, these cannot all be retained if we</p>	<p>Agree – and reflects other feedback.</p> <p>Reword and relocate this principle to 'landscape features' page. New wording should allow greater flexibility to reflect the development of the site, but still emphasise desirability of retaining features wherever possible.</p>	<p>Delete NA.02 from p42 as this sits better with existing landscape features.</p> <p>Amend the text so that it is clearer</p>	<p>All landscape features must be retained and connectivity between them enhanced.</p> <p><i>The protection, retention and enhancement of landscape features should be a priority within applications to have meaningful, positive contributions to nature and nature's recovery. There must be robust justification for their losses.</i></p>

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				are going to deliver a connected, viable, deliverable development across this allocation.			
192	Homes England	Nature	P42, NA.04	This code needs to be balanced against highways, movement and access considerations. We'd therefore suggest this is amended to a should.	Delete this code	Delete this code	NA.04 The wooded character of mature hedgerow...
193	Homes England	Nature	p42	The Graphic provides a site analysis and therefore does not relate to the codes on the page. We are also concerned that this is based on the existing situation and does not currently take account of how the landscape will be transformed by the approved proposals for the other developments proposed within the allocation. We'd suggest that as a minimum the approved HLR proposals are taken account of as well as the other strategic infrastructure outlined by the adopted SPD as these will impact the future landscape character and are fundamental to the delivery of the allocation.	This plan is to be reproduced as outlined in response to 189.	As above, plans on p41 and 42 to be combined to illustrate the pertinent point. The outline of the HLR and existing Tritax employment to be included.	
382	R. Allanach	Nature	P42 NA.06	Worldwide there are over one hundred Pinus species. However none of them are native to England. The one oak which is local to Rugby is Quercus robur and the species of birch which the Warwickshire Landscape Guidelines recommends as a major component of new woodland planting in the Dunsmore area is Silver Birch. Therefore NA 06 should read "New woodland planting should favour English Oak as a major tree species alongside Silver Birch".	NA.06 refers to new woodland creation. Whilst we propose to keep reference to Pinus Sylvestris within the code (for reasons outlined under	Delete NA.06 from page 42 as this refers to new landscape proposals. A new section on landscape proposals is to be included and this will sit in that section.	NA.xx New woodland planting should favour oak as major tree alongside pine and birch

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					389 below) we agree to delete it from this principle.	Delete pine from this principle.	
30	Catesby	Nature	P43 NA.1 2	While we generally support the aspiration, we are concerned about the lack of clarity regarding the reference to landscape features and the blanket use of 'must' in relation to buffers. It is unclear which specific landscape features are being referred to. We believe that buffers should be addressed in a single section of the document to ensure clarity and should be primarily focussed on buffers to the Ancient Woodland.	Agree. Based on feedback to this section we think buffers should be addressed as a discrete section with a simplified map. This will include revised information on the features to which buffers should be provided and the nature of those buffers.	Create a discrete section on buffers with a simplified plan to demonstrate information in a clearer way. Review the nature of the buffers (see comments in buffers section).	
31	Catesby	Nature	p43, NA.1 9	While we generally support the aspiration to align with drainage practices, this code only references 'micro-SUDS' and provides just a few very specific examples of SuDS. A key concern is that, due to the ground conditions, these forms of SuDS may not always be feasible.	Agree to change must to should, and clarify that suggestions are examples and not an exhaustive list.	Change must to should NA.19 to move to new landscape proposals (as reworded)	(include in new section on landscape proposals)NA.xx As <i>part of drainage strategies, the use of water management interventions should be explored, for example SUDs, filtration tree pits and permeable paving.</i>

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				As a result, the reference to "must" should be changed to "should," and we recommend that this code be revised to address SuDS and drainage in broader terms. Where specific examples are mentioned, it should be made clear that these are just a few examples of a much wider range of possibilities.			
194	Homes England	Nature	p43	Unfortunately, we cannot read or understand this diagram. Is this diagram work in progress? Is it a repeat of the prior Land Ownership Diagrams?	The intention of this plan was to illustrate the existing landscape features on site based upon mapped data (there has not been a full survey of the site for this purpose in developing the design code). However, we agree that the plan would benefit from simplification to make it more legible	Create a new simplified 'landscape features' plan.	Create a new, simplified landscape features plan
195	Homes England	Nature	P43, NA.0	We find the overlaps between existing, proposed, and management confusing. One	Having reflected on this	Delete NA.09 and NA.10	NA.09-NA.10

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			9, NA.10 and NA.11	<p>thing that we think would be helpful is to cover management in a separate section.</p> <p>For NA.11 we suggest the use of Ecological Impact Assessment (EIA) rather than Preliminary Ecological Appraisal (PEA) Report. The EIA constitutes an EIA plus additional surveys plus mitigation.</p>	<p>content, we will delete management principles from the code and consider at application stage</p> <p>We will delete NA.11 as application requirements are covered in the validation checklist</p>	Delete NA.11	Delete NA.11
196	Homes England	Nature	P43, NA.12	<p>While we are generally supportive of the aspiration, we are concerned by the lack of clarity around the reference to landscape features and blanket use of 'must' regarding buffers. It is not clear which landscape features are being referenced. It is our view that buffers should be covered in one place in the document to ensure clarity. As currently outlined within the code they are very prescriptive. See 4.3.5 below.</p>	See response to comment 30 above	As action for comment 30	As above (comment 30)
197	Homes England	Nature	P43, NA.15	<p>This is very detailed and would result in assumptions being made within the wording as it generically references existing trees. Suggest revising this as follows:</p>	Agree to amend this principle.	Amend broadly as suggested	Where the intersection of development and existing <i>high quality trees; TPOs, Cat A and B trees</i> , cannot be avoided, landscape

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				"Where high quality trees are impacted by nearby development, opportunities to retain these trees through the use of landscape techniques such as root cell systems must be explored."			techniques such as root cell systems must be utilised <i>explored and robust explanation must be made for losses.</i>
198	Homes England	Nature	P43, NA.16	These buffer strips are covered in other ways in other sections of the code. We are concerned by having overlapping codes spread out within the code as this may create confusion at future stages. See 4.3.5 below.	Agree that repetition is unnecessary. As outlined above (see comments 30 and 196), propose a discrete section regarding buffers, which will then not be repeated elsewhere.	Create discrete section regarding buffers	Delete NA.16 from p43 and include information on 'buffers' page
199	Homes England	Nature	P43, NA.17	This is very detailed and prescriptive if applied to the entirety of the allocation. We also feel this is a design code about 'proposed hedges' and not an existing landscape feature which appears to be the theme of Page 43. Suggest 'proposals' are covered in a separate section and that a code like this is a 'should' to ensure an appropriate degree of flexibility is allowed for given there will be a variety of hedges across this allocation. For example,	Agree there is a need to be clear about whether this point (and others) are referring to existing hedges or new planting – propose subheadings to achieve this.	Separate out retained planting and new planting under sub-headings. The new 'Landscape proposals' section to retain reference to species mix.	See comments relating to new section.

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				some of the hedges will be within residential development parcels and cannot be the diverse species mix being referenced here. If retained, hedgerows should be referred as “native”.	Do not agree that this principle is excessively prescriptive in principle.	Within section of ‘landscape features, amend wording	Delete NA.17 as worded: Hedges must be.... appropriate to local character <i>Opportunities should be explored to enhance retained hedges, for example through actions such as gapping up and the promotion of existing hedgerow trees, appropriate to the local character.</i>
200	Homes England	Nature	P43, NA.19	We suggest this is a proposal and the clarity of this section could be improved by grouping "the proposals" together. While we are generally supportive of the aspiration to align with drainage practices, this code only references 'micro-SUDS' and includes only a couple very specific examples of SuDS. A key part of our concern is that the ground conditions mean that these forms of SuDS may not always be possible. Therefore, the reference to “must” should be changed to “should” and we'd suggest this code needs to be drafted in a way that speaks more generally to SuDS and Drainage. Where specific examples are provided it is made	Agree this seems to jump to quite specific. See response to comment 31.	As per response to comment 31 above	As per response to comment 31 above

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				extremely clear that these are just a couple examples of a much wider palette.			
201	Homes England	Nature	P43, NA.20	We support the general aspiration and principle but given the overarching nature and large scale of the site we feel this is better coded as a 'should'.	This would apply across the site as a whole and across development parcels. However, can amend to should.	Amend to should and relocate to new section on 'landscape proposals'	Landscape schemes must <i>should</i> be diverse.....
32	Catesby	Nature	p44	NA.23 and NA.24 both specify that woodlands must have a 15m buffer and ancient woodland a 20m buffer. However, paragraph 9.5 of the SW Rugby SPD states that Natural England's standing advice calls for a 15m buffer for ancient woodland. As a result, the design code contradicts the adopted SW Rugby SPD, and the code needs to be revised for consistency. The plans do not accurately show the extent of the TPOs and therefore need to be revised accordingly. It may be that an additional plan is required to successfully differentiate between what is 'Woodland', 'Ancient Woodland', and the TPOs. It is recommended that the graphic distinguish between 'Woodland' and 'Ancient Woodland' and the TPO.	We have reviewed all content on buffers with the appointed landscape consultants. A minimum buffer of 15m is to be specified in relation to the ancient woodland at Cawston Spinney, which could increase if assessment shows impacts may	Specify revised minimum 15m buffer to the ancient woodland at Cawston Spinney and reflect on a revised 'buffers' plan. Also reflect distinction between 'woodland' and ancient woodland on the plan.	Amend buffers plan

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					necessitate. The nature of the buffer is also to be addressed. A revised buffer plan will delineate between woodland and ancient woodland.		
190	Homes England	Nature	NA.23 and NA.24	NA.23 and NA.24 refer to woodland buffers, it is submitted that these proposed codes are overly prescriptive particularly in relation to employment developments. There needs to be flexibility built into the standards to ensure viable schemes can come forward. In general, the thresholds set out in NA.23 and NA.24 are not supported the word must should be removed and justification needs to provided for the suggested buffers. 2.19. The approach with regards to ancient woodland, is not consistent with Natural England's standing advice or adopted development plan Policy DS8 and/or NE1. The buffer should be measured from the boundary of the ancient woodland, as defined by Natural England and available on the MAGIC website, as often non-ancient woodland extends further	Agree to review this section. Ancient woodland to be 15m and other numerical buffers deleted. Principles of buffers to be retained, and nature of buffers to be described.	As previous column	

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				<p>than the ancient woodland (as is the case at Cawston Spinney).</p> <p>2.20. It is not clear on the reasons for extending the buffer zone out to 20m. In order to avoid root damage, a 15m buffer from the boundary of the ancient woodland as defined by Natural England is sufficient, and consistent with the Standing Advice.</p> <p>2.21. There is no justification provided for this additional requirement and it is too prescriptive and is a clear attempt to introduce new policy, as stated in Section 1 above SPDs cannot introduce new policies.</p> <p>2.22. The Standing Advice from NE states that the buffer zone should consist of semi-natural habitats such as woodland, or a mix of scrub, grassland, heathland and wetland planting. There is no evidence to suggest that a buffer in excess of 15m is required. Land can be developed beyond the 15m buffer, provided that any development does not impact upon the ability of semi-natural habitats within</p> <p>Proposed amendments:</p> <p>NA.23 Woodlands must be buffered by 15m, the ancient woodland buffer should must be increased to 15m 20m and utilised to reduced the impact of increased use to the core woodland which will be managed with 'no go' areas according to its management plan.</p> <p>NA.24 Buffer widths must comply with the following minimum requirements:</p>			

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				<ul style="list-style-type: none"> • Waterbodies including ponds, streams and ditches: up to 10m buffer • Ancient woodland 15m 20m buffer • Cawston Greenway: up to 15m buffer • Hedgerows: up to 2m buffer strip from centre of hedge. 			
203	Homes England	Nature	P44, NA.24	<p>Whilst we understand the intention of this code, we have concerns about the proposed water body buffer as this is written as a blanket code with no room for site specific design responses or understanding of delivery challenges relating to the drainage of the site. As currently worded, this code would not allow the development to come forward and we'd suggest this is best dealt with via the various planning applications that will need to come forward across SW Rugby.</p> <p>We suggest removing the reference of a water body buffer as the site's drainage is very complex and there is a need for altering existing ditches and water bodies in places to make the site's drainage feasible and deliverable. In addition, there is a need for some types of development (e.g. enhancements to PROW, earthworks, etc) to occur along or in proximity to a number of these existing features. To support this comment, we'd note that this code does not align with the Framework plan within this code</p>	<p>As set out in response to comment 32 above, buffers to be reviewed.</p> <p>Having reviewed buffers with the appointed landscape consultants we agree to delete numerical requirements for buffers, though the principle of buffers for the features outlined is to be retained.</p> <p>A new subsection on</p>	<p>Amend ancient woodland buffer to 15m and delete other numerical buffer sizes.</p> <p>Add section on the nature of buffers.</p> <p>Amend buffers plan</p>	<p><u>The nature of buffers</u></p> <p>NA.xx Buffers to existing landscape features should provide the optimum widths for the protection and management of the habitat. Applicants must demonstrate suitable buffer widths and treatments within applications .</p> <p>NA.XX Buffers should be landscaped, using appropriate native species. This could include dense woodland matrix planting with ecotones of scrub, grassland and wildflowers representative of the local character.</p>

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				<p>(e.g. there is development suggested around or very close to a number of existing water bodies / ditches).</p> <p>We are supportive of the principle of retaining existing hedgerows (although not all hedgerows will be able to be retained); however, we have a number of concerns related to this part of the code as drafted. First, there are areas of hedgerow that we will need to remove to enable the development to come forward. We need to ensure the code is written in a way that allows the flexibility for detailed conversations can be had on a case by case basis. Second, it is worth noting there are PROW which run directly adjacent to (and even within existing hedgerows) so we'd flag these would be within the suggested buffer. To resolve this, we'd suggest the reference to a specific measurement is removed and all references to buffers related to existing hedgerows are changed to a 'should' to support more site specific conversations on a case by case basis in the future.</p> <p>We'd also like to ensure this code clearly excludes proposed hedges. Proposed hedges will not always be able to have such an extensive buffer as some of them will be integrated within the development (e.g. as front garden boundary treatments, etc.).</p>	the nature of buffers to be included.		<p>NA.xx New footpaths should be outside of root protection zones and set back from ecologically valuable existing landscape features.</p> <p>NA.xx Opportunities to use buffers to enhance green infrastructure and habitat connectivity across the landscape should be explored.</p> <p><u>Ancient Woodland Buffer</u></p> <p>NA.XX The ancient woodland of Cawston Spinney must be protected by a buffer of <u>at least</u> 15m. The buffer could should increase if arboricultural and impact assessments indicate this is necessary.</p>

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339	Taylor Wimpey	Nature	P43, 44, 45	A water feature is shown on each of the plans that it not present (see also response on page 45 below). The key for these plans in relation to hedgerows appearing or not on current datasets, google maps, and the 'GB' infrastructure drawing (presumably Green and Blue), is unclear and the purpose of the distinction between the different typologies is unclear. Clarification is required.	Noted. Water features mapped are shown in GIS data, and we propose to keep this dataset intact. Any planning application will require relevant surveys which will reflect the presence (or otherwise) of landscape features. The hedgerow information mapped is a composite of information from various datasets. The key is highlighting where the data has come from.	None	N/a
86	Tritax Big Box	Nature	P44, NA.2	NA.23 and NA.24 refer to woodland buffers, it is submitted that these proposed codes are	Buffers to be amended as set	As per 230 above	As per 230 above

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	Development		3, NA.24	<p>overly prescriptive particularly in relation to employment developments. There needs to be flexibility built into the standards to ensure viable schemes can come forward. In general, the thresholds set out in NA.23 and NA.24 are not supported the word must should be removed and justification needs to be provided for the suggested buffers.</p> <p>2.19. The approach with regards to ancient woodland, is not consistent with Natural England's standing advice or adopted development plan Policy DS8 and/or NE1. The buffer should be measured from the boundary of the ancient woodland, as defined by Natural England and available on the MAGIC website, as often non-ancient woodland extends further than the ancient woodland (as is the case at Cawston Spinney).</p> <p>2.20. It is not clear on the reasons for extending the buffer zone out to 20m. In order to avoid root damage, a 15m buffer from the boundary of the ancient woodland as defined by Natural England is sufficient, and consistent with the Standing Advice.</p> <p>2.21. There is no justification provided for this additional requirement and it is too prescriptive and is a clear attempt to introduce new policy, as stated in Section 1 above SPDs cannot introduce new policies.</p> <p>2.22. The Standing Advice from NE states that the buffer zone should consist of semi-natural</p>	out in response to comment 230 above		

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				<p>habitats such as woodland, or a mix of scrub, grassland, heathland and wetland planting. There is no evidence to suggest that a buffer in excess of 15m is required. Land can be developed beyond the 15m buffer, provided that any development does not impact upon the ability of semi-natural habitats within the buffer zone to provide appropriate screening to the woodland.</p> <p>Proposed amendments: NA.23 Woodlands must be buffered by 15m, the ancient woodland buffer should must be increased to 15m 20m and utilised to reduced the impact of increased use to the core woodland which will be managed with 'no go' areas according to its management plan. NA.24 Buffer widths must comply with the following minimum requirements:</p> <ul style="list-style-type: none"> • Waterbodies including ponds, streams and ditches: up to 10m buffer • Woodland up to 15m buffer • Ancient woodland 15m 20m buffer • Cawston Greenway: up to 15m buffer • Hedgerows: up to 2m buffer strip from centre of hedge. 			
340	Taylor Wimpey	Nature	P44	Guidance as to buffers (e.g. Ancient Woodland) needs to be consistent with the existing SPD and standing guidance. It is not clear from which standards / policies the buffers (waterbodies, hedgerows) are derived.	Buffers will be revised as set out in response to comment 32 in respect of	Buffers to be revised as per above comments (see 230).	

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				<p>They need to be substantiated or are at risk of presenting as arbitrary and unjustified.</p> <p>NA.28 requires that permeable soft landscape boundaries 'must' be prioritised in applications. It is not clear how this could be achieved along the boundary with existing properties on Alwyn Road, which are defined by close board fences onto private rear gardens. Nor would a 'permeable' boundary appear to be preferable given the potential implications for safety and security. NA29. suggests that opportunities for a diversity of landscape typologies to be implemented along the eastern boundary to the edge of the settlement 'should' be explored. It is not clear which locations along the eastern boundary this would apply to, particularly in the context of emerging masterplans for the various phases of the site.</p>	<p>ancient woodland.</p> <p>Other buffers also to be reviewed.</p> <p>Reflecting on this point there would be merit in clarifying what applies to new property boundaries, and site boundaries, as officer interpretation is that NA.28 may be referring to new property boundaries. Similar clarification to be sought in respect of NA.29, with indication on the appropriate plan about the</p>	<p>Clarify site boundaries and new property boundaries, and separate under subheadings as required.</p> <p>Indicate area of site boundary referenced in NA.29.</p>	

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					area being referenced.		
204	Homes England	Nature	P44, NA.27	We would request that this code is amended to provide some clarity. What is 'They' referring to? Suggest this is a 'should' as it is very detailed to make a mandatory requirement at this stage.	Assume reference is to buffers, but agree this requires clarification or deletion.	Delete NA.27	NA.27 They must.....incorporation
205	Homes England	Nature	P44, NA.28	This is overly prescriptive and not clear what boundaries are being referred to. Suggest this needs to be removed and included as an aspiration.	See response to comment 340 above. The intention to prioritise soft landscaped boundaries is to be retained however.	As per 340	Amend plan
206	Homes England	Nature	P44, NA.29	We would request that further geographical information is included as it is not clear what part of the allocation is being referenced.	Agree as outlined in response to comment 340 above.	As set out for 340 above	Amend plan
383	R. Allanach	Nature	P44 NA.29	NA 29 is far too permissive. It does not reflect the strength of the existing DS8 policy "... Development proposals shall respect and maintain a physical and visual separation between Rugby town and Dunchurch to prevent coalescence and protect their individual character and identity ...". It should	This requirement is not referring to the boundary between Rugby and Dunchurch, but the	Indicate edge/boundary being referenced on the buffers plan. Include new plan highlighting strategic	Amend plan

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				be strengthened. A strengthened NA 29 might read something like “Development abutting Bilton should incorporate distinctive landscape features along the parish boundary to maintain the physical and visual distinction between Rugby and Dunchurch”.	boundary at the rear of Alwyn Road. This is to be clarified on a plan as suggested in response to 340 and 206. In addition, the new green and blue infrastructure connectivity plan will address the DS8 corridor more clearly	green and blue corridors	
207	Homes England	Nature	P44, NA.30	This is confusing as worded. Suggest this is reviewed or deleted as this seems to be a movement code and not a nature code as currently written.	We think this links to comments above relating to clarifying principles under the boundaries heading, and agree further review and clarification is necessary. Area of reference to	Links to comments re NA.29 (340 and 206 above). Locational reference to be added to a plan.	

