

Brandon and Bretford Regulation 16 Consultation- Representation Summaries.

ID No	Name	Representation Type	Organisation & Client	Summary of Rep	Date Received
001	Diane Clarke	Comment	Network Rail	The proposal area includes a section of the West Coast Main Line including 25kv overhead power lines. Any future proposals and plans should be flagged up to the Network Rail Town Planning Team.	04/09/18
002	Ian Dickinson	Comment	Canal & River Trust	No comments to make.	17/09/18
003	Gemma McKinnon	Comment	Warwickshire County Council Health	Guidance document 'Neighbourhood Development Planning for Health' provided along with a link to the Public Health England tool to understand health needs of the local population.	20/09/18
004	Lucy Bartley	Comment	Wood on behalf of National Grid	National Grid has no record of apparatus within the Neighbourhood Plan area.	25/09/18
005	Maria Meede	Comment	Wolston Parish Council	No comments.	05/10/18
006	Sharon Jenkins	Comment	Natural England	No comments.	09/10/18
007	Adrian Chadha	Comment	Highways England	Any development that may come forward in the parish that has the potential to generate a significant number of trips should be supported by a Transport Assessment. The commitment to sustainable travel is endorsed by Highways England.	09/10/18
008	Annie Ottaway	Support	Warwickshire Wildlife Trust	WWT is supportive of the plan. Minor factual error pointed out.	11/10/18
009	David Carter	Support with comments	Save Brandon Stadium	<p>The Save Brandon Stadium Campaign Group has a vision to see the return of both Speedway and Stock Car Racing back to Coventry / Rugby, preferably at the iconic Brandon Stadium or at a new venue, as soon as possible.</p> <p>The group have submitted representations to the Rugby Local Plan Consultations.</p> <p>The Save Brandon Stadium Campaign Group are broadly supportive of the Brandon and Bretford Neighbourhood Plan.</p>	15/10/18

				<p>Concern is raised that the Neighbourhood Plan is progressing before the Local Plan and that changes may subsequently be needed to the Neighbourhood Plan.</p> <p>Paragraph 4.17 should be strengthened to show the history and current need for a sporting venue.</p> <p>A new strategic objective should be added relating to the stadium.</p> <p>Policy H2 and paragraph 6.5 should emphasise that the site only has a relatively small brownfield element.</p> <p>The conclusions on landscape sensitivity are questioned. Brandon Stadium has a prominent position in the landscape.</p> <p>Policy E1 should recognise the economic value of Brandon Stadium.</p> <p>There are concerns that Brandon Stadium has been identified as a potential development site. The Neighbourhood Plan group have not identified an alternative site for the Stadium.</p> <p>The preference for reopening the stadium in PDS1 is supported. However criteria a requires strengthening and criteria e should be removed.</p> <p>Three appendices have been provided: Appendix 1 - The Campaign to Save Coventry Speedway and Stox Appendix 2 - Brandon Stadium – A Brief History of this Iconic Stadium – one of the Most Important Motorsport Venues in the UK – sets out the rich heritage and importance of Brandon Stadium to both Speedway and Stock Car Racing. Appendix 3 - The Systematic Damage to The Iconic Brandon Stadium – this documents the manner in which the current owners and prospective</p>	
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				<p>developers of the Brandon Stadium site have been seeking to secure redevelopment of the site. The Save Brandon Stadium Campaign Group strongly assert that the tactics of the type employed should not be allowed to succeed.</p>	
010	Louise Steele	Objection	<p>Framptons on behalf of Brandon Estates Ltd.</p>	<p>An outline planning application for 137 houses on the former Brandon Stadium site was submitted in January 2018, ref. R18/0186.</p> <p>Concern remains that Brandon Estates Ltd was not formally consulted as part of the regulation 14 consultation. It is acknowledged that the representation was summarised.</p> <p>Para 4.4 fails to recognise the site is in close proximity to services including a school in Binley Woods.</p> <p>The Neighbourhood Plan should acknowledge that development of the site will support services in both Binley Woods and Brandon.</p> <p>There is no reference to the live planning application in chapter 5. This is contrary to PPG which requires the most up to date information on housing to be available.</p> <p>Policy H2 should be combined with H1. No definition of a sporting use is provided.</p> <p>The supporting text of policy H2 includes an extract of a plan titled 'Brandon On the Hill – Landscape Sensitivity to Housing Development'. It is not made clear that this is from the Rugby Borough Council Landscape Sensitivity Study (2016). RBC have allocated other sites of medium sensitivity therefore making clear this is acceptable. The supporting text does not acknowledge there were two SHLAA sites within the landscape parcel which were acceptable subject to recommendations.</p>	16/10/18

				<p>Appendix 4 of the Brandon and Bretford NDP include a traffic appraisal which cannot be relied on as evidence.</p> <p>Policy H3 is based on an outdated survey which had a very low response rate. Other evidence for affordable housing, including the 2015 SHMA should be taken into account.</p> <p>The description of Brandon Hill in BNE8 is misleading. The location that the photographs were taken from should be provided. The car park is not a key open space.</p> <p>Brandon Estates will look to mitigate traffic impact in line with INF1.</p> <p>Extensive comments are provided on PDS1. In summary:</p> <ul style="list-style-type: none"> • The supporting text is out of date and doesn't recognise the site is vacant and the sporting use unviable; • Para 12.6 should present the data more clearly; • The planning application meets many of the requirements from the survey; • The policy does not take the opportunity to grasp the benefits of development in line with the survey results. Benefits are listed; • Neither the core strategy or the Local Plan provide explicit protection for this site; • There is no realistic prospect of the former use being viable at this site; • Criteria b is supported; • Criteria c will be met by the planning application; • Criteria d should be amended; and • The supporting text states housing may be appropriate, this should be in the policy itself. 	
011	Nic Thomas	Oxalis for Rural Development Holdings Ltd.	Objection	Previous representations were made to the Regulation 14 consultation in May (this representation is also attached to the email). This raised concerns that	16/10/18

				<p>PDS2 did not fully grasp the benefits of development of the Oakdale Nurseries Site.</p> <p>The site is partly brownfield, RDH are committed to bringing forward housing on the site.</p> <p>The wording of PDS2 has been changed but still does not take a more positive approach to redevelopment of the site.</p> <p>Amended wording for PDS2 is put forward.</p> <p>Criteria a and b of PDS2 are repetition of the NPPF and not required.</p>	
012	Deb Roberts	The Coal Authority	Comment	<p>The western part of the Neighbourhood Plan area lies within the current defined deep coalfield. However, the area does not contain any surface coal resources or any recorded coal mining legacy features at shallow depth and we therefore have no specific comments to make.</p>	19/10/18
013	Juliet A Carter	The Joint Burial Committee of Wolston Parish Council	Comment	<p>Endorse the response from Wolston Parish Council.</p>	28/10/18
014	Anne-Marie McLaughlin	Environment Agency	Comment	<p>Flood Risk- The River Avon and its tributaries flow within the Neighbourhood Plan Boundary. Policy INF 4 should be expanded to safeguard land at risk from fluvial flooding as well as the provision of sustainable management of surface water from both allocated and windfall sites. Proposed wording for INF 4 is put forward.</p> <p>Biodiversity- Generally in support of biodiversity policies. Proposed modification for CON 2 is put forward.</p> <p>Groundwater & Contamination- Comments are provided on the protection on 'Controlled Waters' receptors. It is noted that the Plan is not likely to have</p>	31/10/18

				significant impacts on 'Controlled Waters' receptors. It is also noted that there are several historic landfill sites within the neighbourhood plan area.	
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