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					be included on a plan		
202	Homes England	Nature	p44	We struggled to review this diagram. We have assumed it is to be updated for the final version of the Design Codes. While we are generally supportive of the aspiration, regarding the inclusion of existing grassland we do not see a code related to this and nearly all of the existing grassland is situated in areas of proposed development within the Illustrative Framework Plan. This should be acknowledged in the text.	We have reviewed this diagram with the landscape consultants and produced a simplified version that is more legible.	Simplified version of the plan, showing key information only.	
341	Taylor Wimpey	Nature	P45	<p>Clarification required as to the existing features. A pond is shown on the Taylor Wimpey parcel, for example, which is not present on site. The overlapping of colours on the proposed green infrastructure that is located through the centre of the Taylor Wimpey Parcel and runs into the Homes England parcel results in an unclear and difficult to interpret plan which should be updated to provide clarity.</p> <p>The text for NA40. should be amended to provide clarity that details of the management and maintenance of landscapes is not a validation requirement and can be secured through appropriately worded conditions, recognising the stages of detailed design of such proposals.</p>	The features shown on the maps have come from the Council's GIS data sets, though it is possible that it is no longer present or visible. This will be picked up in site survey information provided in planning applications.	<p>Recognise that detail will come forward in site surveys included with planning applications which will represent the latest accurate site conditions. A principle could be included on potential reinstatement of features where appropriate (under 'existing landscape features).</p> <p>Delete NA.40</p>	<i>The reinstatement of lost landscape features could add a positive contribution to the habitat offerings within the allocation. For example through the consultation it has been identified that a waterbody identified in the eastern portion of the site on the GIS dataset is not currently visible on the site.</i>

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					Agree regarding NA.40		NA.40
208	Homes England	Nature	p45	In the case of both Graphics used on Page 44, we are concerned by the amount of detail and the lack of clarity with how this relates to the codes. Both are unclear in scale and legibility, it is also not clear on how it relates to the principles established by the Framework, and what principles it is trying to communicate. It would be beneficial for the user to include some narrative on the graphics and how to use in combination with the codes in this section.	We agree that simplified graphics would be more effective to communicate the principles of connectivity being sought. We will review the plan and text in combination.	Amend plans and text to ensure they are simpler and align better	Amend plans and reference in accompanying text
209	Homes England	Nature	P45, NA.34	Could this be worded in a more accessible way?	We consider this principle unnecessary as it is covered in the vision and the design of public open spaces is addressed in a separate page (p48 of	Delete NA.34	Public open spaces must be designed...as well as social prescribing

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					consultation draft)		
210	Homes England	Nature	p45, NA.36	It is not clear what boundary treatments are being referenced here. Please could additional information be provided within the wording of the code.	This principle and feedback on it illustrates a repetition from p44 (NA.28).	Delete from this section but include reference to soft boundary treatments under new section on 'landscape proposals'. Amend text to clarify boundaries	Permeable, soft boundary treatments should be prioritised <i>utilised</i> to strengthen natural connectivity. <i>This applies to both front and rear boundary treatments.</i>
211	Homes England	Nature	P45, NA.37	We suggest this should be revised from a “must” to “should”. We agree with the ambitions of the code, but it still needs to be fully tested through development delivery.	We will amend to a should. We also propose to relocate this principle to the new landscape proposals sub-section	Amend must to should Relocate to landscape proposals section	Hard boundary treatments must <i>should...</i>
87	Tritax Big Box Developments	Nature	P45, NA.38	NA.38 which states ‘Verges alongside routes and planting alongside PRowWs must be landscaped to create safe spaces for users with good visibility and enhanced wildlife connectivity’ needs to reflect PRow guidance which requires landscaping set back to avoid overhanging trees etc on PRow.	Noted. We do not see a conflict with this guidance as the principle refers to being safe and good visibility	None	N/a
212	Homes England	Nature	P45, NA.39	We suggest this should be revised from a “must” to “should”. We agree with the ambitions of the code, but SuDS still needs to	Remove SuDS from previous NA.19 and put	As per response to comment 31 above	As per response to comment 31 above

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				be fully tested through development delivery as the ground conditions mean SuDS may not always be possible.	reworded code here. Agree to amend must to should	Amend must to should	
384	R. Allanach	Nature	P45	A belt of land around the proposed Homestead Link is shown in turquoise. However this colouring is not included in the key. Perhaps it should be labelled “Proposed Green and Blue Infrastructure Corridor linking Cawston Spinney with Cock Robin Wood”.	Noted. As outlined under the response to comment 208 above, we propose to review this plan to simplify it. This will include strategic green and blue infrastructure corridors as suggested.	Amend and simplify plan with clearer reference to green and blue infrastructure corridors	
88	Tritax Big Box Development	Nature	p46	With regards to page 46 ‘Open Space Provision’ it is noted that these typologies and quantities reflect the adopted South West Rugby SPD however it is noted in the adopted SPD there is a facility to allow provision across the allocation. Therefore, if the employment or residential land is overproviding in one aspect of open space it should be agreed that less can be provided in the other typologies.	The content of the Masterplan SPD is unaffected by this page	None	N/a
385	R. Allanach	Nature	P46	The description of Parks and Gardens does not align with Rugby’s Green Space Strategy	Agree for consistency.	Amend description.	Parks and gardens include urban parks, squares ,

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				<p>which at page 11 defines Parks and Gardens as “These particular sites would normally contain a whole range of quality facilities and experiences for all members of the public. These can be classed as the Borough’s main parks and would allow the visitor to spend several hours enjoying the open space environment. An example would be Caldecott Park or Hillmorton Recreation Ground”. Not all urban parks would have a sufficient range of facilities to engage the visitor for several hours. Squares clearly do not meet the cut. [The 2011 local development plan used to have an allowance for civic space which might include squares but sadly this was axed in the 2019 local development plan.] The standard adopted in Rugby’s Green Space Strategy should be used instead of the current wording in the draft SPD.</p>	<p>The Greenspace Strategy 2014-2024 does use the definition described, as does the Open Space Audit 2015.</p> <p>The adopted South West Rugby Masterplan SPD, identifies that the open space typology of ‘Parks and Gardens’ is required for the urban extension, but that some of the requirement could instead be delivered in the form of the natural and seminatural green space typology to be concentrated</p>		<p>country parks and formal gardens. <i>These would normally contain a whole range of quality facilities and experiences for all members of the public. These can be classed as the Borough’s main parks and would allow the visitor to spend several hours enjoying the open space environment</i></p>

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					within green/blue corridors, Rugby to Dunchurch landscaped buffer and around Cawston Spinney.		
342	Taylor Wimpey	Nature	P47	As above, whilst the aspiration for maximum walking distances to accessible open space is supported, the Code needs to accept flexibility for site conditions and other relevant factors.	These distances are based on guidance from The Fields in Trust, and some flexibility is acknowledged in the text. The information here represents the desired strategy, which is supported by the strong emphasis on landscape and open space in the community engagement. RBC will review any cases	None	N/a

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					where this cannot be achieved alongside the relevant evidence and form a view on an individual basis.		
213	Homes England	Nature	P48, NA.48	We would request further wording is added to this code which considers routes within areas of woodland. A number of these may struggle to be accessible depending on how that is defined.	Noted. We propose to amend the text to indicate may not always be most accessible in some contexts	Amend text	Routes must be as <i>accessible as possible, giving consideration to their context</i>
214	Homes England	Nature	P48, NA.48	We suggest that the following is added as a precursor to the code: “Across South West Rugby a...”	Agree in slightly amended version	Amend sentence	NA.48 Across South West Rugby routes must be accessible, and well maintained with clear way marking.
215	Homes England	Nature	p48, NA.51	We suggest this should be revised from a “must” to “should”. We agree with the ambitions of the code, but it still needs to be fully tested through development delivery. It may be better suited to state that “all habitats created for the purpose of wildlife benefit”.	Agree to proposed amendment following discussion with landscape consultants.	Reword as suggested and delete reference to 30%	Wildlife friendly habitats....at least 30% of the area. <i>Within new parks and public open spaces all habitats should be created for wildlife benefit</i>

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89	Tritax Big Box Developments	Nature	P48, NA.51	NA.51 requires wildlife friendly habitats within new parks and open spaces must cover at least 30% of the area, TBBD consider that this requirement is overly prescriptive. The site will already need to meet statutory BNG requirements and such an approach may contradict with what is already being required to be provided as part of a proposal: suggest deletion.	As above in response to 251	As per 251 above	As per 251 above
216	Homes England	Nature	P48, NA.54	We suggest this is best picked up as a condition or aspiration at the RMA stage.	Agree	Delete NA.54	NA.54 Applications must detail.....within the site
217	Homes England	Nature	P48, NA.55	We suggest this is best picked up as a condition or aspiration at the RMA stage.	Agree	Delete NA.55	NA.55 Evidence of.....and agreed
218	Homes England	Nature	P48, NA.56	We suggest this is best picked up as a condition or aspiration at the RMA stage.	Agree. Delete NA.56	Delete NA.56	NA.56 Regular audits.....must be outlined
343	Taylor Wimpey	Nature	P48, 49, 50	NA.55 requires 'that 'Evidence of the funding and management responsibilities must be outlined and agreed'. At the stage of submission of a planning application, although robustly viability assessed, due to the timeframe of delivery, such details are very unlikely to be available. Therefore, this paragraph should be amended to reflect that this information will be secured prior to the occupation of dwellings utilising the proposed open space.	Agree. This page is focussed on design principles and NA.54-NA.56 discuss management.	Delete NA.54, NA.55, and NA.56 as above	NA.54 NA.55 and NA.56 inclusive

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				Standards as to wildlife friendly habitat as a % of open space, woodland mix and canopy clearance need to be set within national policy or other statutory, tested standards. Otherwise, as above, they present as arbitrary.			
386	R. Allanach	Nature	P48 NA.58	The requirement to consider non-native species in NA.58 directly contradicts local development plan policy SDC2 and should be removed. An SPD cannot rewrite a local development plan.	Agree.	Delete NA.58	NA.58 Plant selections.....displays
N/a	Officer	Nature	P49	N/a	N/a	In line with feedback across the 'nature' section a new set of general principles to be included (regrouped from elsewhere in the section) in a new landscape proposals sub-heading.	
90	Tritax Big Box Developments	Nature	p49	With regards to the NA.59 to NA.61 again these requirements are overly prescriptive and the requirements must be looked at on a case by case basis. It is felt that this paragraph is overly prescriptive, large native trees may not necessarily be the best solution for the site as there are better establishment/growth rates for smaller planting, and that this will establish to similar levels as if more mature planting were to be provided at day 1, when the Landscape Assessment is being undertaken at Year 15 –	We disagree, and consider it important to set expectations for new landscaping to be introduced on the site area. NA.59 -NA.61 do not refer to size of trees	None	N/a

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				<p>i.e. the same result is achieved and conclusions on levels of impact reached are the same. Another issue may be that the species suggested may contradict carbon sequestering requirements as required in NA.68):</p> <ul style="list-style-type: none"> • suggest deletion of NA.59 • suggest deletion of NA.61 • suggest amendment to NA.72 	<p>specified, but do refer to native tree species in response to landscape character and local plan requirements to utilise native species.</p> <p>NA.68 refers to climate resilience and not carbon sequestration. This has been retained on advice of our landscape consultants.</p>		
219	Homes England	Nature	P49, NA.59	We feel the wording of this code is confusing when read in combination with NA.57 and NA.58. It suggests that 'favour' equates to 20%. We would request that this is confirmed within the code.	We do not see a conflict with NA.57 and NA.58. In any event NA.58 is to be amended/deleted as set out above. NA.59	None	N/a

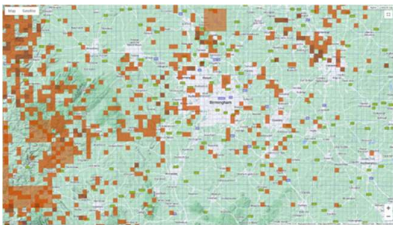
Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					refers specifically to new woodland planting – see officer action below.		
N/a	Officer	Nature	P49, NA.60	On advice from the consultants having reviewed the principle reword.	N/a	Reword	Existing and n New areas of woodland planting must <i>should</i> consist of a diverse stand and structure <i>to help with climate resilience and protect from pest and diseases</i>
N/a	Officer	Nature	P49, NA.62	N/a	N/a	Amend must to should	A diversity of tree species must <i>should</i> be selected...
220	Homes England	Nature	P49, NA.64	Whilst we understand the intention of the code, our suggestion is that reference to “non-native species aid species diversity” is removed as this would be controversial.	As above comments, all reference to non-native species to be deleted.	Delete reference to non-native species – delete NA.64	Delete NA.64
N/a	Officer	Nature	P49, NA.65	N/a	N/a	Amend must to should	Existing conditions and climate resilience must <i>should</i> be considered in plant selection
221	Homes England	Nature	P49, NA.72	We would request that this code is amended to include reference to maturity and maintenance. We suggest that the following is added to provide added context:	The canopy clearances are taken from the Warwickshire Design Guide,	Amend wording as suggested	The following canopy clearances should be achievable in line with the Warwickshire Design Guide <i>As trees mature and</i>

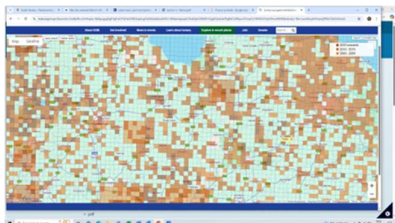
Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
				“As trees mature and overhang nearby routes, they should be able to be maintained to achieve tree canopy clearances of...” (Or Similar)	however the suggested wording is reasonable and will be included.		<i>overhang nearby routes, they should be able to be maintained to achieve tree canopy clearances below in line with the Warwickshire Design Guide:</i>
364		Nature	P49	Could the opportunity for tree pits as a multi-purpose SuDS feature be mentioned in the Street Trees section on page 49?	We propose to introduce a wider section including principles for new landscape proposals, which will immediately precede the soft materials palette, so this can be included in the principles there.	Include SUDs feature principle under general landscape proposals (likely to be p49)	<i>As part of drainage strategies, the use of water management interventions should be explored, for example SUDs, filtration tree pits and permeable paving.</i>
387	R. Allanach	Nature	P49 NA.61	NA.61 seems overly restrictive. I am reasonably certain that naturally occurring pioneer woodland in this area could contain far more than 10% Silver Birch. I suspect, but see no way of proving [beyond an experiment significantly outlasting even the youngest currently Rugby resident], that if there were to be such a thing as naturally occurring ‘climax’ woodland in our area it would have more than 10% English Oak.	These are guidelines to promote species diversity, not restrict it. The code has been amended to reference new planting. These	None	N/a

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					guides came from the 'Tree species selection' section (p.57) of the Warwickshire, Coventry & Solihull Sub-Regional GreenInfrastructure Strategy (2024).		
388	R. Allanach	Nature	P49 NA.69	NA.69 contradicts SDC2 and it would be far better to remind developers of the requirements of the local development plan viz "It should be ensured that new planting comprises native species which are of ecological value appropriate to the area". The local development plan policy could be fleshed out by a reference to selecting for climatic resilience. [Incidentally there is no such category as "near-native". Vascular plants fall into just four exclusive categories: native, neonative, archaeophyte and neophyte.]	Agree – delete NA.69	Delete NA.69	NA.69 White priority.....space is restricted
389	R. Allanach	Nature	P49	Species selections Public Open Space Trees	Refer to: Scots Pine (Pinus sylvestris) -	None	N/a

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				<i>Pinus sylvestris</i> is not native to England.	British Trees - Woodland Trust. Scots Pine (<i>Pinus sylvestris</i>) is included in the Warwickshire Landscape Guidelines, with note that Scots Pine is not native to Warwickshire but is associated with former healthland in Dunsmore. A previous consultation comment was that Scots Pine along Dunchurch Primary routes are locally distinctive. The landscape consultants		


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				<p><i>Quercus petraea</i> is not found in the local area. It is only rarely recorded in the wider Rugby area – see Midlands distribution map. Bagnall's 1890 flora of Warwickshire described it as local or rare and had no sites in Rugby for it. Generally <i>Quercus petraea</i> is found to the North and West of Rugby within the British Isles. As these areas have cooler and wetter summers than Rugby the ability of <i>Quercus</i></p>	<p>argue that widening the species diversity to encompass some coniferous species will strengthen habitats.</p> <p><i>Quercus petraea</i> is included in the Warwickshire Landscape Guidelines</p>		

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				<p><i>petraea</i> to withstand the hotter drier summers that are coming has to be questioned.</p>  <p>In contrast <i>Corylus avelana</i> and <i>Malus sylvestris</i> are to be found locally and were likely here before modern times, they are both native to England. Why are they not included in the list of trees suitable for public open spaces?</p>			
390	R. Allanach	Nature		<p>Street Trees</p> <p><i>Amelanchia arboria</i> is native to the USA but not to England.</p> <p><i>Prunus pandora</i> is thought to derive from <i>Prunus serrulata</i> which is native to SE Asia but not to England.</p> <p><i>Prunus X hillieri</i> and <i>Sorbus X arnoldiana</i> are hybrids and neither native nor neobative.</p> <p><i>Sorbus aucuparia</i> is only identified in the woods and hedges of the area once. I have</p>	<p>Agree to delete non-native species.</p> <p>We have been advised that Sorbus</p>	<p>Delete non-native species (All street trees in palette except sorbus aucuparia)</p>	<p>Delete images of non-native species: all street trees palette except sorbus aucuparia.</p> <p>Delete street tree heading.</p> <p>Add other native trees to the palette including:</p> <p>Quercus Robur, Quercus Patraea, Ilex Aquifolium, Salix Fragilis, Corylus,</p>

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				<p>looked for it in its specified location but failed to find it. It is clearly not a common “natively” occurring tree in this area. Whilst wildy planted its “naturally” occurring area is generally like <i>Quercus petraea</i> to the North and West of Rugby. These areas experience cooler wetter summers and again like <i>Quercus patraea</i> its ability to withstand the hotter drier summers that are coming is to be doubted. As the attached distribution map shows it is completely absent from much of the Breckland whose current climate we can expect Rugby to emulate in future years.</p>  <p>Some of the planting will take place alongside water courses and ponds which are likely to provide moist habitats even in the dryer summers which are coming. The absence of a recommendation for <i>Alnus glutinosa</i> in these locations is a surprising omission from this draft SPD.</p>	<p>aucuparia is a small native tree.</p> <p>Not all possible selections have been used as this is a suggestive palette. It is beholden on developers to develop planting strategies of native species appropriate to the landscape.</p>		<p>Avellana, Tilia Cordata, Acer Campestre, Malus Sylvestris, Populus Tremula, Salix Alba, Alnus Glutinosa, Betula Pubexcens.</p>

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391	R. Allanach	Nature	P50	<p>I suspect that the only “Ancient” hedges in the area are those flanking the Northampton Lane by-way.</p> <p>The eighteenth century farmers who enclosed the area do not seem to have worked to a seven species rule. I suspect what they planted was either hawthorn or a hawthorn/blackthorn mix with oak and ash as standards. I wonder if seven species mix hedges will look quite different from the landscape we currently see.</p>	The Hedgerows Regulations 1997 sets out that wildlife and landscape criteria for determining “important” hedgerows contain 7 species, we use this as our baseline to ensure opportunities for biodiversity are met in new landscape schemes.	None	N/a
392	R. Allanach	Nature	P50	<p>Hedges</p> <p>Somewhat surprisingly <i>Cornus sanguinea</i> was not found once amongst the 18 agricultural hedges surveyed by Homes England for their Homestead Link proposal. However <i>Ilex aquifolium</i> was found in 31% of those hedges and <i>Sambucus nigra</i> in 22%. Both these</p>	<p>We have updated hedge species with <i>Ilex aquifolium</i>, <i>Sambucus nigra</i> is included in the palettes. The palettes are not intended to</p>	<p>Update hedge species with <i>Ilex aquifolium</i></p> <p>Delete: <i>Capinus betulus</i> and <i>Fagus sylvatica</i> 'Atropurpurea'</p>	<p>Include image in palette</p> <p>Also add: <i>Taxus Baccata</i></p> <p>Delete images</p>

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				species should be included in the list of acceptable hedge species.	be a definitive selection, more as a guideline with expectation that landscape schemes will have undertaken robust analysis of all data, existing site conditions etc		
393	R. Allanach	Nature	P50	<p>Scrub</p> <p>I question the inclusion of <i>Cornus sanguinea</i> in this list.</p> <p>In the <i>Warwickshire Landscape Guidelines</i> Rendell refers to the recent heathland nature of this area [heather is recorded persisting into Victorian times]. Rendell challenges highway engineers to recreate heathland surrounding new roads to acknowledge the history of the site. As we have seen Homes England's Homestead Link proposal totally flunked this opportunity. One remaining relic of the former heathland is the gorse still to be found on the margins of hedges.</p>	<p>Cornus sanguinea is listed in the Warwickshire Landscape Guidelines for Dunsmore area.</p> <p>With reduction in plant palette we have added this element in to be considered where appropriate</p>	<p>Delete: Cornus sanguinea</p> <p>Add: Calluna vulgaris</p>	Delete image and replace as described

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				<p><i>Ulex europaeus</i> should be included in the list of desirable scrub species.</p>  <p>Gorse growing alongside the R169c bridleway. October 2022.</p>	within development.		
91	Tritax Big Box Developments	Nature	P49-51	In general, the landscape material palettes proposed are overly prescriptive and should be a guide only.	The palettes are intended as a guide. We will clarify this point.	Add sentence at the beginning of page 49.	The following palettes have been produced as a guide for species that could be selected for landscape schemes.
222	Homes England	Nature	P50, NA.73	<p>The current wording assumes hedgerows will only be along unlit routes and this code seems to imply boundaries and edges will be only within open spaces.</p> <p>This may not always be the case (e.g. the central bridleway connecting the schools or mixed use centre will need to be lit and is an open space with a number of different</p>	Noted and agreed	<p>Add 'species rich native hedgerow to beginning of principle as requested</p> <p>Amend from a must to a should.</p>	<p><i>Species rich native</i> hedgerows act as dark corridors for wildlife and where appropriate must <i>should</i> be prioritised over single species hedges in landscaping schemes.</p>

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				boundaries) and there could be boundaries within the proposed development parcels. Please also reword to read “species rich native hedgerow”.			
223	Homes England	Nature	P50, NA.74	We don't fully agree with this especially for such a large site as there will be situations that require various alternative boundary treatments, and we need the flexibility to consider management over the long term. In our view, this is a detail that should be discussed as a part pre-application engagement for future RMAs. Amend language to include “could” rather than “should”.	Disagree – ‘should’ allows room for justification against the code requirement.	None	n/a
N/a	Officer	Nature	P50, NA.74	N/a	N/a	Delete word ‘ornamental’ from beginning of sentence	Ornamental single species hedges.... Images to have title: Single Species hedges (ornamental hedges)
224	Homes England	Nature	P50, NA.75	We do not feel there is a requirement to quantify the number of species within hedgerows, it is restrictive and would constrain development coming forward. We recommend the number is either removed or reduced and the wording of “must” is amended to “should”	As per response to 391. Additional officer comment below.	None	N/a
N/a	Officer	Nature	P50, NA.75	N/a	N/a	Inset words ‘species rich’ at the beginning in line with consultant recommendations	<i>Species rich</i> hedgerows....

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225	Homes England	Nature	P50, NA.76	We recommend the number is either removed or reduced and the wording of “must” is amended to “should”	Believe this must refer to NA.75 and not NA.76 as this does not include a number – see response above.	None	N/a
N/a	Officer	Nature	P50, NA.78	N/a	N/a	Delete NA.78 as this does not relate to soft landscape materials palette	Footways must remain clear.....management plans.
394	R. Allnach	Nature	P51, NA.86	Making use of seed derived from the Draycote SSI is a very good idea.	Noted	None	N/a
N/a	Officer	Nature	P51	N/a	N/a	Delete ‘Ornamentals’ from this page (as non-native) NA.83 & NA84. amend ‘must’ to should	
Public space							
132	Homes England	Public Space	General	The Preservation Codes in the Public Space section overlap and repeat other codes within the nature section. We suggest this might be better covered by signposting to those codes, duplication under different sections of the code may result in contextual confusion for users.	Agree in principle – will pick up specific responses in further points in this statement	As in specific comments below – avoid duplication and cross reference	N/a

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133	Homes England	Public space	General	Numerous codes within the Public Space section are focused on movement and access within streets and not actually public spaces. Suggest this is reviewed and where possible keep movement focused codes within the movement section of the code as we have found it difficult to read this in combination with the movement section given there are various overlaps. Duplication under different sections of the code may result in contextual confusion for users.	We recognise the overlap between 'movement' and 'public space'. It was decided to place information on streets within the public space section (as suggested in the National Model Design Guide) because these spaces are a balance of place and movement. We are keen that the 'place' element is not undermined by consideration only of movement – albeit this is an important element of streets. The need to ensure	Avoid repetition and improve cross referencing	N/a

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					that strong cross referencing is employed is recognised.		
226	Homes England	Public space	P54, PS.01 - PS.04	It is considered that the content of these codes is repetitive from the movement section earlier in the document. Rather than repeating, could utilise cross reference and amend the text to be an introduction. No mention of details on public space (benches, wayfinding etc) apart from the car focussed road network	Acknowledge repetition and propose to make info on p29 coded ie MO.XX and remove codes from p54. P54 more about place quality + specific elements/relationships.	Delete PS.01-PS.04	PS.01-PS.04
344	Taylor Wimpey	Public spaces	P54	As above, whilst the aspiration of delivering bus stops within 400 metres of all dwelling is supported, there will be instances where this is not physically possible owing to site conditions, alignment and viability of the bus route. It is important that the Code accepts the need for flexibility.	400m walking distance has been supported by the LHA. It is understood that this may not always be feasible, in which case this would be set out in any application	None	N/a

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475	WCC Highways	Public Space	p54, PS.03	This is dependent on the number of dwelling - refer to Warwickshire Design Guide on this matter.	Principles on this page may be repetition of content from the Movement chapter, so cross reference and delete some of the content	Delete and cross reference to Movement section	Delete
476	WCC Highways	Public Space	P54, PS.04	Not as the crow flies	Noted and agree. Distance along actual route. However, this content is proposed for deletion and this point is addressed in the 'movement section'	Delete PS.01-PS.04	Delete
477	WCC Highways	Public Space	P54 - images	Should enquire with the Active Travel team regarding local Warwickshire examples of cycleways. WCC do not accept shared spaces on the public highway & local Warwickshire examples of secondary streets should be used.(bottom 2 images)	Noted. Active Travel team has shared some examples we can use We do not read these images as shared spaces, as there is clear	Substitute for local precedents where possible	

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					delineation between space for different users. We will seek to use more local examples where possible.		
	Officer	Public space	P56	N/a	N/a	Amend sub-heading to align with street types	<i>3b: Secondary Distributor Road/Secondary Streets – Urban residential/mixed use</i>
N/a	Officer	Public space	p55	Amend first sentence for clarity			This example...network example (p31) <i>Sample layout A (see page 31 showing illustrative street network for location)</i>
227	Homes England	Public space	P55, PS.05	We aren't sure why there is a need for both the “urban” and “sub-urban” typologies for secondary streets. Could there be a bit more narrative around this as we currently assume the urban areas relates to areas around the mixed use centre, schools and areas around bus stops. This also largely replicates highways guidance. We feel it would be more appropriately located within the Movement section of the document. If the code is to be retained, it should be amended from “must” to “should” as there needs to be room for nuance and variation given the various site conditions and	The inclusion of urban and suburban street typologies relates to the built form area types (Cross ref). It shows there is flexibility for the character of the public space to be altered.	Add clarification and cross referencing – cross reference to area types. Delete duplication	Amend titles as per officer comments above.

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				constraints. This should also apply to the bullet points stating “must” within the code. We’d also note that the last bullet point of PS.05 is not consistent with PS.01. Suggest this bullet point should align with PS.01.	<p>Agree to delete duplication, though streets have a movement and place function, so some movement information is relevant here. reference to bullet points and cross ref.</p> <p>Disagree with changing from a ‘must’. However, need to review ‘coulds’ within the bullet points.</p> <p>PS.01 is to be removed to Movement. Ensure cross referencing</p>		
548	WCC highway	Public Space	P55, PS.05	could you change the text to something like, ‘cycle tracks (segregated) must be provided as	Amend bullet 5 as suggested.	Amend bullet 5 as suggested	Where required by traffic flow or speed, <i>cycle tracks (segregated) must be</i>

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	s (Active Travel)			per LTN1/20. The desirable minimum width is 3.0m'			<i>provided as per protection must follow LTN1/20 guidance. The desirable minimum width is 3m.</i>
549	WCC highways (Active Travel)	Public Space	P55	0.5m is the desirable minimum horizontal separation between cycle track and carriageway (for speed limits of 30mph or lower) but as most images show a verge, SUD or other separation, this is not necessary in the drawings – except where the cycle track is adjacent to on-street parking, where the buffer helps prevent car doors from being opened into the path of cyclists	Noted	Ensure this is reflected on the drawing	Reflect drawing
550	WCC highways (Active Travel)	Public Space	P55 image	consider some on-street cycle parking	Agree	Ask PJA to include	
551	WCC highways (Active Travel)	Public Space	P55 image	Footways on building side of road are confusing	Noted. We will clarify this – public realm beyond the highway	Amend plan/label as appropriate	
552	WCC highways (Active Travel)	Public Space	P55 image	Bus stop – if a mini zebra could be placed at the back of the bust stop across the cycle track, this would help to indicate priority for pedestrians/ bus passengers – see attached photo from Coundon Cycleway in Coventry	Agree – to include on the drawing	Include priority crossing across the cycle track for pedestrians	Amend drawing
228	Homes England	Public Space	p55	We suggest that the dimensions are removed as these have the potential to create confusion if	In line with other feedback (including from the LHA) we	Correct dimensions on diagram as required – see comments below.	N/a

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				applied elsewhere. The dimensions also contradict other parts of the code (such as MO.57 widths for secondary streets_	have corrected some of the dimensions. We do however plan to retain these.		
229	Homes England	Public Space	P55, PS.06	Same comments as PS.05	As above in respect of PS.05	As above in response to 227	As above
478	WCC Highways	Public Space	P55, PS.05, bullet 5	Remove this as WCC will not accept this on new greenfield sites	Delete bullet 5, and amend diagram accordingly	Delete bullet 5 Amend diagram	Carriageway median and edge friction strips could be provided to aid speed management
479	WCC Highways	Public Space	P55, PS.05, bullet 6	Please clarify this - is this for controlled or uncontrolled crossing points?	Formal' should refer to 'priority' – may be controlled or uncontrolled depending on circumstance. Informal crossings every 100m with more formal arrangement where a desire line or	Substitute the word formal for priority	Formal <i>Priority</i> pedestrian crossings...

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					circumstance warrants.		
480	WCC Highways	Public Space	P55, PS.05, bullet 8	Footways at a min. must be provided.. Remove the word 'Standard'	Agree	Remove the word 'standard' and substitute for 'minimum.	Standard <i>Minimum</i> 2.0m footways....
N/a	Officer	Public Space	P56	N/a	N/a	Amend 1 st sentence for clarity	This example.....network example (page 31) 'Sample layout B (see page 31 showing illustrative street network for location)
N/a	Officer	Public Space	p56	N/a	N/a	Amend sub-heading to align with street types	3b: Secondary Sistributor Road/Secondary Streets – Suburban residential
230	Homes England	Public Space	P56, secondary street graphic	We suggest that the dimensions are removed as these have the potential to create confusion if applied elsewhere. It would also be beneficial to include an illustrative bus stop.	Agree to remove dimensions. Demonstrate bus stop	Demonstrate bus stop on diagram.	Amend diagram
481	WCC Highways	Public Space	P56, 1 st sentence	Not a clear sentence may need to be reworded.	Reword		This example.....network example (page 31) 'Sample layout B (see page 31 showing illustrative street network for location)

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482	WCC Highways	Public Space	P56, PS.06, bullet 1	Where this is a bus route, carriageway width must be 6.1m without on street parking or 6.7m with on street parking.	Clarify wording – not a range between 6.1 and 6.7m. It is one or the other depending on whether parking is envisaged on carriageway		Carriageway width must be between 6.1m (minimum) <i>whewre there is no on-street parking</i> and 6.7m (maximum) <i>with where there is on-street parking.</i>
483	WCC Highways	Public Space	P56, PS.06, bullet 3	Please clarify this	'footway construction' – links to side friction strips discussed on previous page.	None	N/a
484	WCC Highways	Public Space	P56, PS.06, bullet 4	Stop (typographical error)	Agree, correct typo.	Replace 'stopping' with 'stop'	stopping
485	WCC Highways	Public Space	P56, PS.06, bullet 6	Uncontrolled or controlled crossing point please clarify.	Substitute word 'formal' with 'priority'	Substitute word 'formal' with 'priority'	Formal Priority crossings...
553	WCC highways (active travel)	Public Space	P56, PS.06, bullet 7	Suburban secondary street – PS.06 – could you change the text to something like, 'cycle tracks (segregated) must be provided as per LTN1/20. The desirable minimum width is 3.0m'	Agree – amend as suggested	Amend as suggested	Where required cycle protection must follow LTN1/20 guidelines. <i>Cycle tracks (segregated) must be provided as per</i>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
							<i>LTN1/20. The desirable minimum width is 3.0m'</i>
486	WCC Highways	Public Space	P56, PS.06, bullet 8	Minimum not standard for 2 metre footway. However, where a bus route is being provided, guidance within LTN 1/20 needs to be followed for cycleways.	Agree. Add cycleway	Remove word 'standard', and refer to minimum 2m footway.	Standard Minimum 2.0m...
487	WCC Highways	Public Space	P56 drawing	Buildouts/pinchpoints will not be accepted by WCC Highways and this should not be shown on the illustration.	Noted	Delete build out shown on diagram	Amend diagram
488	WCC Highways	Public Space	P56 drawing	Cycling access should be provided on both sides of the carriageway with suitably located cycle crossing points.	Discussed this point further with the active travel team 27.05.25. Agreed to show cycle tracks on one side (though single direction on both sides would be acceptable), but to show crossing points directly opposite side streets.	Amend diagram	Amend diagram

Ref no	Respondent	Section	Page/ reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
554	WCC highways (Active Travel)	Public Space	P56 image	Doesn't need 0.5 separation strip/ buffer	Noted	Remove buffer from drawing	Remove buffer from drawing
555	WCC highways (Active Travel)	Public Space	P56 image	Please add a gap opposite the side road so that cyclists can transition from the side road (on-carriageway) to the cycle track (off-carriageway) as done in Coundon Cycleway Coventry	Agree	Add to drawing	Amend drawing
345	Taylor Wimpey	Public spaces	P55-56	The dimensions provided on the plans are not consistent with LTN 1/20 guidance from WCC. This begs the question as to whether WCC have been consulted on the draft Code? They are not identified on page 7 as a party that have been engaged in the development of the Code. It is very important that the Code is consistent with guidance provided by WCC previously to applicants and is consistent with WCC's requirements.	WCC has been a key stakeholder in the development of the code, as identified on p26. RBC has continued to work with WCC to ensure that the design principles in the code are acceptable. Amendments have been made in line with WCC highways	Make amendments requested by the LHA	N/a - see WCC highways comments

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					feedback (see below)		
N/a	Officer	p56	PS.06	N/a	N/a	Bullet 6 – amend should to must	N/a
N/a	Officer	p57	Land scape princi ples	N/a		<p>Delete page 57. Create a general ‘street landscape principles page later in this section to address all street types and avoid repetition.</p> <p>Delete ‘Preservation principles’ and cross reference to relevant principles in the Nature section.</p> <p>Retain ‘application’ principles where appropriate.</p>	
231	Homes England	Public Space	p57	We suggest that the dimensions are removed from the graphic as these have the potential to create confusion if applied elsewhere. The “pedestrian space 2” label within the key and feel it is not correct. Most of the indicated space would be an interface with the adjacent buildings and significant parts of it are likely to be defensible space, front gardens, or landscaping.	With reference to the officer comment above, the use of these drawings will be reduced. Dimensions will be deleted.	Delete dimensions from these plans if retained in revised page.	

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
232	Homes England	Public space	p57, PS.08	As per previous comments on buffers, we suggest this is removed or wording significantly revised. There are instances where this cannot be achieved, and we feel this needs to be reviewed on a case by case basis. An example is parts of Cawston Lane within Homes England's submitted planning application.	Delete Preservation codes and refer back to NA.XXs	Delete Preservation codes and refer back to NA.XXs	Preservation PS.07-PS.10 <i>Preservation Refer to NA.xx</i>
233	Homes England	Public Space	P57, PS.09	As per previous comments, it will not always be possible to include a 10m buffer from all existing drainage features (e.g. existing ditches) if these were to be classed as "water bodies". We suggest this is removed.	As above delete preservation codes and cross reference to nature as required.	As 232	As 232
234	Homes England	Public Space	P57, PS.10	Not all trees are capable of being preserved due to the highway infrastructure required. Whilst trees will be retained where possible, not all can be. We request "must" is amended to "should".	As 232 and 233	As 232 and 233	As 232 and 233
235	Homes England	Public Space	P57, PS.11	The mandatory nature of the code in combination with the detail at this stage of the project give us hesitancy. Could this text please be reviewed to the following: "General best practice for the implementation of landscape must be followed at all times. This should include, but not be limited to...."	Propose to retain PS.11 in new general landscape principles for streets page	Amend as suggested in revised location.	"General best practice for the implementation of landscape must be followed at all times. This should include, but not be limited to...."
236	Homes England	Public Space	P57, PS.12	We generally agree with the principle but this again applies a blanket requirement to a very large site that will need a degree of nuance and flexibility to support its delivery and further	Agree to amend to a should	Amend must to a should in revised location.	SuDs must <i>should</i> be incorporated....

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
				engagement with stakeholder. We request “must” is amended to “should”.			
237	Homes England	Public Space	P57, PS.13	“Mown” grass verges conflicts with other guidance in the document such as NA.88. Suggest this is removed or if retained can it be revised from “must” to “should”	Disagree – we don’t read this as conflicting	None	N/a
238	Homes England	Public Space	P57, PS.16	We’d suggest this is reviewed and revised to “should” as again, this may need future discussion with highways.	Agree	Amend must to should in revised location	In visibility splays, mown grass must should be....
346	Taylor Wimpey	Public spaces	P57	A 10m buffer “must be applied” to water bodies. The standard buffer distance is 8m. The increased buffer distance is not evidenced or justified.	This forms part of the ‘preservation section’ that is to be deleted in lie with above responses	Delete ‘preservation principles	Delete preservation principles as above
489	WCC Highways	Public Space	P57 drawing	See previous notes regarding pinch points and buildouts.	Drawings to be reduced in relevance in new location.		
490	WCC Highways	Public Space	P57, PS.13	Does this measure relate to the height of the planting? Any planting must not be an obstruction to visibility.	It does refer to height of planting. Note point re visibility and will specify	Add note that should not obstruct visibility.	Mown grass verges must be maintained up 600mm comprising of grass species and flowering forbs with specimen tree planting, <i>which should not obstruct visibility.</i>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
491	WCC Highways	Public Space	P57, PS.14	Please clarify what height structures means	We understand this to refer to the heights of planting, which should not obstruct visibility	Add note that should not obstruct visibility	PS.14 Verges of 3m+ widths must be managed with diverse height structures, <i>which should not obstruct visibility.</i>
492	WCC Highways	Public Space	P57, PS.15	This seems very prescriptive and WCC concern is with suitability of the type of planting within the Highway and ensuring visibility is not affected.	This specification comes from the Warwickshire Design Guide, Part 6 (p10) Tree species to be checked in line with revised palette in 'nature' section	Check tree species specified and amend as appropriate Delete canopy clearances as duplication from p49	Medium trees should be specified
556	WCC highways (Active Travel)	Public Space	P57 diagrams	Example A doesn't need 0.5m buffer except next to parking, Example D doesn't need 0.5m buffer	Noted – as above re the use of drawings on this page – downgrade use on revised page for all street types	Collocate on page and will be smaller	
362	WCC Flood/Strategic Infrastru	Public Space		The requirement to include SUDS in secondary street verges is also welcomed.	Noted.	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
	Structure + Climate Change						
33	Catesby	Public Space	P58, PS.18	We recommend reviewing and revising this to "should," as this may require further discussion with highways. Additionally, it implies that pedestrian and cycle permeability must be achieved through frequent road junctions, rather than balancing this against the role of public rights of way and recreational routes as alternatives.	Agree to amend to should, and refer to route intersections to clarify that this point does not just refer to roads.	Amend to should and refer to intersections rather than junctions	Must <i>Should</i> support direct frontage access and frequent <i>route intersections</i> junctions for permeability
34	Catesby	Public Space	P58, PS.20	This repeats guidance from the Warwickshire Design Guide and adopts a car-focused approach. The photographic examples are not particularly representative of the tertiary street typology and should be reviewed and substituted with more relevant examples.	Do not consider it problematic to repeat existing guidance, as this is a LHA requirement. We will review the precedent choices to ensure they reflect the street typology effectively and are local where possible.	We will review the precedent images and replace with local examples where possible	N/a
239	Homes England	Public Space	P58, PS.18	We'd suggest this is reviewed and revised to "should" as again, this may need future discussion with	As response 33 above	As response to 33 above	As above

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
				highways. It also suggests that pedestrian permeability must be achieved through frequent road junctions, instead of considering the role of footpaths, greenways etc.			
240	Homes England	Public Space	P58, PS.20	This replicates guidance set out in the Warwickshire Design Guide and sets out a car focussed approach. None of the public space items illustrated in the pictures relate to the coding. Suggest omitting this information.	As response 34. We will review the precedent choices to ensure they reflect the street typology effectively and are local where possible	As response to 34 above	As above
493	WCC Highways	Public Space	P58, PS.20	The sentence should read as 'There must be multiple access points to be able to allow access for up to 200 units.'	We consider this duplication of principles in the Movement section. Therefore delete PS.17-PS.20 and cross reference to Movement here.	Delete PS.17-PS.20	PS.17-PS.20
241	Homes England	Public Space	P58, PS.22	We feel that the wording of this code as written conflicts with other parts of the document. Either it needs to be removed or re-written including additional detail.	We consider this duplication of content from the 'movement' section, and	Delete PS.21-PS.23	PS.21-PS.23

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					therefore propose deletion here. Refer back to p31.		
494	WCC Highways	Public Space	P58, PS.23	Should serve up to but no more than than 50 units - the current sentence does not sound correct.	As above	Delete	PS.17-PS.23
347	Taylor Wimpey	Public spaces	P58	In terms of dwelling numbers served off Tertiary Streets, there is no justification provided. For example, the Code requires that a Tertiary Street T2 “must carry a maximum of 50 units”. What is the basis for this requirement?	This requirement aligns with the Warwickshire Design Guide (Part 3 – Street Design p6) See also WCC feedback (ref 494 above)	None	N/a
495	WCC Highways	Public Space	P58 image of Goldsmith Street	Local examples from Warwickshire should be used and showing straight long roads does not help with traffic calming.	Agree. We will replace images with local examples where possible.	Replace images with local examples where possible.	N/a
496	WCC Highways	Public Space	P58, image of public	This is a regeneration area - the example is not suitable for a greenfield site	As above, we will replace with local examples where possible.	Replace images with local examples where possible.	N/a

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
			space in cul de sac				
497	WCC Highways	Public Space	P58, image of Derwenthorpe	Trees in footway close to the property frontage - problematic for mobility scooters/pushchair users etc.	As above	Replace images with local examples where possible	N/a
498	WCC Highways	Public Space	P58, image of Nansledan, Newquay	This is a staggered junction and who has priority at this junction?	We will replace this precedent image with a more local example – as per the comment below.	Replace bottom right image (Narlesdam, Newquay) with a tertiary street from Houlton, Rugby.	N/a
499	WCC Highways	Public Space	P58 general	Better local case studies within Warwickshire should be used.	Agree. Whilst we cannot replace every image in the code, we will seek to include local examples where possible	Include local images where possible (such as Houlton as above)	N/a
N/a	Officer	Public Space	p59	N/a	N/a	Amend title in grey box to be consistent with others	Street codes <i>Tertiary Streets</i>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
	Officer	Public space	p59	N/a	N/A	Amend subheading to relate to street typologies	Suburban residential tertiary street T1 <i>4a: Link Road/Tertiary Street (type 1)</i>
N/a	Officer	Public Space	p59	N/a	N/a	Amend first sentence for clarity	This example....network example (page 31) <i>Sample layout C (see page 31 for location)</i>
35	Catesby	Public Space	P59, PS.24	The code should be revised from "must" to "should" to allow for flexibility and variation, considering the different site conditions, constraints, and potential future discussions with highways. This change should also apply to the bullet points within the code that currently use "must."	We do not agree to change this to a 'should'. Many of the requirements in PS.24 are drawn from the Warwickshire Design Guide. We do however recognise use of 'must' and 'could' within the bullet points which we will revisit.	Revisit 'musts' and 'coulds' within the bullet points and separate out where necessary	Split out must, should, could
242	Homes England	Public Space	P59, PS.24	The previous page refers to Tertiary Streets then the heading changes here to the more general street codes. Suggest this is reviewed for consistency.	Agree headings should be consistent (see officer comments)	Amend heading to 'tertiary streets'. Also apply to pages 60, and 61	Street Codes <i>Tertiary Streets (pages 59, 60, and 61)</i>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
				<p>Bullet four relating to highway verges feels very weak in the context of all the other codes. Suggest this is amended from “could” to “should” if acceptable to the highways authority.</p> <p>Bullet nine relating to side street junctions does not include lower tiers of streets which could support alternative junction types. Advice would be to include a reference to secondary or tertiary streets. If the code is to be retained, it should be amended from “must” to “should” as there needs to be room for nuance and variation given the various site conditions, the site’s constraints and future discussion with highways. This should also apply to the bullet points stating “must” within the code.</p>	<p>Bullet 4 – agree. Amend to should (see also 501 below from LHA)</p> <p>Bullet 9 – it is our understanding that the Warwickshire Design Guide is only permissive of T junctions</p>	Amend could to should	Highway verges could <i>should</i> include street trees <i>subject to achieving appropriate visibility.</i>
348	Taylor Wimpey	Public spaces	P59	The requirements set out for Tertiary Street T1 is not consistent with LTN 1/20 guidance from WCC.	We understand the amended content on p59 (see other comments and actions) to be consistent with relevant guidance.	None	N/a
500	WCC Highways	Public Space	P59, PS.24 bullet 2	On street parking cannot be allocated parking	Noted.	Add clarification to this point	“...inset bays. <i>On street parking cannot be allocated parking.</i> ”

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
501	WCC Highways	Public Space	P59, PS.24 bullet 4	Trees should not affect visibility	Agree. Add some wording to make this clear. See also 242 re this bullet point.		Highway verges could <i>should</i> include street trees <i>subject to achieving appropriate visibility</i>
502	WCC Highways	Public Space	P59, PS.24 bullet 6	Needs to be written as 'could be' instead of 'must be'	Noted. Propose to amend to should be with the addition of extra contextual information further to discussion with Active Travel Team 27.05.25 (see also 557 below)	Amend bullet 6	Safe cycling must <i>should</i> be accommodated on carriageway <i>except where connecting to a school, community facility or providing a short link between cycle tracks. In these cases cycle tracks should be provided.</i>
557	WCC Highways (Active Travel)	Public Space	P59, PS.24, bullet 6	Tertiary Street change text to 'safe cycling must be accommodated in the carriageway unless the street includes schools or community facilities, or provides a short link between cycle tracks, in which case cycle tracks should be provided'	Agree – as above	As above	As above
503	WCC Highways	Public Space	P59, PS.24 bullet 7	Minimum not standard	Agree. Change 'standard' to 'minimum'	Substitute word	Standard <i>Minimum 2.0m footways....</i>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
504	WCC Highways	Public Space	P59, PS.24 bullet 11	Not necessarily and blockwork would not be accepted. Any materials need to be agreed with WCC S38.	'Should' suggests sometimes where appropriate so retain this. This code does not advocate for blockwork, but the point is noted, and to be picked up under hard landscape materials on p66. Cross referencing to be included.	Cross reference to materials pallet on p 66	Add cross reference.
505	WCC Highways	Public Space	P59, PS.24 bullet 12	'Curb' should be 'kerb'. visibility needs to be considered - parking should be set back 10m from the junction and not obstruct visibility.	Agree, but propose to delete Agree – diagram to be amended	Delete bullet 12 as removed from drawing Amend diagram	Bullet 12 Amend diagram
506	WCC Highways	Public Space	P59, drawing	Using parking spaces as a buildout for pinch points is not acceptable. WCC do not accept buildouts	Noted.	Delete build out from diagram	Amend diagram
507	WCC Highways	Public Space	P59, drawing	Designated on street parking should not be provided where adjacent to driveways as this blocks/obstructs visibility for drivers exiting/egressing from on plot parking bays.	Noted. On street bays between on plot spaces (north-	Amend diagram	Amend diagram

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					east of drawing) to be amended – possibly by amending built form typology illustrated.		
N/a	Officer	Public space	p60	N/a	N/a	Amend title in grey box	Street codes <i>Tertiary Streets</i>
N/a	Officer	Public Space	P60	N/a	N/a	Amend subheading to relate to street typologies	Suburban residential tertiary street T1 4a: Link Road/Tertiary Street (type 1)
N/a	Officer	Public space	p60	N/a	N/a	Amend first sentence for clarity	This example.....network example (see p31) <i>Sample layout D (see page 31 showing illustrative street network for location.</i>
508	WCC Highway s	Public Space	P60, drawing	Priority crossings should not be placed on tertiary roads. There should be suitable uncontrolled crossing points every 100 metres.	Remove priority crossings on tertiary streets Uncontrolled crossings are addressed in the Movement Section (see MO.28)	Remove priority crossings from tertiary streets drawing	N/a
509	WCC Highway s	Public Space	P60, drawing	Junctions need to have a 6m radii at a minimum	Text does not specify junction radii and	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					unspecific on drawings – to be subject to vehicle tracking, but keen to retain option to reduce vehicle speeds through tighter radii where appropriate		
510	WCC Highways	Public Space	P60, drawing	Priority crossings are not provided on tertiary streets in Warwickshire.	As above – amend diagram	Amend drawing	N/a
511	WCC Highways	Public Space	P60, drawing	See previous comments on pg. 59 about on street parking	As above	Check diagram and amend as appropriate	N/a
N/a	Officer	Public Space	p61	N/a	N/a	Amend title in grey box	Street Codes <i>Tertiary Streets</i>
N/a	Officer	Public Space	p61	N/a	N/a	Amend sub-title to align with street types	Suburban residential tertiary street T2 <i>4b – Local Access Road/Tertiary Street (Type 2)</i>
N/a	Officer	Public Space	p61	N/a	N/a	Amend first sentence for clarity	This example....network example (page 31) <i>Sample layout E (see page 31 showing the illustrative street network for location)</i>
36	Catesby	Public Space	P61, PS.25	The code should be revised from "must" to "should" to allow for flexibility and variation, considering the different site conditions,	We do not agree that this 'must'	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
				<p>constraints, and potential future discussions with highways. This change should also apply to the bullet points within the code that currently use "must."</p> <p>The first bullet point refers to a minimum carriageway width of 5.0m. However, the Warwickshire Design Guide requires a minimum carriageway width of 5.5m, also noting that swept path tracking may require localised widening. Has the proposed minimum carriageway width of 5.0m been agreed with Warwickshire County Council.</p>	<p>should be changed.</p> <p>The Warwickshire Design Guide (Part 3, p6) addresses Local access Roads/Tertiary Roads (Type 2). The road width is 5.0m as stated</p>		
243	Homes England	Public Space	P61, PS.25	<p>Bullet nine relating to side street junctions does not include lower tiers of streets which could support alternative junction types. Advice would be to include a reference to secondary or tertiary streets.</p> <p>If the code is to be retained, it should be amended from “must” to “should” as there</p>	It is our understanding that the Warwickshire Design Guide is only permissive of T-junctions	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
				needs to be room for nuance and variation given the various site conditions, the site's constraints and future discussion with highways. This should also apply to the bullet points stating "must" within the code.	We disagree with amending 'must' to 'should'		
512	WCC Highways	Public Space	P61, PS.25, bullet 1	Carriageway width of 5 metres when serving up to and no more than 50 units.	P58 of the code states that Tertiary type 2 streets would serve up to a maximum of 50 dwellings so width is relevant.	Rephrase as suggested. Annotation of diagram to be corrected to 5.0 (from 5.1m) (see 514 below)	Carriageway width must be a minimum of should be 5.0m when serving up to 50 dwellings excluding any additional parking
513	WCC Highways	Public Space	P61, PS.25 bullet 7	'Standard' should read 'minimum'	Agree. Change 'standard' for 'minimum'	Substitute word	Standard Minimum 2.0m footways...
514	WCC Highways	Public Space	P61, drawing	Why is this 5.1 metres? (referring to dimension noted on the street width)	Propose to delete dimensions from drawings to avoid confusion	Delete dimensions	
515	WCC Highways	Public Space	P61 drawing	The arrangement of the private drive is not suitable - very ambiguous and may lead to developers submitting unsuitable layouts. Reference WCC Design Guide.	Noted. Concern understood to relate to apparent through route	Amend diagram to narrow and or include a modal filter between private drives.	Amend diagram

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					between private drives, so this is to be amended.		
516	WCC Highways	Public Space	P61 drawing	Suitable parking restraints needed to stop parking on the green space	Noted. Understood to require a rail or physical barrier between the highway and the green space to prevent unwanted parking.	Include low barrier/rail around the green space to illustrate this point.	Amend diagram.
517	WCC Highways	Public Space	P61 drawing	Buildouts not acceptable	As above – delete build outs from diagram	Delete buildouts	Delete build outs.
37	Catesby	Public Space	P62, PS.27	This code should be revised to say that hedgerows should be preserved in accordance with the recommendations of the submitted tree survey and arboricultural implications assessment.	As in the secondary street landscape principles (p57), we propose to delete ‘preservation principles’ and cross reference to the Nature section.	Delete PS.26-PS.29	PS.26-PS.29
38	Catesby	Public Space	P62, PS.33	Consider making reference to “fastigate” trees rather than small and medium tree species.	We propose to consolidate	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
				This will provide clarity that trees with upright branches that have a columnar shape are more appropriate as street trees.	landscape 'application' principles on a single page (as set out under actions for p57). They will be grouped as general and street type specific. Street tree palletes have been amended to delete non-native species (as per other feedback)		
39	Catesby	Public Space	P62, PS.34	We suggest this code is refined. In reality the use of root barrier systems is only required in highway open spaces such as verges. The current wording of the code could be misintepreted as refering to all open spaces that abut a highway, where in reality new tree planting may be a signicant distance away from the highway and therefore not require a root barrier system.	As above. This page only relates to street trees	None	N/a
40	Catesby	Public space	P62, Tertiary Street	We've observed that the diagrams provided include very few on-plot parking spaces for tertiary streets. Without labels, it's difficult to grasp the key principles that RBC intends to	As above, the contents of this page is to be consolidated	Consolidate landscape principles pages	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
			s – Landscaping general principles	convey. We recommend including at least one example with more on-plot parking and adding labels for clarity. Design example B does appear to show any front garden space or at the very least a threshold space within the curtilage of the house that will be required to allow for the overhang of eaves and for windows to be opened onto.	with landscape principles for secondary and minor streets. Plan drawings may be used (which are based on the 3D images on related pages) but will feature less prominent.		
244	Homes England	Public Space	P62, PS.26 - PS.32	Refer to response for PS.08	Refer to response for point 232.	As above	As above
245	Homes England	Public Space	P62, PS.33	We recommend the following revision: "Within Tertiary Streets, small to medium trees should be used. Examples could include...."	We have amended this principle in light of feedback elsewhere regarding the street trees palette.	Species examples removed.	
246	Homes England	Public Space	P62, PS.34	We suggest this code is further clarified as there are likely to be areas of open space without trees nearby to highway that may not require a root barrier system.	This only refers to street trees.	None	N/a
247	Homes England	Public Space	p62	We have noticed that the diagrams included show very few on plot parking spaces for tertiary streets and without labels it is hard to	Please see response to point 40.	As per 40	N/a

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
				pick up the key principles that RBC are aiming to communicate. We'd suggest at least one example needs to show more on plot parking and some labels are added.			
365	WCC Flood/Strategic Infrastructure + Climate Change	Public Space	P62	We would also like to query the design examples on page 62 whereby SUDS are included in the key but not clearly illustrated. SuDS could still be considered in this setting where the amenity grass and street trees are illustrated to provide multiple benefits.	Noted. We have requested that the landscape consultants update the plan – the the prominence of these plans will reduce as the three landscape principles pages are consolidated.	Update plan as appropriate	N/a
395	R. Allanach	Public spaces	P62	This is the first mention of <i>Prunus umineko</i> which comes from Japan. It is not native to England. <i>Sorbus X arnoldiana</i> is a hybrid and neither native nor neo-native. I have expressed my reservations about <i>Sorbus aucuparia</i> in my comments on Section 4 above.	We agree to delete non-native species as described in the Nature section. We will update this principle accordingly.	Update PS.23 in its new location – delete non-native species	<i>Prunus umineko</i> <i>Sorbus X arnoldiana</i>
518	WCC Highways	Public Space	P62 drawings	The parking standards need to adhere to the parking section within the Movement Strategy as well as the latest comments from WCC Highways. Diagrams need to reflect this.	Noted, though this is not the specific role of these plans. The role of	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
				Have rain gardens for landscaping been considered?	these plans will be less prominent in the consolidated page. Add reference to p38 (or as updated)		
41	Catesby	Public Space	P63, PS.35 - PS.38	We recommend changing these codes from "must" to "should" so they can be thoroughly reviewed as part of future RMAs. PS.36 – The Warwickshire Design Guide sets out that private drives can reduce in width to a minimum of 4.5m	Disagree with amending to a should. The private drives requirements align with the advice of the Local Highway Authority as amended.	None Include potential reduction in width.	
42	Catesby	Public Space	P63, PS.39 -43	The provision of car-free streets is laudable. However, there is no indication of their anticipated provision or where they are to be located. Is the provision of car-free streets discretionary? More detail is required to understand whether this Code is appropriate and deliverable.	The locations of car free streets are not specified within the design code. However, given the long build program it is considered appropriate to	None	N/A

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					advocate for forward thinking practices. If and where provided, these principles would apply.		
523	WCC Highways	Public Space	P63, PS.39	How is this car free?	Car-free streets - what we mean here is that, if provided, they must be located along active travel routes that go through quiet / low car neighbourhoods - so a car free street would connect up with quiet / low car streets, not much busier secondary streets for example.	Amend text for greater clarity.	<i>If provided, they must create safe, sociable spaces and should connect to quiet/low-car streets that form part of the active travel network.</i>
524	WCC Highways	Public Space	P63 PS.40	Why does this need to be 8 metres?	The principle suggests approximately 8m between. These would not	None	N/a

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					be adoptable streets		
525	WCC Highways	Public Space	P63, PS.42	Sheltered and secured - remove well designed	Agree, though consider this duplication from 'movement' (p37)	Update MO.43 to include this wording Delete PS.42	MO.43... <i>sheltered and secure (see also p37)</i> PS.42
526	WCC Highways	Public Space	P63, PS.43	This sentence is unclear	On advice from the highways consultants we propose to amend the wording and omit refuse references	Amend text	Emergency and refuse vehicle access must be maintained via proximate bin storage
43	Catesby	Public Space	P63, PS.44-45	There is no indication of where these routes would be located. The wording of these codes, which suggests dedicated cycle provision on all routes, could affect their feasibility. A blanket mandatory requirement for dedicated spaces for cyclists is not practical. Active-only routes should be implemented to ensure strong connectivity across the allocation and encourage walking and cycling.	We note the support for active only routes. An active travel framework is included on p35. Agree	Cross reference to the active travel framework on p35	Cross reference to active travel network on P35.
558	WCC Highways (Active Travel)	Public Space	P63, PS.44	Change to must provide dedicated spaces for walking, wheeling and cycling	Agree	Amend as suggested	Must provide safe dedicated spaces for walking, <i>wheeling</i> and cycling

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
248	Homes England	Public Space	P63, PS.35 - PS.38	We suggest these codes are amended from “must” to “should” so they can be worked through in detail as a part of future RMAs. PS.36 - could you please clarify why private drives are recommended for 5.5m wide but Tertiary Streets T2 only 5.0m. We'd suggest both are aligned to 5m for consistency.	Disagree with amending to should. The distance quoted is building to building/edge. However, refer to comment 41 above and 520 below for changes proposed to private drive codes.	See amendments under 41 and 520	N/a
519	WCC Highways	Public Space	P63, PS.35	Should serve no more than 6 units	PS.35 states ‘up to six dwellings’, so no conflict observed. Reword to state must serve no more than a maximum 6 dwellings to strengthen	PS.35 – Private drives must not serve more than six dwellings and remain unadopted.	PS.35 – Private drives must <i>serve up to not serve more than</i> six dwellings and remain unadopted.
520	WCC Highways	Public Space	P63, PS.36	must be 5 metres wide for a minimum of 7 metres from the back of the public highway	Amend PS.36 Does the 45m text remain relevant or not?	PS.36 They should be 5.0m wide for a minimum of 7m from the back of the public highway	PS.36 They should be 5.5m 5.0m wide and must not exceed 45m from the highway boundary <i>for a minimum of 7m from the</i>

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							<i>back of the public highway after which they may reduce to 4.5m</i>
521	WCC Highways	Public Space	P63, PS.37	Must (instead of should)	Agree	PS.37 They must be accessible by emergency vehicles and require a turning head is over 20m.	PS.37 They should must be accessible by emergency vehicles and require a turning head is over 20m.
522	WCC Highways	Public Space	P63, PS.38	WCC Design Guidance (typographical error)	Correct	PS.38 Refuse and emergency service access must be incorporated as per the WCC Design Guidance.	PS.38 Refuse and emergency service access must be incorporated as per WCC the WCC Design Guidance.
249	Homes England	Public Space	p63, PS.42 - PS.43	Duplication of content within the Movement section, we would request that these are signposted too to avoid confusion by the user.	We propose to amend PS.42 and PS.43 as outlined above (see 525 and 526).	Amend PS.42 and PS.43 as outline in 525 and 526	As 525 and 526
250	Homes England	Public Space	P63, PS.44 -45	There is no indication of where these routes would be located. The wording of these codes and their suggestion of dedicated cycle provision in all of these routes may impact deliverability. Dedicated spaces for cyclist cannot be a blanket mandatory requirement. Active only routes should be provided to ensure good levels of connectivity across the allocation and promote walking and cycling.	Please refer to response to point 43.	As in response to 43 above	N/a

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
527	WCC Highways	Public Space	P63, active only routes	Surfaces for active travel need to be suitable for all year round use and well lit	Agree – add these points as codes)	Add these points as codes	PS.44 Must provide safe dedicated spaces for cycling, walking <i>and wheeling, which are suitable all year round and well lit.</i>
528	WCC Highways	Public Space	P63, Marmalade Lane, car free street image	Doesn't look like a well used pedestrian area.	We will substitute precedent images where possible	Substitute images where possible	N/a
530	WCC Highways	Public Space	P63, images	Need local examples	We will substitute precedent images where possible	Substitute images where possible	N/a
366	WCC Flood/Strategic Infrastructure + Climate Change			Permeable paving could be considered as a sustainable drainage method for private roads and driveways.	Agree – add 'permeable paving' to table on p66 under 'private roads'	Agree – add 'permeable paving' to table on p66 under 'private roads'	Add <i>permeable paving</i> to 'private roads row in the 'materials column.
44	Catesby	Public Space	P64, PS.47	We support the retention of hedgerows. However, the wording of this code needs to be revised to recognise that the loss of some stretches of hedgerow will be required to facilitate access from existing roads and	As per comments relating to pages 57 and 62, landscape	Delete PS.47-PS.50, and collocate 'Application' principles onto a new	PS.47-PS.50

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				between development parcels. The code should add that compensatory planting is to be provided where there is such loss.	principles for streets will be consolidated onto a single page, and 'preservation' principles will be deleted (with cross reference to the nature section.	page addressing all street types	
45	Catesby	Public Space	P64, PS.49	This code should be revised to say that hedgerows should be preserved in accordance with the recommendations of the submitted tree survey and arboricultural implications assessment.	As above (44) PS.49 to be deleted.	As above	As above
251	Homes England	Public Space	P64, PS.47	We support the retention of existing hedgerows where possible, but this cannot be a blanket mandatory requirement as this suggests. Please remove or revise to be aspirational (could).	As above (44), PS.47 to be deleted	As above	As above
252	Homes England	Public Space	P64, PS.48 - PS.50	We have concerns around these blanket codes as they are very prescriptive and give no room for nuance discussions around the various factors that will be needed to be balanced to deliver the allocation. In short, these codes give no room for case by case discussions to be worked through as designs are developed and weigh up the various considerations that will need to be balanced to support deliverable solutions	As above (44), PS.48-PS.50 to be deleted	As above	As above

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
349	Taylor Wimpey	Public spaces	P64	The Code requires that “Hedgerows must not be removed”. Whilst every effort will be made to retain existing hedgerows, there will be instances (e.g. the formation of highway access) when sections of existing hedgerow do need to be removed. It is important that the Code accepts this flexibility.	As above (44), PS.47 to be deleted	As above	As above
396	R. Allanach	Public spaces	P64	The list of appropriate street trees on page 49 includes five native species of which at least three viz <i>Betula pendula</i> , <i>Acer campestre</i> and <i>Crataegus monogyna</i> clearly meet the SDC2 criteria. Why then does the draft SPD seek to promote one tree from the Americas, one tree from SE Asia and a hybrid in preference to our local trees? PS.53 should be re-written to make it comply with SDC2.	As outlined in response to feedback on p49, non-native species have been deleted. PS.53 to be amended accordingly	Amend PS.53 to delete reference to non-native species.	Delete species
531	WCC Highways	Public Space	P64, PS.47	Visibility must be a consideration	As above (44), PS.47 to be deleted	Delete PS.47	As above
532	WCC Highways	Public Space	P64, PS.52	Does this relate to width or height? To be adoptable they must be a minimum width of 1 metre and for height it must not obstruct visibility.	This does relate to height. This principle is repeated from pages 57 and 62, so will be referenced once on a new consolidated page, and amended as appropriate	Include on consolidated page with amended text regarding not obstructing visibility	As above

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					based on all comments		
N/a	Officer	Public space	PS.53	N/a	N/a	Delete species types and heights	N/a
533	WCC Highways	Public Space	P64 (general)	All landscaping where appropriate needs to not affect visibility and be suitable for adoption within the highway.	Agree – add wording to this effect.	Add general principle	PS.xx <i>All soft landscaping should not adversely affect visibility and should be suitable for adoption within the highway.</i>
253	Homes England	Public Space	P65	We'd suggest that Potsford Dam Link and Streets for Employment are important and significant streets. Given this, we feel their role within the street hierarchy should be clearer as currently drafted the order of this section and their inclusion on this page implies they are strategic streets.	We recognise the point. Propose to place the content on the Potsford Dam Link after p53 so that it precedes 'secondary streets'.	Move content ahead of secondary streets to page on its own.	Relocate content
254	Homes England	Public Space	P65, PS.58	Given PS.62 is a must, we suggest this code is reviewed for consistency.	We believe that this is consistent as necessary, but is describing specific requirements for any new streets in new	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					employment areas		
534	WCC Highways	Public Space	P65, PS.60	The purpose of the Postford Dam Link is to provide a strategic link road for the movement of traffic especially HGV's. The Highway Authority does not consider private drives/tertiary roads linking directly to this route to be appropriate. These should be taken off the junctions which also need to be kept to a minimum.	The section doesn't show or say the tertiaries/private drives link directly to the PDL. It shows them running parallel to it and PS.60 says direct access should be avoided. We will however add text to clarify that tertiary streets and private drives should not directly link to the PDL.	Add text to PS.60	PS.60 “.....Instead, a parallel tertiary <i>street</i> or private drive should be provided for frontage access, <i>though these should not link directly to the Potsford Dam Link.</i>
92	Tritax Big Box Developments	p65	Public space	As a general comment the word ‘must’ is too stringent; and should be replaced with ‘should where feasible’. Page 65 refers to Street Types, the codes proposed do not align with the first limb of the Potsford Dam Link (PDL which has already been constructed (the first limb comprises approximately 50% of the PDL):	“Where feasible” is not necessary with reference to the definitions of must, should and could.	None	N/a

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					We acknowledge that part of the Potsford Dam Link is constructed. However the part yet to be delivered will pass through a different context, including residential development. As such, it is desirable for the characteristics of the link to respond to this.		
93	Tritax Big Box Developments	Public Space	p65	Suggested amendment: Potsford Dam Link This strategic route must should be classified as a category 3A primary road, designed to accommodate higher volumes of mixed traffic at faster speeds. Primary roads typically link strategic routes with urban centres and have limited frontage access.	Disagree. This text aligns with classification on page 35.	None	N/a
94	Tritax Big Box	Public Space	P65, PS.59	Suggested amendment:	“Where feasible” is not	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
	Developments			PS.59 Footways and cycleways must should where feasible be set back from the main carriageway to mitigate the impact of high traffic volumes, including heavy goods vehicles (HGVs)	necessary with reference to the definitions of must, should and could.		
95	Tritax Big Box Developments	Public Space	P65, PS.60	Suggested amendment: PS.60 Development frontage can provide a setting for the primary road, as illustrated in the section below. However, direct access must should where feasible be avoided. Instead, a parallel tertiary or private drive should be provided for frontage access.	Disagree. “Where feasible” is not necessary with reference to the definitions of must, should and could.	None	N/a
96	Tritax Big Box Developments	Public Space	P65, PS.62	Suggested amendment: PS.62 To maintain an avenue character, industrial streets must should where feasible incorporate generous verges and street trees. Footways and cycleways should generally be set back from the carriageway to enhance safety and comfort for pedestrians and cyclists	“Where feasible” is not necessary with reference to the definitions of must, should and could.	None	N/a
97	Tritax Big Box Developments	Public Space	p65	The plans on the page 65 should be amended to reflect the widths that have been implemented on Phase 1 of the PDL e.g. 2 metre verges (not 2.5 metres), 3.5 m shared cycle and footway, to ensure consistency of provision.	Please refer to response to point 92.	See 92	See 92
98	Tritax Big Box Developments	Public Space	P66-67	In general, the hard landscape material palettes proposed are overly prescriptive and should be a guide only.	Hard landscape palettes are a guide. All hard materials on	Add sentence to this effect at the beginning of p66	<i>The table below indicates a guide for hard materials that could be selected. Materials specified on</i>

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					adoptable surfaces to be agreed with the S38 team		<i>adoptable routes are to be agreed with the S38 Team.</i>
537	WCC Highways	Public Space	P65, example of a purpose built facility	The example is not acceptable and examples within Warwickshire can be provided upon request. See Google Streetview in September 2023 - the traffic around Tadpole Farm School has built up and there is a significant amount of on street parking. TRO's have had to be applied to this area along with the use of speed cameras. There are also people crossing the road between the parked cars and not using the uncontrolled crossing points. This example is really a school safety zone and not a school street.	Noted. We will include a local example as suggested: Eastlands Primary School, Rugby	Delete ariel image of Tadpole Farm, Swindon. Include reference to WCC school streets guidance: <u>School Streets – Warwickshire County Council</u> Add ariel information regarding Eastlands Primary School	Propose to replace section with: <i>PS.XX - School entrances should be located on low traffic tertiary streets, away from the primary and secondary street network, and must have direct access to the active travel network.</i> <i>PS.XX - Streets near schools must prioritise vulnerable and active travel users, incorporating enhanced safety and comfort measures such as:</i> <ul style="list-style-type: none">• <i>Traffic management</i>• <i>Parking controls</i>• <i>Protected off carriageway space for cycling</i>• <i>Secure on street visitor cycle parking (see page 37 for requirements)</i> <i>PS.XX - The street providing school access should not</i>

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							<p><i>provide a through route for vehicular traffic and must be suitable for 'school street' classification. Measures could include:</i></p> <ul style="list-style-type: none"> <i>• Pedestrian and cycle zone classification</i> <i>• No vehicular access at drop-off and collection periods except to residents</i> <p><i>PS.XX - Where parental drop-off and collection is deemed necessary, a dedicated facility should be provided. This could be on street or within the school boundary.</i></p> <p><i>PS.XX - Designers must ensure that school street designs can integrate the required safety and comfort features and that the character of these streets are clearly distinguished from other road types.</i></p> <p><i>PS.XX - Opportunities for dedicated park and stride facilities should be located within a maximum 5-10min walk from the school</i></p>

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538	WCC Highways	Public Space	P65 images	An image in plan form should be provided that links back to the diagram on pg. 34 for SWR	Agree with linking to p34 for context of the Potsford Dam Link. Consider this can be done by cross referencing	Add cross reference to p34 adjacent to 'Potsford Dam Link' heading	Potsford Dam Link (<i>see p34 for location</i>)
255	Homes England	Public Space	p65, PS.66	No detail in this code on the necessity for these types of facilities. We recommend that this is separated into two codes as currently, it reads and mixes “must” and “should”.	Agree to split for clarity.	Disagree. We think the two points are appropriately separate the principle	None
256	Homes England	Public Space	P66 – hard lands cape materials	We request some introductory text is included giving a brief introduction and description of the table. Inclusion of “crossings” to “junctions”	Agree to include introductory sentence – see response to comment 98 above. Add ‘and crossings’ to ‘junctions’ box/row	As per 98 + add ‘and crossings’ to junction row	As per 98 <i>Junctions and crossings</i>
257	Homes England	Public Space	p67 – hard lands cape materials	We request some introductory text is included giving a brief introduction and description of the table.	Agree – as above (98)	As per 98	As per 98

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539	WCC Highways	Public Space	P66 junctions	Block/sett paving not accepted	Noted	See S38 comments and actions below	See below
540	WCC Highways	Public Space	P66	The Highway Authority have the jurisdiction over the materials in the adoptable highway and this needs to be agreed with the Highway Authority. This slide is being shared with S38 for their advice.	Noted – see WCC highways (S38) comments below	N/a	N/a
559	WCC Highways (Active Travel)	Public Space	p67	Rights of Way team should also be consulted on Bridleways. WCC Active Travel team should be consulted on recreational routes and greenway links	Agree	Include reference in relevant place in the table	In final column of 'Bridleway interfaces with movement routes add: <i>PRow team to be consulted</i> In final column of 'Non designated recreational routes and Greenway links add: <i>Active Travel Team to be consulted</i>
560	WCC (S38)	Public Space	66	Modular paving will have , not may have a commuted sum applied.	Noted	Amend to clarify in all rows of 'guidance' in the table that refers to modular paving (secondary footways, secondary junctions, tertiary footways, tertiary junctions, minor footways and minor junctions)	Modular paving will, in many cases have a higher maintenance cost and so commuted sums may <i>will</i> be required as part of the overall justification.
561	WCC (S38)	Public Space	p66	HFS whether in footways or carriageways will have a commuted sum applied. It should also	Noted and agreed.	Delete images of HSF	Delete images of HSF

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				be noted HFS is something that will wear off very quickly as it is used, and it will cause a mess. It must also be noted as in previous comments, these roads are being designed on Greenfield Sites and should not rely on retrofit solutions such as HFS.	Guidance under minor footways (where HFS is referenced) specifically states that this material should be avoided. The image of HFS is perhaps misleading in this context and suggest this is deleted.		
562	WCC (S38)	Public Space	p66/67	Sets are never good to use in carriageways they have a very high failure rate and are difficult to repair due to the mortar which should be a high-performance resin/polymer type.	Noted. (see also 563 and 564 below)	Delete reference to setts in all junction lines	Block or sett paving. Colour consistency to be demonstrated.
563	WCC (S38)	Public Space	p66	Sets are not to be used in ramps. Increases failure rate and will if used be even more problematic when repaired due to setting time if in live traffic situations.	Noted.	As above (563)	As above (563)
564	WCC (S38)	Public Space	p66	In short, setts will not be accepted for adoptable areas.	Noted.	As above (563)	As above (563)
565	WCC (S38)	Public Space	p66	The use of modular surfacing for junctions has been interdicted by the S38 Team. It should also be noted lining does not have a good survival outlook on block paving. This can	Noted. In response to a comment above, the row in the table	Asterix (*)to block paving and indicate currently interdicted at junctions	

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				present a problem for enforcement if the lining fail.	currently 'junctions' will address crossings too. Propose to add an asterix to these materials in junctions to say 'interdicted'		
566	WCC (S38)	Public Space	p66	It is assumed the last picture on the slide is for conservation kerbs. There should be a reference to a commuted sum for their use.	Noted. We believe that the new introductory sentence will address the need to agree materials with S38, and do not propose to address commuted sums specifically in the design code	None	N/a
567	WCC (S38)	Public Space	p66	Block paving is the lesser option for modular installations due to increased maintenance issue.	Noted, though we are keen to indicate a range of hard landscape materials for placemaking	None	N/a

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					reasons. We will acknowledge agreement with S38 Team is necessary in the new introductory sentence (see 98)		
568	WCC (S38)	Public Space	p66	Complaints from residents are also received regarding the noise/vibration that block paving creates.	Noted	None	N/a
569	WCC (S38)	Public Space	p66	From a maintenance point of view 'Bitmac' only is the best approach on new developments.	Noted. Understand Bictam to be addressed by 'asphalt' already within the table	None	N/a
570	WCC (S38) Public Space	Public space	p66	The S38 Team have suggested a surface feature of a 1-2 metre 'Tegula Blocked Paved' strip with conservation kerbs either side of the block as this has the desired effect required. This will only be accepted on tertiary streets that are a short length and will attain a maximum speed of 20mph or less.	Noted. We will include this suggestion	Add 2 lines or carriageway in the table. First to include asphalt, second to include this suggestion	Add x2 lines in table for carriage way on tertiary streets 1) As per secondary materials 2) surface feature of a 1-2 metre 'Tegula Blocked Paved' strip with conservation kerbs either side of the block

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Built form							
N/a	Officer	Built form		N/a	N/a	Add a 'see also' box to area types, frontages, edges to cross ref other built form pages	N/a
N/a	Officer	Built form	P69	N/a	N/a	Add key drawings and reference to safeguarded land scenario 02	N/a
N/a	Officer	Built form	p72	N/a	N/a	Remove BF.23 as inherent in 'must' definition? Intro + BF.22 updated to say minimum density averages. Higher density extended to edge of Homestead Link Road in drawing	BF.23
N/a	Officer	Built form	p73	N/a	N/a	P73 building heights - safeguarded land scenario 02 drawing removed and moved to new page	N/a
N/a	Officer	Built form	P75-78	N/a	N/a	Clarified front boundary treatments to all tables	N/a
N/a	Officer	Built form	P75-78	N/a	N/a	Add BF.XX code to area types to say "Development in the	<i>Development in the XX area type should utilise the design principles in the table opposite</i>

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
						XX area type should utilise the design principles in the table opposite” (previously absent	
N/a	Officer	Built form	P75-78	N/a	N/a	‘Non-vehicular and vehicular’ removed in reference to movement routes in area types tables	N/a
46	Catesby	Built form	Built form, p69,	The suggestion of overriding information may lead to confusion. Could this be rephrased to emphasise that each section adds an extra layer of information or detail, complementing and offering additional 'site-specific' guidance?	Wording to be updated for greater clarity.	Wording to be updated for greater clarity.	<i>‘Requirements within each sub-section aim to provide an additional layer of information and location-specific guidance, where appropriate superseding information in the previous sub-section. For example, the Edge types permit in some instances dwelling typologies that differ from those generally permitted in the host area or a localised increase or decrease in permitted building heights.’</i>
258	Homes England	Built form	p69	The suggestion of overriding information runs the risk of creating confusion.	Please see response to point 46 above	As per 46 above	As per 46 above

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
				Could this be better stated and focused around that each section adds an additional layer of information or detail that complements and provides added 'site specific' guidance.			
47	Catesby	Built form	P70, BF.05	While we appreciate that the wording allows for some flexibility, it is vitally important to emphasise that this may not be feasible in all cases, as orientation and built form must also consider a range of factors (e.g. BF 12-14 on the following page). We suggest moving this to the next page, where it can be read alongside BF.12 – BF.14, to provide greater clarity on the balance of factors that need to be considered.	As stated, the use of 'should', allows flexibility here. Agree to move to p71	BF.06 moved to p71 and to be considered alongside BF.12-BF.14 (will become BF.11-BF.14). Renumber all BF codes	N/a
259		Built form	P70, BF.05	Appreciate the wording here supports some flexibility; however, we need to highlight this will not be possible everywhere as orientation and built form also needs to take into account a whole host of factors (for example BF 12 - 14 on the following page). We'd suggest this is moved to the following page to be read with BF 12 - BF 14 as that would support added clarity on the balance of factors that need to be weighed up.	Please see response to point 47.	As per 47 above	N/a
260	Homes England	Built form	p70	Appears to be missing a graphic, will this be added later for consultation?	We recognise that the page is relatively blank, but there are no plans to add a graphic	None	N/a

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350	Taylor Wimpey	Built form	P70	The Code requires that “existing buildings on site should be retained if possible and where they are considered to contribute to the character of a development”. There will be existing buildings on site, such as dilapidated farm buildings and structures. These structures are not listed or otherwise protected. They arguably provide character albeit to the existing farmland character – not to a housing development in which they would present as incongruous. Reuse of these buildings would be prohibitively expensive. The Code needs to provide for flexibility.	Disagree and think this code is flexible (should), it does not state that all existing buildings must be retained.	None	N/a
48	Catesby	Built form	P71, BF.17	We agree with the intent of this code. However, the wording of this code does not quite make sense and should be reviewed and refined to be more clear.	Refer to response to point 261 (below)	See below	See below
261	Homes England	Built form	P71, BF.15-17	We agree with the principles but suggest the codes should be revised from “must” to “should” as there may be instances where this is not fully achievable. We acknowledge that the list of acceptable ‘terminations’ is extensive so applies to most matters. BF.17, we would request this is amended to: Long building frontages must be visually broken down so as not to appear as one large mass. This can be achieved with stepped footprints, changes in height and façade or fenestration detail.	Agree on BF.17 wording. Disagree on amending to should. BF.15 allows choice of termination features, and BF.16 is also considered achievable in most instance	Amend BF.17 wording None	Buildings that join should..... <i>Long building frontages must be visually broken down so as not to appear as one large mass. This can be achieved with stepped building footprints, changes in height and façade or fenestration detail. These elements can contribute towards a sense of rhythm and indicate individual buildings.</i>

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262	Homes England	Built form	Residential density	<p>See framework plan mark-ups</p> <p>Additional drawing comments in mark-up appendix include:</p> <ul style="list-style-type: none"> Request higher density zone to be extended south Request parcel between district centre and HLR is subject to higher density Suggest triangular parcel at junction between HLR and sustainable transport corridor is at a density to match area south of local centre 	<p>Agree</p> <p>Agree</p> <p>We are not showing triangular parcel.</p>	<p>Amend density plan Extend toward HLR</p> <p>None</p>	Amend density plan
351	Taylor Wimpey	Built form	P72	Plan needs to be updated to reflect the latest alignment of the Community Spine Road. In terms of the higher density on the Community Spine Road, consideration needs to be given to existing residences on Cawston Lane.	<p>As previously, the code does not and cannot reflect information which is part of planning applications that have been submitted but not yet approved.</p> <p>The density on this plan represents</p>	None	N/a

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					averages across parcels, as stated in the explanatory text, and are intended to describe where changes in density might be expected. It is expected for planning applications to consider specific scenarios and make appropriate proposals.		
397	R. Allanach	Built form	P72	The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.	The amended 'nature' section of the code addresses this matter more explicitly. It is not the purpose of this plan to address this point, and it does not	None	N/a

Ref no.	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					prohibit the delivery of green and blue corridors		
49	Catesby	Built form	P73 Building heights	We echo the concerns of Homes England here. We are concerned about the proposed taller building heights on the safeguarded land to the west of our site. This approach will not facilitate a cohesive transition in scale and massing between residential and employment areas. The graphic also suggests that development could be placed close to the boundary of the safeguarded land without adequate consideration of its visual impact on residential areas, the structural landscape planting, existing public rights of way, or the protection and enhancement of existing hedgerows and associated habitats. There should be a clear principle of lower building heights next to new residential areas, with appropriate setbacks in the safeguarded land to mitigate potential environmental and visual impacts from the employment land.	There is not intended to be an increase in building heights, but the building heights shown reflect the current topography and therefore require a stepping down of the employment buildings in line with this.	Update to reflect building heights and AOD	
263	Homes England	Built form	P73, BF.25	We suggest this code is strengthened to a must to ensure coordination across boundaries.	We don't entirely understand this point, however building heights will be reviewed (see 574 below)	Review building heights and make clearer regarding the impact of topography. (see 574 below)	See 574 below

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264		Built form	P73, building heights	<p>Please refer to the appended framework plan mark-ups referencing page 73 of the design codes.</p> <p>We are concerned by the plans for the safeguarded land taller building heights next to residential development on Homes England's and U&C's land to the east. This will not support a cohesive transition in scale and massing between residential development and employment. The graphic also suggests that development can be situated close to the boundary of the safeguarded land without due consideration of visual impact on the residential areas, structural landscape planting, existing public rights of way, or protection and enhancement of existing hedgerows and associated habitats.</p> <p>Lower heights next to Homes England's housing needs to be a clear principle with appropriate set backs in the safeguarded land ensured to mitigate potential environmental and visual impacts of employment land.</p>	Please see response to point 49.	As per 49	As per 49
574	Homes England	Built form	P73, building heights	<p>Additional drawing comments in mark-up appendix include:</p> <ul style="list-style-type: none"> Request 3 storey zone to Homestead Link frontage east of Alwyn Road 	This diagram already does allow for 3.	None	Heights new wording - <i>Up to 2.5 storeys generally. 3 storeys may be permitted in limited circumstances including to key buildings,</i>

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				<ul style="list-style-type: none"> Suggest triangular parcel at junction between HLR and sustainable transport corridor allows for 4 storeys Suggested change for 2.5 storey zone to allow strategic use of 3 storeys Suggest lowering of building heights to southeastern edge of sg land in scenario 01. Suggest lowering of building heights to specific development area adjacent to HE's land in safeguarded land scenario 2 	<p>Not showing triangular parcel between HLR and sus trans – undetermined application. Agree</p> <p>Disagree. Reason not given</p> <p>These heights will be reviewed but they respond to the topography of the area.</p> <p>Coloured areas here relate to safeguarded land as mapped in the local plan, except for the set back</p>	<p>None</p> <p>Allow change – see wording in next column</p> <p>None</p> <p>Review heights</p>	<p><i>gateways and to apartments/maisonettes within interiors of sites.</i></p>

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				<ul style="list-style-type: none"> Request set back of built development in safeguarded land scenario 2 represented on this drawing 	along the south which indicates space for the western end of the sus trans corridor .		
352	Taylor Wimpey	Built form	P73	As above, plan needs to be updated to reflect the latest alignment of the Community Spine Road and building heights along the Spine Road need to consider the relationship with existing residences on Cawston Lane.	As throughout, the code does not respond to unconsented proposals. The building heights on this plan represent maximums, as stated in the explanatory text, it is expected for planning applications to consider specific scenarios and make appropriate proposals. The specific point on scale adjacent to existing	None	N/a

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					dwelling is also made on the Cawston Lane frontage code – p81		
398	R. Allanach	Built form	P73	The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.	Please see response to point 397. This is not the purpose of this plan, and the delivery of green and blue infrastructure is not impacted by this.	None	N/a
50	Catesby	Built form	P74	The shade of yellow used for the 'suburban residential' and 'green fringe' character areas are very similar. These should be amended to provide a clearer distinction and avoid confusion.	Agree	Amend shades for greater clarity	N/a
265	Homes England	Built form	p74	See framework plan mark-ups Additional drawing comments in mark-up appendix include: <ul style="list-style-type: none"> Suggest triangular parcel at junction between HLR and sustainable transport corridor is identified as 'urban residential' area type. 	Not showing this triangular portion of land – undetermined application.	None	N/a

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353	Taylor Wimpey	Built form	P74	As above, plan needs to be updated to reflect the latest alignment of the Community Spine Road.	Disagree – not approved	None	N/a
399	R. Allanach	Built form	P74	The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.	This is not the purpose of this plan, and it does not prohibit green and blue infrastructure corridors which are addressed in the Nature section	None	N/a
266	Homes England	Built form	p75	Appreciate this term aligns with the SPD, however we'd note the draft code sometimes uses District Centre and sometimes uses Local Centre. Our preference would be that Mixed Use Centre is used if possible.	Correct term for planning purposes is district centre - any reference to 'local centre' to be checked and amended.	Amend all references to 'local centre' to 'district centre'	Local centre District centre
N/a	Officer	Built form	p76	N/a	N/a	Maisonettes added to urban resi area type	N/a
354	Taylor Wimpey	Built form	P76	This would benefit from 3D visualisation to understand how the various heights and densities would present in reality.	Noted though this has not been achievable.	None	N/a

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				<p>for variations in road alignment and different edge conditions within the character area. For example, it is appropriate to have deeper front gardens alongside the woodland buffers to complement their landscape character, whilst shallower front gardens are more appropriate along the character areas main streets and internal public spaces. The stated set back distance of 1 – 3m does not allow for sufficient variety or nuance.</p> <p>We suggest the following wording: "Limited setbacks, with proposed setbacks used to respond to existing landscape areas and provide variety or nuance in alignment with the Placemaking Aims."</p> <p>Boundary treatments: Make clear this applies to front boundary treatments to avoid confusion with other parts of the Design Code.</p>	<p>Areas adjacent to woodland buffers are addressed in Landscape Edge sub-section.</p> <p>Setback wording addition proposed</p> <p>'Boundary treatments' should be clarified as front boundary treatment</p>		
N/a	Officer	Built form	p78	N/a	N/a	Homestead south + green fringe front boundary treatment wording changed to align with 'no vertical treatment' wording later on in edges	N/a
N/a	Officer	Built form	p78	N/a	N/a	Homestead south + green fringe front boundary treatment wording changed to align with 'no vertical	

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
						treatment' wording later on in edges	
N/a	Officer	Built form	p78	N/a	N/a	Dwelling typologies to Homestead south adjusted to include consistency – make distinction with green fringe	
N/a	Officer	Built form	p78	N/a	N/a	Density of building lines changed to be 'lower'.	N/a
267	Homes England	Built form	P79, BF.29	<p>Dwelling typologies: Predominantly apartments or maisonettes within mixed use buildings. Suggest remove reference to mews – the secondary typology is a terraced house / town house. Ideally threestoreys.</p> <p>Building Height: Additional height (in the form of a 5th storey, prominent roof forms or overall taller built form) to be limited to locations where it will contribute to placemaking aims, ie form key gateways, mark important corners or mark key public spaces.</p> <p>Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any</p>	<p>Agree to add maisonettes.</p> <p>Agree that mews not really relevant here.</p> <p>Building height changes – will change text to 'mark' important corners' and 'signify' key public spaces.</p> <p>Building line – subject to a change initiated</p>	<p>Add maisonettes</p> <p>Delete mews</p> <p>Change text as suggested</p>	<p>For example, form key gateways, <i>mark</i> important corners' and <i>signify</i> key public spaces.</p> <p>Minimal to no set back at ground floor level. It is appropriate for there to be a variety of public realm areas within the district centre, driven by use types, location and the orientation of spaces. Therefore this setback is from the edge of the public realm at ground floor where it denotes a transition between public</p>

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				<p>reference to numbers should be clearly indicated as an aspiration. Suggest 'Minimal to no setbacks' is removed. Setbacks should be considered for Dunkleys Yard for example to stitch into the scale of the retained farm building and to help get light into the public space.</p> <p>Boundary Treatments: We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature section. If amended, it should reference the opportunity for non-residential uses to spill out into the public realm with no boundary treatment.</p> <p>Roof Form: Suggested amended text: "Cohesive to primary elevations and from key views to support a shared sense of place. Desire for a consistent overall approach with variations focused on contributing to the placemaking aims and adding interest to the built form in key locations."</p>	<p>by RBC. Clarify that this does not preclude widening of public realm areas, but relates solely to the relationship between public and private, ie 'back of footway'. Quantification removed.</p> <p>Boundary treatments – agree but used alternative wording. Have specified front boundary treatment</p>		<p>and private residential space.</p> <p>'Usually no boundary treatment, especially on main routes through local centre.</p> <p>If present... <i>Where there are non-residential uses at ground floor, omitting physical boundary treatment can provide opportunities for non-residential uses to extend into the public realm.'</i></p> <p>Roof form – 'Consistent and repeated generally, especially to primary elevations. Variation may be permitted where it will contribute to placemaking aims, <i>for example</i> form key gateways, <i>mark</i> important corners or <i>signify</i> key open spaces.'</p>
268	Homes England	Built form	P76, BF.30	Building Height: We request the inclusion of the following text:	Add maisonettes	Add maisonettes	Dwelling typologies – add <i>maisonettes</i>

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				<p>".... to be concentrated toward the Mixed Use Centre, the strategic street network, and to highlight key corners or entrances."</p> <p>Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. We suggest the following:</p> <p>"limited set backs with proposed setbacks used to respond to areas of existing landscape, and provide variety or nuance in alignment with the Placemaking Aims."</p> <p>Boundary Treatments: We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature section.</p> <p>Roof Form: Suggested amended text:</p> <p>"Mostly consistently, desire for a consistent overall approach with variations focused between recognisable groupings that contribute to the placemaking aims."</p>	<p>Building height changes agree</p> <p>Building line – subject to a change initiated by RBC.</p> <p>Quantification removed + more description added.</p> <p>Boundary treatments – clarified front.</p> <p>Roof form proposals agree in principle</p>	<p>Amend text regarding building heights</p> <p>As changed by RBC</p> <p>Remove quantification and add more description</p> <p>Clarify front boundaries</p> <p>Amend text as in next column</p>	<p>Heights - 4-storey buildings to be concentrated toward the <i>district</i> centre, <i>the strategic street network</i> and to highlight key corners or entrances.</p> <p>Building line - the Limited set backs. Where set backs are implemented they are expected to be <i>as small as feasible</i> to achieve the following as appropriate; threshold between public and private; responses to existing landscape features and related street alignment requirements where present; or features such as cycle or refuse storage to terraced dwellings.'</p> <p>Changes in set back should be well considered and relate to other aspects of the built form, such as dwelling typology, building footprint, parking.</p> <p>Boundary treatment – added front.</p>

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							Roof form - Mostly Mostly consistent in overall approach, with some variation focused between recognisable groupings or to highlight <i>particular placemaking opportunities</i> .
269	Homes England	Built form	P77, Bilton Park and Suburban residential	“Suburban Residential”: Could a more place specific name be provided for this area? This could pick up on either Cawston Spinney, Windmill or alternatively reference a western location.	Noted, though merit in change not sufficient to change	None	N/a
270	Homes England	Built form	P77, BF.31	Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. We suggest the following:	Building line – subject to a change initiated by RBC. Quantification removed. Description added. Boundary treatment – clarified ‘front’.	Amend building line Quantification removed and description added Clarify ‘front boundary treatment	Building line - Mostly formal and consistent, with variation between recognisable groupings. Medium density of building line, with consistency and coherence in size and frequency of gaps. Small-medium set backs, with variation focused between recognisable

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				<p>"Potential use of small to medium set back to allow variation between groupings or along frontages where appropriate."</p> <p>Boundary Treatments: We would request this is removed or at least revised to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature section.</p> <p>Roof Form: Suggested amended text: "Mostly consistently, desire for a consistent overall approach with variations focused between recognisable groupings that contribute to the placemaking aims."</p>	Roof form – understand but have proposed different wording.	Amend roof form	<p>groupings or frontages, relating to other aspects of built form or layout.</p> <p>Roofs form - Mostly consistent, some variation between recognisable groupings or to highlight particular placemaking opportunities.</p>
271	Homes England	Built form	P77, BF.32	<p>Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. Suggested amends: "Potential use of small to medium set back to allow variation between groupings or along frontages where appropriate."</p> <p>Boundary Treatments: We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the</p>	<p>Building line – subject to a change initiated by RBC. Quantification removed.</p> <p>Boundary treatment – clarified 'front'.</p>	<p>Amend as per RBC</p> <p>Quantification delete and description added</p>	<p>Building line - Some variation, but a level of consistency within groupings or frontages.</p> <p>Medium density of building line, with consistency and coherence in gaps.</p> <p>Medium set backs, with some variation between recognisable groupings or frontages, relating to other aspects of built form or layout.</p>

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				Nature section.			
272	Homes England	Built form	P78, BF.33	<p>Dwelling Typologies: Suggested Revision: "Predominantly houses including short terraces, semi-detached houses, link-detached houses, and detached houses. Small apartment blocks along main routes, toward Homestead Link Road or within the interior of the site."</p> <p>Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. Suggested amends: "Potential use of larger, more generous set back to allow for variation as appropriate."</p> <p>Boundary Treatments: We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature section.</p>	<p>Disagree but will add further detail. Reference to HLR removed as this is covered in HLR edge.</p> <p>Building line – subject to a change initiated by RBC. Quantification removed. Description increased.</p> <p>Boundary treatments – clarified front.</p>	<p>Add further detail</p> <p>Change as suggested by RBC</p> <p>Delete quantification and add description</p> <p>Clarify front boundary treatments</p>	<p>Typologies - Predominantly houses - semi-detached, link detached and detached.</p> <p>Short terraces or small apartment blocks to interior of sites (including to smaller scale spaces such as mews areas), along main routes or to gateways.</p> <p>Typologies arranged in groupings for consistency and to achieve a cohesive relationship with the built edge of Dunchurch.</p> <p>Building line - Some variation, but a level of consistency within groupings or frontages. A higher level of consistency and formality to main route(s).</p> <p>Lower density of building line, variation in gaps across parcels but consistency within groupings.</p>

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							Larger set backs to reduce the level of enclosure, with some variation to reduce formality.
273	Homes England	Built form	P79 frontages	See framework plan mark-ups 'Special built form' – A building with a special treatment through height, articulation, change of material, colour and/or window arrangement. Marker buildings are used to identify key gateways, areas of public realm or to inform wayfinding within SW Rugby.	Noted	None	N/a
N/a	Officer	Built form	p79	N/a	N/a	Added note and requirement about topography, adjusted key dotted line - meant to be schools site not sus trans. Added missing gateways. Extents of frontage lines reviews and revised for clarity and consistency. Added potential positions for school built form to plan	N/a
N/a	Officer	Built form	p79	N/a	N/a	Removed BF.36, individual requirements added to each frontage page instead. Combined these with 'a coherent	N/a

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						approach' so that also became a 'should'.	
N/a	Officer	Built form	p80	N/a	N/a	Added 'utilisation of', added landscape features and public realm to suggested gateway.	N/a
N/a	Officer	Built form	p80	N/a	N/a	removed transition to suburban area requirement - think this should be provided by Cawsotn Lane rather than CSR	N/a
N/a	Officer	Built form	P80-83	N/a	N/a	Frontages - more detail added to descriptions/intros and to requirements on each page. For greater clarity	N/a
N/a	Officer	Built form		N/a	N/a	Gateways + frontage descriptions separated out	N/a
274	Homes England	Built form	P80, Caws ton Lane	We understand the intention of this code but feel this be more focused on the integration of existing homes and the proposed school. In our view those are the key factors in the character of this frontage.	Think this is meant to be p81.	Reference school	School referenced in thrid paragraph

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				Reference to the school should be included in paragraph 2.	Noted. School referenced in third paragraph		
355	Taylor Wimpey	Built form	P80	<p>As above, the approach to the Community Spine Road would benefit from realistic 3D visualisation. The long section diagrams do not adequately present the vision for the Spine Road. The north and south sections need to be read together, not separately.</p> <p>BF.38 and BF.39 refer to ‘appropriate transitions / treatments’ but no guidance is</p>	<p>Noted. Not achievable in resource terms</p> <p>Disagree - these diagrams are intended to identify contextual changes and suggest appropriate responses while retaining flexibility for the detailed proposals. Consider that more detailed 3D representation would also contradict requests for flexibility.</p>	None	N/a

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				provided as to what would be considered 'appropriate'. Given that this is identified as a 'must' requirement either further clarification is required, or 'must' should be replaced with 'should' to provide appropriate flexibility.			
N/a	Officer	Built form	p81	N/a	N/a	may be suitable for a grouping on other side of HLR (schools site) said likely suitable before	N/a
N/a	Officer	Built form	p81	N/a	N/a	General rewording to try and increase clarity	
N/a	Officer	Built form	p81	N/a	N/a	Remove 'The built form here should reflect this, being less consistently formal and containing overall less built density.' Add 'and an opportunity for a relatively continuous built form character. As previously unfinished sentence.	
356	Taylor Wimpey	Built form	P81	As per 80, the same would apply to Cawston Lane.	As per response to 355 above	None	N/a
N/a	Officer	Built form	p82	N/a	N/a	Remove 'dwellings facing movement route' under first	

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						bullet point to both requirements All frontages drawing annotations simplified where the same point is made in the text below	
275	Homes England	Built form	P82, Sustainable Transport Corridor	We'd also like to raise that we do not understand why there is 3 gateways identified in the top diagram on this page as only 2 gateways are identified on the associated plan. See framework plan mark-ups	Agree. Noted as mistake – to update key drawing.	Update key drawing	Update drawing
401	R. Allanach	Built form	P82	The use of the definite article before Sustainable Transport Corridor is incorrect as the DS8 Masterplan provides for not one but two sustainable transport corridors. See earlier comments on this topic.	Correct, but this page refers to the specific one between HLR and PDL. Language clarified.	Add text to clarify	'The Sustainable Transport Corridor between the Homestead Link Road and Potsford Dam Link is due to form the main connection between the east and west parts of the site.'
402	R. Allanach	Built form	P83	"employemtdevelopment" ???	Second line – spelling to be corrected.	Correct spelling	<i>Employment development</i>
N/a	Officer	Built form	p83	N/a	N/a	Add 'with sufficient tree planting' to boxes, changed 'avenue' character to	<i>with sufficient tree planting</i>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
						PDL having large verges and significant tree planting.	
N/a	Officer	Built form	P84-90	N/a	N/a	Edges – whole pages re-formatted to address general principles on the left and drawings/table as one example of built form in a specific area type.	N/a
N/a	Officer	Built form	p84	N/a	N/a	Adjustments to p84 edges intro page to reflect changes to p85, 86, 88.	N/a
52	Catesby	Built form	P84 Edges	If the Safeguarded Land is developed for employment, a landscape edge should be incorporated on the employment site (safeguarded land) to create a positive interface with the adjacent housing and mitigate all environmental impacts on the employment land. This mitigation may require more than just new landscaping, and the potential use of acoustic bunds and fencing needs to be acknowledged and explored further in the Design Code, with appropriate coding required to ensure an appropriate interface is created between the potential employment uses and the new homes.	This is intention of codes on pages 89-90. Agree regarding mitigation.	Safeguarded land scenarios to be addressed on separate pages for greater clarity. Add text to reference further mitigation requirements may be needed	

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276	Homes England	Built form	P84, Sustainable Transport Corridor	<p>See Framework mark-ups</p> <p>Additional drawing comments in mark-up appendix include:</p> <ul style="list-style-type: none"> Suggest 'parkland edge' adjusted to align with previous framework masterplan adjustments align with HE masterplan Suggest removal of discrete portion of HLR edge to east of southern end to reflect previous requested masterplan adjustments Suggest HLR edge continuous across main portion to north of landscape buffer Suggest removal of 'parkland edge' type at southern junction into TW land from community spine road 	<p>Not aligning with undetermined proposals as above.</p> <p>Agree – to adjust</p> <p>Disagree – edge type does not preclude a road and RBC likely want a continuation of character.</p>	<p>None</p> <p>Agree to amend</p> <p>None</p>	<p>N/a</p> <p>Amend plan</p> <p>N/a</p>
277	Homes England	Built form	P84, Sustainable transport corridor or scenario 2	In the case where the Safeguard Land becomes employment, there should be a landscape edge provided on the employment site (safeguarded land) to ensure it creates a positive interface with the adjacent housing and mitigates all of its environmental impacts on its own land as previously requested by Homes England.	Please refer to answer to point 52.	As per 52	As per 52

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403	R. Allanach	Built form	P84	The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.	As above, this is not the purpose of this plan and it does not preclude delivery of the green and blue infrastructure corridors. This is addressed in 'Nature'	None	N/a
N/a	Officer	Built form	P85-86	N/a	N/a	Precedent images removed from edges – weren't consistent and now there isn't enough space	N/a
278		Built form	P85 Edge – Homestead link	<p>Whilst we understand the intention of this code, it would be clearer if these codes focused more clearly on the consistent features and principles of these edges and let the other parts of this section pick up some of the variations (e.g. building height) you've noted. For us the breaking down by areas type and overlapping references are currently causing confusion when reading this for the first time.</p> <p>We don't agree with the use of the phrase 'villas in parkland' as it is likely to cause confusion. Please remove or reconsider given</p>	<p>These pages have been significantly re-formatted for greater clarity.</p> <p>Have removed 'villas in parkland'.</p>	<p>Reformat pages for clarity</p> <p>Remove 'villas in parkland'</p>	<p>Reformat pages</p> <p>villas in parkland</p>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
				what is stated in the Urban Residential section of the code.			
279	Homes England	Built form	P85, BF.50	<p>We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it's more developed than other graphics.</p> <p>If the table is retained, could the following be addressed: Parking: "Car parking should be located to the rear of buildings and screened from the building frontage where possible."</p> <p>Gaps between buildings: Please remove. We are concerned by references to specific distances especially as there will be gaps between buildings that will be larger than the state 2-4m. We feel this is difficult to code</p>	<p>Disagree to remove table – these pages have been subject to significant re-format which uses the drawings and table as an example of how the character can be achieved.</p> <p>Agree to amend parking</p> <p>Gaps between buildings – agree</p> <p>Boundary treatments disagree</p>	<p>Reformat pages</p> <p>Amend parking as suggested</p> <p>Delete gaps between buildings</p>	<p>Reformat pages</p> <p>No parking...on-street <i>Car parking should be located to the rear of buildings and screened from the building frontage where possible</i> Gaps between buildings row</p>

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				beyond setting out an aspiration for a degree of rhythm and order across the frontage. Boundary Treatments: Please remove. Roof Form: Please remove. In general, we request there is a consistency in the coding of the edges as currently the code varies in the level of detail and prescription being placed on some area types.	Roof form – disagree no reason given Consistency – re-format should satisfy this concern as all edges are now subject to a bullet pointed list of general characteristics/ design principles and accompanied by an example.	None None Reformat	N/a N/a Reformat
280	Homes England	Built form	P86, Parkl and edge	We struggle to understand and follow why the edges have broken up by area type. For us it would be clearer if these codes focused more clearly on the consistent features and principles of these edges and let the other parts of this section pick up some of the variations (e.g. building height) you've noted. For us the breaking down by areas type and overlapping references are currently causing confusion when reading this for the first time. No codes appear to be drafted in relationship to the Bilton Parkland in the same way as the other areas below.	See above regarding re-format. Re Bilton parkland – not referenced separately as that is the example shown.	None	N/a

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281		Built form	p86, BF.56	<p>We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it's more developed than other graphics.</p> <p>If the table is retained, could the following be addressed:</p> <p>Building Height: We disagree with the suggestion that no on-plot parking can be provided along the edges you've identified on your diagram on page 82. We feel this should be approached with more flexibility; but in short we think on-plot parking if done in a good way could be allowed around Bilton Open Space.</p> <p>Gaps between buildings: Please remove.</p> <p>Set Back: Please Remove</p> <p>Boundary Treatments: Please remove.</p> <p>Roof Form: Please remove.</p>	<p>Disagree to remove table – these pages have been subject to significant re-format which uses the drawings and table as an example of how the character can be achieved.</p> <p>Parking – agree</p> <p>Gaps between buildings – agree</p> <p>Set back – disagree, no justification</p> <p>Boundary treatments disagree – no justification</p>	<p>Reformat pages</p> <p>Amend as suggested</p> <p>Delete</p> <p>None</p>	<p>Reformat</p> <p>Limited</p> <p>Gaps between building row</p> <p>N/a</p>

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					Roof form – disagree, no justification	None	N/a
						None	N/a
357		Built form	P85-86	A particular style for the Link Road edge and parkland edge is preferred in the Code. One could regard these as quite “urban” styles in their height and form. These aren’t the only solutions to achieve the objectives and the Code should allow for other options to be explored and agreed.	Explanatory text on p84 states that ‘The examples shown represent one way in which the edge may be addressed, alternative proposals are expected to demonstrate how they comply with information contained in the tables and achieve the	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics</i> – new text to be added. Strikethrough – text to be deleted
					desired character’.		
404	R. Allanach	Built form	P86	This illustrates how “Bilton Parkland” should about “parkland” – which I strongly suspect is likely to be mainly SUDs represented by the developer as semi-natural open space. What is lacking is an illustration of how Bilton Parkland should address the Bilton parish boundary in accordance with DS8.	This is designed to respond to the parkland. Boundaries as buffers in the ‘Nature’ section outlines one way that the edge with Bilton could be addressed	None	N/a
282		Built form	P87, BF.61	We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it’s more developed than other graphics. If the table is retained, could the following be addressed: Building Height: Given the amount of existing mature landscaping, we feel up to 2.5 storeys is acceptable along Cawston Lane South. Gaps between buildings: Please remove. Set Back: Please Remove Boundary Treatments: Please remove. Roof Form: Please remove.	Disagree as per comments on previous pages. Building height – disagree, about responding to existing character not just about ‘negative’ impact of height. Gaps between buildings – disagree,	None None	N/a N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					<p>suggests a less formal rhythm.</p> <p>Set back disagree</p> <p>Boundary treatments – disagree</p> <p>Roof form – disagree</p>	<p>Delete gaps between buildings as in other pages</p> <p>None</p> <p>None</p> <p>None</p>	<p>Delete row gaps between buildings</p> <p>N/a</p> <p>N/a</p> <p>N/a</p>
405	R. Allanach	Built form	P87	Given the lipservice paid to active transport and that Cawston Lane should be a key movement axis for people travelling from the North of the “Sustainable Urban Extension” to the district centre and school it is a great shame that the illustration does not show cycles as well as cars to demonstrate how this movement is supposed to relate to the built form.	Clarify that this illustration refers to the part of Cawston Lane south of the Homestead Link Road, ie not part of the main movement axis. Movement is also addressed by a separate	Add text for greater clarity	The example shown on this page is the portion of Cawston Lane to the south of the Homestead Link Road and associated landscape buffer, at which point it is separated from the rest of Cawston Lane to the north for vehicular access but retains an active travel connection.

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					section of the code		
53	Catesby	Built form	P88	The text sets a mandatory requirement for buffers to be widened regularly to allow for extra 'breathing space'. Although this is laudable, we respectfully refer back to the adopted guidance in the SW Rugby SPD, which state that Natural England's standing advice calls for a 15m buffer for ancient woodland. As a result, the design code contradicts the adopted SW Rugby SPD. The requirement for increasing the width of the buffers should be stated as a 'could' requirement.	Remove 'to allow extra breathing space for natural assets'. Retain the rest as it is about the built for responding to this edge condition, which we think requires regular breaks and infiltration of green space into the resi development.	Remove 'to allow extra breathing space for natural assets'. Retain the rest as it is about the built for responding to this edge condition, which we think requires regular breaks and infiltration of green space into the resi development	to allow extra breathing space for natural assets
283		Built form	p88, BF.66	Given the "title" of the code (HLR edge within Urban Residential Area type), we are unsure where this would be on the framework plan and this makes it difficult for us to comment on. We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it's more developed than other graphics.	The title is incorrect Disagree regarding the table as on other pages	Amend title	HLR edge within Urban Residential area type <i>Landscape edge within green fringe area type</i>

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284		Built form	P88, BF.67	It is not clear what is being coded here, please could this code be rewritten to better clarify. As drafted, we believe this area relates to Cock Robin Wood but that is not reference here at all. Another alternative idea could be the addition of a location map.	This code has been moved to sit on the HLR edge page and reference to Cock Robin Wood added to increase clarity.	Relocate BF.67 and amend as appropriate	Relocate and amend as appropriate
N/a	Officer	Built form	P89-90	N/a	N/a	Employment edge page s – 89 + 90 re-formatted to address scenario 01, then 02. For clarity.	N/a
N/a	Officer	Built form	p89	N/a	N/a	References crossover with sustrans corridor frontage type – p82. Both pages cross ref each other.	
N/a	Officer	Built form	p89	N/a	N/a	BF.71 removed specific reference to screening buffer (on resi side). More relevant to safeguarded land scenario 02.	
54	Catesby	Built form	P89, BF.71	We suggest that this code is amended to make it clear that need for the landscape buffer must be provided within the employment site, not	Significant re-format of these pages to make	Reformat and add clarity regarding the	BF.71 to be illustrated on a plan

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				the residential areas, otherwise the westernmost part of our site is rendered undevelopable.	clear where buffer is expected to be accommodated in each scenario.	location of the buffer including a plan	
285		Built form	P89, Edge – employment and residential	We feel this introductory paragraph needs to be further expanded on and enhanced especially the second sentence in relationship to Scenario 2. Page 89 is not clear as written as to which scenario is being referred too. Please could this be addressed. Please also refer to our comments on Scenario 2 in ref: 4.5.33	Significant re-format of these pages to make clear where buffer is expected to be accommodated in each scenario and requirements are clearly illustrated.	Separate the two scenarios on different pages with appropriate graphics and introductory text	New plans and text as appropriate
286	Homes England	Built form	P89, BF.71	In Scenario 1, this is excessive for the potential residential areas to the north and places a series of additional constraints on Homes England. We suggest a code of this nature cannot be a mandatory requirement at this stage as it should be assessed in detail as a part of any future planning application.	Significant re-format of these pages with extent of expected buffer drawn. 80m has been tested and is understood to be reasonable in the context of the	Reformat of pages Illustrate 80m on plan	

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					employment buildings. Downgraded to should.	Amend BF.71 to a 'should'	A landscape buffer must <i>should....</i>
287	Homes England	Built form	p89, BF.74 - right hand diagram within second row of graphic	We raise that the general principle of this code could also be achieved with houses as there are a variety of variations to this series of diagrams.	The illustrations communicate examples, other solutions that satisfy the requirement may be provided and assessed with application.	General reformat for greater clarity	N/a
288	Homes England	Built form	P89, BF.75	Could further clarification be added to this code. It was assumed that there would be no new employment buildings outside of those that exist. Have we misunderstood?	Within the existing allocation, there will be no further employment	None	N/a

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					buildings of the type illustrated on this page. There is a potential scenario where such buildings may be, and this principle was trying to anticipate the relationship with surrounding development.		
55	Catesby	Built form	P90, BF.77	We suggest revising this from "must" to "should." We agree with this as an aspiration and that it should be avoided; however, given the scale of the employment buildings, it may be unavoidable in some cases.	Agree	Change “must” to “should”	Streets must <i>should...</i>
289		Built form	P89, BF.77	Suggest this is revised to a “should” from “must”. We agree this as an aspiration and that it should be avoided but with the scale of the employment buildings this may be unavoidable in all instances.	Please refer to response to point 55.	As per 55 above	As per 55 above
56	Catesby	Built form	P90	We echo the concerns of Homes England here. Greater protection is needed between the employment edge and our site. This should receive the same level of attention as Scenario	Please refer to response to point 290 (below).	As per 290 below	As per 290 below

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				1, with graphic illustrations developed to further clarify the statement on the previous page: “At the interface between proposed dwellings and proposed employment buildings (safeguarded land scenario 2), proposed employment buildings will be expected to provide the design response” If the Safeguarded Land is developed for employment, a landscape edge must be included on the employment site (safeguarded land) to create a positive interface with the adjacent housing and mitigate all environmental impacts on the employment land.	We propose to reformat so that scenarios have a page each, and the landscape edge is to be indicated		
57	Catesby	Built form	P90, BF.80	Echoing Comment 4.32 above, it must be stated here that buffering must be included within the employment site.	Significant re-format of these pages to make clear where buffer is expected to be accommodated in each scenario and requirements are clearly illustrated.	As per 290 below	As per 290 below
290	Homes England	Built form	P90 – employment	There must be greater protection between the employment edge and both Homes England's and U&C adjacent land. This should be given the same level of attention as Scenario 1 with	Significant re-format of these pages to make clear where	Reformat so that the scenarios have a page each	Reformat

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			and landscape edge	<p>graphic illustrations developed to further clarify the following statement on the previous page.</p> <p>“At the interface between proposed dwellings and proposed employment buildings (safeguarded land scenario 2), proposed employment buildings will be expected to provide the design response”</p> <p>In the case where the Safeguard Land becomes employment, there should be a landscape edge provided on the employment site (safeguarded land) to ensure it creates a positive interface with the adjacent housing and mitigates all of its environmental impacts on its own land as previously requested by Homes England.</p>	buffer is expected to be accommodated in each scenario and requirements are clearly illustrated.	Include indicative plans illustrating the buffer.	Include illustrative plans of buffer
291	Homes England	Built form	P90, BF.80 & BF.82	<p>In scenario 2, we suggest that it needs to be clear that the screening and landscape buffer measures will be placed on the proposed employment land (Safeguarded Land in Scenario 2) given the detrimental impact it could possibly have on Homes England's land. We'd suggest this code may need to be strengthened by complementary codes as in our view the potential employment land should also mitigate noise and other potential environmental impacts on Homes England's land to the south.</p>	<p>Agree that the location of the landscape buffer should be clarified as indicated.</p> <p>Propose to add a principle regarding other mitigation that may be required.</p>	<p>As above re plans</p> <p>Add new principle regarding other mitigation measures that may be required</p>	<i>BF.XX It must be demonstrated that this buffer also mitigates other potential environmental impacts on residential development, for example noise.</i>
N/a	Officer	Built form	p91	N/a	N/a	Roof broken into two - one for stepping down	N/a

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						in height and one for form	
58	Catesby	Built form	P91, BF.85	We believe this would be more appropriate as a "must" rather than a "should," as selecting two from the list provides sufficient flexibility.	Agree – upgrade.	Change from ‘should’ to ‘must’.	Massing should <i>must</i> ...
292	Homes England	Built form	P91, BF.85	We consider that this would be better as a “must” rather than “should” as the selection of two from the list gives a good deal of flexibility.	Please see response to point 58.	As per 58 above	As per 58 above
406	R. Allanach	Built form	P91	It is regrettable that this advice was not available to the planning committee when R16/2569 and subsequent applications were determined.	Noted.	None	N/a
59	Catesby	Built form	P93	Self and custom build housing are not the same. Their definition here needs revising.	Agree – will set this out	Amend definition	It is anticipated that some serviced plots will be made available for self <i>and/or</i> <i>custom</i> build housing development within South West Rugby. A self or custom build home is designed and built by the owners bespoke specifications, in order that it can reflect their requirements, lifestyle and budget. <i>A custom build home is facilitated by a developer, but built according to the preferences of the buyer</i>

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99	Tritax Big Box Developments	Built form	General	Throughout this Section, the plans should be updated to reflect the employment allocation in the emerging plan (on the safeguarded land). This should be amended on all plans throughout this section.	This SPD will supplement policy in the adopted local plan. Whilst it is recognised that there is a proposed allocation on the safeguarded land in the Preferred Options Consultation Document, this is yet to be subject to consultation. It is considered to accommodate this request would be to incorporate new policy which an SPD cannot do.	None	N/a
100	Tritax Big Box Developments	Built form	p72	For page 72 It is considered that the density of the western and northern parcels of residential land in TBBD's ownership should be amended that to reflect that of the submitted planning application on this site (albeit not determined, application ref. R22/0853) which is 45 dph and	As throughout, not responding to planning proposals in the code.	AMend BF.22 to make clear referring to minimum density averages	Proposals should align with the <i>minimum</i> density averages shown on the diagram opposite

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				(application ref. R18/0995, which is resolved to be approved which is at 45 dph. . No justification has been given for these reduced densities which may impact on viability and marketability etc. The plan should therefore be updated to 45 dph in these areas. Again the word must should be replaced with 'should, if feasible'	Densities intended as minimum averages, to prevent low densities.		
101	Tritax Big Box Developments	Built form	p73	On page 73 the plan should be updated to reflect the employment allocation in the emerging plan.	As above – this would introduce new policy	None	N/a
102	Tritax Big Box Developments	Built form	P74 & p78	On pages 74 and 78, TBBDs two residential sites are located in the 'Green Fringe' area. TBBD consider that the typologies are too prescriptive; combined with proposed 30dph (which is incorrect as set out above and is strongly contested) and therefore risks the site being unviable/unmarketable. As set out above, the typologies etc are is not consistent with either the Phase 1 resolution or Phase 2 residential applications.	As above, densities are intended as minimum averages, wording has been changed to reflect this. It is not prescribed that all typologies listed must be utilised, but list the acceptable typologies and their	None	N/a

Ref no	Respondent	Section	Page/reference	Comments	RBC response	Action in relation to the design code	Recommended Change <i>Italics – new text to be added. Strikethrough – text to be deleted</i>
					acceptable locations.		
103	Tritax Big Box Developments	Built form	p73	The inset plan which relates to proposed Scenario 2 employment uses does not reflect a likely layout for an employment scheme on the safeguarded land but seems to be the same layout as a residential scheme. This should be amended to show a consistent blue wash across the entirety area of this land.	Noted, though the code is not responding to proposed schemes.	None	N/a
104	Tritax Big Box Developments	Built form	p73	For the employment scheme, the building heights should be assessed and agreed via an LVIA submitted with an application rather than via an overly prescriptive design code, which offers no justification for the heights proposed. An LVIA will properly assess the context in which the development sits (i.e. adjacent to the phase 1 employment development), the impacts of the heights proposed (for which logistics development has specific requirements driven by internal racking layout design), and will take into account proposed mitigation. Heights cannot be prescribed at this stage without that detailed analysis. The requirements are overly prescriptive and go above and beyond what is stated in policy DS8 which states “Specifically regarding the employment allocation to incorporate design and landscaping measures, including structural landscaping, to mitigate the impacts on the surrounding landscape and setting of	Maximum heights above AOD retained, an acceptable range of heights provided (12-18m) and reference to an LVIA added.	Maximum heights above AOD retained, an acceptable range of heights provided (12-18m) and reference to an LVIA added. Employment building heights now addressed in a different location (p90)	<i>Heights will also be subject to a Landscape and Visual Assessment</i>

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				any nearby heritage and GI assets, including Thurlaston Conservation Area.			
105	Tritax Big Box Developments	Built form		In summary, proposals should be assessed on their own merits on the basis of their accompanying Landscape and Visual Impact Assessment, and therefore the heights referred to on the Design Codes should be removed or expressed as minimum heights.	Noted. This is reflected in the inclusion of wording above	As above	As above
106	Tritax Big Box Developments	Built form	P83 and BF.45	Page 83 (Potsford Dam Link - PDL), needs to be updated to reflect the draft employment allocation now proposed in the emerging plan on the east side of the PDL. The cross section and text under BF.45 should therefore be removed.	As above – this would introduce new policy.	None	N/a
107	Tritax Big Box Developments	Built form	P83, BF.44	It is unclear where the cross section in BF.44 is taken from and this should be clarified in a the key on the drawings. It is also considered that the text for BF.44 is too prescriptive and contradicts itself with amendments as suggested below: BF.44 Proposals must should present a coherent approach along the west side of the Potsford Dam link which demonstrates: • Larger distance between carriageway and dwellings, should be considered where feasible reflecting its likely use by larger vehicles including HGVs and utilising more significant landscape verges to provide a positive outlook.	Agree	Add titles to the cross sections	<i>West side of Potsford Dam Link</i> <i>East side of Potsford Dam Link</i>

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				<ul style="list-style-type: none"> • Sufficient overlooking and activation of active travel routes adjacent to the road (dwellings facing the movement route), especially where there is a significant distance between the route carriageway and residential development. • A relatively consistent, ordered frontage aligned with and facing the movement route. • Appropriate treatment of gateways responding to the defining characteristics of each (ie gateway onto the Sustainable Transport Corridor, with the adjacent employment buildings in mind, and gateway into the allocation at the north of the route. 			
108	Tritax Big Box Developments		P84	On page 84, the plans need to be updated to reflect the employment allocation in the emerging plan (on the safeguarded land) and include the land to the east of the safeguarded land up to the woodland (which is now also allocated for employment use). This needs to result in an amendment to the inset map under BF.49, with the 'employment uses edge' now only needing relate to a small part of the safeguarded land fronting onto the proposed residential to the south.	As above – this would introduce new policy.	None	N/a
358	Taylor Wimpey	Built form	P87	This edge does not appear to be identified on page 84	This edge is identified as the portion of Cawston Lane to the south of the Homestead	Add reference to p 87	

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					Link Road under 'residential facing edge' on p84. Clear reference to this location added to page 87 for clarity.		
109	Tritax Big Box Developments	Built form	p89	Page 89 'Edge – Employment + residential edge' is relevant to the TBBD land and TBBD comment as follows: this section is overly prescriptive, introduces policies and requirements which are not in the adopted local plan policy for the site; is not clear in places; is not justified; does not take account of landscape bunding as delivered through the phase 1 employment.	We propose to reformat this so it is clearer. Although the safeguarded land is not currently allocated for a particular use is centrally located in the urban extension and will relate to the surrounding allocation. One of the scenarios explored in the code is for the safeguarded land to come forward for further	None	No

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					employment, therefore consideration of the interface with residential uses is considered appropriate. We are aware of the bunding on P1 of the employment and have accounted for this.		
110	Tritax Big Box Developments	Built form	p89	It is submitted that this section should be deleted in its entirety as the Phase 1 scheme has delivered a site that is high quality design, sustainable and energy efficient, and will be replicated across Phase 2 , however if retained the comments below are relevant, and should be amended as set out below.	For the reasons outlined above, we do not propose to delete this section.	None	N/a
111	Tritax Big Box Developments	Built form	p89	For the employment scheme, as stated above, the buffers should be assessed and agreed via an LVIA submitted with an application rather than via an overly prescriptive design code. An LVIA will properly assess impacts and will take into account proposed mitigation. Buffers cannot be prescribed at this stage without that detailed analysis. It is felt that the development plan policy provides sufficient	Reference to an LVIA added (as above), other code content retained and illustrative plans included for clarification.	None	N/a

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				guidance. The requirements are overly prescriptive and go above and beyond what is stated in policy DS8: "Specifically regarding the employment allocation to incorporate design and landscaping measures, including structural landscaping, to mitigate the impacts on the surrounding landscape and setting of any nearby heritage and GI assets, including Thurlaston Conservation Area.	The safeguarded land is not currently allocated in the adopted local plan.		
112	Tritax Big Box Developments	Built form	BF.71	BF.71 A landscape buffer should must be part of this edge condition and must: Provide an appropriate depth between employment buildings and residential buildings. • Contain a screening buffer that complies with NA.25. • Contain some tree planting within 25m proximity of dwellings (can include street trees, likely to be provided by proposed residential development).	Disagree – retain must Also propose to include a principle that the buffer may contain uses such as parking	None Add new principle regarding inclusion of parking in the buffer	N/a <i>Parking could be a part of the landscape buffer</i>
113	Tritax Big Box Developments	Built form	BF.72	Propose strike through - BF.72 Overlooking must be provided onto landscape buffer.	Disagree.	None	N/a
114	Tritax Big Box Developments	Built form	BF.74	Propose strikethrough -BF.74 The orientation of employment warehouses and the only or main orientation of residential streets and dwellings should not be parallel with or directly orientated toward each other.	Disagree – some overlooking of the buffer is desirable	None	N/a

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115	Tritax Big Box Developments	Built form	BF.75	Propose strikethrough - BF.75 Employment buildings must be orientated with short ends (rather than long sides) facing key movement routes and frontages onto residential areas.	Disagree.	None	N/a
116	Tritax Big Box Developments	Built form	P90 BF.82 and BF.83	Page 90 'Edge – Employment + landscape edge' is relevant to the TBBD land and TBBD comment as follows: this section is overly prescriptive, introduces policies and requirements which are not in the adopted local plan policy for the site; do not take account of shape of the site and the requirement for large floorplate buildings; and are not justified; and should be amended as follows: Strikethrough BF.82 and BF.83	Disagree. Examples are provided of other large floorplate buildings achieving these design aims on p91+92.	None	N/a
117	Tritax Big Box Developments	Built form		As a general comment in the Built Form Section for employment buildings, it needs to be recognised in this section that Phase 1 of the employment building has been built out and Phase 2 will be built out by the same developer. This should be acknowledged in the introductory text. As stated above, the proposed design and height of the buildings in the RBC Draft South West Rugby Design Code SPD 17 Framptons Tritax Big Box Developments Town Planning Consultants March 2025 PJF/LS/10844	See no reason why these (relation to existing development and striving for higher quality) need be mutually exclusive.		

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				Phase 2 employment land, will flow from the design language of the approved buildings on the existing Symmetry Park. The Phase 1 buildings are leading assets in terms of energy efficiency and sustainability. The Design Code seeks to set out a number of design characteristics, but it is not clear that the example images relate to logistics developments, or that some of the detailed comments on materials for example are proven in this sector. It is striking that there is no contextual assessment of the Phase 1 employment buildings, nor recognition of a number of design features that these already incorporate including portico entrance details, full height glazing to the offices, different materials for office/warehouse elements, and large scale windows/glazing within warehouse elevations.			
118	Tritax Big Box Developments	Built form	p91	Furthermore, many of the details on page 91 are details that should be left to be determined at reserved matters application stage. In general, the details set out below are overly restrictive and do not reflect the fact that there is an existing Phase 1 employment development on the site.	These will be discussed in reserved matters applications, this page is intended to guide those conversations.	None	N/a
119	Tritax Big Box	Built form		It is considered that this Section should be deleted in its entirety as the Phase 1 scheme has delivered a site that is high quality design,	Disagree. We are seeking the highest possible		

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	Developments			sustainable and energy efficient, and will be replicated across Phase 2 , however if retained, the following amendments are suggested for this section:	quality deliverable		
120	Tritax Big Box Developments Tritax Big Box Developments	Built form	p91	The scale and design of modern employment buildings can mean they have a relentless and overbearing impact on their surroundings. The scale and design of the employment buildings should where possible reflect that on the Phase 1 employment development. They often feature large expanses of blank elevation which contribute little to the spaces around them. It is important for a sufficient design approach to be taken that both mitigates the impact of these buildings on their surroundings and is not dishonest about their use	Disagree. It is yet to be determined what the most appropriate form of development will be on the safeguarded land.	None	N/a
121	Tritax Big Box Developments	Built form	BF.85	BF.85 Massing should be manipulated or broken up by at least two of the following: <ul style="list-style-type: none"> • Breaking particularly large buildings into several smaller buildings. • Use of recesses where total breaking up of buildings is not possible. Sizes, ratios, positioning and the relationship of these with the base & roof will require careful design. • Stepping of roofs or use of roof forms which convey a sense of rhythm, order and building structure. Use of a plinth to provide definition between base and upper.	Disagree. This principle is a 'should' inferring some flexibility. The type of development is to be determined.	None	N/a

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				<ul style="list-style-type: none"> • Use of features to introduce articulation and depth including circulation cores, fenestration, service/building environment elements such as shading and use of materials 			
122	Tritax Big Box Developments		BF.91	<p>BF.91 Staff amenity spaces should be where feasible, must:</p> <ul style="list-style-type: none"> • Be visible from the public realm and connected to movement routes • Not be positioned behind parking areas • Integrate with the overall landscape approach to the site • Conveniently co-locate well-designed facilities such as cycle parking. 	Disagree. These are urban design principles that must be included. Where not feasible, this would need to be justified in any application.	None	N/a
123	Tritax Big Box Developments		BF.95	<p>BF.95 Proposals could include the following (non-exhaustive):</p> <ul style="list-style-type: none"> • Materials that reflect industrial or agricultural buildings, such as metals and corrugated materials • Reflective materials that provide some dynamism to the facade • Colours or materials referencing buildings in the immediate (Phase 1 Employment Land) or wider context • The introduction of different textures 			
407	R. Allanach	Built form	P92	It is regrettable that this advice was not available to the planning committee when R16/2569 and subsequent applications were determined.	Noted.	None	N/a

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134	Homes England	Built form	General	It is unclear if the tables within this section are codes or guidance. We suggest that wording is added to clarify the requirements using words such as 'must', 'should' or 'could'. Our interpretation is that this is general guidance and not prescriptive design codes. If they are codes, we believe this level of detail needs to be an aspirational in nature, thus adopting "could".	Agreed. This will be addressed through reformatting	Reformat	Reformat
293	Homes England	Built form	Self and Custom build housing	There is a mixing of self and custom build housing within this text, therefore mixed use buildings could be included. These are not the same. We request that the introductory text is reviewed, and this is appropriately clarified across this page. Could consider renaming the section "Community Heart".	Agree	Better define self and custom buildings	See response to 59 above
294	Homes England	Built form	p93, BF.96 & BF.97	Suggest that a Design Code and Plot Passport for self-build / custom build plots will be too onerous and challenge delivery. A plot passport will give enough structure and guidance to ensure a cohesive approach to the design of a street or series of plots.	Disagree. The design code need only be simple to demonstrate how plots located together would relate to each other.	None	N/a
295	Homes England	Built form	P94, BF.101	Suggest this is amended to a "should" from "must" and include: 'Where possible' as there is likely to be an instances where this cannot be avoided (e.g.	Agree – to change.	Change code from 'must' to 'should'.	Must <i>should</i>

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				Cawston Lane, Community Spine Road) given the various factors that we are needing to way up.”			
296	Homes England	Built form	P94, BF.103	We agree with the stepping back of upper floors, therefore please amend reference to setbacks on page 75 as there is currently a contradiction.	Setbacks on page 75 refer to setbacks of built form from street at ground level – to clarify.	Clarify	P75 text - Minimal to no set back at ground floor level. It is appropriate for there to be a variety of public realm areas within the district centre, driven by use types, location and the orientation of spaces. Therefore this setback is from the edge of the public realm at ground floor where it denotes a transition between public and private residential space.
297	Homes England	Built form	P94, BF.104	Inclusion of the following: The Masterplan must ensure there is coherence between the design of the Mixed-Use Centre, Older People's Housing, Primary School and Community Sports Area to create a strong sense of place and a ‘Community Heart’ at the core of South West Rugby.	Disagree.	None	N/a
Homes & buildings							
298	Homes England	Homes + Buildings	p96, HB.01	Suggest the following amendment: "Dual aspect homes must be prioritised. Where single aspect are proposed, detailed designs should demonstrate how good levels of ventilation, daylight and sun access will be provided to habitable	Agree in terms of being realistic about the schemes we are likely to get.	Amend HB.01	Dual aspect dwellings, including apartments, must be prioritised. Where single aspect dwellings are proposed, detailed designs must demonstrate how good

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				spaces." Would also be beneficial to make a reference to single aspect north facing homes to be avoided.	Have changed to HE suggested wording and added about north facing		levels of sunlight, daylight, ventilation and aspect will be provided to habitable spaces. “There must be particular focus on avoiding single aspect dwellings that are north-facing.” (separate code)
60	Catesby	Homes + Buildings	p96, HB.0 2	Add “garden space / private amenity space” to list of acceptable spaces.	Code already makes reference to ‘private amenity space’ as the general term. To add garden to list.	Add garden space.	Add ‘garden’
299	Homes England	Homes + Buildings	P96, HB.0 2	We suggest the following amendment: "All homes should be provided with private amenity space through the introduction of a garden space, patio, balcony or roof terrace."	Agree	As above	As above
300	Homes England	Homes + Buildings	p96, HB.0 3	Suggest this is amended to a “should” from “must” and include: “Where possible...” (at the start)	Agree	Change from must to should	Shared gardens must <i>should...</i>

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301	Homes England	Homes + Buildings	p96, HB.04	Inclusion or reference to “apartments” and “maisonettes”	To add maisonettes.	‘Maisonettes’ added.	<i>Maisonettes</i>
302	Homes England	Homes + Buildings	P96, HB.05	Suggest this is amended to a “should” from “must”. Amended text could include: “Unless site constraints make it impossible, all dwellings, especially ground floor apartments, must have defensible space or privacy strip”	Disagree. Where site constraints make this impossible this may be justified in a proposal	None	N/a
359	Taylor Wimpey	Built form	P96	Code requires that all buildings including apartments must be dual aspect. It is not clear what the basis is for this. Apartments on corners can be dual aspect. However, efficient apartment layout requires single aspect to most apartments. This does not inevitably produce poor light conditions, aspect and amenity - providing the apartments are set and laid out properly.	It is widely accepted as good practice for all dwellings to be dual aspect, as stated in numerous pieces of existing dwelling design guidance.	See response to Homes England suggested wording	N/a
311	Sport England	Homes + buildings	P96 HB.08	Sport England considers that the development must facilitate and promote active travel opportunities for all residents by ensuring that appropriate infrastructure are in place from the outset. As such, HB.08 it must be a requirement for cycle storage to be provided.	This requirement is about the location of cycle storage, rather than its existence. Cycle	None	N/a

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					storage is a requirement of Appendix 5 of the Local Plan and is further addressed in the 'Movement' section of the design code (MO.41-MO.46).		
Identity							
303	Homes England	Identity	P99, ID.07	It feels this may be strengthened by expanding on the current code. Suggest the following is included: " Proposals should develop a locally inspired materials palette. This should be inspired by the non-exhaustive materials palette opposite, which is intended to provide a starting point for further development."	Agree	Include suggested wording	<i>Proposals should develop a locally inspired materials palette.</i> align with the palette opposite. <i>This should be inspired by the palette is non-exhaustive materials palette opposite, which is and is intended as a starting point for further development.</i>
304	Homes England	Identity	P99, materials palettes	We suggest that the palette and examples could be further expanded on to show accent materials. There are local Rugby examples using timber, white render, white painted brick work, and metal cladding that could all be helpful in adding a layer of nuance / diversity to the starting point established here.	It is not within the scope of this project to expand on this at this time.	None	N/a

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62	Catesby	Identity	p100, ID.14	Amend to “should”. It isn’t possible to specify that unprescribed details must be followed. Amend wording to: “Unless site constraints make it impossible, all dwellings, especially ground floor apartments, must have defensible space or privacy strip.”	Requirement referencing defensible space/privacy strip is HB.05. Assume this is in relation to ID.14 regarding ‘depth and character’	Please see response to point 305.	As per 305
305	Homes England	Identity	P100, ID.14	We suggest this amended to a “should” as it isn’t possible to specify that unprescribed details must be included, the wording could also be amended too: ‘Architectural features add depth and character. Buildings lacking in detail and therefore identity are not acceptable and must be reconsidered.’	Understand the principle of this statement, but suggest alternative wording. Intention of this code was more that <i>where</i> features are included they must be integrated, not <i>that</i> they must be integrated	Clarify wording	ID.14 Features including those below must be integrated into the overall elevational and 3D composition of the built form: <i>Depth and character must be incorporated into the overall elevational and 3D composition of the built form. This includes the way features such as those below are expected to be incorporated as part of the whole.</i>
63	Catesby	Identity	P99, ID.17	This code is overly specific. It should be amended to be more general about how elevational treatments can be used to emphasise building entrances. Recessed	Please see response to point 306.	As per 306	As per 306

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				entrances could be identified as one of several potential design solutions.			
306	Homes England	Identity	P100, ID.17	This code is overly focused and specific. We suggest this code should be something more general about elevational treatment emphasising entrances and ensuring their legibility within front elevations. For example, recessed entrances could be then used as one example of a good way to achieve this.	Disagree. ID.14 (as amended above) will already address this matter. The use of 'should' rather than 'must' does not necessitate that all entrances have to be recessed, however, we are keen to avoid 'bolted on' doorway features a regular feature.	None	N/a
307	Homes England	Identity	P100, ID.19	This is overly contextual and difficult to prescribe and therefore would impact deliverability. Suggest this code is removed	Disagree. The code is seeking simple arrangements, and not prescribing beyond this.	None	N/a
408	R. Allanach	Identity	P100 ID.22	Personally I would add balconies to the ID.22 restriction. If they are not to be functional they should be omitted.	The intention of HB.02 is to make clear that all dwellings are	None	N/a

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					to have a directly accessible, useable private amenity space ie that Juliet balconies will not be acceptable as the only private amenity space.		
Appendix							
64	Catesby	Appendix 1	Appendix 1	<p>Echoing concerns raised by Homes England, whilst we understand the intent behind the Appendix, we believe it requires extensive review and coordination with the rest of the Code, along with clarification regarding its status. Typically, an appendix provides supplementary information and does not include 'musts' or 'shoulds.'</p> <p>In its current form, it could limit suitable development across the allocation due to the level of detail emerging. This may negatively affect the overall viability and delivery of the development throughout the allocation and add considerable complexity in terms of how compliance would be assessed over SW Rugby's long delivery period. Additionally, the information appears very generic and not specific to the site.</p>	Having reviewed the information holistically we will delete this appendix	Delete appendix	Delete appendix

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				We strongly urge RBC to remove this appendix from the Code.			
409	R. Allanach	Appendix 1 – Landscape to routes and streets		Within this section there are multiple references under ‘tertiary’ to Sorbus x arnoldiana and Prunus umineko [neither of which are native] and to Sorbus aucuparia. I commented on the undesirability of Sorbus aucuparia in my comments on page 49. It is not clear to me why trees which do not conform to SDC2 are being promoted rather than Betula pendula, Acer campestre and Crataegus monogyna which do.	Having reviewed the information holistically we will delete this appendix	Delete appendix	As above
410	R. Allanach	Appendix 1 – Landscape to routes and streets		Also within this section there are multiple references under ‘minor’ to Amelanchia arboria a native of the USA but not of England, Prunus pandora which is thought to derive from Prunus serrulata which is native to SE Asia but not of England and to the hybrid Prunus x hillieri. Again . it is not clear to me why trees which do not conform to SDC2 are being promoted rather than Betula pendula, Acer campestre and Crataegus monogyna which do.	Having reviewed the information holistically we will delete this appendix	Delete appendix	As above